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May 21st, 2009

20x2020 Agency Team
c/o California Department of Water Resources
1416 Ninth Street, P.O. Box 942836
Sacramento, CA 94236-0001

Re: Proposed Final Draft Statewide Implementation 20x2020 Plan for Urban Water Conservation

Dear 20x2020 Agency Team members:

On behalf of Calleguas Municipal Water District, I would like to express our agency's continuing support for the Governor's call for reducing per capita water consumption 20% by 2020 and the effort of the 20x2020 Agency Team to develop a workable plan for affected parties. Calleguas is a wholesale water agency which provides imported water to roughly 75% of Ventura County's residents and businesses. The District relies on the State Water Project for 100% of its water supply, so we greatly appreciate the constraints on California's water resources and the need for increased conservation.

While Calleguas is supportive of the 20x2020 planning effort acknowledges that a great deal of the analytical work developed in support of the 20x2020 Water Conservation Plan (Plan) is beneficial to increasing our understanding of water use and conservation, as the Agency Team is aware many significant policy issues raised by various water interests remain unresolved. As such, we urge the 20x2020 Agency Team to refrain from finalizing and submitting the Plan to the Governor until further refinement.

As a member of both the Metropolitan Water District of Southern California and the Association of California Water Agencies, Calleguas concurs with the comments and concerns expressed by those entities with respect the Plan. Of particular concern to Calleguas are the following aspects of the plan and process:

- The Plan's central focus is on reduction in gallons per capita per day by geographic regions as the way to achieve the 20 percent reduction goal. Calleguas supports a process that achieves the goal through reasonable use by every urban customer, with flexibility for water agencies to show how they are contributing to the goal and with a "reconciliation" process to show how the state collectively is meeting to goal.

- The 20x2020 Plan does not emphasize that water conservation, while an important element of an overall State water plan, is just part of a comprehensive solution that involves a variety of water resource options, including development of new water supplies.
- We remain dismayed that the primary focus of the Administration's conservation-related policy setting efforts have largely been on urban water use. Given the significant annual water demands by agriculture, we believe a more balanced and honest evaluation of the State's water use in its entirety is in order.
- While somewhat intriguing, the concept of a "public goods charge" assessed by the State for water management and use efficiency programs is not generally acceptable to water agencies. Such a charge is more appropriately assessed at the local level so that it can be tailored and managed by those with a clear understanding of the needs of a particular region.

Finally, we would like to acknowledge the tremendous time and commitment that members of the 20x2020 Agency Team have contributed to this effort. Thank you for your consideration of our comments and for your dedication in pursuing reasonable program objectives and implementation methods with respect to the Governor's ambitious call to curb water use by 20 percent by 2020.

Very truly yours,



Donald R. Kendall, Ph.D., P.E.
General Manager