

**2020Comments - Comments from the Municipal Water District of Orange County  
Regarding the 20x2020 Water Conservation Plan**

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**From:** "Joe Berg" <jberg@mwdoc.com>  
**To:** <2020comments@waterboards.ca.gov>  
**Date:** 5/22/2009 12:12 PM  
**Subject:** Comments from the Municipal Water District of Orange County Regarding the 20x2020 Water Conservation Plan

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The Municipal Water District of Orange County has reviewed the Draft 20x2020 Water Conservation Plan dated April 30, 2009 and has the following comments:

1. The approach establishing baselines and targets for each hydrologic region is not scalable to a sub-regional or individual retail agency level. As a result, it is not clear how compliance will be measured or enforced at a retail agency level.
2. The methodology used to establish targets is not fully transparent or replicable. The methodology should be very clearly defined to allow individual agencies the opportunity to calculate at the local level.
3. Reporting would be burdensome and costly. More streamlined reporting should be established and agencies that do not currently have the ability to disaggregate water use by customer class should be afforded some transition time to convert billing systems to achieve reporting goals.
4. Prescriptive recommendations such as "limit irrigation.... To two days per week" may be inequitable across regions and would limit the ability of agencies to implement programs that are equally as effective.
5. The methodology and recommendations are inconsistent with our regional Policy Principle on Water Use Efficiency in the following areas:
  - a. Ag water use is not addressed.
  - b. Only provides one methodology for compliance, does not provide option to use the simple approach or water efficiency standard. Multiple compliance options will result in broader longterm compliance and a better chance of meeting the Governors goal.
  - c. Uses a single year (2005) as the baseline; not representative of hydrologic/economic cycles and normal use. Agencies should be able to use an average of a ten year period.
  - d. Only provides partial credit for past investment in recycled water and water use efficiency (2006 forward).
  - e. Does not provide for the formation of a CII task force to develop alternative BMPs for this sector.
  - f. Requires annual reporting instead of through UWMPs.

- g. Based on 2015 evaluation, provides for legislative and administrative actions as needed instead of a report to the legislature with recommendations.
  - h. Anticipates continued use of AB 1420 requirements. AB 1420 established impediments to implement water conservation programs.
  - i. Under additional measures, quantifies savings from mandatory BMP implementation, regardless of cost effectiveness. Per the policy principle, BMPs for the CII and ag sectors are to be cost effective and technically feasible.
6. The report should be used to inform legislation; firm recommendations on what should be included in legislation should be removed.
7. Any reliance by the state on the CUWCC for assistance to implement recommendations contained in this plan must be compensated appropriately. The CUWCC is a membership funded organization with limited financial resources.

Should you have any questions regarding these comments please reply to this e-mail or call me at the number below.

Sincerely,

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