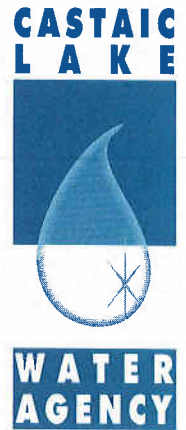


May 19, 2009

20X2020 Agency Team
DEPARTMENT OF WATER RESOURCES
1416 Ninth Street, P.O. Box 942836
Sacramento, CA 94236-00001
2020COMMENTS@WATERBOARDS.CA.GOV



Re: 20x2020 Water Conservation Plan Comments

The Castaic Lake Water Agency (CLWA) appreciates the opportunity to submit comments on the 20x2020 Water Conservation Plan (Plan) and we strongly urge you to consider a more refined method of calculating water savings goals within the South Coast Zone.

Our major concern is how the draft Plan apparently treats all water agencies in the South Coastal Zone (Hydrologic Region 4) as if they are located in the same climatic zone. With a large percentage of urban water use dedicated to landscaping purposes, it is unreasonable to expect per capita water demands for a coastal city and a city located 30 miles inland to be the same. Yet, the water allotment as outlined in Table ES-1 and ES-2, for all locations in the region are apparently based on the entire regions estimated average usage of 180 GPCD with the target for year 2020 as 149 GPCD.

The *Sunset Western Garden Book* lists 10 different climate zones within the South Coast Zone. Those zones vary from Marine influence along the Southern California Coast to both Low and High Desert of California. DWR's Reference Evapotranspiration (ETo) Zone Map that uses information from the California Irrigation Management Information System (CIMIS) lists 12 different ETo zones for the same Hydrologic Region. These ETo zones have yearly water demand varying from 33" to 71.6" or a 46% difference. CLWA recommends that the Plan be based on water demands that incorporate a water agency's evapotranspiration zone.

If the Plan does not take this approach, CLWA would request that it be removed from the South Coastal Region and placed in the South Lahontan Region for purposes of complying with the 20 percent by 2020 efforts. The CIMIS station at CLWA's Rio Vista Water Treatment Plant site in the Santa Clarita Valley shows an ETo zone that is consistent with ETo factors in the South Lahontan Zone, not the South Coast Zone. The Plan also does not reflect how it would be incorporated into the 2010 Urban Water Management Plan (UWMP) Guidelines. The content of this Plan and the requirements for UWMPs need to be consistent and the adoption of this Plan should supply the preparers of UWMPs with a single model to follow. This information will be critical for demonstrating compliance with Urban Water Management Planning Act.

Thank you for consideration of these comments. If you need further information, please call me at (661) 513-1297.

Sincerely,

A handwritten signature in black ink, appearing to read "Dirk Marks", written over a white background.

Dirk Marks
Water Resources Manager

DIRECTORS
E.G. "JERRY" GLADBACH
DEAN D. EFSTATHIOU
WILLIAM C. COOPER
ROBERT J. DIPRIMIO
WILLIAM PECSI
PETER KAVOUNAS
BARBARA DORE
THOMAS P. CAMPBELL
EDWARD A. COLLEY
JACQUELYN H. McMILLAN
R.J. KELLY

GENERAL MANAGER
DAN MASNADA

GENERAL COUNSEL
McCORMICK, KIDMAN &
BEHRENS, LLP

SECRETARY
APRIL JACOBS

"A PUBLIC AGENCY PROVIDING RELIABLE, QUALITY WATER AT A REASONABLE COST TO THE SANTA CLARITA VALLEY"