

**Huff, Gwen**

---

**From:** Melanie Thomson [cuwa@sbcglobal.net]  
**Sent:** Monday, June 07, 2010 4:15 PM  
**To:** Water Use Efficiency  
**Cc:** Alemi, Manucher  
**Subject:** DWR SBx7-7 - CUWA Comments on Methodology Papers  
**Attachments:** CUWA Letter to Manucher Alemi 6-7-10.pdf

In response to today's COB deadline to submit comments regarding the DWR SBx7-7 Methodology Papers, attached is CUWA's comment letter.

Thank you.

Melanie Thomson  
Project Coordinator  
California Urban Water Agencies  
(916) 552-2929



June 7, 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 Technical Methodologies**

Dear Dr. Alemi:

The California Urban Water Agencies (CUWA) appreciates the opportunity to provide comments to the California Department of Water Resources' (DWR) Urban Stakeholder Committee (USC) regarding the Draft Urban Technical Methodologies (Draft Methodologies) that we recently received. We also continue to appreciate the opportunity this stakeholder process allows for our CUWA members to participate in this important DWR process and implementation of Senate Bill X7-7.

Per our discussion with you on Tuesday, June 1, 2010, it is CUWA's understanding that the purpose of the expedient review of the Draft Methodologies is to assist DWR in assuring that the continuing USC process will allow more substantive and in-depth dialogue with the USC members on these technical issues at its forthcoming USC meetings. In that vein, we urge DWR to consider providing a more detailed Draft Methodologies schedule that will assure that our CUWA member agencies are prepared to engage on the specifics of each individual Draft Methodology. For example, if DWR will be seeking consensus on the proposed means and methods in determining gross water use, it would be helpful to note that as a desired outcome for each scheduled and forthcoming USC meeting and for each Draft Methodology.

We understand that once DWR has received all comments from the USC members on the Draft Methodologies, you will revise them and will present new drafts for USC member review by June 17, 2010, and discussion at the next USC meeting on June 22, 2010 in Southern California. We note that it is likely additional policy, process, and/or technical issues may be identified as the revised Draft Methodologies are distributed, reviewed, and discussed with the USC members, thereby requiring further refinements as appropriate.

---

455 Capitol Mall, Suite 705, Sacramento, CA 95814 916.552.2929 FAX 916.552.2931

Individual CUWA member agencies will be commenting on the various specifics associated with the Draft Methodologies; however, CUWA has identified several significant recommendations that CUWA believes should be used to guide DWR in the preparation of the next set of Draft Methodologies. These recommendations are noted below:

1. Urban water agencies should be allowed to determine what constitutes “substantial industrial water use” when calculating the process water exclusion from gross water use. Set or arbitrary percentages should not be used in that regard; we recommend that no minimum threshold be prescribed by DWR and that individual urban water agencies determine and present the basis for their exclusion in their urban water management plans. Basis: The water use characteristics of each individual urban water supplier and quantity they provide for process water vary greatly; requiring a minimum percentage for all urban water suppliers does not make sense given this high variability;
2. Urban water agencies should be able to use methodologies to estimate population based on federal, state, and local data when calculating service area population so long as the methodology meets the standard for urban water management plans and it is used consistently between the baseline and compliance years. Basis: These methodologies have been in use by urban water agencies in documents subject to public review for quite some time; we believe that as long as they are used consistently, they will continue to provide meaningful data and trends over time;
3. Urban water agencies should have the option to use recognized scientific data and instruments in calculating landscape area water use as well as DWR’s proposed parcel-by-parcel calculation method. Basis: Urban water agencies have made substantial progress in identifying and utilizing the latest technologies to provide meaningful data in a more timely and cost-effective manner; we believe a parcel-by-parcel approach would not necessarily yield better data and it would likely require much more time to secure;
4. Urban water agencies recommend that the criteria for using “compliance year adjustments” (which would allow for adjustments to water use based on differences in climate, economy, demographics, or other impacts not yet defined) be triggered by any factor that affects an agency’s compliance with its daily per capita water use target. Basis: This recommended approach would assure that the individual member agency characteristics and factors are taken into account when allowing for compliance year adjustments; and,
5. Urban water agencies want assurance that criteria for regional compliance are developed and provided in a timely manner for CUWA to actively participate in the development for the Urban Water Management Plan process. Basis: Regional compliance may result in increased water savings and more cost-effective approaches for water suppliers within a region, particularly when considering development of recycled water supplies and collaboration on conservation programs. Agencies need to be able to fully evaluate this

Manucher Alemi, Ph.D., P.E.

June 7, 2010

Page 3

option along with individual compliance prior to formalizing their compliance approach and targets in the 2011 urban water management plans.

We look forward to continuing to work with you and your staff as part of the USC process, and we look forward to providing 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 with a large, circular flourish at the beginning.

Ernesto A. Avila, P.E.  
Executive Director

EAA/mmt