

**From:** [Lucero, Stephanie](#)  
**To:** [DWR Water Use Efficiency](#)  
**Subject:** email comments at UAG  
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Jerry De La Piedra: As a groundwater management agency our WSCP stages are based on the impacts to our groundwater basins (i.e. how far gw levels will fall) rather than a comparison of supply vs demand in that year. Will the recommendation have enough flexibility to allow for this?

Dan Drugan: Reporting 5-year dry period assessments every year will just be confusing to our customers. To satisfy the EO, this should just be included as part of the regular UWMP process.

Tiffany Titus: Just to echo what has already been said the five year assessment will create unforeseen issues for urban retail suppliers.

Tara Campbell: This is perhaps a tangent, but I haven't heard it addressed to date: A big assumption that seems to be made throughout this process seems to be that water agencies have a clear way to estimate supply (without or without weather conditions taken into account). This is true I'm sure for most suppliers who use surface water and/or groundwater basins. However, it's not true for those who use fractured rock groundwater (mostly in the mountains or foothills), in fractured rock, there can be up to a 7-year difference between when rainfall percolates to the level of wells, so weather is hard to take into account. Also, fractured rock wells are usually not part of basins... water continuously runs downhill and often continues on to eventually end up in a valley groundwater basin. While you can measure current well levels, there's no good way to estimate future or even current year supply in these conditions. I would like to see some guidance for fractured rock/mountain groundwater urban water suppliers

Tara Campbell: re funding: please consider recommending that funding be made available to privately-owned as well as public ones. Customers of privately-owned agencies carry the burden of water service costs just the same as customers of public agencies, yet private agencies are excluded from nearly every form of funding. the result is a higher cost to customers of private vs agencies that is really unfair to them

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