STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., *Governor*

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
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March 26, 2014

Mr. Larry Pennell
Interim General Manager
Bear Valley Community Services District
28999 South Lower Valley Road
Tehachapi, California 93561

Dear Mr. Pennell:

The Department of Water Resources (DWR) has reviewed Bear Valley Community Service District's 2010 Urban Water Management Plan. The District was not required to submit a Plan because the number of service connections and volume of water supplied to urban areas was below the reporting threshold. However, the District voluntarily submitted an individual Plan and participated as part of the Tehachapi 2010 Regional Urban Water Management Plan.

As a courtesy, and in acknowledgement of the Districts voluntary reporting, DWR has reviewed the individual UWMP for Bear Valley CSD. DWR's review of Plans is limited to assessing whether suppliers have addressed the required legislative elements. In its review, DWR does not evaluate or analyze the supplier's UWMP data, projections, or water management strategies.

DWR's review of Bear Valley CSD's 2010 Plan has determined that some elements have not been addressed in accordance with the Water Code and recommend these amendments in future updates of the Plan:

1.) Amend the Baseline GPCD. *Water Code Section 10608.20*
On page 118, the UWMP states that the five calendar years ending December 31, 2007 were used to determine the baseline gpcd for Bear Valley CSD. The baseline gpcd is determined using the 10 year baseline period, not the 5 year baseline period. The 5-year baseline is used to calculate the maximum allowable water use target. See the 2010 UWMP Guidebook for a more detailed explanation of the differences in the two baselines.

Also, please note that in table 3-10, the 5 year baseline gpcd for the period 2003-2007 is miscalculated. The correct 5 year average for this period is 188 gpcd, not 200 gpcd.

2) Amend the 2015 Target GPCD. *Water Code Section 10608.20.* Given the suggested revision to the baseline gpcd (above), the 2015 target will need to be recalculated as the midpoint between the revised 10 year baseline and the 2020 Target.

3) Include a comparison of supply and demand over the next 20 years, in five-year increments, for a normal water year, a single dry water year, and multiple dry water years. These were not provided. *Water Code Section 10635 (a)*

By including this data in future Plans, Bear Valley CSD will better meet the requirements of the Water Code.

If you have any questions regarding the review of the Plan or urban water management planning, please do not hesitate to contact me.

Sincerely,

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