

From: Rhodora Biagtan
Sent: Tuesday, March 16, 2010 4:57 PM
To: 'wueurbannews@water.ca.gov'
Cc: Stan Kolodzie; Dave Requa
Subject: Comments per 3/8 Listening Session

Dear Mr. Brostrom,

Per the request of the DWR staff in the listening session on March 8, 2010 we are sending our comments on the proposed Water Use Target Method 4 for the 2009 Water Conservation Act.

Dublin San Ramon Services District (DSRSD) is requesting that DWR avoid penalizing water retailers that have implemented water conservation efforts, especially in recent years. We request that Method 4 include a credit component for those who have achieved water reduction per capita over the past 5 years and who have implemented a recycled water program.

Because of DSRSD's accomplishments in reducing our potable water consumption to reduced levels from the baseline, DSRSD has an unusual perspective on the regulations concerning 20% by 2020. The only requirement for agencies such as DSRSD should be to calculate the baseline potable gpcd and the minimum per capita water use reduction of 5% and apply that minimum reduction as the DWR requirement.

DSRSD has been actively working to reduce potable water consumption for more than 5 years and has already reduced our demands on California's potable water resource by more than 20% while increasing our service area population by 18,400. DSRSD thus deserves some form of credit for its recent efforts to help bring California to the goal specified by the governor.

In 2004, DSRSD began an expensive Recycled Water program, replacing potable water used for irrigation. This year, our Recycled Water sales are more than 15% of our total water sales. In 2007, our Board of Directors called for voluntary reduction of potable water use; and our customers have since reduced our potable use per account by over 16%. DSRSD has preceded the governor in the drive for potable water conservation and should receive credit from the state of California for its early efforts to anticipate and help mitigate the potable water crisis. DSRSD should not have its early efforts in conservation ignored and should not suffer any penalty from the 20% by 2020 regulations.

The regulations specify a 4th method is to be developed for future implementation. This method is to be developed by DWR staff with the input of interested water utility stakeholders in the state of California. We believe this method should be used to acknowledge and provide regulatory relief to those agencies that have actively invested in projects and programs that have significantly reduced the agencies dependence on water from California's traditional sources.

The comments presented in this e-mail are from Dublin San Ramon Services District (DSRSD) in the east Bay region of northern California. DSRSD has been proactive in water conservation for the past several years. Currently, our District customers are responding well to a request from our Board of Directors (issued in June 2007) to voluntarily reduce water use. Responding to our Boards request, customers have consistently reduced water consumption in the months since June 2007. Our District's Board of Directors, District Staff and customers have implemented the following actions:

- The Board of Directors issued a request for our customers to voluntarily reduce water consumption by 10%. Our customers have responded by achieving more than the Board of Directors called for. The amount of water conserved over Base Year consumption in the last 12 months was 16.4%.

- The District has built a facility to produce Recycled Water (RW) from our WWTP suitable for irrigation of the ground cover plants in our area. We have also built a separate RW distribution network of the necessary pipelines, pump stations and reservoirs to provide RW to our large volume customers including golf courses, road medians, public sports grounds and public parks.
- The District has issued policies requiring that Recycled Water be used instead of potable water for all appropriate construction purposes such as dust control and grading.

Our comments regarding Water Use Target Method 4 arise from the District's recent accomplishments in Water Conservation. We believe the method to be developed must take into consideration the efforts of water utilities such as ours that have already worked hard and had customers suffer the financial sacrifices of Water Conservation. We believe the method must give some form of credit or consideration for the varied projects and policies undertaken to implement Water Conservation in the past four years. It would not be equitable to require our district to reduce water consumption the same percentage from this point into the future as another District that has not already undertaken similar projects and policies.

We appreciate the opportunity to comment. Please call me at the number below, or Stan Kolodzie at (925) 875-2253 (Kolodzie@dsrsd.com) if you should have any questions.

Regards,
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