

Ms. Bean,

I am still reviewing the data but I immediately see a problem in that the numbers we submitted to the Water Board for September 2014 were not truly a Residential GPCD number. At that time, we did not have a methodology to determine residential use and so this number reflects our TOTAL water production divided by number of residents as directed on the submission form provided by the Water Board. If we apply our current methodology for calculating R-GPCD our number would drop to 80.4 and move us into Tier Two. I would think that many agencies are in a similar position based on some of the questions and comments received today during a webinar with the League of California Cities this afternoon. I also believe that this methodology of using the R-GCPD does not really account for previous conservation efforts and places an unfair bias upon areas with a high population density and cooler climates. I appreciate this opportunity to submit comments to the Board and I look forward to seeing how the Water Board addresses some of the issues raised.

**James Tsumura
Water Supervisor
Community Services Department – Water Division
City of La Palma
7821 Walker Street
La Palma, CA 90623
714-690-3313 – office
jamest@cityoflapalma.org**