



CITY OF HOLLISTER

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PUBLIC WORKS: ENGINEERING SECTION

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February 24, 1999

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA. 95814

RE: CALFED WATER USE EFFICIENCY PROGRAM - CITY OF HOLLISTER
COMMENTS ON STAKEHOLDER PROPOSALS FOR CERTIFICATION
COMPLIANCE WITH THE URBAN MOU

On behalf of the City of Hollister I wish to thank the participants and host agencies involved with the recent Urban MOU Compliance Certification Workshops. I also offer the following comments on the CUWA/EWC and KCWA/BVCSD stakeholder proposals as presented.

CUWCC Certification Oversight and Membership:

Having CUWCC become the responsible agency for the certification program is supported. The KCWA/BVCSD proposal for automatic membership is also supported. It appears that this would allow the CUWCC an ability to evolve and modify governance and administrative structures as the certification process evolves. Any proposal to totally redefine these structures prematurely would be a disservice to those agencies that have not yet come on-board.

Wholesale Water Supplier Participation:

The KCWA/BVCSD proposal is supported as a method to simplify the process. The relationship between "first tier" wholesalers and retail agencies should be allowed to develop on a case by case basis without being predefined and mandated by others.

MOU Compliance Standards:

The KCWA/BVCSD proposal is supported to allow CVPIA reporting compliance to automatically satisfy CUWCC reporting. Similarly the KCWA/BVCSD proposal is supported to modify the current cost-effectiveness standard to include clear and objective criteria. It is understood that all participants would work towards modification of the current environmental criteria so that they can later be included within the objectively defined standards.

BMP Implementation Variances:

The KCWA/BVCSD proposal is supported to require only that a water supplier submit a written description of a variant, and not to require CUWCC approval.

MOU Compliance Designations:

The CUWA/EWC proposal is a simple yet well defined progression of compliance designations. However, when taken into consideration with other factors, including the Assurances and Enforcement process, the CUWA/EWC proposal becomes too convoluted. Therefore, because of the complications indicated below under the Assurances and Enforcement discussion, the KCWA/BVCSD proposals are supported for conditional and suspended compliance designations.

MOU Certification Decision-Making:

Both proposals are sufficiently similar that they would seem to operate well. It may well be beneficial to have USBR and DWR representatives on the Certification Review Committee in order to ensure their concurrence with the program. Since these agencies are expected to provide some funding assistance it seems best that they have a defined role as members of the Certification Review Committee.

Appealing CUWCC Certification Decisions:

The KCWA/BVCSD proposal is supported as providing appropriate alternative methods for the water supplier to pursue appeals. Since the premise of the program is to establish a fair, uniform, and binding certification process there is no justification for others to have appeal rights.

Assurances and Enforcement:

The KCWA/BVCSD proposal is supported as a uncomplicated and straightforward routing of actions leading to CALFED enforcement. Building multiple pathways and levels of enforcement promises to create a large unwieldily, expensive, and unnecessary bureaucracy.

Thank you for the opportunity to comment.

Sincerely,



Jim Perrine
CIP Manager