



April 26, 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 Urban Stakeholder Committee Draft Charter and Issue Papers

Dear Dr. Alemi:

Enclosed herein are brief comments on the Department of Water Resources' (DWR) Urban Stakeholder Committee (USC) Draft Charter dated April 15, 2010 (Charter) and the five draft Issue Papers (Papers) dated April 14, 2010 related to SBx7-7 Urban Technical Methodologies under review by the USC. It is in the spirit of the expedited review that likely additional process, policy and/or technical questions or issues may arise during the USC deliberations that may warrant further refinement to the Charter and/or Paper as appropriate. It is my understanding that once DWR has received all comments from the USC members on the Charter and Papers, the documents will be revised and re-circulated to the USC members for review.

Charter Comments:

Establish Clear Priorities and Consensus-Building Process. I suspect that many of the USC members may share my concern that the timeline to fully discuss and vet 20X2020 USC deliverables is short and the need to incorporate subcommittee work products into the broader USC decision-making framework will require close coordination among the committee chairs. I would hope the process will include a prioritization of the USC's work tasks and a process toward reaching consensus recommendations where possible. Also, I suggest the reporting of USC recommendations and the future report to the legislature clearly articulate where DWR was in concurrence with or differed from the USC recommendations.

USC and CII Task Force Liaison. Understanding the requirements under SBx7-7 to address commercial, industrial and institutional (CII) water use, and the inherently different schedules and task priorities for the USC and CII Task Force, it is suggested that a liaison from the CII Task Force be named to the USC, and perhaps vice versa, to assist in the cross-communication to keep both processes moving within their respective timelines.

Additional Questions for Papers:

Paper #1 - Clarification of Gross Water Use. Clarification is needed on DWR's description of "gross water use" on page 3.

Paper #4 – Economic Changes/Normalization. Additional questions need to be presented on how changes in the state's economy will affect all consumer sectors and how normalizing for significant changes will be presented, especially under circumstances where water use may increase substantially.

Regional Compliance Options. The Papers do not adequately address options for regional compliance. Numerous questions should be presented that cover data collection, reporting and flexibility for on-going agency participation in regional solutions.

Ongoing USC and Stakeholder Input throughout 2020 Horizon. Recognition of statewide geographic and demographic variability will require maintaining flexibility in the implementation of 20X2020 targets to the extent possible. A question that should be asked is how the USC and stakeholder process will continue throughout the 2020 time horizon to address any issues that may arise in reporting on interim and 2020 targets.

Thank you for the opportunity to participate on the USC and to provide input on the important tasks ahead.

Sincerely,



Richard Harris
USC Member