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To: <2020comments@waterboards.ca.gov>
Date: 5/22/2009 9:47 AM
Subject: 20X2020 Comments

To whom it may concern:

Indian Wells Valley Water District has reviewed the draft 20X2020 Plan and has the following concerns:

1. Reasonable use - The Plan continues to focus on reduction in gallons per capita per day (GPCD) by geographic regions as the way to achieve the 20% reduction goal. The plan should include 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 in aggregate is meeting to goal.
2. Comprehensive solution - The Plan does not stress that water conservation must be part of a comprehensive solution that involves a variety of resource options.
3. Public goods charge for water - The concept of mandating a public goods charge for water is not acceptable to water agencies.
4. Water conservation pricing - Although water conservation pricing structures can be helpful and we encourage state assistance to water agencies that wish to implement such a program, mandating a state-wide water conservation pricing structure is unacceptable.

In addition to the concerns noted above, IWVWD recommends including the following concepts in the plan:

1. Protect water rights - The Plan does not indicate that implementation of water conservation programs must protect the water rights of the entities implementing the programs.
2. Local management - The Plan should more fully stress the importance of local water agencies designing and implementing the conservation programs.
3. One size fit all - While the Plan implies regional differences are important, it may be best to be clear that the most successful programs will be designed with the flexibility to adjust to widely varying local circumstances.
4. CII water use - The Plan does not discuss the fact that once all cost effective CII conservation measures have been taken to save water,

additional reductions may result in loss of business (i.e. reduced production water.)

5. Recycled water - The Plan mentions the need for the use of recycled water and non-traditional sources of water. However, it may be helpful to outline some of the challenges in realizing those opportunities. At least, the plan could mention the need to return to this issue in the future.

6. Evaluation of progress - The Plan anticipates that the Agency Team will play the prominent role in collecting data and analyzing progress toward achieving the goal. It is our understanding that ACWA is developing a concept where the CSU system (viewed as an impartial third party) would play a role in progress evaluation and recommending improvements.

Thank you for your consideration.

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