

## Huff, Gwen

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**From:** Chorneau, Charlotte [cchorneau@ccp.csus.edu]  
**Sent:** Monday, June 07, 2010 10:42 AM  
**To:** Water Use Efficiency  
**Subject:** Fwd: SBX7-7 USC Meeting #3 and U4 Technical Subcommittee Date Change

**Attachments:** U3 comments Cotton.doc; ATT00001..htm



U3 comments ATT00001..htm  
Cotton.doc (54 KB) (192 B)

Comments

Sent from my iPhone

Begin forwarded message:

**From:** Mary Lou Cotton  
<maryloucotton@KennedyJenks.com<mailto:maryloucotton@KennedyJenks.com>>  
**Date:** June 6, 2010 1:26:32 PM PDT  
**To:** "Chorneau, Charlotte"  
<cchorneau@ccp.csus.edu<mailto:cchorneau@ccp.csus.edu>>, "Ceppos, David M"  
<dceppos@ccp.csus.edu<mailto:dceppos@ccp.csus.edu>>  
**Subject:** RE: SBX7-7 USC Meeting #3 and U4 Technical Subcommittee Date Change

I just tried to submit these to the  
'wueurbanenews@water.ca.gov<mailto:wueurbanenews@water.ca.gov>' email add and it  
bounced back. Did I miss something? If so, I apologize: can you pls transmit  
these where they need to go?  
Thank you.

Mary Lou Cotton  
Senior Water Resources Manager  
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2775 Ventura Road, Suite 100  
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805/973-5700

-----Original Message-----

**From:** Chorneau, Charlotte [mailto:cchorneau@ccp.csus.edu]  
**Sent:** Friday, June 04, 2010 10:47 AM  
**To:** Charlotte Chorneau  
**Cc:** Alemi, Manucher; Brostrom, Peter N.; Guivetchi, Kamyar; Chris Brown; Ceppos,  
David M; Huff, Gwen; Elizabeth Betancourt; Mills, Richard; Ugarte, Nicole;  
Davidoff, Baryohay; Frame, Kent  
**Subject:** SBX7-7 USC Meeting #3 and U4 Technical Subcommittee Date Change

Good Morning USC Members,  
Thank you for your participation in Tuesday's Workshop. In response to the  
request to hold the USC Meeting #3 and U4 Technical Subcommittee in two days,  
please see the following set times. The meeting on June 22nd will begin at 9:30  
to ensure we have enough time for discussion. Members are encouraged to attend in  
person.

Meth 1, gross water use:

Page 1-2, Step 2 dist system boundary: there seems to be some confusion about the relationships and functions of wholesale and retail water suppliers. It is often the case that wholesalers own and operate treatment plants that treat raw water sources and then have turnouts to retail distribution systems. This section seems not to recognize that.

Also, there are many wholesalers that import raw water sources and then recharge these sources into a local groundwater basin (or basins). Retailers then pump the supplies out of the groundwater basin and introduce them into a distribution system, sometimes with treatment at the wellhead and sometimes through a treatment plant (or in some cases without treatment). This section also does not seem to account for these situations.

To enable agencies to follow this methodology, all such relationships should be considered and examples given for the calculation.

Page 1-3, steps 5 and 6: there are also situations wherein suppliers (both wholesale and retail) import raw water supplies and then store them for a period of time in a groundwater basin. Note that the definition of gross water use in SBX7-7 refers to water placed "into long-term storage." Distribution systems storage, which is by nature usually seasonal or short-term, does not seem applicable to this definition.

Page 1-5 step 11: allow each agency to determine a "substantial" percentage and then report it with documentation, utilizing a consistent method through time.

Page 1-6, commercial water use: see the definition in SBX7-7 and utilize it. Note that it does not say "retail."

Meth 2, population

Overall comment: water agencies have the ability to determine service area population utilizing a variety of data sources, all of which are allowed under the UWMP Act (Section 10631 (a)). As long as agencies utilize a consistent and well-documented method, it should be allowable under SBX7-7. There is no need to develop prescriptive methodologies, especially for smaller agencies.

Also, through time, local Associations of Governments adjust population estimates based on census and Dept of Finance data; water agencies already routinely utilize these (and other) sources as they update UWMPs and master plans. The same is true for annexations and de-annexations, which are carried out under the local County Tax Assessor.

Meth 4, compliance daily gpcd

As above, overall comment is that local agencies (both land use planning and water agencies) track these types of changes to service area boundary and population, and know best when and how to make adjustments. As long as agencies utilize a consistent and well-documented method, it should be allowable under SBX7-7.

Meth 5, landscape: there seems to be a lot of potential extra work in here to determine landscaped area, which will be onerous for small agencies. I appreciate that the paper says (page 6-3) "techniques that *may* be used to estimate landscaped area," and hope that DWR provides clarity that it is the Model Landscape Ordinance that must be

followed by *land use planning agencies working cooperatively with water agencies* (i.e., the onus is *not* on the water supplier).

U4 comment: I agree with others at the May 18 meeting who opined that the charge of the Technical Subcommittee should be to help develop the methodology, not simply react to a proposal provided by DWR and the Consultant Team. Since there will likely be at least two or more proposal (or ideas and concepts) submitted to DWR for consideration, all of these should be provided to the U4 Subcommittee, the USC and the public for review and comment before a final draft U4 methodology is crafted.

REVISED SCHEDULE:

USC Meeting #3  
Tuesday, June 22nd  
9:30 AM - 4:00 PM

U4 Technical Subcommittee Meeting #1  
Wednesday, June 23rd  
9:30 AM - 2:00 PM

U5 Process Water: We heard many people express an interest in participating in the U5 Subcommittee. We anticipate this group will meet three times between June and September. The first meeting will be in June, and will focus on initiating the conversation about DWR's interpretation of the statute and how the potential language of the regulation would address processed water as presented in SBX7 7. This will be an initial scoping meeting on what the subcommittee's interpretation of what the regulation should be addressing. The first meeting will be a 2-3 hour meeting.

\* If you are interested in participating in the U5 Process Water Subcommittee please send a note to [wue@water.ca.gov](mailto:wue@water.ca.gov)<<mailto:wue@water.ca.gov>>

\* We would like to poll those interested in participating in the U5 Subcommittee on whether they would prefer to have the first U5 Subcommittee meeting on June 23rd after the U4 Subcommittee meeting (from 2-4pm at Inland Empire) OR if you feel that would be too much to pack into the two days and would prefer the meeting be held on another day in a workshop style. When your note indicating your interest in participating please include your meeting preference.

thank you!

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