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REVIEW AND COMMENT

Date: April 2, 2014

To: WRAC Members

From: George Kendall and Joy Fitzhugh

Re: Agenda Item #9 – Resource Management System Update

LOS Definitions: The definition of LOS III is a concern, especially with the replacement of “*equal or exceeds*” with the much broader, sliding nature word “*deficiency*” when LOS III is described. Additionally, the use of “*deficiency*” or “*met, equal or exceeds*” is not consistently used throughout the document. Four different pages relate to these comments. Table F on page 49 uses the terms “*equals or exceeds*” and this is the appropriate terminology for all the definitions for LOS III.

Page 33, LOS III: Reinstate the next to the last paragraph on the page. “*Level of Severity III occurs when resource use exceeds the capacity of the resource.....*”

Page 37: LOS list: Reinstate the “*met or exceeded*” or possibly use “*meets or exceeds*”.

Page 42, Top of page:

Header: LOS III “*Resource Capacity is met or exceeded*”

Paragraph 1, definition: *LOS III is established when the capacity of a resource has been met or exceeded. At LOS III the resource demand is such that it equals or exceeds the resource’s capacity or dependable supply.*

This “*meet, met or exceeds*” is important for a clearer definition of the true condition of the resource. The use of the word *deficiency* can and is applied to all LOS levels, thus is not an appropriate term for clearly defining the state of the resource. Although the WRAC focuses on water, we have to remember that the above pages refer to not only water but also the other resources such as roads, air, schools, etc.

Reinstating “*depletion*”: The term “*use*” as written on page 46 could stop all use of a resource. For example the phrase “*initiate whatever restrictions are necessary to minimize or halt further resource use*” could be used to stop a farmer or rancher from any and all irrigation. On the other hand the term “*use*” could totally close a road or school. Replace “*use*” with the prior term “*depletion*”.

Page 45, LOS II, 1: Reinstate the word "*depletion*" which has been replaced with "*use*" in the action requirement.

Page 46, 2: Again, reinstate the word "*depletion*" which has been replaced with "*use*" in this action requirement.

Pages 38 LOS I Procedure, #1 and 39 LOS II Procedure: If the phrase "at this level staff" needs clarification on page 39, it would be appropriate to have the same clarification on page 38. The need to identify who staff is appears to be appropriate.

Page 41, Figure 3-1: The suggestion to replace "WRAC Recommendation" with the more generalized term "advisory bodies" is appropriate as there are Area Advisory Committees and other advisory bodies such as ALAB and the Parks Commission.

Using descriptive sections for needed information: Reinstate the informative paragraphs on pages 43, 44, 46, 47 and 48. These informational sections are beneficial as not all readers are versed in *government-ese* and these descriptions or definitions are needed for better understanding by the reader.