

**Alliance for Water Efficiency
American Rivers
Natural Resources Defense Council**

February 10, 2010

Michael Finn
Office of Groundwater and Drinking Water
Drinking Water Protection Division
Environmental Protection Agency
1200 Pennsylvania Ave., NW 4606M
Washington, DC 20460

Re: Comments on *Review Draft, Control and Mitigation of Drinking Water Losses in Distribution Systems*

1. We are very pleased that EPA is developing a guidance manual on water loss, and that the new methodology contained in AWWA's updated Manual M-36, *Water Audits and Loss Control Programs*, is referenced. That said, there are several significant shortcomings in the draft.
2. After discussing the top down audit (pp. 2-5 & 6), no mention is made of the data quality rating system in the AWWA water audit software. This is crucially important, both to encourage small and medium sized systems to start using the software with the information they have on hand, and also to help them prioritize the particular data inputs where data quality improvement is most helpful for strengthening the reliability of the results computed by the software in future years. Utilities should recognize that water audit results that are accompanied by low data quality scores are not appropriate for making investment decisions, and that conversely, higher data quality scores can serve as a foundation for a cost-effective water loss reduction program.
3. The transition from the top down audit to the bottom up audit (p. 2-6) is given very short shrift. No mention is made of a component analysis, through which the losses identified in the top down audit are disaggregated by type, and to the extent possible, by location. This is a crucial precursor to putting together a cost effective loss reduction program.
4. The discussion of performance indicators and benchmarks (pp. 2-7 to 2-9) has two serious problems. First, there is extensive discussion of the computation of unavoidable annual real losses (UARL). It mentions that UARL is difficult to estimate, but UARL is actually an output of the AWWA software. In any event, why point small and medium systems toward documenting losses that are unavoidable, rather than estimating what's economically recoverable? Secondly, the Infrastructure Leak Index (ILI) is presented as a target setting system, when in fact, the ILI is a non-denominated index that may have some value for international comparisons of water systems, but is not particularly useful for an individual utility attempting to set water loss reduction targets. Real losses per service connection per day and apparent losses per service

connection per day, which are much more useful performance indicators for purposes of target setting, are computed by the water audit software.

5. The guidance on meter testing and replacement (p. 3-10) is very inadequate, essentially shrugging off the topic by saying it requires “complex analysis” and that current strategies are “more complicated” than in the past. This is simply not actionable guidance for small and medium systems. This important topic should not be glossed over while extensive space is provided for topics such as leak detection methods which, albeit important, are perhaps not as fundamental to developing an accurate assessment of real and apparent losses as water meter accuracy.

Thank you for your consideration of these views.

Sincerely,



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