

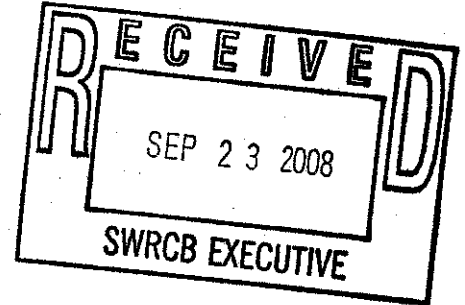


10/1/08 Board Workshop
Urban Water Conservation
Deadline: 9/23/08 by 12 noon

West Basin Municipal Water District
17140 S. Avalon Blvd., #210, Carson, California 90746
(310) 217-2411 – (310) 217-2415 fax

September 22, 2008

Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend:

**State Water Resources Control Board (SWRCB)
Development of Urban Water Conservation Regulatory Program-Comment Letter**

On behalf of West Basin Municipal Water District, I want to thank you for the opportunity to comment on the proposed Urban Water Conservation Regulatory Program. After reviewing the SWRCB discussion paper, we wish to support the SWRCB's effort to investigate the need for enforcement of water use efficiency throughout the State and, when timely, the development and implementation of potential solutions.

As a signatory to the California Urban Water Conservation Council (CUWCC) Memorandum of Understanding since 1991 and an active stakeholder in the negotiation of Assembly Bill 2175, we believe that such an effort is necessary to achieve a statewide reduction in water demand. While West Basin supports these efforts, we urge the Governor's 20 X 2020 Committee, the SWRCB and the CUWCC to work in a coordinated manner to achieve the common goal. Specifically, we believe it is necessary to identify the reduction baseline and targets and then pursue the Best Management Practices and Regulatory efforts necessary to achieve those targets.

Currently, the Governor's 20 X 2020 Committee is in the beginning stages of identifying the regional baseline and targets, having had their first public meeting on September 15. West Basin was an active participant in this meeting and is very pleased with the policies currently being discussed. In order to play an active role in your future actions on this matter, West Basin staff will be attending your October 1st workshop and has prepared the enclosed comments related to your Key Issues and Questions provided in the Notice of Workshop.

Thank you again for this opportunity to provide input. Please feel free to contact me at (310) 660-6210, if you have any questions.

Sincerely,

Rich Nagel
General Manager

Enclosure

cc: Richard Atwater, CEO/GM, Inland Empire Utilities Agency
Marv Shaw, Manager of Planning & Water Resources, Inland Empire Utilities Agency
Lisa Morgan-Perales, Water Resources Analyst, Inland Empire Utilities Agency

**State Water Resources Control Board
Urban Water Conservation Public Workshop**

**Response to Key Issues and Questions
Submitted by West Basin Municipal Water District**

1. Yes, however, the regulator program should be developed only after the Governor's 20 X 2020 Committee identifies the regional baselines and conservation targets. The regulatory program should be designed to provide higher standards for water use efficiency and regional tools to enable water retailers to achieve the 20% reduction in water use.

3. The regulatory program should serve to benefit all areas of the state. While all regions should not be subject to the same programs and reduction targets, the regulations should set standards of water use efficiency throughout the state. **We strongly believe that the revised BMP's provide such standards and a variety of tools for diverse regions to achieve the required reductions.**

4. As a leader in the development of recycled water, West Basin would advocate for a performance-based option to be incorporated into the regulatory program. Although we do believe that a performance-base option should be provided, the urban water supplier should be judged by the performance results regionally, rather than by the traditional residential and CII sectors.

5. Prescriptive urban water conservation management practices should be incorporated into the Board's regulatory program, but urban water supplier should be provided options for compliance. These options should include prescriptive practices, a flexible menu of conservation tools and a performance-based model. West Basin strongly believes "that a one size fits all" is in appropriate for California's diverse regions

6. While pricing structures are not always the most effective conservation measures in every community, we do believe that the use of conservation structures should be utilized.

7. As the Governor's 20 X 2020 Committee has recently noted, the data for past conservation practices and measurements has been inconsistent and lacks statewide significance.

If you have questions or need further information, please contact Rich Nagel, General Manager, West Basin Municipal Water District at (310) 660-6210.