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TO: Mr. Peter Bostrom
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DATE: August 12, 2010

NO. OF PAGES: 5 (includes cover sheet)

RE: The Public Draft of Urban Water
Use Target Methodologies --
Comments Submittal Deadline
August 12, 2010.

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Simi Valley, CA 93063
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Mr. Peter Brostrom
DWR, Water Use and Efficiency Branch
P.O. Box 942836
Sacramento, CA 94236-0001

Re: The Public Draft of Urban Water Use Target Methodologies--
Comments Submittal Deadline August 12, 2010.

Dear Mr. Brostrom:

The following are my comments, concerns, suggestions, and questions on the aforementioned document.

- #1 - Please in future press releases, number the public notice pages.
- #2 - Please in future press releases, include a fax number. Since this is a public review and comment period document, all communication submittal tools must be allowed (mail, facsimile, e-mail, courier, etcetera).
- #3 - The report is a well compiled document.
- #4 - The report must have the pages that read from "State of California..." to the "Contents" numbered. This will make it easier for the reader to reference the page correctly if a comment is warranted, than to allude to the information printed on the page in order for DWR staff to know the exact text location.
- #5 - The report's page numbers must be in larger print.
- #6 - Page 5, under Reporting Compliance Year Water Use, the last sentence reads "the compliance y ear water use..." Please delete the spacing ("year").
- #7 - While the public draft report is dated July 12, 2010, the DWR released the document for public review and comment on July 27, 2010. This short period does not

allow for adequate review of the report, and cross-referencing of other documents/reports in order for a lay person to fully comprehend what the ultimate impacts to residents, and most especially to the elderly, and disabled populations may be in the near future, even if they have conserved, are and will be conserving water.

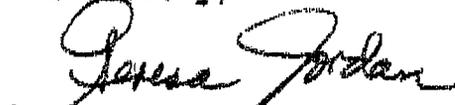
- #8 - Water suppliers are benefiting because they don't need to use the urban water use target methodologies to develop their 2010 urban water management plans.
- #9 - Water suppliers are benefiting because more time is "needed to develop the weather normalization model a major component of the methodology" (Page 1, under Introduction, second to last paragraph, last sentence).
- #10 - Water suppliers are benefiting because there are two exceptions if they cannot meet the water use targets. They are eligible for grants and loans if adequate documentation required by the DWR is submitted for "achieving the per capita reductions" (Page 5).
- #11 - Water suppliers are benefiting if they submit to DWR approved documentation that demonstrates that their "entire service area qualifies as a disadvantaged community" (Page 6).
- #12 - Water suppliers are benefiting because the DWR does not "review or approve the terms of memoranda of understanding (MOUs) or legal agreements that water suppliers use to create and manage regional alliances (Page 45).
- #13 - Water suppliers are benefiting because the DWR is giving them two exceptions for the procedure to develop population estimates for non-census years (Page A-5).
- #14 - I am concerned because it is stated on Page 15 "[NOTE: See Appendix D for guidance on whether to include or exclude process water", yet it is stated on Page D-1, APPENDIX D, "TO BE DEVELOPED".

- #15 - I am concerned that "DWR has not developed specific standards for sampling design" (Page 35).
- #16 - I am concerned with the statement of Page 35 that "Urban water suppliers should follow standards of professional practice sufficient to demonstrate unbiased estimates of landscaped area".
- #17 - I am concerned about the use of GIS "to calculate the landscaped area within each parcel" (Page 35).
- #18 - I am concerned over the use of sampling for parcels smaller, or larger than 24,000 square feet (Page 35).
- #19 - I am concerned that "If no GIS boundary map of the distribution area is available, a water supplier will have to perform this exercise manually" (Page A-1).
- #20 - I am concerned that "Water suppliers differ in their metering of certain structure types" (Page A-4).
- #21 - I am concerned that the DWR is encouraging "water suppliers to identify multifamily accounts separately from CII accounts" (Page A-6). The DWR should demand that this take place.
- #22 - I am concerned that if water suppliers use other sources to calculate the population, it is stated that "they should maintain consistency between the baseline and compliance years..." (Page A-6). This is another "shall" situation.
- #23 - The text headings on pages 33 through 37 are not consistent with the five steps listed on Page 33. Each of the five steps must be numbered accordingly. Each of the five steps must have the same heading as those listed on Page 33. The reader should not have to determine which heading language coincides with each of the five steps. The additional language can be included under the headings for informational purposes instead.

QUESTIONS

1. Page 4, third bullet point states "Method 3: ...as stated in the state's draft 20x2020 Water Conservation Plan". Is this statement in concert with the Final 20x2020 Water Conservation Plan?
2. Page 18, does the possibility exist that water suppliers can abuse the "Estimating the Service Area Population" process? How can the DWR guarantee that this will not take place?
3. Page 19, how does the DWR determine which water suppliers fall within each of the categories?
4. Page D-1, will the completed APPENDIX D be noticed for a public review and comment period?
5. Page 41, will the developed "Calculation of Adjustments to Compliance GPCD" be noticed for a public review and comment period(Methodology 8)?
6. Page C-1, will the developed "Method 4 for Determining Water Use Targets" be noticed for a public review and comment period?
7. Page B-1, APPENDIX B, what happens if a residence has landscaping that was installed before January 1, 2010, and landscaping that was installed after January 1, 2010?
8. Under what section of the DWRs' Website are the public comments going to be posted? I have yet to find the DWR Website section where the submitted comments on the July 29, 2010 Communities Handbook(for implementing the FloodSAFE Program Strategic Plan) are posted. I have also left a message for Mr. Pineda letting him know I sent my letter by e-mail, but have not heard from him.

Sincerely,



Teresa Jordan