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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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May 22, 2009

20X2020 Agency Team
Department of Water Resources
1416 Ninth Street
Sacramento, California 94236

SUBJECT: DRAFT 20X2020 WATER CONSERVATION PLAN

Dear 20X2020 Agency Team:

The Orange County Water District (OCWD) commends the efforts of the Governor and the Legislature to set ambitious, but achievable, water conservation goals by the year 2020. Increased conservation is critical to California's water supply future and achieving long-term sustainability in the face of a growing population, seemingly reoccurring drought conditions and the anticipated effects of global climate change.

The Orange County water community has been a recognized leader in water conservation practices in California for nearly two decades by complying with Best Management Practices (BMPs), instituting voluntary tiered rate structures and through integrated water management practices that decrease urban runoff, lessen the use of non-potable water use, and reduce potable water use for irrigation.

OCWD supports the spirit and goal of the DRAFT 20x2020 water conservation plan and believes that SB 261 (Dutton) and AB 49 (Feuer) have elements that should be considered in meeting the conservation goals of the plan and providing a financial incentive to comply with standards such as AB 1420 and future conservation measures. Many of the components within SB 261 align with reasonable recommendations outlined in chapter three of the DRAFT Plan. Comparable examples from the DRAFT Plan include:

- Water suppliers should be treated consistently and targets should be equitable;
- Allow flexibility in implementation;

- Accommodate, encourage and support emerging regional water management entities;
- Separate approaches are necessary for residential and commercial/industrial water use;
- Initiate coordination and standardization of data collection;
- Automate the submittal of summary information; and
- Existing effective programs should continue

Conversely, OCWD has reservations regarding some of the doctrine, methods and mandates included in the DRAFT document. OCWD would like to express its concerns with the following items included in DRAFT 20x2020 Water Conservation Plan and outlined below:

- Baseline: Although calendar year 2005, as defined on page 12 of the DRAFT Plan as the baseline year, may statistically represent average estimates of regional per capita water use, OCWD believes this “one-size fits all” approach is unduly prescriptive and not scalable to a sub-regional or agency level. OCWD respectfully requests consideration of a multi-year approach to setting the baseline or another method that could provide more balance and equity at the agency level.
- Targets: Constructing a single compliance target for each of the ten hydrologic regions without clear, reasonable instructions for compliance throughout the diverse landscape within each hydrologic region invites disastrous problems. The implementation strategy must be reasonably clarified so that the burden of compliance can be equitably shared rather than uniformly dictated.
- Prescribed mandates for reduction without regard to cost: Many of the recommendations to reduce per capita consumption are prescriptive in nature, lack quantifiable evidence that implementation will yield necessary results and are not easily or appropriately implemented at the local level. OCWD respectfully requests that the 20X2020 Agency Team revisit these mandates and solicit additional input from local agencies regarding this issue.
- Recycled water: The DRAFT plan mentions the need for the use of recycled water and non-traditional sources of water. However, it is critical that the plan outline some of the challenges in realizing those opportunities and explore solutions. Investment and development of recycled water resources is a reliable and cost-effective way to reduce the use of potable water. The plan should explicitly provide full credit for all past recycling efforts and generous incentives for future recycling as a means to reduce potable use.

OCWD appreciates the opportunity to provide comments on the Draft 20X2020 Water Conservation Plan and looks forward to working with the 20X2020 Agency Team and stakeholders throughout the state to develop a functional and fair water conservation plan that will allow us to achieve our shared goals.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Markus', with a long horizontal flourish extending to the right.

Michael R. Markus, P.E.
General Manager