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September 24, 2008

Governor's 20X2020 Agency Team On Water Conservation

RE: Questions/Concerns

Weber, Ghio & Associates, Inc. serves as the contract City Engineer for six cities in Calaveras and Amador Counties as well as numerous utility districts. After reviewing the Public Draft Technical Memorandums on Establishing Baseline and Determining Conservation Targets, as well as attending the workshop held on Monday, September 15, 2008, I would like to present the following comments/questions with regards to the proposed Baseline and Conservation Targets.

- 1. The baseline presented is based upon the DWR Public Water System Survey (PWSS) for the time period 1995 to 2005. As the surveys were collected voluntarily, it is doubtful many of the small agencies in California provided this information due to fiscal and staffing constraints. As our clients are located primarily in Amador and Calaveras County, please provide a listing of all agencies which provided responses to the PWSS broken down by year from 1995 to 2005 for both Amador and Calaveras County. In addition, please provide information on how total water use was projected for Amador and Calaveras Counties if no response was received from these agencies to the DWR-PWSS.
- 2. San Joaquin Region (Hydrologic Region No. 6) includes Amador, Calaveras, Madera, Mariposa, Merced, San Joaquin, Stanislaus, and Tuolumne Counties. Some of these counties are located in the foothill region as opposed to more urban areas located in the Central Valley. The foothill region historically has larger parcels with higher per capita water use and smaller population. What is the breakdown in per capita water use and the breakdown in population for each of the counties combined in Region 6 which was utilized in developing the baseline number?
- 3. In reviewing the methodology of determining the conservation targets combined with comments during the workshop, it is indicated that Hydrologic Regions 1-4 have well established conservation histories which demonstrate much lower

baseline values than the inland regions. What is this historical conservation history? Please provide a breakdown of the yearly per capita water use for Regions 1-4 for the time period 1995 through 2005. Although the baseline calculations indicate much lower water use in Regions 1-4, it would seem this low water use is more related to low ET rates than actual conservation. Should that be the case, the 20 percent reduction should be spread evenly across the state without penalization of regions in the state with higher ET rates.

Everyone in California understands the necessity of water conservation and the fact that more will be required in the future as the population grows with limited water supplies. It should be noted that the proposed 20 percent state wide reduction in urban water will result in savings of only one percent of all statewide water usage on a yearly basis assuming no growth occurs. In addition it should be noted that the agencies located in the foothills of the Central Valley are already having difficulty with high domestic water rates due to governmental regulations on drinking water combined with low economy of scale due to the population densities of these areas. Imposing additional costs on the citizens in these areas to achieve a large level of conservation will place a burden on citizens who are already struggling just to utilize subsistence water levels. As this process is carried through to completion, the state agencies involved in establishing the conservation targets and implementation measures must address the economic impacts on the smaller agencies with limited population due to the loss of revenue which will result from mandatory water conservation.

Ghio, President

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