

**DEPARTMENT OF WATER RESOURCES**

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(916) 653-5791



July 10, 2014

Mr. Kenneth Bradbury  
General Manager  
Montebello Land and Water Company  
344 Madison Avenue  
Montebello, California 90640

Dear Mr. Bradbury:

The Department of Water Resources (DWR) has reviewed the Montebello Land and Water Company (Company) 2010 Urban Water Management Plan (UWMP), received July 21, 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 Company's 2010 plan has determined the following required elements have not been addressed in accordance with the Water Code:

1. 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 10631 (a) and 10608.20 (f) and (h) (1) (A).
2. Not all Demand Management Measures (DMMs) were adequately addressed 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. The descriptions of DMM B (residential plumbing retrofits), E (large landscape conservation programs), F (washing machine rebates), G (public information), H (school programs), I (commercial, institutional, and industrial programs), L (water conservation coordinator), and N (residential toilet replacement) did not properly address this requirement. CWC Section 10631 (f-h).
3. Actions to be undertaken to prepare for, and implement, during a catastrophic interruption of waters supplies was not provided. CWC Section 10632 (a) (3).

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To meet the requirements of the Water Code and to be eligible for State water grants and loans, the Company 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  
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(916) 651-7034

cc: Sergio Fierro  
DWR Southern Regional Office

Gwen Huff  
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