

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

May 22, 2009

20x2020 Agency Team

VIA EMAIL: 2020comments@waterboards.ca.gov

Dear 20x2020 Agency Team:

Comments on the Draft 20x2020 Water Conservation Plan

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the draft 20x2020 Water Conservation Plan (Plan) dated April 30, 2009. Metropolitan understands the importance of this issue; however, despite the efforts of the 20x2020 Agency Team, we have significant concerns about the Plan including:

- The Plan sets a regional gallons per capita per day (GPCD) target which cannot be easily apportioned to a single agency's goal. As an example, the Plan sets the target for the South Coast Region at 149 GPCD, but has no means for apportioning this goal to the roughly 300 communities in this region which comprise over half the state's population.
- The approach to setting regional targets is not fully transparent and therefore cannot be validated. The targets appear to be derived from baseline water use and water savings estimates, but the Plan does not adequately explain how water savings are determined for each region.
- Nine categories of recommended actions are identified that are prescriptive, inequitable across regions, and will likely conflict with local policies and priorities. The recommendations could limit the ability for water suppliers to implement programs that are equally as effective in conserving water within their service area.
- Implementation will create burdensome and costly reporting requirements for water suppliers as well as the lead state agency when there are existing reporting mechanisms that are adequate. For example, a comprehensive database would be created with annual reporting by water suppliers and the lead coordinating state agency instead of reporting through urban water management plans.
- The Plan fails to recognize the value of indirect potable reuse of recycled water.

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Due to the scope of these concerns, Metropolitan recommends that the Plan be stripped of specific administrative recommendations and instead be offered to assist in the development of legislation and not be adopted as an additional regulation.

Metropolitan would support a plan that includes the following elements:

- Addresses both urban and agricultural water use;
- Alternative compliance options for urban retail water suppliers with targets based upon a 20 percent reduction in urban per capita water use, achievement of a water efficiency standard or additional reduction from regional targets established through an administrative process;
- Appropriate baseline water use with recognition of unique hydrology, weather, and land-use patterns within a particular water supplier's jurisdiction;
- Credit for past and future investments in recycled water for direct and indirect use, including planned indirect potable reuse through groundwater recharge or reservoir augmentation;
- Formation of a commercial, industrial, and institutional (CII) task force, facilitated by the California Urban Water Conservation Council, to develop alternative best management practices for this sector;
- Reporting through urban water management plans with targets reported in 2010 and progress reported in 2015 and 2020;
- A progress evaluation in 2015 by the Department of Water Resources with recommendations to the Legislature, if necessary, to achieve the 20 percent reduction goal by 2020;
- Recognizes no enforceable element of the targets unless AB 1420 is repealed;
- Requires agricultural water suppliers to file agricultural water management plans;
- Allows urban water suppliers that also supply agricultural water to report agricultural water use in the urban water management plan to reduce the reporting burden;
- Defines agricultural water supplier with a reasonable threshold; and
- Best management practices required for CII and agricultural sectors are cost effective and technically feasible.

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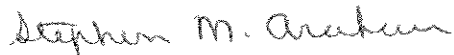
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In conclusion, Metropolitan appreciates the analyses and information that the Plan provides in support of a statewide effort to reduce per capita water use. We look forward to continued collaboration with state and federal agencies and water suppliers to achieve the goal of a 20 percent reduction in per capita water use by 2020.

If you have any questions, please contact Mr. Timothy Blair of my staff at (213) 217-6613 or via email at tblair@mwdh2o.com.

Very truly yours,



Stephen N. Arakawa
Manager, Water Resource Management

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Enclosure