

**MEMORANDUM**

DATE: March 8, 2013

TO: Sarah Jones, Acting Environmental Review Officer  
San Francisco Planning Department – Environmental Planning

THROUGH: Paula Kehoe, Director of Water Resources

FROM: Sarah Rhodes  
Water Resources Division

SUBJECT: Water Code Section 10912(a)(7) “Equivalent” Project Threshold

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Water Code Section 10910-10915 were signed in legislation in 2003 to coordinate local water supply and land use decisions to help provide California’s cities, farms and rural communities with adequate water supplies. Additionally, these bills increase requirements and incentives for urban water suppliers to prepare and adopt comprehensive management plans on a timely basis.

To that end, the SFPUC has had a number of inquiries regarding the “equivalent” standard. The California Department of Water Resources provides the following guidance on their website:

*Under Water Code § 10912(a)(7), SB 610 would also apply to a "project" that "would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project." In order to determine whether an assessment will be required under the 500 unit equivalency threshold, the city or county would need to work with the water supplier to determine if the demand associated with a proposed project would be equivalent to or greater than the demand for a 500 unit project in that jurisdiction.*

Based on citywide demand analysis completed by the SFPUC, we believe that an equivalent project within our jurisdiction would be any project using an average of **50,000 gallons per day (gpd)** or **18.25 million gallons per year (gpy)**.

This was determined as follows:

$$50 \text{ gpcd}^1 \times 2.0 \text{ persons/unit} \times 500 \text{ units} = 50,000 \text{ gpd}$$

Notes:

1. 50 gallons per person (or capita) per day (gpcd) is based on residential population and sales data, as reported in the 2010-2011 Water Conservation Report. This number has remained constant for the City over the past few years.
2. 2.0 persons per household is the estimate for multi-family residential (MFR) density within the City, as reported in the 2011 Retail Water Conservation Plan. Projected persons per household for single and multi-family housing units were derived from Census 2000 data and then scaled so that household population computed by multiplying the number of housing units by persons per household equaled the updated population projections utilized in the 2010 Urban Water Management Plan.

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