

**DEPARTMENT OF WATER RESOURCES**

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(916) 653-5791



July 11, 2014

Mr. Mike Story  
City Administrator  
City of Rialto  
150 S. Palm Avenue  
Rialto, California 92376

Dear Mr. Story:

The Department of Water Resources (DWR) has reviewed the City of Rialto's (City) 2010 Urban Water Management Plan (UWMP) received August 19, 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 City's 2010 plan has determined the following required elements have not been addressed in accordance with the Water Code:

- 1) Service Area Population: The UWMP did not provide the method used to determine the population for the service area, nor the population estimates for each of the baseline years. This data is the basis for determining population, baseline and target water use. Therefore, if revisions are made to the population estimates, this should also be reflected in adjustments to baseline and target water use. CWC Sections 10631 (a) and 10608.20 (e - f) and (h) (1) (A).
- 2) The City did not calculate gross water use in accordance with Technical Methodology 2: 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 is most accurately measured at the point the water enters the distribution system, which would account for total water use, including non-revenue water. Additionally, the water sales to Marigold MWC should be excluded from the reported gross water use. Adjustments to gross water estimates can affect the calculations of baseline and target water use, which should be adjusted accordingly. CWC Sections 10608.12 (g) and 10608.20 (h) (1) (A).
- 3) 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. The descriptions of DMMs A (residential surveys), F (washing machine rebate), I (commercial, institutional, and industrial programs) and N (residential toilet replacement) did not properly address this requirement. CWC Section 10631 (f - h).

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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.

If you have any questions regarding the review of the plan or urban water management planning, please don't hesitate to email or call.

Sincerely,



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UWMP Program Manager  
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(916) 651-7034

cc: Ms. Michele Aguirre  
City of Rialto

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