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June 5, 2009

Transmitted Via Email

20X2020 Agency Team 1416 Ninth Street P.O. Box 94236 Sacramento, California 94236-001

Subject: Comments on Draft 20X2020 Water Conservation Plan

Dear 20X2020 Agency Team:

The Monterey Peninsula Water Management District (MPWMD) is a public agency formed by the State Legislature in 1978 to manage, augment and protect the water resources of the Monterey Peninsula. MPWMD supports the Governor's plan to reduce California's per-capita water use by 20 percent by 2020, but has concerns about details of the draft Water Conservation Plan and offers the following comments:

#### Regional Goals

- The final plan should provide clear guidance as to the implementation of regional goals. Within Region 3, there are numerious water systems that are located in diverse areas with very different water supplies and conservation requirements. Water Distribution Systems within MPWMD have been subject to varying levels of regulatory restrictions since 1995 and have successfully reduced water consumption by over 20 percent during this time, partly due to its rigorous conservation requirements and incentives. MPWMD would like credit given for systems that have previously implemented successful conservation and reuse programs and have achieved low per-capita water use exceeding the proposed regional goal.
- The final plan needs to clarify the responsibility and participation level of small water disribution systems, including private wells.

#### Data

• Data collection, quality and management need to be addressed in the final plan. The existing data is insufficient and incomplete. There are water providers in MPWMD that are not included in the data, and it is not clear who is subject to the reduction goals.

- Regional and local water agencies should be requested to provide additional well and small water distribution system data.
- Streamline all data collection with the California Urban Water Conservation Council (CUWCC).

## Per Capita Water Use

• The methodology for determining population within a water distribution system should be clearly described in the final Plan.

# Landscape Recommendations

• Local agencies should determine appropriate landscape water conservation measures for their areas.

## Specific Water Conservation Measures

- Allow individual agencies to develop conservation targets for their unique customer mixes.
- Provide local agencies the flexibility to implement the best cost-effective water conservation measures for their area.

### Use of Non-Potable Sources

• Continue to use only potable water use in the baseline and targets to allow recognition of recycling efforts of local agencies in per-capita reductions.

We appreciate the opportunity to comment on the draft 20X2020 plan. If you have any questions about these statements, please call me at 831-658-5630 or email <a href="mailto:Steph@mpwmd.dst.ca.us">Steph@mpwmd.dst.ca.us</a>.

Sincerely,

Stephanie Pintar

Water Demand Manager