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March 15, 2010

Dr. Manucher Alemi, P.E.
Water Use and Efficiency Manager
Department of Water Resources

Subject: COMMENTS ON SBX7-7 PUBLIC LISTENING SESSION

Dear Dr. Alemi:

Thank you for providing urban water suppliers the opportunity to voice their comments regarding DWR's implementation of SBx7-7. I attended the March 10 public listening session and felt that many of us in attendance had similar concerns. I want to emphasize a couple items that are crucial to making this work for water suppliers preparing 2010 Urban Water Management Plans:

1. The methodology for water suppliers to calculate their service area population must be flexible. DWR should require agencies to use a citable, scientific data source; however, because of the wide variation in water supplier service areas, different data sources are more accurate for different water suppliers. Mojave Water Agency has done extensive research to find an accurate source for estimating our service area population. Some of the data sources we have reviewed include: 2000 Census; American Community Survey; CA Department of Finance; residential water service connections; GIS products such as ESRI data; county assessor data; building permit data. I believe all of these data sources can be accurately used to estimate population depending on a particular water supplier's service area characteristics, and I believe all these sources should be considered acceptable by DWR.
2. Wholesale water suppliers who are preparing an UWMP in cooperation with retail water suppliers should be allowed calculate the baseline and target GPCD based solely upon the water use and population of those consenting retailers. All other water use and population in the wholesale UWMP should be excluded from 20x2020 reporting requirements. Additionally, each participating retailer should have the option of choosing the baseline and target methodology that works best for them, rather than applying one baseline and target methodology to all participating retailers.

Thank you again for considering our comments.

Sincerely,

Timothy E. Gobler
Water Resources Planning Analyst