

## Huff, Gwen

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**From:** Walker, Andy [AWALKER@fairfield.ca.gov]  
**Sent:** Thursday, August 12, 2010 4:52 PM  
**To:** Water Use Efficiency; Brostrom, Peter N.  
**Cc:** 'David Okita'; aflorendo  
**Subject:** Comments on DWR Urban Water Use Target Technical Methodologies (July 12, 2010 Public Draft)

August 12, 2010

Peter Brostrom  
Department of Water Resources  
Water Use and Efficiency Branch  
P.O. Box 942836  
Sacramento, California 94236-0001

Re: Comments on DWR Urban Water Use Target Technical Methodologies (July 12, 2010 Public Draft)

Senate Bill X7-7 is lacking clarity in connection between calculating a baseline and the target if an agency selects Option 2. The components of delivered residential water, delivered dedicated irrigation water, and delivered CII water provide an explicit performance standard for efficient levels of consumption. However, the last component of “lost” water is left out of a calculation of gross water, upon which all of the baseline information is based.

DWR should provide technical direction regarding Option 2 and this shortcoming. I see two possible alternatives:

- 1) DWR should provide direction that Option 2 applies only to a “net” calculation of the delivered water components of Indoor Residential, Outdoor Residential, Dedicated Irrigation, and CII use. All baseline calculation factors can be ignored, with the exception of the CII component, as the delivered water is performance-standard-based at the point of delivery. This methodology would be in conformance with the existing law.
- 2) DWR should provide direction regarding a performance standard for lost water. This would allow a calculation of performance based gross water. This methodology, as we discussed, would most likely require clean-up legislation.

I am certain that there may be other alternatives to consider that I have not outlined.

As all agencies are required to weigh out which of the four options they will select, DWR needs to provide technical direction on how this should be addressed. Without direction on this issue, the analysis of all water agencies considering Option 2 will be in question and subject to litigation.

Sincerely,

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