
From: Walker, Andy
Sent: Monday, April 26, 2010 5:00 PM
To: 'Dave Bolland'
Cc: 'David Okita'
Subject: RE: DWR SBX7-7 Draft Issue Papers

April 26, 2010

Re: Comments for Draft Issue Papers

Dear Mr. Bolland,

In SB X7.7, the legislation calls for Method 4 to consider the following areas,

(A) Consider climatic differences within the state.

(B) Consider population density differences within the state.

(C) Provide flexibility to communities and regions in meeting the targets.

(D) Consider different levels of per capita water use according to plant water needs in different regions.

(E) Consider different levels of commercial, industrial, and institutional water use in different regions of the state.

(F) Avoid placing an undue hardship on communities that have implemented conservation measures or taken actions to keep per capita water use low.

In its Method 4 proposal, ACWA has provided an outline methodology to explicitly address climate, plant water needs, and population density differences (A, B, and D). Item C, the directive to provide flexibility is not clearly outlined, although there appears to be substantial flexibility in implementation built into SB X 7.7.

Item E and F are entirely unaddressed in the ACWA proposal.

With Item E, the components of water use, as a portion of total water use, vary dramatically from community to community. For a bedroom community, residential water use could be as much as 90% of total water use. In other communities, residential water use may comprise 50% or less of total water use. To comply with the requirements of the bill, DWR should have a separate issue paper which addresses the profile of water use in different regions of the state, and any hardships that should be addressed in Option 4 to offset the target setting method.

Item F points out that there are communities which have performed substantial measures to conserve water, but may not qualify for the reduction in water savings under the conditions of Option 3. Given that the established, recognized standards of conservation effort were outlined and reported on for the past 10 years in the CUWCC BMP reporting system, it would make sense to use the CUWCC Compliance Calculator as a sound measure of those who should be given consideration under Option 4, sub-paragraph F.

In summary, Item E should have its own issue paper, and Item F should have a clear, established standard put into place for those who might qualify for Option 4.

Sincerely,

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cc: Manucher Alemi, DWR
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