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MEMBER AGENCY OF THE  
METROPOLITAN WATER  
DISTRICT  
SOUTHERN CALIFORNIA

May 21, 2009

State of California  
Department of Water Resources  
1416 Ninth Street, P.O. BOX 942836  
Sacramento, CA 94236-0001

#### RE: Comments – 20 x 2020 Water Conservation Plan

Las Virgenes Municipal Water District (LVMWD) appreciates the opportunity to comment on the proposed 20 x 2020 Water Conservation Plan.

LVMWD is a retail agency providing potable water, wastewater treatment and recycled water services for the western portion of Los Angeles County including the cities of Agoura Hills, Calabasas, Hidden Hills and Westlake Village. LVMWD is entirely dependent upon imported water; the District's sole supplier is the Metropolitan Water District of Southern California. There are no native or ground potable water resources.

We ask the Department of Water Resources to note the following comments:

- **Gallons Per Capita Per Day (GPCD)**

We believe measuring water use efficiency by GPCD places the focus on an unnecessarily narrow parameter that will make attainment difficult to measure and obtain. The GPCD metric may vary to extremes within an individual agency's service area, from minimal-use multi-family dwellings to high-use estate properties. Variations in customer categories, as noted in the report (Residential, Commercial / Industrial / Institutional (CII), Agriculture, etc.) further impact the effectiveness of using GPCD.

LVMWD believes an aggregated approach will allow retail agencies to both reconcile composite water use and place its conservation efforts where they will produce the greatest benefit. Conversely, agencies that adopt an emphasis on GPCD run the risk of placing all customers in a defensive posture while at the same time, they de-emphasize the need to decrease non-personal consumption activities, such as landscape, ornamental, maintenance or recreation.

- **Full Offset Credit for Recycled Water Use**

LVMWD has made a substantial investment across three decades in developing and expanding the use of tertiary-treated Title 22 compliant Recycled Water (RW) as a viable landscape irrigation resource. Anything less than full credit for this effort devalues the millions of dollars ratepayers have invested in the system and penalizes agencies that "have done the right thing" for a substantial period of time.

Worse, some proposals devalue existing RW use but grant full credit to new RW installations. LVMWD believes RW systems should be developed and expanded throughout the state wherever possible, but insists that there be full parity among existing and new systems. The reality is that LVMWD's RW distribution system



provides a gallon-for-gallon offset to imported water, which should be recognized as a substantial and valued resource. Limiting RW offset credits to indirect potable reuse or groundwater recharge discriminates against agencies such as LVMWD for which neither is a viable option. LVMWD believes efficiencies in potable water use are also necessary but no agency should be penalized for having developed recycled water use.

- ***Reduce Landscape Irrigation Demand***

LVMWD supports this measure but cautions against a “one size fits all” approach, as mentioned in the report, *“Limiting irrigation to two days per week or less...”* Deference must be considered for ET demands in the state’s widely varied climatological zones.

- ***Establish a public goods charge to provide stable funding for water management***

LVMWD opposes this proposal.

The report states, *“Local municipal water agencies face challenges raising the capital to invest in efficiency improvements, and substantial investment in efficiency measures may reduce water use, water sales, and revenue for the water supplier. This can provide a substantial disincentive for suppliers to implement aggressive conservation programs.”*

Contrary to the above statement, LVMWD believes local agencies are best equipped to determine their capital funding needs. Without a public goods charge in place, LVMWD has long-established history of meeting its capital construction needs and has maintained conservation programs consistent with the objectives found in the CUWCC’s BMPs.

- ***Economic Impacts***

After all feasible conservation measures have been implemented, constraints on CII use can limit job and economic growth.

LVMWD thanks the Task Force for its comprehensive examination of the 20 x 2020 Plan. It is our hope the comments included in this letter will provide additional substantive material for consideration.

Sincerely,



John R. Mundy  
General Manager

Copies: ACWA  
Metropolitan Water District of Southern California