



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

March 17, 2010

Mr. Manucher Alemi, Ph.D., P.E.
Manager
Office of Water Use and Efficiency
Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Dear Dr. Alemi,

Comments on SBX7-7 Water Use Target Method 4 and Technical Methodologies

Thank you for the opportunity to provide input on the methodologies to be used in implementing SBX7-7 (Steinberg, 2009), including setting water use targets under the fourth compliance method and calculating baseline water use and compliance reporting period adjustments. The Metropolitan Water District of Southern California (Metropolitan) supports the Department of Water Resources' (Department) efforts to develop sound methodologies that are consistent with statutory requirements.

Target Method 4: SBX7-7 includes four methods for retail agencies to set 2020 targets; three are fully defined in the legislation and the fourth is to be developed by the Department as outlined in Water Code Section 10608.20(b)(4). The three defined methods use different approaches, allowing an agency to determine which method is most suitable for service area conditions, data availability, past conservation efforts, and other factors. It is important that the fourth method provide an alternative that will cumulatively result in a statewide 20-percent reduction in urban daily per capita water use, as required in the legislation. Metropolitan encourages the Department to develop a methodology that considers water efficiency standards and provides an alternative to agencies that do not have the resources to complete the land use analysis required for Method 2. Comments provided in the recent listening sessions illuminated some ideas that may be helpful, such as considering the potential water savings from full implementation of best management practices and compliance with ordinances and codes, refined reference evapotranspiration data, and targets based on local or subregional geographic areas.

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Gross Water Use and Recycled Water: Water Code Section 10608.12(m) defines recycled water that may be excluded from gross water use, including recycled water supplies used for reservoir augmentation. The Department's methodologies for calculating gross water use should clarify that recycled water supplies used for reservoir augmentation may be excluded, provided the recycled water meets the definition of Water Code Section 10608.12(m)(1) and is added to a drinking source water reservoir through a conveyance or distribution system constructed specifically for recycled water.

Compliance Reporting Period Adjustments: Water Code Section 10608.24(d)(1) allows agencies to consider several factors when reporting compliance water use. Metropolitan encourages the Department to incorporate the methodology being developed by the California Urban Water Conservation Council for weather-related differences between the baseline period and the reporting period. Also, the adjustment should be based on differences in reference evapotranspiration and rainfall; the legislation does not differentiate between plant-specific evapotranspiration and reference evapotranspiration that would apply to landscape area in general. Clarification of this issue by the Department will eliminate some confusion expressed by some water agencies.

Stakeholder Involvement: Metropolitan appreciates the efforts of the Department to allow for meaningful public participation through listening sessions and stakeholder involvement in the Urban Stakeholder Committee and the Commercial, Industrial and Institutional (CII) Task Force. We support broad representation on both committees, while limiting the number of participants to ensure that the work effort is efficient and the committees can produce the work products envisioned within the timeframe set by statute. For the CII Task Force, Metropolitan suggests that representatives of the following sectors be invited to participate: bottling, wineries, food processing; paper products; oil refineries; development, construction, building management, and retail shopping centers; hospitality, including hotels and restaurants; aerospace, technology; hospitals, universities, and public schools.

In a related effort, Metropolitan is working with legislative staff to address technical cleanup issues in legislation proposed for 2010, which do not change the requirements of the fourth compliance option or the Department's technical methodologies. The two issues include extending the due date for wholesale urban water management plans to July 1, 2011 and updating the federal Executive Order number relating to Department of Defense military installations, referenced in Water Code Section 10608.26(c), to reflect the new Executive Order of the Obama administration. Metropolitan believes that these changes are non-controversial and will improve implementation of SBX7-7.

Mr. Manucher Alemi, Ph.D., P.E.

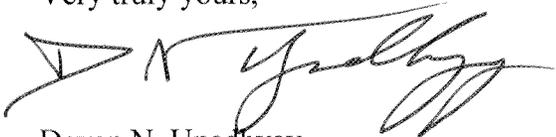
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Metropolitan would like to acknowledge the significant effort of the Department to fulfill the requirements of SBX7-7 by December 2010. We would like to offer our assistance on technical issues if it will benefit the Department's process. We would also be willing to provide contact information for potential participants of the CII Task Force.

Again, thank you for the opportunity to provide input. If you have any questions, please feel free to contact Mr. Tim Blair of my staff at (213) 217-6613 or tblair@mwdh2o.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. N. Upadhyay', with a stylized flourish at the end.

Deven N. Upadhyay
Manager, Water Resource Management

CS:tt