



February 15, 2011

Bill George, Chair  
Marty Hanneman, Vice  
Chair

Mr. Anthony Saracino, Chair  
California Water Commission  
By e-mail to [cwc@water.ca.gov](mailto:cwc@water.ca.gov)

**Members**

California American Water  
Carmichael Water District  
Citrus Heights Water District  
Del Paso Manor Water District  
El Dorado Irrigation District  
Fair Oaks Water District  
Folsom, City of  
Fruitridge Vista Water  
Company  
Golden State Water Company  
Lincoln, City of  
Orange Vale Water Company  
Placer County Water Agency  
Rancho Murieta Community  
Services District  
Roseville, City of  
Rio Linda / Elverta Community  
Water District  
Sacramento, City of  
Sacramento County Water  
Agency  
Sacramento Suburban Water  
District  
San Juan Water District  
West Sacramento, City of

Dear Mr. Saracino,

I am writing to urge you and your fellow commissioners to not approve inclusion of the document "Provisional Method 4 for Determining Water Use Targets" by reference in the Department of Water Resources proposed regulation for Industrial Process Water pursuant to SBX7 7 (2009).

As a member of the Urban Stakeholder Committee that wrestled with development of "Method 4" for many months during 2010, I want to commend the hard work of DWR staff to develop a workable methodology, as well as their commitment to considering input from various stakeholders and evaluating a variety of possibilities. Despite the level of effort, many of those involved believe that the outcome reflects time running out rather than a workable alternative method for compliance.

The proposed methodology fails to adequately consider several of the factors required under Water Code Section 10608.20(b)(4). By applying a uniform water use reduction on all outdoor water use, the proposed method lacks any real consideration of climatic differences within the state, population density differences within the state, and different levels of per capita water use according to plant water needs in different regions.

The Legislature intended there be four viable alternatives for compliance, to reflect the variety of factors that affect water use in California and provide some equity in the imposition of conservation requirements. DWR recognized the need to more fully develop Method 4 in the future by creating the "provisional" document. However, your approval of the provisional method may actually undermine and delay efforts to develop a more appropriate methodology, and would downplay the fact that the legislative intent was not met. I urge you to take action on the rulemaking package without inclusion of the Provisional Method 4.

**Associates**

El Dorado County Water  
Agency  
Sacramento Municipal Utility  
District  
Sacramento Regional County  
Sanitation District

Thank you for your consideration of these comments. If you have any questions, please contact me at (916) 967-7692.

Sincerely,

A handwritten signature in black ink, appearing to read 'John K. Woodling', written in a cursive style.

John K. Woodling  
Executive Director  
Regional Water Authority