

Summary of Changes Made and Changes not Made to Draft Methodologies

The following changes have been made to the draft methodologies in response to written comments received from USC members, comments received during the May 18 and June 1 USC meetings, and further discussion by DWR staff. These lists focus on significant changes or clarifications, and do not include relatively minor changes in wording or format.

DWR also received some comments that were considered and discussed, but for which ultimately no changes have been made in the draft methodologies. An explanation is provided for why these changes were not incorporated into the methodologies.

Changes to Methodology 1: Gross Water Use

1. Clarified that each supplier must delineate the distribution system for its service area and that in some instances this may include facilities upstream of the primary treatment plants.
2. Added a statement that in some systems, some retail customers receive water directly from transmission canals and pipes, in which case the utility may treat these facilities as part of the distribution system.
3. Clarified that forms of water measurement other than metering may be used in cases where metering deliveries is not practical.
4. Added text to clarify that while Figure 1 shows a typical distribution system configuration, other configurations are possible. Also, added text to the figure noting the same thing.
5. Added the definition of recycled water as a text box.
6. Clarified that appropriate references other than AWWA M36 can be used for calibration of raw water delivery measurement data.
7. Revised description of how to calculate the net change in distribution system storage and added statement that if change expected to be insignificant or needed data are unavailable, supplier can forgo this step.
8. Added statement that supplier may use either the default loss factor or a previously calculated loss factor for recycled water groundwater recharge if one is available.
9. Removed the text relating to “substantial percentage of industrial water use.” Added note that what constitutes substantial percentage will be determined through the department’s rulemaking process for adoption of process water regulations.
10. Clarified that supplier does not have to pro-rate process water use between supplier deliveries and industrial facility-own-sources if facility records are available showing the amount of delivered water used for process water uses.

Changes not made

1. Comment: When meter calibration is performed less frequently than once a year, backcasting of adjustments should be required.

DWR Response: Meter performance, maintenance and recalibration are not static. It can be not assumed that calibration results from current year testing would be applicable to past meter reads.

2. Comment: The agricultural water deduction should extend only to commercial livestock and crop production

DWR Response: Footnote 11 on page 1-6 references WC section 535 which exempts water suppliers from having to meter commercial agriculture. Further language will be added in the Public Draft Methodology to emphasize that the exclusion is only for water used in commercial agriculture. DWR is working to obtain or develop a definition of commercial agriculture.

3. Comment: Including recharge water in the gross water calculations prior to adding it to a groundwater basin would be double counting, once when it is recharged, and once when it is extracted.

DWR Response: DWR accepts this comment. Clarifying language will be added to the Public Draft Methodology to be released in July.

Changes to Methodology 2: Service Area Population

1. Added text to emphasize that population estimates must rest on a solid foundation that is either based on the California Department of Finance data or the US Bureau of Census data. Furthermore, the population estimates must reflect a water supplier's actual distribution area.
2. Added a flowchart (Figure 2) to further emphasize the above two points.
3. Included examples of local data sources that could be legitimately employed including county assessor data, building permits data, and traffic analysis zone data.
4. Moved most of the census block based methodology to Appendix A.
5. Corrected typographical errors (identified by Jim Lin) from the test run of the methodology.
6. Removed all references to individually- and master-metered connections, replaced with single family and multifamily connections.
7. Added text to indicate that inactive connections are those with zero reads for all months in a year.
8. Added text that if annexed areas lack historical data, estimates are permissible.
9. Removed the phrase "methodologically rigorous" while discussing how to correct for changes in seasonal population between the baseline and compliance years.

Changes not Made:

1. Comment: Allow water agencies to use flexible approach found In Urban Water Management plans;

DWR Response: The legislature directed DWR to develop seven technical methodologies including service area population for the consistent implementation of the water use targets. The service area population methodology permits the use of federal, state or local population estimates that are based on California Department of Finance or US Bureau of Census data.

2. Comment: The use of ancillary sources should be tightened up and left less open.

DWR Responses: Many water districts boundaries do not match municipal boundaries requiring water districts to estimate population through persons per connections. Multi family connections can make this approach problematic. The methodology allows districts that have the data to use other approaches such as person per housing unit if they document the approach and use the same approach in the base years as in the compliance years.

3. Comment: DWR should provide guidance in how the 2010 census is used to adjust baseline calculations.

DWR Response: DWR is looking into when 2010 census will be released. Future draft methodologies will provide guidance on how to adjust baseline calculations from 2010 census data.

Changes to Methodology 3: Base Daily Per Capita Water Use

1. Clarified role of different base periods in the calculation of base daily per capita water use.
2. Broke into different sections the calculation of base daily per capita water use for (1) determining baseline water use, and (2) determining the minimum 2020 reduction in per capita water use required under the legislation.
3. Added second figure to show how the 10 to 15-year and 5-year base per capita water use calculations are used to determine the minimum 2020 reduction in per capita water use and whether the 2020 target will need to be adjusted to account for the minimum reduction requirement.
4. Added a numerical example showing how the minimum reduction requirement is calculated and its impact on the 2020 target derived under the different target determination methods.

Changes not Made:

All comments were accepted.

Changes to Methodology 4: Compliance Daily Per Capita Water Use

1. Replaced “may” with “shall” in two places in section entitled “When distribution area contracts” due to service rationalization.
2. Added footnote to clarify meaning of annexation for the purpose of this methodology.

Changes not Made:

1. Comment: Allow for changes in distribution systems for inclusions of areas that are in the supplier’s coverage area, but were not included in the baseline distribution area.

DWR Response: The June 17th draft has a footnote that mentions how to handle the inclusion of undeveloped land into a supplier’s distribution area. This topic will be brought into the main body of the Public Draft Methodology. The section will address land that is added to the distribution system area from both within a supplier’s coverage area and land that is added to the distribution system from outside of the supplier’s coverage area.

2. Comment: Because of the uncertainty and sensitivity of GPCD calculations, compliance should be tested on a sliding scale basis and not on a yes/no scale.

DWR Response: The question of grant eligibility will be covered as DWR revises grant eligibility based on SBx7-7 requirements. It should be noted that suppliers who have not met their per capita reductions may be eligible for water grants and loans if they submit a schedule, a financing plan and a budget for achieving the per capita reductions.

Changes to Methodology 5: Indoor Residential Water Use

1. Revised the description of DWR's report to the legislature.

Changes not made:

1. Comment: The Department should observe caution in any future recommendation to change the performance standard.

DWR Response: DWR will conduct the study of indoor residential water use first, and only after the study has been completed will any recommendations be considered.

Changes to Methodology 6: Landscaped Area Water Use

1. Added a statement that water suppliers using reference ET estimates not from the MWELo Appendix A or from another procedure developed and approved by DWR shall provide documentation of the data and calculations.
2. Clarified that landscaped area information already collected by a water supplier from on-site surveys, remote sensing, and landscape irrigation plans may be included in landscaped area for calculating water use.
3. Revised the language defining landscaped area to include water features. The language now matches that from the MWELo.
4. "Re-estimate" changed to "update" in the last paragraph of "Definition of Landscaped Area Water Use", so that in 2020 suppliers only need to revise or add landscaped area that has changed between 2010 and 2020.
5. Clarified that an irrigation system can be either in-ground or hose-supplied.
6. Language added to clarify how to group parcels into size classes.
7. Added a statement that suppliers can use a combination of techniques to estimate landscaped area.
8. Clarified that sampling is fundamental to technique 3 and to field verification of remote sampling, but there may be other ways it can be used.

Changes not made:

1. Comment: DWR should provide clarity that the model landscape ordinance must be followed by land use planning agencies working cooperatively with water agencies.

DWR Response: DWR through both the model landscape ordinance and SBx7-7 encourages land use planning agencies and water suppliers to work closely and cooperatively together. SBx7-7 directs DWR to develop a landscape water use methodology for water suppliers' use on how to measure landscape and water use. Other documents such as Model Landscape Ordinance provide regulation and guidance on efficient landscape water use.

2. Comment: Agencies reporting their per capita water use should be able to obtain an overall water agency landscape area measurement and then subtract landscaped areas served by CII accounts and non-irrigated areas.

DWR Response: DWR is investigating this method and will consider it in future drafts.

3. Comment: This section should clarify the 2010 Model Ordinance definition of Special Landscaped Area (SLA).

DWR Response: The Special Landscape Area is defined in the Model Landscape Ordinance.

4. Comment: The draft Methodology provides no justification for the 24,000 sq. ft. foot cap on using sampling techniques and could prove to be a significant burden on a supplier with only a nominal improvement in accuracy.

DWR Response: The 24,000 foot cap was based on landscape measurements completed by a water supplier. DWR will consider other recommendations on cap sizes.

Changes to Methodology 7: Baseline CII

1. Added a calculation to remove residential uses (for example, military barracks or college dormitories) that are included in a supplier's base CII but are not on separate meters or connections.

Changes not Made:

1. Comment: DWR should investigate using permitted wastewater discharges as a proxy for capturing the volume of industrial process water.....

DWR Response: DWR will investigate.

2. Comment: DWR states no reason why a water supplier should have to have CII data for the entire baseline period.

DWR Response: Target Method 2 is based on efficiency standards. Adequate data is necessary to document efficiency.