



Inland Empire Utilities Agency

A MUNICIPAL WATER DISTRICT

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October 1, 2008

Mr. Chris Brown, Executive Director
California Urban Water Conservation Council
455 Capitol Mall, Suite 703
Sacramento, CA 95814

Subject: Comment Letter on Proposed BMP Revisions

Dear Chris,

Thank you for the opportunity to submit comments on the BMP revisions. As you know, the State, in recent months, has taken aggressive steps to begin the process of formulating rules and/or regulations for compliance with Urban Water Conservation. We have seen this shift through the enactment of AB 1420, provisions under the failed AB 2175 (Governor's call for 20% reduction), formation of the 20 X 2020 Agency Team, and finally the State Water Resources Control Board's effort to begin development of an Urban Water Conservation Regulatory Program. It is our opinion that the most important focus for the Council and Steering Committee members must be to bring about resolution of all BMP revision issues and move forward with the adoption of those revisions as soon as possible.

The CUWCC and its signatories have worked diligently to stay on the forefront of water use efficiency issues and practices by setting standards and establishing goals and objectives that have ultimately resulted in significant water-use reduction since the Council's formation in January 1991. CUWCC members have collaboratively worked together through issues and accomplishment of goals that integrate urban water conservation Best Management Practices into the planning and management of California's water resources, establish sound water use efficiency practices and achieve water savings results.

IEUA and its retail agencies, the Cities of Ontario and Upland, Cucamonga Valley Water District, Monte Vista Water District, and Fontana Water Company (a subsidiary of San Gabriel Valley Water Co.), signatories to the MOU, have concluded the following actions are needed:

1. We urge the Council to advocate and promote to State and legislative bodies the monumental accomplishments made by its members in standardizing water-use efficiency practices and BMPs since the last drought, and insist that these entities'

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activities don't create duplicity, parallel processes, and/or overshadow the Council's efforts.

2. We urge the Council to quickly resolve the three "options" available to agencies for BMP compliance so that Group 1 Members will have flexibility in meeting compliance, and achieving their water-saving goals. We feel the most accurate approach in reporting water-use reductions moving forward is in "water-use in gallons per capita per day (gpcd)" through Statewide or Regional goals and not by market sector.
3. We recommend the Council mediate and resolve the issue of allowing credits for recycled water with Group 2 members as quickly as possible. We believe that, in addition to recycled water usage being credited through the gpcd compliance option both recycled water usage and incentives for onsite conversion to recycled water usage should be credited through the Flex-Track compliance option for the Landscape and CII BMPs.
4. We highly recommend the Council evaluate and analyze the impacts to reporting agencies (Group 1), State agencies, and proposed legislation if there is a failure to adopt the BMP revisions in a timely fashion.
5. We urge that the adoption of the newly revised BMP's occur expeditiously, to prevent State agencies and/or legislators from enacting or implementing new laws or rules and regulations that overshadow the BMP process and that would create barriers and confusion among water purveyors on demand reduction responsibilities.

IEUA and its retail agencies, the Cities of Ontario and Upland, Cucamonga Valley Water District, Monte Vista Water District, and Fontana Water Company (a subsidiary of San Gabriel Valley Water Co.), signatories to the MOU, thank you for this opportunity to comment. Please feel free to contact us if you should have any further questions.

Sincerely,



Richard W. Atwater
Chief Executive Officer
General Manager