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
(916) 653-5791

March 21, 2014

Mr. Bill Fisher, General Manager
Stallion Springs Community Services District
Post Office Box 637
Tehachapi, California 93561

Dear Mr. Fisher:

The Department of Water Resources (DWR) has reviewed Stallion Springs Community Service District's (District) 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 District's voluntary reporting, DWR has reviewed the individual UWMP for the District. DWR's review of Plans is limited to assessing whether suppliers have addressed the required sections of the California Water Code. In its review, DWR does not evaluate or analyze the supplier's UWMP data, projections, or water management strategies.

DWR's review of Stallion Springs' 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 219 the UWMP states that the five calendar years ending December 31, 2007 were used to determine the baseline gpcd for the District. 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.

2. Amend the 2020 and 2015 Targets *Water Code Section 10608.20*
   Amend the 2015 and 2020 Targets based on the recalculation of the baseline gpcd.

3. Amend the Demand Management Measure (DMM) Section *Water Code Section 10631 (f)*
   Each of the 14 DMMs listed in Water Code Section 10631(f) must be addressed in one of the three ways noted below:
   - If implemented, include a description of an active program
   - If not implemented, include either
     - a simple cost/benefit analysis and statement addressing why it was not implemented or
     - a specific plan for implementation of the DMM.

   This was not done for DMM 2, 5, 9, or 14.

4. Include a comparison of supply and demand over the next 20 years, in5-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, Stallion Springs Community Services District 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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cc: Mr. John Martin, Manager
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