



**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

September 22, 2008

20X2020 Agency Team  
Department of Water Resources  
1416 Ninth Street  
P.O. Box 942836  
Sacramento, CA 94236-001

**VIA EMAIL**  
[2020comments@ccp.csus.edu](mailto:2020comments@ccp.csus.edu)

Dear 20X2020 Agency Team:

Comments on Governor's Statewide Water Conservation and Implementation Plan

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments regarding Governor's Statewide Water Conservation and Implementation Plan described at the September 15, 2008 workshop.

Metropolitan has identified the following issues that need to be addressed.

1. The baseline water usage was calculated as the average GPCD for 1995-2005 (dropping 2000 as an outlier) but was not normalized for weather or the economy. The baseline should be normalized for weather and economy to ensure an accurate comparison point for future water use;
2. Any Water Conservation and Implementation Plan must take previous water conservation efforts into account to be equitable and stimulate proactive conservation instead of waiting on conservation requirements. Since 1990, Metropolitan has aggressively approached water conservation and spent over \$200 million dollars and saved a cumulative 977,000 acre-feet of water through direct incentive based intervention. These good acts should not be discounted or ignored by future state actions or requirements,
3. A Statewide Water Conservation and Implementation Plan must be transparent and equitable. As a result, a meaningful agricultural water conservation savings approach needs to be included in any Statewide Water Conservation Plan,
4. The baseline should factor out the use of recycled water to avoid making water savings targets for agencies with recycled water higher than they should be;

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5. It seems unreasonable that the South Coast Region GPCD target should end up being the same as the San Francisco Bay Region. We would like more time and information to understand how these targets were derived, and
6. Metropolitan's 2005 Regional Urban Water Management Plan estimated the regional GPCD is 192 in contrast to the estimate of 180 GPCD in the technical memorandum. We would like to work with you to determine if adjustments to your calculated GPCD is necessary.

In conclusion, Metropolitan requests that the Governor's 20x2020 Agency Team include transparent and equivalent water conservation measures across all water sectors of the proposed Statewide Water Conservation and Implementation plan.

If you have any questions, please contact Mr. Timothy Blair of my staff at (213) 217-6613 or via email at [tblair@mwdh2o.com](mailto:tblair@mwdh2o.com).

Very truly yours,



Stephen N. Arakawa  
Manager, Water Resource Management

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