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Sent: Thursday, January 7, 2021 11:08 AM

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Subject: Comments on MWD's draft UWMP

Good morning,

Attached please find comments from IEUA on MWD's draft UWMP for your consideration.

Thank you,

Cathleen

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Page	Reference	Comment
1-25	Table 1-5, Local Supplies for Average and Dry Years	<p>In-region groundwater replenishment from “natural recharge” is expected to increase between 2025 and 2045. Is this assumed to occur because of anticipated increases in precipitation due to climate change? I cannot find a reference to the assumptions governing this assumption. For the Chino Basin, there are concerns that replenishment from precipitation will decrease over time due to land development and the related reduction in permeable acreage. Also, increased outdoor water-use efficiency (including reductions in system water loss) is expected to also result in reduced recharge. The Chino Basin Watermaster estimates that 40% of current basin recharge is related to precipitation and applied water from irrigation systems.</p> <p>Also, why is natural groundwater replenishment assumed to be higher in multiple dry years as compared to normal years? That seems counterintuitive.</p>
3-50	Table 3-5, Metropolitan’s Conservation Credits Program	<p>Wouldn’t it be more appropriate to list the lifetime saving associated with investments made in each FY (demonstrating \$/AF saved) rather than listing the AF saved that particular year, which includes cumulative AF saved as a result of future year investments and implies a lower cost per AF? Would recommend that you add column for lifetime AF saved for each year’s financial investment to link the investments with the actual yield of savings.</p>
3-58	Table 3-8, Existing and Projected Total Effluent Capacity Wastewater Treatment Plants within Metropolitan’s Service Area	<p>This table is based on a 2002 study, which seems outdated. It seems unlikely that existing primary treatment capacity is 1,770 mgd and that capacity levels are expected to grow to 3,139 mgd by 2040 given that secondary treatment or higher is required for discharges. The estimate of advanced treatment levels in 2040 seems very low too. Jennifer West at WateReuse may have updated numbers.</p>