

Huff, Gwen

From: Lovsted, Elizabeth [lovstede@emwd.org]
Sent: Monday, June 07, 2010 2:37 PM
To: Water Use Efficiency
Subject: SBx7-7 Issue Papers

Thank you for the opportunity to provide input on SBx7-7 Technical Methodologies. The draft issue papers bring up several issues to be considered in compliance with SBx7-7. Eastern Municipal Water District would like you to consider the following as you finalize the methodologies for SBx7-7:

Issue Paper 1: Methods and Issues in Determining Gross Water Use

Ground Water Recharge

The definition of long term storage should include groundwater recharge. When recharge water is extracted from the ground it is accounted for in the gross water calculations as it enters the potable water distribution system. Including recharge water in the gross water calculation prior to adding it to a groundwater basin would effectively be double counting its value; once when it is used for recharge and again when it is extracted. This would penalize those who protect and maintain groundwater sources through recharge.

Changes in Boundaries

Changes in boundaries could have a significant effect on GPCD calculations, especially if an older area is added to a retail agencies service area. Deliveries to large developed areas added to an agencies service area between the end of the identified base period and the target years should be considered separately from the rest of the agency. A formula to prorate a reduction target could be developed for the new area. Undeveloped areas that are added to an agencies water service area should have a neutral effect on GPCD and should be included in compliance calculations.

Issue Paper 2: Methods and Issues in Determining Service Area Population

EMWD would encourage a more flexible approach to determining service area population. Since compliance with SBx7-7 will be determined by each individual agency, consistency in the method used to calculate the base year and compliance year should be required rather than a very prescriptive method across the state. Accommodations should be made if a more accurate set of information becomes available (i.e. the Department of Finance adjusts its population estimates) but any changes in methodology must be applied to both the base period and compliance period calculations.

Issue Paper 5: Criteria for Compliance Year Adjustments

The Definition of Substantial

Substantial should be defined as any amount that could affect the GPCD calculation. Using different assumptions and methodology EMWD has found GPCD calculations sensitive to changes in demographics and assumptions. An agency should have the opportunity to demonstrate that there is a disproportionate increase in CII demand either through billing records or land use information.

GPCD Compliance

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.

Methodology 6: Landscape Area Water Use

Water features should be included in the definition of landscape area. EMWD has a budget based tiered rate and has included pools and other water features in the landscape square footage. To remove water features from landscape would be difficult. Since water evaporates at nearly the same rate as turf uses water, water features should be added to the water budget area.

Thank you again for the opportunity to comment on the methodology papers developed.

Sincerely,

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