



IRVINE RANCH WATER DISTRICT

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20x2020 Agency Team

VIA EMAIL: 2020comments@waterboards.ca.gov

Dear 20x2020 Agency Team:

Comments on the Draft 20x2020 Water Conservation Plan

The Irvine Ranch Water District (IRWD) appreciates the opportunity to comment on the draft 20x2020 Water Conservation Plan (Plan) dated April 30, 2009. We understand the significant efforts made by the 20x2020 agency team to address California's water issues, but have the following concerns regarding the Plan:

- The analysis and targets are set by hydrologic regions, which are very broad. As the Plan indicates, climate is a substantial factor that affects water demands within a region. The Plan sets targets without considering the level of efficiency within a region. There is no provision within the Plan to make adjustment of the broad hydrologic targets within a region down to the agency level that factors in climate or that is based on a measure of efficient use.
- California's fiscal crisis is unlikely to result in availability of the state grants and loans which may be necessary to assist agencies in meeting the targets described in the Plan. The Plan assumes that \$30 million per year would be available between 2005 and 2014, and \$7.5 million thereafter. However, many grants that were issued have already been frozen by the state. The Plan does not address the feasibility of meeting the proposed targets in the absence of grant funding. Revised targets should be developed based on the assumption that no grant funding is available.
- Given the uncertainty of funding, as well as problems with the accuracy and completeness of the data, any targets should be considered very preliminary and interim, and should be revised based upon 2010 and 2015 Urban Water Management Plan (UWMP) reporting. The Plan should include recommendations that UWMP reporting incorporate certain standardized data requirements.
- The calculations of previous savings estimates are not clear. Furthermore, the Plan does not explain how water savings derived from conservation programs that are not a CUWCC BMP are captured. Many progressive agencies are already implementing "potential conservation savings". This could have the effect of underestimating water savings to date, and over-estimating future savings potential.
- Reuse of wastewater that converts wastewater into a potable source should not be excluded as an efficiency measure. Regions and agencies that have made substantial investments into planned indirect potable reuse should receive credit for those

investments in the same manner as recycled water, and the baseline per capita use and targets should be adjusted accordingly.

- Many of the recommended actions are overly prescriptive and would remove an agency's flexibility to develop and implement the most effective conservation program within its own service area. For example, irrigation restrictions require costly enforcement. Those prescriptive recommendations should be removed from the Plan, and allow individual agencies to determine how best to meet the target reductions.
- IRWD does not support the creation of a mandated Public Goods Charge for water. IRWD has developed an equitable allocation-based tiered rate structure that rewards water conservation, discourages waste and provides a funding mechanism for IRWD's investments in water conservation and other water use efficiency projects. An agency already has the option of establishing these types of rate structures and ensuring the rate structure meets the needs its service area. IRWD opposes this being mandated at the state level.

In summary, IRWD appreciates the work already developed in this Plan and recommends that the 20 x 2020 Agency Team address the significant concerns before it is finalized. IRWD remains committed to continuing its own water use efficiency efforts and collaborating on developing an approach that will achieve the Governor's goals.

If you have any questions, please contact me at (949) 453-5325 or via email at sanchezf@irwd.com.

Yours truly,



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Water Conservation Manager

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