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Cucamonga County Water District
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ROBERT A. DeLOACH
Secretary / General Manager

March 3, 1999

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

Dear Mr. Ritchie:

The purpose of this memo is to provide you with comments to the information presented at the Urban Water Use Efficiency Workshops held during the month of February.

We commend both the Kern County Water District (KCWA), Bear Valley Water District (BVWD), California Urban Water Agencies (CUWA), and the Environmental Water Caucus (EWC) for taking the time to develop and present the two proposals. Below are a few comments regarding both proposals:

MOU Certification Decision Making Process

The CUWA/EWC Proposal appears to be too cumbersome and includes too many entities which may slow down the certification process. The structure of the nine-member certification committee proposed by KCWA/BVCSD appears to be more simplistic and manageable.

There are also concerns regarding the monetary compensation of the persons represented on a certification review committee. Whichever structure is selected for certification, it is understandable that it will create an additional bureaucracy. We hope that CALFED officials will be cognizant of an organization that is financially prudent.

Appealing CUWCC Certification Decisions

We strongly disagree with the idea that Group 2 members should be able to appeal certification decisions once an agency has been certified. Reservations regarding an agency's BMP report should be debated during the review process, not after an agency has been certified.

ROBERT NEUFELD
President

GEORGE A. KUYKENDALL
Vice President

JEROME M. WILSON
Director

DONALD J. KURTH
Director

HENRY L. STOY
Director

MOU Compliance Standard

An agency's certification should not be denied due to the value it assigns to the environmental benefits/costs portion of the cost-effectiveness exemption calculation. Currently, the language regarding the cost-effectiveness criteria is subjective and sensitive to different interpretations. When the CUWCC develops the guidelines that will be used to compute the BMP costs and benefits then the analysis should be included in the certification process.

We also have an overall concern with the funding necessary to implement the BMP's. At the workshop there was mention that funding would be available to assist agencies with the implementation of the BMP's. We are a medium size agency that would appreciate any funding sources available to assist in the development and implementation of our programs.

Thank you for providing water agencies the opportunity to respond to these two proposals and we look forward seeing the results from the workshops. Should you have any questions please feel free to contact me at 909/987-2591.

Respectfully submitted,



Jo Lynne Russo-Pereyra
Assistant to the General Manager