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Subject: Comments to Draft 20 x 2020 Water Conservation Plan

Comments to Draft 20 x 2020 Water Conservation Plan

The Plan needs to better acknowledge and state that there should be flexibility in implementing individual targets for cities and water districts within a specific DWR Hydrologic Region. For example, the City of Sonoma is in Hydrologic Region 2 but its climate is somewhere between Region 1 and Region 5. In addition, the City's commercial base accounts for more of the total demand than is accounted for in the Plan's baseline calculations. For this reason, it is appropriate to state that regional targets should be met in consideration of specific baseline data and calculations for cities and districts.

Each city and district will have its own target and from a public affairs standpoint, it is important that we meet our individual target. Unless the Plan has some guideline as to how those individual targets are established in order for the overall regional targets and ultimately, the State's water use target can be met by 2020, each city or district may be forced to use regional targets. Cities whose climate is not within the average climate of its hydrologic region should be taken into account. Cities with a strong commercial base should not be penalized by requiring that their residential users conserve even more in order to meet overall regional targets. In acknowledging that individual targets can be established taking into consideration specific data for individual cities and districts, the Plan can be implemented more readily and with this level of cooperation, regional targets can then be met.

Submitted by,

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