

From: [Katie Evans](#)
To: [DWR Water Use Efficiency](#)
Subject: Comments on Target Framework
Date: Wednesday, September 14, 2016 11:25:37 AM

Good afternoon,

Thank you for the opportunity to provide feedback on the Target Framework. The workshop help September 8, 2016 was helpful in understanding SWRCB and DWR staffs' direction toward a sustainable framework.

As a District that currently uses water budget based rates, we are supportive of this type of proposal and we wanted to provide some insight on potential challenges. Below is some information that we consider lessons learned that may be applicable to the proposal:

- Everything changes. An entity that has an extended patio today, may convert that area to landscape tomorrow. A business that is currently a shoe store, could be a fish store tomorrow. That being said, it will be incredibly important that the State revise its data each time suppliers are evaluated. I do not know the frequency in which the State intends to calculate landscape data, for example, but I would suggest it is done annually based on the intent to require annual reports.
 - For this reason, we would also encourage you to use "irrigable" land instead of "irrigated" as discussed at the meeting. This method will help minimize the amount of change required during each evaluation.
- The Coachella Valley has several CIMIS stations. We also have five microclimate zones within our service area. That being said, what ET data will be used? Will we have a say in this? We are happy to provide data to you to demonstrate the existence and location of the microclimates if you would find that helpful.
- Variances are a very important part of the budget setting process. We spend a great deal of staff time now, 8 years after implementation of water budgets, reviewing variance requests. I imagine you will receive many and would encourage you to plan ahead on how to evaluate them.
- CVWD does not use time as a component of parcel MAWA as proposed. We instead averaged MAWA from appropriate time periods to determine the appropriate outdoor budget. This might be a simpler approach, though we don't object to the approach proposed.
- As discussed in the meeting Thursday, one of the greatest challenges of using actual ET is the inability to predict it. Thus you are shooting for an unknown target. It might be helpful to provide a formula for Districts to use to project their budgets in the future (for example, an average of several years' ET).
- CVWD and EMWD are both using a "persons per household" factor to create indoor residential budgets. CVWD will oppose using population as we know that population as calculated by census, is not an accurate determination for our area due to the influx of part time residents.
- CVWD anticipates that this process will result in some work on our end to exclude areas served by private wells. We have many areas on wells mixed into our domestic service

area. As we have no jurisdiction over their use, we will want to exclude them from the calculation of our target.

- CII is going to be an extremely difficult process to develop. CVWD currently uses Equivalent Dwelling Units to determine these types of budgets, however there are a great many variances allowed. We are willing to share that process and information with you. Allowing suppliers to develop their own CII methodology is likely the simplest way to set CII targets. However CVWD is interested in engaging in any other proposal presented.

Thank you and we look forward to participating in the UAG meetings next week.

Thank you,

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