



August 12, 2010

Manucher Alemi, Ph.D., P.E.
Chief, Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
901 P Street
Sacramento, CA 95814

RE: **Senate Bill X7-7 – 2009 Water Conservation Bill - Comments to Draft Urban Water Use Technical Methodologies Public Draft Dated July 12, 2010**

Dear Dr. Alemi:

The California Urban Water Agencies (CUWA) appreciates the opportunity to continue to provide comments to the California Department of Water Resources' (DWR) Urban Stakeholder Committee (USC) regarding the Urban Technical Methodologies-Public Draft Dated July 12, 2010 (Public Draft Methodologies) that were reviewed on July 28, 2010.

We understand that once California Department of Water Resources (DWR) has received all comments from the USC members on the Draft Methodologies and the public, you will revise them and will discuss them further at the next USC meeting on August 26, 2010 in Sacramento.

As we have noted in the past, our individual CUWA member agencies will be commenting on the various specifics associated with the Public Draft Methodologies; however, CUWA has identified several significant recommendations that CUWA believes should be used to guide DWR in the revision of the Public Draft Methodologies. These recommendations are noted below and are intended to augment and/or reiterate those noted in our letter to DWR dated June 7, 2010, and our comments made at the July 28, 2010 USC workshop:

Methodology 5 – Indoor Residential Use: We believe that urban water agencies should have the opportunity to switch to a different compliance methodology if the indoor residential standard is adjusted significantly in 2016, as this would affect whether an urban water agency is meeting or is on track to meet its water use targets. Therefore, we would request that DWR assure that this flexibility is provided under Methodology 5 by adding clarifying language.

Methodology 6 – Landscaped Area Water Use: DWR's latest draft of this methodology states that landscape area calculations need to be completed at the parcel level; however, we believe that urban water agencies should be allowed to use measurements at the service area or agency level if it uses a remote sensing system that is more efficient and/or more accurate. We believe this provision should be included in Methodology 6.

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Methodology 9 – Regional Compliance: On July 14, 2010, CUWA provided DWR with a regional compliance set of principles based on a dual compliance approach that we would respectfully request that DWR consider as it refines Methodology No. 9. We have attached another copy of the letter for your information.

We would also request that DWR's Methodology 9 should encourage and not constrain the participation of urban water agencies in multiple regional partnerships or alliances. Specifically, we believe that limiting water suppliers to participation in only one alliance will have the potential to reduce the effectiveness of those existing partnerships that further the implementation of water conservation and recycling programs and projects. Urban water agencies will be reporting their individual data and compliance gallons per capita per day (GPCD) in their urban water management plans, which will be used to determine the State's progress toward the 20% goal. Therefore, we believe that participation in multiple alliances should not affect this assessment.

We look forward to continuing to work with you and your staff as part of the USC process, and we look forward to continuing to provide important input to DWR on implementation of SBX7-7.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernesto A. Avila". The signature is written in a cursive style and is enclosed within a large, hand-drawn circle.

Ernesto A. Avila, P.E.
Executive Director

EAA/mmt

Enc: CUWA letter to DWR dated July 14, 2010