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February 26, 1999

Mr. Steve Ritchie  
Deputy Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

**SUBJECT: CALFED WATER USE EFFICIENCY PROGRAM**

Dear Mr. Ritchie,

The City of Santa Maria wishes to express its appreciation for the recent series of workshops on the CALFED's Water Use Efficiency Program. The workshop was very informative and we appreciate the opportunity to submit the following comments.

In general, the City strongly supports all the Kern County Water Agency/Bear Valley Community Services District (KCWA/BVCSD) proposals, contained in the Administrative Draft Efficiency Program. We have commented on some of the more important proposals by KCWA/BVCSD.

- \* The City supports the proposal that water suppliers subject to MOU certification should have an opportunity to become members of the California Urban Water Conservation Council (CUWCC), with all due voting rights and membership privileges. It's only reasonable that agencies subject to CUWCC regulation should have the same voting right as other members regulated by CUWCC.
- \* The City believes that the water wholesaler should be responsible for cost effective Best Management Practices (BMPs) for only the areas controlled by the wholesalers. This would allow individual retailers to comply on their own. The City's water supply should not be held hostage because one individual district within a wholesale area is non compliant.
- \* The City supports the view that MOU certification decision-making should be performed by a committee from CUWCC rather than a politically appointed body. The standards for compliance with economical BMPs should be clear and analytically based. Technical people are best qualified to make this type of determination.

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- \* The City believes that certification decisions of the CUWCC committee should be final, and not subject to appeal by other members of CUWCC, or anyone else.
- \* The City also strongly supports the KCWA/BVCSD proposal for CALFED enforcement actions. They are more direct and less bureaucratic.

In addition, the water efficiency program should consider funding rate relief for agencies such as Santa Maria that pay \$1,000/A.F. for supplemental water and have tremendous capital costs regardless of the water delivered. While the City has implemented most all of the BMPs, revenue shortfall that raised rates would be unacceptable, and upset the City's current financial plan.

Thank you for the opportunity to comment on the efficiency water use program.

Sincerely,



Dwayne K. Chisam, P.E.  
Utilities Manager

xc: Paul Karp, Director of Public Works  
Mary Lou Cotton, Kern County Water Agency

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