

Huff, Gwen

From: PW/ENG-Adam, Peggy [PAdam@burlingame.org]
Sent: Thursday, August 12, 2010 4:12 PM
To: Water Use Efficiency
Subject: City of Burlingame Water Resources Letter
Attachments: 20100812151759836.pdf

To Whom it May Concern:

Attached is the City of Burlingame's comments on Senate Bill 7 Water Use Target Calculation Methodology.

Thank you,
Peggy Ann Adam
Engineering Division



The City of Burlingame

CITY HALL - 501 PRIMROSE ROAD
BURLINGAME, CALIFORNIA 94010-3997

CORPORATION YARD
(650) 558-7670

PUBLIC WORKS DEPARTMENT
TEL: (650) 558-7230
FAX: (650) 685-9310

August 12, 2010

Water Use and Efficiency Branch
Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

SENT VIA ELECTRONIC MAIL

**Subject: Comments on Senate Bill 7 Water Use Target Calculation Methodology
City of Burlingame, California**

The City of Burlingame is submitting this letter to provide comments regarding the methodologies for calculating the 2020 water use targets as mandated by Senate Bill 7 (Steinberg, 2009). The City understands that there are several committees, including the U3-Urban Technical Methodologies Committee, U4-Fourth Target Method Committee, and U5-Process Water Committee, working on these issues and appreciate your consideration of our comments.

Based upon the requirements of Section 10608.12 and 10608.20 of the California Water Code, the City has estimated our baseline water demands and the 2020 water use targets. The existing methods for calculating water use targets established as in Senate Bill 7 overestimate the City's ability to conserve water for the following reasons.

- **Transient Hotel Population:** Relative to the City's population, Burlingame has a large number of hotels due to our proximity to the San Francisco International Airport. The water demand generated by the hotel guests is a substantial portion of our total City water consumption. However, the per capita water use targets established in the existing methods in SB7 are based upon gross water consumption divided by total resident population and do not account for water demands generated by transient populations such as hotels. As a result, the water conservation targets for communities such as Burlingame are an unrealistic over estimation of the water conservation potential within the City.
- **Future Commercial, Industrial, and Institutional ("CII") Demands:** The City has received proposals for new research and development facilities within the City that could increase the City's demand by as much as 8% over the calculated baseline demands. With the exception of a very limited provision for adjustments for "process water," the current methods in Senate Bill 7 for determining water use targets do not include any adjustments for future, non-residential, non-process water demands. The current methodologies for estimating water use targets provide a disincentive to CII growth because any such growth would directly oppose any conservation associated with existing uses.

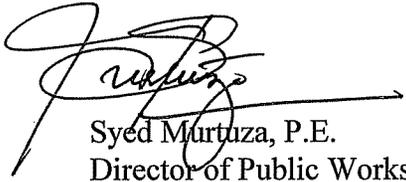
Page 2.....

Department of Water Resources

Collectively, the City's hotels and other CII demands account for approximately 22% of the City's total water demand. Because there is no accommodation for adjusting for CII demands, we feel that the existing methods for calculating urban water use targets inequitably burden communities such as Burlingame. We therefore request that any new methods for determining water use targets appropriately consider demands from transient sources as well as future CII growth.

Very truly yours,

CITY OF BURLINGAME



Syed Murtuza, P.E.
Director of Public Works