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From: **Joe Berg** <jberg@mwdoc.com>

Date: Mon, Sep 22, 2008 at 5:14 PM

Subject: MWDOC Comments on Establishing Baseline and Determining Conservation Targets Memoranda

To: 2020comments@ccp.csus.edu

Cc: "Kevin P. Hunt" <khunt@mwdoc.com>, Matt Stone <mstone@mwdoc.com>, Joe Berg <jberg@mwdoc.com>

The Municipal Water District of Orange County appreciates the opportunity to provide comments regarding the Governor's Statewide Water Conservation Initiative 20X2020 Baseline and Targets Technical Memorandums.

After reviewing the documents, it is clear that the 20X2020 Team did a good job in a very short period of time and with limited data from water agencies throughout the State. The approach appears to be well thought out however, refinements could result in a more reasonable approach.

It is MWDOC's view that the current draft technical memoranda provide a first cut example of how the framework works but is not acceptable without better quality data, further refinements and periodic review. Our comments are listed by Technical Memorandum as follows:

Comments on the Baseline Technical Memorandum:

1. How will an individual agency within a Hydrologic Region be able to monitor their progress of meeting their GPCD goal? Moving to Evapotranspiration Zone based baselines and targets will simplify monitoring for individual agencies. Due to a lack of data such as water agency boundaries relative to Evapotranspiration Zone boundaries, the 20X2020 Team decided to develop a state-wide baseline and hydrologic region baselines rather than baselines by Evapotranspiration Zone. With Evapotranspiration being the single largest driver of urban water use it seems that the missing data should be obtained and incorporated into the next iteration of baseline calculations. While this is a more data intensive refinement, it will allow individual agencies to monitor their progress toward meeting their GPCD Target.

2. Recognition of Past Conservation – Orange County is currently saving more than 19,000 acre feet per from active water use efficiency program implementation using the MOU and BMPs. For example, Orange County has achieved 160% of the BMP No. 6 – High Efficiency Clothes Washer implementation goal and 180% of the BMP No. 14- Ultra-Low-Flush Toilet goal. As a result, our indoor residential water savings opportunity is substantially exhausted requiring our focus to be on landscape and business based efficiency program into the future. Our past investment in water conservation is substantial and should be accounted for by the 20X2020 Team.
3. Data Collection – we are encouraged that modifications to the DWR data request survey are currently being defined with the purpose of improving the evaluations. An item to include in the survey is a GPS based boundary for each agency so that Evapotranspiration Zone based Baselines and Targets can be established.

Comments on the Targets Technical Memorandum:

1. Geographic and Socioeconomic Factors – before final Baselines and Targets can be established acceptable geographic and socioeconomic data must be developed in order to move forward. Among other things, this should take into account the fact that new development is occurring in the higher Evapotranspiration Zones, making it more difficult for Hydrologic Regions to meet their targets over time.
2. There seems to be an inequity or possibly a calculation error when comparing the Baselines and Targets for Regions 2 and 4. The hydrologic Regions have the same target but two significantly different starting points. Both development density and climate could be in play. In Hydrologic Region 2, Evapotranspiration ranges from 33 inches (Zone 1) at the coast to 57 inches (Zone 14) inland. In Hydrologic Region 4 Evapotranspiration ranges from 33 inches per year at the coast (Zone 1) to 62.5 inches per year inland (Zone 16).

We look forward to continuing our participation in the review and comment on the remaining technical memoranda including Current Conservation Actions, New Conservation Actions, and Performance Metrics. Should you have any questions, please call.

Sincerely,

Joseph M. Berg

Water Use Efficiency Programs Manager

Municipal Water District of Orange County

Direct Line (714) 593-5008

Fax (714) 964-5930

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