



**Hi-Desert Water District
Comments on 20x2020 Water Conservation Plan
"DRAFT" – dated April 30, 2009**

The Hi-Desert Water District ("HDWD" or "the District"), is located in the Town of Yucca Valley, approximately 30 minutes from Palm Springs. The District provides water service to the Town and a portion of the unincorporated area within the County of San Bernardino.

With approximately 9,700 service connections and serving a population of 24,000 people, the District prides itself with good clean wholesome water at a reasonable cost to its customers. With a total service area of 57 square miles, the District operates 16 storage tanks, 13 wells, and maintains nearly 300 miles of transmission and distribution pipelines.

Overall, HDWD feels the plan is excellent, and would like to provide the following comments to assist in improving this draft document. We believe it is important to make measurable improvements in communities that have high water use habits. It is also important to recognize communities that are already achieving or surpassing the goals set forth by the plan. A well designed and maintained data collection system is critical to understanding the current water use and measurable conservation efforts in the future.

Page	Comment
ix	It is important to clearly define the method that GPCD should be calculated, as there are many variables that can affect the actual number such as population estimates and what water production includes (i.e. commercial, industrial, residential, fire protection etc.). Conversations with DWR indicate the GPCD is meant to use a water produced number that represents all water produced (meaning that metered at the well sites) and only subtracting agricultural water. In order to be sure that we are examining comparable data the method to calculate GPCD needs to be clearly defined.
xi	1 (b). Given the State's budget crisis, it is hard to justify the need for another state agency to oversee and coordinate this. We have found that conservation tiered rates

that reflect the true value of water to be the most effective and least expensive measures to implement.

4 (a). High efficiency washing machines should be the only option for consumers.

4 (c). Retrofit requirements are a must. In fact Assembly Bill 407 by Padilla addresses this requirement. Hi-Desert Water District has had a retrofit requirement on resale since 1998, which has allowed the District to achieve over 70% retrofit of all properties. Given our low GPCD numbers (120-140 GPCD) our program is evidence that retrofit requirements make a difference.

5 (a). Water conservation pricing is critical to communicate the true value of water and cause for conservation. Hi-Desert Water District's tiered rates have been the most effective and least expensive conservation measure.

5 (c). More description of what is meant by a "public goods charge for water". This is an interesting concept. Due to California's limited water supply it may be reasonable to restrict certain uses for export, etc. (i.e. bottled water).

5 (d). Water meters should be paid for by the users, not by the other tax payers who have already purchased their own meter. In fact, Prop 218 requires that people pay their fair share of the services they receive. If they are not paying for their own meter or water for that matter, who is?

6. Education is key. First and foremost, there needs to be a greater "water ethic" for all state resident's no matter where they reside. The target message should be on outdoor use, since that has been identified as a high percentage of the overall water use.

7 (a). There needs to be a measure to gauge the level of success (i.e. GPCD – once the methodology is defined). There are communities, like our own that have already achieved significant conservation. It is not reasonable to expect communities such as our own to implement a program for an objective that has already been met. There should be preference for funding given to those communities that have been so diligent in conservation, as they have already achieved great measures and can demonstrate responsible stewardship of the State's resources.

9. Alternatives to our current Graywater regulations need to be explored. Arizona is an example of modified Graywater regulations.

1 Paragraph 4 regarding power requirements. This is something the majority of residents do not realize. Include this fact in the outreach.

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Paragraph 5 regarding other benefits to water conservation – another component of the outreach and education.

- 2 Paragraph 3 (below box) Our community is an example of one that has maximized locally cost-effective water conservation opportunities. This being said, those communities that have a proven track record of conservation should be given the opportunity to additional supplies of available supplemental water from the State Water Project.

Plan Scale and Scope section (answers to some bullet points)

- 120-140 GPCD
- Unknown (has GPCD been accurately reflected)
- Yes, factors included: by user class, lifestyles, cost of water, etc.
- Yes we can reduce 20% b 2020 at least the GPCD.
- Individual target goals need to be established by each water district/agency. There should be a defined ideal or goal for then each district/agency to meet. Some districts/agencies may already be there.

- 3 Paragraph 2. It is said the agencies can earn “credit” if they promote recycled water. Does this mean they can let their faucets run longer? The benefit to promoting recycled water is the ability to support landscapes, lawns, etc. It should not offset the potable water demands. Let’s compare apples and apples.

Paragraph 3. This paragraph makes great sense.

Paragraph 5. How can some users be un-reported and still comply with Prop. 218 “fair and equitable”.

- 8 Paragraph 2 (TM2): Certainly one size does not fit all, but it is evident that some communities could be doing a better job at achieving efficiencies, while others are ultra conservative. There has to be a measure of what is actually a required amount of water, versus a luxury. Other countries such as Israel and Australia are examples of lower water use. Somehow, some are still of the belief that water is of unlimited supply.

Paragraph 4 (TM4): 2025 is more than enough time. They should be required to be metered by 2012 in order to meet and measure our 2020 objectives.

Paragraph 4 (TM4): The CUWCC reporting requirements are very tedious and costly. This organization serves as a great resource; however, it can be overwhelming for smaller district’s to comply with.

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- 9 Paragraph 2 (TM5): Hi-Desert Water District has water use restrictions limiting irrigation to 3 days per week, yet the problem is compliance, and how do you enforce it. There needs to be enough resources to properly educate the residents of this restriction and then figure out “enforcement measures”.
- 10 Paragraph 1 (TM5): The key is “rates should reflect the true costs of water”.
- 12 Table 2: regarding UWMPs – it is pointless to require communities to pay for a document that nobody reviews. Public funds may be better served investing in technologies, software for reporting of actual water use trends. The proof is in the data. Measurable, measurable, measurable.
- 13 Data submission to DWR should be mandatory – similar to Department of Public Health Services.
- Paragraph 2. Recycled water should not be a factor of this goal. It is incidental. The Goal – reduce potable water use. That will force investments into alternative sources for irrigation and non-critical uses.
- Paragraph 4. Hi-Desert Water District’s GPCD use is 120-140, which includes all users, using the water produced number including fire protection, water loss, residential, irrigation, etc. HDWD is located in the Mojave Desert. This is below even coastal communities. Hi-Desert Water District is part of Region 10 which reflects a much higher GPCD than what the District has achieved.
- 15 Item 1(a) at the bottom of the page. What is the reason for waiting so long to require all water users be metered. How do you measure progress?
- Item 2. High efficiency washing machines should be included in regulations requiring manufactures provide products that achieve our water conservation needs.
- Paragraph 4 “A measure is regionally cost-effective” if the cost per unit of savings (\$/AF) is less than the cost of the most expensive supply measure currently available regionally.”. This depends if the cost of water is reflected of the “true cost”. Ultimately, cost-effective is subjective and achievements should be determined by a less subjective method. Such as ideal water use by user class or gpcpd.
- 17 Paragraph 4. Do you want water districts to implement BMPs or do you want them to reduce water use or per capita water use? Build the model around reducing use instead of implementing tedious programs that may or may not achieve the goal.

- 20 Paragraph 3: Regarding the State Waiver –“Who do we contact to press for federal approval?”
- 21 Paragraph 3. Hi-Desert Water District has had a retrofit requirement since 1998 and is at just over 70% retrofit. How do we force the remaining 30% if they are not selling the property? The goal is ambitious, achievable and necessary. We like it.
- Last section on page regarding water loss BMP3: This could be difficult for a rural community with limited funds to retrofit systems and few connections. There should be funding made available to communities that have spread out services, demonstrate financial hardship and could otherwise not comply with this requirement. It is recommended that the measure stay consistent with AWWA recommendations. Changing at this point may only complicate the matter. Keep it simple and focused on where we believe our greatest savings can be achieved.
- 22 Landscape practices. First remove the barrier that Home Owner Associations put on residents by requiring lawns. Home Owner’s wishing to install water efficient landscaping are being prevented by Home Owner Association requirements.

We appreciate the opportunity to provide our input to Governor’s 20X2020 Agency Team on Water Conservation on the draft “20x2020 Water Conservation Plan.” If you have any questions or comments regarding our submittal, please contact me or Jennifer Cusack at (760) 365-8333.

Cordially,

ED MUZIK
General Manager

Cc: Hi-Desert Water District Board
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