



## Association of California Water Agencies

Leadership Advocacy Information *Since 1910*

December 14, 2011

Mr. Thomas Carpenter  
U.S. Environmental Protection Agency  
Science Advisory Board Staff Office  
Mailcode 1400  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Carpenter;

The Association of California Water Agencies appreciates the opportunity to comment on the Science Advisory Board's effort to Estimate the Value of Water to the United States Economy (76 Fed. Reg. 219, pp. 70444-70445). ACWA's 450 public water agency members supply over 90 percent of the water delivered in California for residential, agricultural, and industrial uses.

As the Environmental Protection Agency moves forward with this process, ACWA encourages you to incorporate recommendations made by members of the SAB during the Dec. 5, 2011 meeting. Specifically, ACWA supports the recommendation that the SAB examine the value of water on a regional basis. ACWA believes structuring the report by region will provide more useful information than the sector by sector approach proposed by EPA.

In California the value of water has been examined in a variety of contexts including its impact on water banks, water transfers, and even the statewide management of water. The University of California at Davis developed the hydro-economic model known as CALVIN to examine a variety of statewide water issues. Similar models likely exist for other regions of the country and could be utilized by the SAB if they took a region by region approach to assessing the value of water.

Additionally, ACWA encourages EPA to clarify that the purpose of this study is only to examine the market value of water. During the Dec. 5, 2011 meeting EPA officials indicated this to be the case. However, the title of the charge to the SAB as well as some of the documents provided suggests at least some non-market values will be considered. The distinction between market and non-market value should be clarified at the beginning of the report and the specific activities included in both categories should be clearly specified.

Thank you for considering ACWA's comments. If you have any additional questions please contact our DC Office at 202-434-4760.

Sincerely,  
David Reynolds  
Director of Federal Relations