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# COACHELLA VALLEY WATER DISTRICT

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March 5, 1999

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File: 0644.109072

Steve Ritchie  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1153  
Sacramento, California 95814

Dear Mr. Ritchie:

We are pleased to provide you with comments on the two urban certification proposals currently being considered by CALFED.

We do not support any obligations or assurances from any first tier wholesale water suppliers beyond compliance with the MOU. We share the concerns expressed in the KCWA proposal that wholesaler obligations that extend beyond compliance with the MOU tend to inappropriately transfer fiscal authority over certain retail supplier activities to wholesalers and would put wholesalers in the position of being "water cops", enforcing CALFED water supply restrictions placed on their member agencies due to MOU noncompliance.

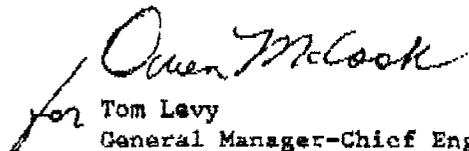
The KCWA proposal echoes our concern that the current MOU's cost-effectiveness criteria relating to environmental costs and benefits are overly subjective and susceptible to multiple interpretations. The criteria need to be modified such that they become more objective and less susceptible to multiple interpretations.

BMPs, by nature, are general and may not be appropriate for all water suppliers. Individual water suppliers should have the ability to implement a BMP variant simply by providing a written description of the variant to CUWCC prior to implementation. The proposal to require approval from CUWCC prior to implementing a BMP variant would be a bureaucratic nightmare and could result in delays in the implementation of BMPs.

We believe that any water supplier subject to a non-compliance finding should be the only group with the right to appeal the decision.

Overall we strongly support the KCWA proposal for a program to certify water supplier compliance with the Urban MOU. If you have any questions, please call Steve Robbins, assistant director of engineering, extension 263.

Yours very truly,

  
for Tom Levy  
General Manager-Chief Engineer

TRUE CONSERVATION  
USE WATER WISELY

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