



February 15, 2011

Manucher Alemi, Ph.D., P.E.  
Chief, Water Use and Efficiency Branch  
Division of Statewide Integrated Water Management  
Department of Water Resources  
901 P Street  
Sacramento, CA 95814

RE: **CUWA Comments Regarding Provisional Method 4 for  
Determining Water Use Targets**

Dear Mr. Alemi:

Thank you for the opportunity that the California Department of Water Resources (DWR) has provided the California Urban Water Agencies (CUWA) to participate in the Urban Stakeholder Committee (USC). This process allowed our organization and other stakeholders to provide key input into DWR's Provisional Method 4 for Determining Water Use Targets (Provisional Method 4), and it highlighted the dedication of your staff and meeting facilitators in that regard. The purpose of this letter is to provide DWR with CUWA input regarding the Provisional Method 4 that is to be presented to the California Water Commission on February 16, 2011.

As you may recall, CUWA and its members participated in a USC meeting on January 21, 2011, in which the Provisional Method 4 was presented by DWR. At that meeting, CUWA and its members noted their appreciation to DWR staff for the improvements that had been made to the Provisional Method 4 over the last two months of review with the USC and its U4 Subcommittee. In that spirit, we felt that it was important to note several key CUWA member observations and requests regarding Provisional Method 4 that were made at the January 21<sup>st</sup> USC workshop and request DWR concurrence that these observations and requests would be addressed as part of the 2014 update of Provisional Method 4:

- **Provisional Method 4 Update Process:** Water Code Section 1008.20(d) provides that DWR will update Method 4 by December 31, 2014. Although the Provisional Method 4 document notes this requirement, it does not stipulate that the USC process would be used as part of this effort. CUWA believes that the Provisional Method 4 benefitted greatly by the substantive input, suggestions, and recommendations made by the USC members, many of which will be called upon to implement Provisional Method 4 and identify areas of potential and future improvements. Therefore, CUWA requests that DWR commit to engaging the USC members and process when it begins to update Method 4 well before the December 31, 2014 deadline and related California Water Commission consideration;

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- **Use of Expanded Random Sample Agency Data:** CUWA commends DWR on its development of an expanded random sampling of 51 water agencies that was used to estimate water savings using this Provisional Method 4 and its more detailed comparison of several agencies and alternative methods. CUWA requests that DWR monitor and keep this data current to aid in the update of the Provisional Method 4 prior to December 31, 2014, and to help the USC and others assess the success of Provisional Method 4 in meeting the SBX7-7 requirements and/or goals;
- **Credit for Past Conservation Practices:** CUWA urges DWR to work with the USC well prior to the December 31, 2014 update deadline to assure that the Provisional Method 4 has provided sufficient credit for past water conservation efforts by urban water suppliers as part of the water use target calculation, particularly in the area of landscape water conservation measures and efforts;
- **Accounting for System Water Losses or Unaccounted for Water:** CUWA requests that DWR also work with the USC and urban water suppliers to evaluate the potential integration of a method to address water system losses more clearly in the future Provisional Method 4 update; and,
- **Provisional Method 4 Terminology:** CUWA requests that the Provisional Method 4 and its subsequent update include a glossary to assure a common understanding of key provisions discussed in the text. These include, for example, the definition of water loss, etc.

Should you have any questions regarding our comments, please feel free to contact me at (916) 552-2929.

Sincerely,



Ernesto A. Avila, P.E.  
Executive Director

EAA/mmt

cc: Sue Sims, Interim Executive Officer  
California Water Commission  
1416 Ninth Street, Room 1147  
Sacramento, CA 95814