

DEPARTMENT OF WATER RESOURCES

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March 19, 2014

Mr. Jon Curry
Utility Manager
City of Tehachapi
115 South Robinson Street
Tehachapi, California 93561-8489

Dear Mr. Curry:

The Department of Water Resources (DWR) has reviewed the City of Tehachapi's (City) 2010 Urban Water Management Plan. The City 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 City 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 Districts voluntary reporting, DWR has reviewed the individual UWMP for the City of Tehachapi. DWR's review of Plans is limited to assessing whether suppliers have addressed the required legislative elements. In its review, DWR does not evaluate or analyze the supplier's UWMP data, projections, or water management strategies.

DWR's review of The City of Tehachapi's 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 151 and 152, the UWMP states that the five calendar years ending December 31, 2008 are used to determine the baseline gpcd for the City as an individual agency. 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. Using the 10 year average baseline, rather than the 5 year average baseline, the baseline gpcd will change from the reported 242 gpcd to either 236 or 233 gpcd, depending on which 10 year period is selected. See the 2010 UWMP Guidebook for a more detailed explanation of the differences in the two baselines.

- 2.) Amend the Target GPCDs Water Code Section 10608.20
The 2020 and 2015 Targets will also need to be recalculated using the correct baseline gpcc.

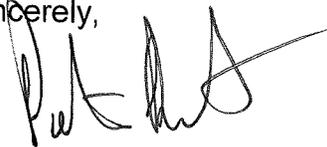
- 3.) Amend the Demand Management Measure (DMM) Section Water Code Section 10631 (f)
Each of the 14 DMMs listed in Water Code Section 10631(f) must be addressed in one of the three ways noted below:
 - If implemented, include a description of an active program
 - If not implemented, include either
 - 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, 6, or 14.

- 4.) Include a comparison of supply and demand over the next 20 years, in five-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, the City of Tehachapi 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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