

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



June 27, 2014

Mr. Tom Romesberg  
Director of Public Works  
City of Crescent City  
377 J Street  
Crescent City, California 95531-4025

Dear Mr. Romesberg:

The Department of Water Resources (DWR) has reviewed the City of Crescent City's (City) 2010 Urban Water Management Plan (UWMP) received on April 26, 2012. The California Water Code (CWC) directs DWR to report to the legislature once every five years on the status of submitted plans. In meeting this legislative reporting requirement, DWR reviews all submitted plans to ensure that they have addressed the required elements of the California Water Code.

DWR's review of the City's 2010 Plan has determined the following required elements have not been addressed in accordance with the Water Code:

The service area population for the baseline period was calculated incorrectly, which can, in turn, affect the estimations of baseline and target water use. The baseline population estimate for the service area should be developed using Technical Methodology 2: Service Area Population found in Methodologies for Calculating Baseline and Compliance Urban Per Capita Water Use, DWR 2010. (CWC Section 10631 (a)).

The City did not report their gross water use correctly. Total water production into the system is most accurately measured at the point the water enters the distribution system, which would account for total water use, including non-revenue water. A miscounting of gross water may lead to a miscalculation of annual Gallons per Capita per Day (GPCD) and Target GPCDs. A detailed explanation of gross water use calculations, including allowable exclusions, can be found in Methodologies for Calculating Baseline and Compliance Urban Per Capita Water Use, DWR 2010. (CWC Section 10608.20 (h) (1) (A)).

Service area population and gross water use both influence the calculation of gallons per capita per day (GPCD) for the baseline and target years. Because both of these have been calculated incorrectly in the original submittal of Crescent City's 2010 UWMP, it will be necessary to recalculate both the baseline and target GPCD's after gross water and population have been revised.

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Address each Demand Management Measure (DMM) listed in the Water Code by providing a description of the program currently being implemented, or, for any DMM not being implemented, provide either a cost/benefit analysis, or a plan of implementation. DMMs A (residential surveys), E (large landscape), F (washing machine rebate), I (commercial, industrial and institutional programs), and K (conservation pricing) did not properly address this requirement. (CWC Section 10631 (f) (g) and (h)).

To meet the requirements of the Water Code and to be eligible for State water grants and loans, the City should consider revising its 2010 UWMP to address the UWMP elements listed above. Revised plans must be adopted by the City's governing board following the public process specified in the UWMP Act. DWR encourages water suppliers to send drafts of the revised sections to DWR for review before adopting the revised plan.

After adoption, copies of the revised plan should be sent to DWR, the State Library, and local cities and counties. On receiving the revised plan, DWR will review the revised sections for compliance with the UWMP Act.

Please feel free to contact me if you would like to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Brostrom', with a long horizontal stroke extending to the right.

Peter Brostrom  
UWMP Program Manager  
Brostrom@water.ca.gov  
(916) 651-7034

cc: Jessica Salinas-Brown  
DWR Northern Regional Office

Gwen Huff  
DWR Headquarters