

To: Users of the 2010 Draft Urban Water Management Plan Guidebook

From: Peter Brostrom/DWR
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Re: 2010 Draft Urban Water Management Plan Guidebook Addenda

The following modifications are being made to the Draft 2010 UWMP Guidebook as the final version is prepared. The comment period for the Draft 2010 UWMP Guidebook has been extended to 5pm February 8, 2011.

When existing text is being modified, deleted text is marked through and new text is shown as underlined. The text modifications shown here do not include all changes that are planned for the Final 2010 UWMP Guidebook. They are simply specific topics where additional text was requested and DWR considered relevant enough to present prior to the release of the final version of the Guidebook.

Change #1: Modification Required Element –Water Use Reduction Plan (pg. 3-3)

Explanation: Urban retail water suppliers are required to discuss their implementation plan for meeting their urban water use targets at a public hearing. To meet this requirement, the supplier must describe a general plan for meeting its urban water use target in its UWMP.

Required Elements — Water Use Reduction Plan

#2. A. Urban wholesale water suppliers shall include in the urban water management plans .. an assessment of their present and proposed future measures, programs, and policies to help achieve the water use reductions required by this part (10608.36). Urban retail water suppliers are to prepare a plan for implementing the Water Conservation Bill of 2009 requirements and conduct a public meeting which includes consideration of economic impacts (CWC §10608.26).

- Wholesale water suppliers are required to include in their UWMPs discussions of programs they intend to implement to support water demand reduction goals. Although wholesale water suppliers are not required to determine baseline daily per capita water use, urban water use target, interim urban water use target, and compliance daily per capita water use, programs that the wholesale suppliers implement may support the retail water suppliers to attain their goals and targets.
- Retail water suppliers are to develop an implementation plan for compliance with the Water Conservation Bill of 2009. The plan should provide a general description on how the

supplier intends to reduce per capita water use to meet its urban water use target. In developing the implementation plan suppliers should avoid placing a disproportionate burden on any customer sector. The plan should also discuss any potential economic impacts that may result from the water use reduction program. Suppliers of water to a United States Department of Defense military installation should consider Federal Executive Orders 13423 (*Strengthening Federal Environmental, Energy, and Transportation Management* (2007) and 13514 (*Federal Leadership in Environmental, Energy, and Economic Performance*), which identifies water use reductions targets for military facilities. The implementation plan should be included in the discussion of the supplier’s urban water use target at the urban water management plan public hearing.

Change #2: AB 1420 of 2007 and DMM Compliance Documentation (pg. E-6)

Explanation: This paragraph is being deleted to make the section consistent with other sections of the guidebook (Documenting DMM Implementation, pg. E-3). Complying with AB1420 does not meet all of the UWMP planning act requirements for demand management measures.

BMP Compliance (AB 1420)

Any urban water supplier that applies for grant or loan funds should comply with AB 1420. Compliance with AB 1420 is discussed in Part II, Section F: Related Programs

Briefly, if an urban water supplier has obtained a determination of “compliant” from DWR, it means that the urban water supplier has met one of the following four criteria:

- Has, in the past, implemented all BMPs at a coverage level determined by the CUWCC MOU; or
- Is currently implementing all BMPs at a coverage level determined by the CUWCC MOU; or
- Has submitted a schedule, budget, and finance plan to implement all BMPs at a coverage level determined by CUWCC and commencing within the first year of the agreement for which grant funds are requested; or
- Has demonstrated by providing supporting documentation that certain BMPs are “not locally cost effective.”

~~DWR has determined that if a water supplier has successfully complied with AB 1420 within 1 year of submitting its 2010 UWMP, and there are no changes to the supplier’s DMM implementation, the water supplier can submit a copy of its approved AB 1420 application to meet the UWMP DMM requirements. The water supplier must also submit a letter indicating that there have been no changes to its DMM implementation. If there have been DMM changes since any AB 1420 submittal, then the water supplier must provide its DMM information in its UWMP~~

Change #3: CUWCC Biennial Reports (pg.E-5)

Explanation: DWR originally stated that CUWCC members who wanted to adopt their plan early before the CUWCC database was complete could include a placeholder for their 2009-2010 BMP report and then include the BMP report after the database was completed without amending and readopting their plan. After further review, DWR recognized that the addition of the BMP report would represent a significant change to the plan requiring the amended plan to be adopted by the water supplier. DWR recommends that UWMPs be adopted when all the required elements are present.

CUWCC BMP Biennial Reports

If an agency is a member of the CUWCC, inclusion of its completed and approved 2009 to 2010 BMP biennial report “shall be deemed in compliance with the requirements of subdivisions (f) and (g) by complying with all the provisions of the "Memorandum of Understanding Regarding Urban Water Conservation in California," dated December 10, 2008, as it may be amended, and by submitting the annual reports required by Section 6.2 of that memorandum.” CWC 10631(j).

~~The CUWCC estimates that its online submittal system will be available in February 2011. If an urban water supplier is planning on adopting and submitting a UWMP to DWR prior to being able to submit its 2009-2010 BMP report, DWR has determined that an urban water supplier that is also a member of the CUWCC can use of the following approaches:~~

- ~~1. Complete and adopt the UWMP with a placeholder for the 2009-2010 BMP report~~
- ~~2. Complete and adopt the UWMP with the 2007-2008 BMP report~~
- ~~3. Comply with the DMM requirements as non-CUWCC member do~~

~~If an urban water supplier does the first or second approach, then the 2009-2010 BMP report must be submitted to DWR after it is completed. DWR will not require that it be adopted separately, but it can be if the water supplier determines that it needs to be for its own requirements. DWR will not be able to provide a determination of completeness for the 2010 UWMP until the 2009-2010 BMP report is received.~~

The CUWCC reviews all submitted agency BMP reports and maintains the information in a database. DWR will work closely with the CUWCC to resolve questions about submitted reports and any follow-up CUWCC did to obtain necessary clarification regarding included data.

Change #4: Water Suppliers with Multiple Service Areas (pg. D-3)

Explanation: The text below was changed to make it clear that supplier's with multiple service areas could calculate water use targets for individual service areas, but for compliance purposes must also calculate an overall target for the entire service area. Privately owned suppliers calculate the overall target at the district level.

Water Use Targets and Water Suppliers with Multiple Service Areas

Many water suppliers within the state have service areas that are at a physical distance from each other. This includes private water companies that operate separate water systems in different geographic regions of California, as well as public water suppliers that operate multiple, physically separate distribution systems. ~~Water suppliers that operate service areas as completely separate business entities (such as a private water company with multiple service areas throughout the state) can either report water use targets for each distribution area or as a whole. If a water supplier reports a single water use target for its combined service areas, a single target method must be used for all subareas and calculated by taking the weighted average of the targets. Essentially, one target method is to be used per UWMP, and the UWMP must very clearly indicate which target method the urban water supplier is using.~~

~~An urban water supplier with separate zones within its service area must provide a single daily per capita water use number and urban water use and interim targets. It must include all portions of its service area(s), whether they are physically distinct or have separate DHS number. No portion of the service area(s) may be excluded. Public water suppliers that have multiple service areas can choose to set urban water use targets for each of its service areas, but the same target method must be used for each service area. If a public water supplier sets targets for individual service areas, it must also calculate a single target for the entire area it serves. The entire area target can be the population weighted average of the individual service area targets or calculated based on data from the entire area served.~~

Private water suppliers with multiple districts should create an UWMP for each district with water supply deliveries or number of connections above the UWMP submittal threshold. If a district has multiple service areas, the private suppliers can, similar to the public suppliers, set individual targets for each service area within a single district. Private suppliers are also to use the same target method for calculating individual service area targets within a single district. Private water suppliers which set individual targets for service areas within a district must also calculate a single urban water use target for the entire district. The district target can either be a weighted average of the individual service area targets or calculated based district wide data.