



*...Dedicated to Community Service*

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May 22, 2009

20X2020 Agency Team  
Department of Water Resources  
1416 Ninth Street  
P.O. Box 94236  
Sacramento, CA 94236-001

Subject: Otay Water District's Comments on Draft 20X2020 Water Conservation Plan

Dear 20X2020 Agency Team:

The Otay Water District (District) believes that the Governor's call to reduce per capita water use statewide by 20 percent in 2020 is a worthy goal. As a retail water agency literally at the end of the pipeline, the District has been actively pursuing conservation measures and alternative water supplies since the early 1990s, is one of the original signatories to the MOU Regarding Urban Water Conservation in California, and is working hard to expand the participation in our water conservation programs in response to the Governor's call and the current water shortage. While you are undoubtedly receiving similar comments from other agencies such as CUWA, ACWA and the San Diego Water Authority, as a public agency that is also a retailer, we have a slightly different perspective and we have provided examples where

We share the same concerns as ACWA, CUWA, the San Diego County Water Authority, and many others on the following issues:

- The Metering Deadline Should be Accelerated
- The State Should Not Mandate Specific Conservation Measures
- The State Should Not Mandate a Public Goods Charge
- An Agricultural Conservation Plan should be part of any statewide effort to use water more efficiently
- The 20x2020 Agency Team Should Propose Several Methods for Translating Regional Targets to Water Supplier Specific Targets
- The Regional Targets Must be Viewed as Preliminary- 2005 was a wet year throughout the state

In addition to these concerns, we have the following comments:

**The State needs to lead by example, as its own plans to expand will drive up the District's per capita water use** – The District was recently notified by the State of California's Donovan Correctional Facility, located within the District's service area, that they had immediate plans to expand by adding a new medical facility. In 2008, Donovan represented 34% of our institutional water use, and 17% of our commercial and institutional water use. We also provide water to other state and county facilities and they should also be required to lead by example in order to help agencies meet the targets set by the state.

Page 2  
20X2020 Agency Team  
May 22, 2009

**The State Should Not Mandate a Standard for Water Meter Accuracy** –The District and most other water agencies in the state closely follow the meter accuracy guidelines outlined in the AWWA M6 publication. We believe that this recommendation should not be included in the final report as it will do very little to reduce the state and individual agency's gallons per capita per day consumption.

Otay as well as the San Diego County Water Authority and its other member agencies are aggressively developing local supplies which will take pressure off of our state supplies. That effort must be acknowledged in the Governor's call for good stewardship of our water resources. A one size fits all policy or plan will not adequately address California's water supply condition.

The District looks forward to working with the Agency Team to implement conservation activities that will achieve the Governor's goal. Please contact William Granger, Water Conservation Manager at (619) 670-2290 or at [wgranger@otaywater.gov](mailto:wgranger@otaywater.gov) if you have any questions regarding our comments.

Sincerely,



Mark Watton  
General Manager

Cc: Lester Snow, Director, Department of Water Resources