

**DEPARTMENT OF WATER RESOURCES**

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



July 8, 2014

Mr. Alan Ariki  
General Manager  
Los Angeles County Water Works District No. 40  
900 South Fremont Avenue  
Alhambra, California 91803-1331

Dear Mr. Ariki:

The Department of Water Resources (DWR) has reviewed the Los Angeles County Water Works District No. 40 (District) 2010 Urban Water Management Plan (UWMP) received July 28, 2011. 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 District'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 not calculated in accordance with Technical Methodology 2: Service Area Population, found in Methodologies for Calculating Baseline and Compliance Urban Per Capita Water Use, DWR 2010. Adjustments to baseline population estimates can affect the calculations of baseline and target water use, which should be adjusted accordingly. CWC Sections 10608.20 (f) and 10631 (a).
- Gross water use was not calculated in accordance with Technical Methodology 1: Gross Water Use, found in Methodologies for Calculating Baseline and Compliance Urban Per Capita Water Use, DWR 2010. The UWMP provided the water use from the billing data, rather than the water production into the distribution system. Total water production into the system would include all non-revenue water. Adjustments to baseline gross water use can affect the calculations of baseline and target water use, which should be adjusted accordingly. CWC Section 10608.20 (h)(1)(A).
- Water suppliers that are members of the California Urban Water Conservation Council (Council) may meet the Demand Management Measures (DMMs) requirement by submitting their evaluated 2009-2010 Council Best Management Practices (BMP) Report showing that all BMPs are "on-track". The coverage report submitted with the District's UWMP showed that the District was not in compliance ("on track") with BMPs 2.2, 3, and 5. CWC Section 10631 (j).

Mr. Alan Ariki  
July 8, 2014  
Page 2

To meet the requirements of the Water Code and to be eligible for State water grants and loans, the District should consider revising its 2010 UWMP to address the UWMP elements listed above. Revised plans must be adopted by the agency'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,



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

cc: Aracely Jaramillo  
Los Angeles County Water Works District No. 40

Kirk Allen  
Los Angeles County Water Works District No. 40

Sergio Fierro  
DWR Southern Regional Office

Gwen Huff  
DWR Headquarters