

May 21, 2009

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

Subject: Comments on Draft 20X2020 Water Conservation Plan

Dear 20X2020 Agency Team:

We support efforts to achieve the Governor's call to reduce per capita water use statewide by 20 percent by 2020. The Santa Clara Valley Water District administers over 20 water conservation programs that are a key part of its core business, helping us meet 14 percent of the District's water supply. We welcome the opportunity to provide comments on the Draft 20x2020 Water Conservation Plan (Draft Plan) and herein have summarized our issues to address in the final report.

- **Regional Baselines and Regional Targets for 2020**  
The use of regional baselines and regional targets in the Draft Plan, especially when demarcated by hydrologic zone rather than ET zone leads to broad regional values that obscure important climatic variation on smaller scales that contribute, among other variables, to differences in water demand and use among different water agencies. Additionally, they are based on a number of uncertain assumptions and limited data. As such, these numbers should be viewed as preliminary estimates to be used for planning purposes only; further data collection is needed before accurate baselines and targets can be developed. It is also unclear how these regional values would be translated into specific agency targets in an equitable manner, taking into account differences among agencies with respect to climatic variables, mix of uses, housing density, etc. The Final Report should propose several alternative methods that water agencies can select from to use to develop a realistic agency-specific baseline and target.
- **Uniform Data Collection and Statewide Database**  
A uniform data collection methodology and data management system will be important for developing accurate baselines and targets as well as for tracking progress made through water conservation measures. We recommend that any data collection methodology and data management system take into account and be streamlined with reporting that is already done through the California Urban Water Conservation Council (CUWCC) and through the Urban Water Management Plans.
- **Landscape Recommendations**  
While we recognize the huge potential for savings in the landscape sector and support the inclusion of reducing landscape demand as a goal in the recommendations section of the Draft Plan, we suggest that local agencies be allowed to choose whether to implement watering restrictions and if so, the manner in which they will be implemented,

rather than mandating a state-wide watering restriction of two days per week. A watering restriction of two days per week does not necessarily lead to water conservation if the total watering time per week does not decrease. Local agencies are able to best determine the appropriate landscape water conservation measures for their service area.

- **CII Water Conservation**

There are significant water savings opportunities in the CII sector; however, there are also significant barriers to implementation of CII water conservation measures that exist, including layers of personnel/staff/management in the CII area with competing objectives and strict company payback thresholds (e.g. some companies require a payback period of less than 1 year). Therefore, while we support the recommendation in the Draft Plan to “accelerate the adoption of water-saving technologies in new businesses” we do not support mandating specific CII water conservation measures. Rather, each agency should have the ability to determine which mix of CII water conservation measures is most appropriate and how those measures will be implemented so as to successfully address any barriers to implementation.

- **Specific Conservation Measures**

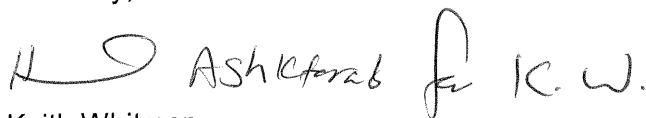
Related to the above sections, we do not support mandating specific water conservation measures at the state-wide level as is done in the Draft Plan. Instead, we recommend developing individual agency targets and allowing agencies to select the best suite of cost-effective and locally-suited mix of water conservation measures for meeting the targets.

- **Use of Non-Potable Sources**

We support the use of only potable water use in baseline and target value calculations as outlined in the Draft Plan as we will receive credit for the significant progress we have made in developing recycled water use throughout Santa Clara County. However, we don't support the exclusion of “desalination or the use of recycled water to recharge aquifers or augment surface water” (recommended in the Draft Plan) as a method to reduce per capita use. The use of recycled water, either directly for landscape irrigation (or other uses) or through aquifer recharge, reduces demands on potable supplies and should receive credit toward reducing per capita demand.

The Santa Clara Valley Water District looks forward to working with the 20x2020 Team to develop a comprehensive solution for addressing California's water supply challenges and to achieving the Governor's goal through our successful water conservation and water recycling programs. Please contact me if you have any questions.

Sincerely,

Handwritten signature of Keith Whitman in black ink, appearing as 'K Whitman'.

Keith Whitman  
Deputy Operating Officer  
Water Supply Operations Division