

From: Jerry De La Piedra [mailto:GDeLaPiedra@valleywater.org]
Sent: Monday, June 07, 2010 1:50 PM
To: Chorneau, Charlotte
Subject: RE: SBX7-7 USC Meeting #3 and U4 Technical Subcommittee Date Change
here are my comments on the Methodology Papers:

Methodology 1: Gross Water Use: It's not clear where the 4% (industrial) and 20% (industrial and commercial) thresholds came from and without this analysis it's hard to know if these are reasonable. My guess is there are going to be cases where these may not be appropriate, so I recommend allowing the retail water agency to define what is "substantial" based on their system.

Methodology 2: Service Area Population: the methodology needs to address commuters and seasonal populations as this may have a significant impact on overall water use in some areas.

Methodology 3: Base Daily Per Capita Water Use: the methodology does not clarify when to use a 10 or 15 year period as the baseline versus using the 5 year period as the baseline (i.e. Section 10608.22).

Methodology 4: Compliance Daily Per Capita Water Use: no comment at this time

Methodology 5: Residential Indoor Use: Concerned that the 55 GPCD may be adjusted at a later date. Criteria needs to be developed and the study should include a stakeholder process (i.e. involve the USC). Since this may have a significant impact on compliance for the water retailers that choose Method 2 they should have the option to select a different method once the study is released.

Methodology 6: Landscape Area Water Use: Paper states that water features, including pools, are not part of the calculation (middle paragraph page 6-1), I don't believe that was the intent of the law. Also, throughout this paper it refers to "all meters", for clarification I believe it should state "all applicable meters" or "all single-family and dedicated landscape meters"...again, this is throughout the paper. Also, the calculation doesn't need to be done at the parcel level. If an agency is using remote sensing the measurement can be done more efficiently on an aggregate level. Finally, in terms of verifying accuracy of the remote sensing, this can be done by comparing square footages and/or water use budgets for a select number of sites. When using remote sensing tree canopy can be a limiting factor for comparing square footages, which in turn can lead to a higher percent error. However, when comparing water use budgets this effect is minimized.

Methodology 7: Baseline CII Water Use: no comment at this time

Methodology 8: Criteria for Compliance Year Adjustments: Still not clear on what is considered "substantial"? Need to allow for flexibility, one size fits all will not work for all agencies.

Thanks
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