



SECTION 6: WATER SHORTAGE CONTINGENCY PLANNING

6.1 DOCUMENT REQUIREMENTS

6.1.1 UWMP Requirements

This section will include the following:

- Provide an urban water shortage contingency analysis that specifies stages of action, including up to a 50-percent water supply reduction, and an outline of specific water supply conditions at each stage. (CWC, 10632(a))
- Identify actions to be undertaken by the urban water supplier to prepare for, and implement during, a catastrophic interruption of water supplies including, but not limited to, a regional power outage, an earthquake, or other disaster. (CWC, 10632(c))
- Identify additional, mandatory prohibitions against specific water use practices during water shortages, including, but not limited to, prohibiting the use of potable water for street cleaning. (CWC, 10632(d))
- Specify consumption reduction methods in the most restrictive stages. Each urban water supplier may use any type of consumption reduction methods in its water shortage contingency analysis that would reduce water use, are appropriate for its area, and have the ability to achieve a water use reduction consistent with up to a 50 percent reduction in water supply. (CWC, 10632(e))
- Indicated penalties or charges for excessive use, where applicable. (CWC, 10632(f))
- Provide an analysis of the impacts of each of the actions and conditions described in subdivisions (a) to (f), inclusive, on the revenues and expenditures of the urban water supplier, and proposed measures to overcome those impacts, such as the development of reserves and rate adjustments. (CWC, 10632(g))
- Provide a draft water shortage contingency resolution or ordinance. (CWC, 10632(h))
- Indicate a mechanism for determining actual reductions in water use pursuant to the urban water shortage contingency analysis. (CWC, 10632(i))

6.1.2 AWMP REQUIREMENTS

The Drought Management Plan should detail how the water supplier would prepare for droughts and manage water supplies and allocations during drought conditions. Some components or actions may require detailed review of conditions, policy changes, and long term capital improvements. Additionally, as conditions change and new technology and knowledge becomes available, opportunities and constraints will change.



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A description of the water shortage allocation policies is required by the Water Code and will be a key component of the drought management plan. Water suppliers that have a Water Shortage Allocation Policy should attach a copy of the policy in Section VIII of the AWMP and describe the allocation plan in this section. If the supplier does not have such a policy, the agricultural water supplier can describe how reduced water supplies are allocated.

In addition to the water shortage allocation policy, the drought management plan should consider describing the following components:

- What hydraulic levels or conditions (reservoir levels, stream flows, groundwater, snowpack etc.) are monitored and measured to determine the water supply available and level of drought severity.
- The district's policy and process for declaring a water shortage and implementing the water shortage allocation and drought management plan.
- Operational Adjustments- changes in district water management and district operations to respond to drought, including canal and reservoir operations and groundwater management.
- Stages of Actions- include the stages of action and corresponding levels of drought severity that district will implement in response to the drought.
- Coordination and Collaboration- include a description on how coordination and collaboration with other local districts and water agencies or regional groups will be used in drought response.
- Revenues and Expenditures- describe how the drought and lower water allocations will affect the districts revenues and expenditures.

6.2 WATER WASTE PROHIBITIONS

6.2.1 Priorities of Water Use

Casitas MWD recognizes the following priorities for potable water:

- Public safety, health, and sanitation;
- Economic sustainability; and
- Quality of life for the Casitas MWD's customers.

Within each of the customer classifications there may be water uses that are considered non-essential to public health and sanitation and may have no significant impact to the economic productivity of western Ventura County. The non-essential water uses may be asked at any time to be curtailed during times of extreme water shortages. Casitas MWD recognizes that the agricultural crops in western Ventura County are primarily tree orchards that require a substantial period of time before becoming productive, and if fallowed will experience several years of non-production. To maintain water supplies into the future that will meet the local water demands, Casitas MWD and the public may be faced with additional decisions on water use reductions that may impact the agricultural classification.



6.2.2 Water Waste Prohibitions on Certain Uses

The Casitas MWD has the authority to restrict the use of CMWD water during any emergency caused by drought, or other threatened or existing water shortage. The Casitas MWD prohibits the wastage of CMWD water or the use of CMWD water during such periods for any purpose other than household uses or such other restricted uses as the CMWD determines to be necessary. The Casitas MWD may also prohibit use of CMWD water during such periods for specific uses which it finds to be nonessential.

Casitas MWD Resolution 15-02 includes permanently prohibited uses of water that are in effect year round (copy of Resolution 15-02 provided in **Appendix K**). Provisions of this Ordinance shall apply to all persons, corporations, public or private entities, governmental agencies or institutions, or any other direct water customers of the Casitas MWD. The water customers of other water purveyors shall be governed by the prohibitions that are adopted by the other water purveyors. The Casitas MWD water waste prohibitions include the following:

- 1) **General Waste:** Indiscriminate running of water or washing with water which is wasteful and without reason or purpose.
- 2) **Washing of Exterior Surfaces:** The washing of hard or paved surfaces, including but not limited to sidewalks, walkways, driveways, parking areas, tennis courts, patios or alleys, except when necessary to alleviate safety or sanitary hazards or when broom or other waterless device will not suffice. If necessary, washing may only be done with a bucket or similar container, a hose equipped with a positive shut-off nozzle, a pressure washer, a low-volume high pressure water efficient water broom, or a cleaning machine equipped to recycle the water used.
- 3) **Cleaning of Structures and Vehicles:** The washing of building exteriors, mobile homes, cars, boats or recreational vehicles without the use of a positive shut-off nozzle on either the hose or pressure washer.
- 4) **Watering/Irrigation Runoff Control:** The watering of grass, lawn, groundcover, shrubbery, open ground, crops and trees, including agricultural irrigation, in a manner or to an extent which allows water to run off the area being watered. Every water user is deemed to have under their control, at all times, their water distribution lines and facilities, and to know the manner and extent of their water use and run off.
- 5) **Limits on Watering Hours:** The watering or irrigating of outdoor ornamental landscapes and turf areas between the hours of 10:00 a.m. and 6:00 p.m. Pacific Standard Time on any day. (Does not apply to irrigation systems that use drip irrigation and weather-based controllers or stream rotor sprinklers that meet a 70 percent efficiency standard. Exceptions may be authorized by the General Manager where there is no ability to not water between 10:00 a.m. to 6:00 p.m.).
- 6) **Watering During Rainfall:** The watering of grass, lawn, groundcover, shrubbery, open ground, crops and trees, including agricultural irrigation, at any time while it is raining.



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- 7) **Drought Restrictions:** Watering/irrigating during publicly declared curtailment period in a manner that is not compliant with drought restrictions.
- 8) **Plumbing Leaks:** The escape of water through leaks, breaks, or malfunctions within the water user's plumbing or distribution system, for a substantial period of time within which such break or leak should reasonably have been discovered and corrected.
- 9) **Fountains and Decorative Water Features:** The operation of any ornamental fountain using water from the Casitas MWD's domestic water system unless water for such use is re-circulated.
- 10) **Cooling:** The use of water in mechanical equipment purchased and installed after the adoption of this Ordinance that utilizes a single pass cooling system. Water used for all cooling purposes shall be re-circulated.
- 11) **Drinking Water Served Upon Request Only:** Eating and drinking establishments, including but not limited to restaurants, hotels, cafes, cafeterias, bars, clubs or other public places where food or drinks are sold or served, are prohibited from providing drinking water to customers unless expressly requested. Affected establishments must prominently display notice informing their customers of this requirement using clear and easily understood language.
- 12) **Restaurant Non-water Conserving Dish Wash Spray Valves:** Food preparation establishments, such as restaurants or cafes, are prohibited from using non-water conserving dish wash spray valves.
- 13) **Providing Option to Not Launder Linen and Towels Daily:** Hotels, motels, vacation rentals and other commercial lodging establishments must provide customers the option of not having towels and linen laundered daily. Commercial lodging establishments must prominently display notice of this option in each bathroom using clear and easily understood language.
- 14) **Commercial Car Wash Systems:** Installation of non-recirculating water systems is prohibited in new or renovations of commercial conveyor car washes systems.
- 15) **Turf Irrigation Restrictions:** Irrigating turf or ornamental landscapes during and 48 hours following measurable precipitation.

6.2.3 Exempted Water Uses

- 1) All water use associated with the operation and maintenance of fire suppression equipment or employed by the Casitas MWD for water quality flushing and sanitation purposes shall be exempt from the provisions of this Ordinance.
- 2) Use of water supplied by gray water or rainwater collection system is also exempt; however, use of water from these systems is not exempt from the applicable regulations of the State and local jurisdictions governing the use of such water.
- 3) Supervised testing, adjusting, or repairing of irrigation systems is allowed any time for no more than five (5) minutes per station.



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6.2.4 Violations and Penalties.

- 1) Any person, who uses, causes to be used, or permits the use of water in violation of this Ordinance is guilty of an offense punishable as provided herein.
- 2) Enforcement of Violation. Complaints of water waste will be investigated and enforced by the Casitas MWD in the form of a notice of violation. The following officers and employees of the Casitas MWD are hereby designated and authorized to issue citations for enforcement of this Ordinance:
 - A. Operations and Maintenance Manager
 - B. Public Affairs/Water Resource Manager
 - C. Water Conservation Coordinator
 - D. Utility Workers
 - E. Employees designated by the General Manager.
- 3) Notice of Violation. A Casitas MWD notice to the water customer of a violation of this Ordinance will be issued by either a telephone call, mail, hand-delivery, or posting at the entrance of the violator's premises. The Casitas MWD will issue a written notice that state the time, place, and general description of the violation or repeat of violation, as well as a time frame in which the violation must be corrected. Casitas MWD staff may use discretion when determining the correction time.
- 4) Consequence of Violation. Administrative fines and water service actions may be levied and applied for each violation of a provision of this Ordinance as follows:
 - A. Penalties: Penalties for failure to comply with any provision of the ordinance are as follows:
 1. First Violation: The Casitas MWD will issue a written notice to the water customer and attach a copy of this Ordinance.
 2. Second Violation: If the first violation is not corrected within the time frame specified by the Casitas MWD, or if a second violation occurs within the following twelve (12) months after the first violation notice, a second notice of violation will be issued and an administrative fine of one hundred dollars (\$100.00) shall be levied for the second violation of this Ordinance.
 3. Third Violation: A third violation within the following twelve (12) months after the date of issuance of the second notice of violation is punishable by an administrative fine of two hundred fifty dollars (\$250.00).
 4. Fourth and Subsequent Violations: Each day that a violation of this Ordinance occurs beyond the remedy allowance provided in the third notice of violation is a separate offense, subject to any or all of the following penalties:
 - a. Water service may be turned off or flow may be restricted. Where water service is turned off or flow restricted, it shall be turned on or unrestricted upon correction of the violation and the payment of the reestablishment charges, staff time, and material purchases per the Casitas MWD Rates and Regulations for Water Service in effect at the time.



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- b. A fine of not more than \$600 or imprisonment in the county jail for not more than 30 days, or both the fine and imprisonment, may be imposed upon conviction under Section 71644 of the California Water Code, or fines/ penalties as defined and allowable under Section 53069.4 of the Government Code may be imposed.
- B. Payment of Administrative Fines: The water customer is responsible for the full payment of administrative fines. Each administrative fine shall be applied in the customer's regular water billing. Payment of the administrative fine will be the final responsibility of the individual named on the water account. Non-payment of fines will be subject to the same remedies as non-payment of basic water rates, in accordance with the Casitas MWD Rates and Regulations for Water Service.
- C. Appeal: Any customer against whom a penalty is levied pursuant to this Ordinance shall have the right to appeal as follows:
 1. The customer request for an appeal consideration must be in writing, legible, and received by the General Manager within ten (10) calendar days of the issuance of the notice of violation to the customer. Any determination not timely appealed shall be deemed final. The written request for appeal consideration shall include:
 - a. A description of the issue,
 - b. Evidence supporting the appeal, and
 - c. A request for resolution of the dispute.
 2. The General Manager will review the material submitted and make an independent determination of the issue, which shall be mailed to the customer within fifteen (15) calendar days of receipt of the request for appeal.
 3. The General Manager's determination may be appealed in writing within ten (10) calendar days of the mailing of the notice of determination. The appeal of the General Manager's determination shall be heard and considered by the Board of Directors at an upcoming regular meeting of the Board. Notice of the hearing shall be mailed to the customer at least ten (10) calendar days prior to the date of the appeal hearing. The Board may, in its discretion affirm, reverse, or modify the determination. The Board's determination is final.

For additional details related to Casitas MWD water waste prohibitions, see Resolution 15-02 in **Appendix K**.

6.3 STRATEGY FOR MANAGED WATER SUPPLY AND DEMAND

6.3.1 Allocation Principles

Casitas MWD has developed water allocations for all its customers. When the allocation ordinance was adopted in 1992, the ordinance set the allocation of all customers at 80 percent of 1989 usage. Allocation assignment is the connection of the individual customer water use to the Lake Casitas safe-yield. As Casitas MWD has deemed water is available for allocating to new or expanded use, Casitas MWD has created a waiting list and offered the opportunity to purchase limited water allocations to waiting list applicants. An example of water becoming available is the adaption of the Mira Monte



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Well to the Casitas MWD system, providing 300 acre-feet of new water to be allocated within the service area. For the Program, the allocation becomes the point at which excess water use charges are applied to the customer's water bill, encouraging the customer to reduce water use to a level that is at or below the allocation.

Casitas MWD water allocations are assigned to properties or water purveyors, are not transferable from one property or water purveyor to another, and may not be sold or traded by Casitas MWD customers. Casitas MWD Board of Directors reserve the right to alter allocations for any customer class at any time and the term allocation shall not mean an entitlement or imply a water right.

The communities and rural agricultural areas of western Ventura County recognize that there is a reliance on limited local groundwater and surface water supply to serve all of the beneficial uses within the Casitas MWD, and there is a local responsibility required to sustain those supplies during extended drought periods. The continuous implementation of water conservation education and measures (Best Management Practices) has had a significant influence on the beneficial use and sustainability of local water supplies. Ongoing water conservation efforts can ease the impact on normal activities during drought periods, but may not completely eliminate the need for reductions in water use during periods when Lake Casitas water supplies are severely impacted by extended drought.

The main mechanism to respond to water supply conditions is to rely on informed customers working in partnership with Casitas MWD to limit water use to no more than the assigned water allocation and support the water use limitations with appropriate conservation penalties for water use in excess of the assigned, or adjusted, allocation.

6.3.2 Water Allocation Program

Each and every water service provided by Casitas MWD is metered and a basic water use allocation is established for each customer account that provides a reasonable amount of water for the customer's needs and property characteristics. The following principles are to be followed for the Casitas MWD water allocations:

- Each Casitas MWD water service shall be assigned either a monthly water allocation in the terms of units or an annual water allocation in terms of units and acre-feet.
- Allocation shall not mean an entitlement or imply water rights in favor of the customer.
- The assignment of allocations shall be based on reasonable and necessary water use, the application of water conservation practices and standards, and other relevant factors associated with water use during Stage 1 conditions at Lake Casitas (see details related to Casitas MWD Stage Demand Reduction in **Section 6.4**).
- The Casitas MWD Board of Directors reserve the right to make individual allocation assignments and to change water allocations at any time within each classification based on the changes to the availability of water stored in Lake Casitas, changes in water use that appears to compromise the reliability of the Lake Casitas water supply, and changes in water conservation practices and standards.



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- Water allocations provided by Casitas MWD are assigned to property or water purveyors and are not transferrable from one property or water purveyor to another.
- Casitas MWD's water allocations shall not be sold, exported, bartered or traded by or between Casitas MWD's customers.
- Casitas MWD water allocated shall not be transported from the property or by any agency served to any other property or agency without prior written agreement with Casitas MWD.

6.3.3 Allocation Assignments to Water Service Classifications

Casitas MWD has established the definitions of water customer classifications as provided by the Casitas MWD Rates and Regulations for Water Service and has made specific allocation assignments to each and every water account by either (1) written agreement, or (2) the application of historical water use data, or (3) the application of documented water use standards. Where deemed necessary, Casitas MWD may perform site specific water use audits and survey to determine the appropriate level of allocation to be assigned to anyone service connection or customer. Water allocations may change by action of the Casitas MWD Board of Directors based on the Lake Casitas storage level or trend, water use trends, and the performance by customer classification in meeting water consumption reduction goals.

The following subsections describe the method used to assign the water allocation for each classification of water service at **Stage 1** condition:

6.3.3.1 Business

The following applies to “Business” accounts:

- 1) Water allocation shall be specified as an **annual** allocation based on a fiscal year (July 1st to June 30th).
- 2) Allocation assigned by recorded agreement; or
- 3) Where not defined by recorded agreement, the lesser of the historical water consumption recorded for either 80 percent of the fiscal year 1989-1990 water use or the fiscal year 2012-2013 water use. An exception can be determined when usage is at or near zero during one of these periods. Estimated usage will be based on reasonable usage that does not include unauthorized expansion of facilities.

6.3.3.2 Fire

There is no water allocation for the “Fire” account classification. This water use is for emergency only, and not a part of a continuing annual water use.

6.3.3.3 Industrial

The following applies to “Industrial” accounts:

- 1) Water allocation shall be specified as an **annual** allocation based on a fiscal year (July 1st to June 30th).
- 2) Allocation assigned by recorded agreement; or



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- 3) Where not defined by recorded agreement, the lesser of historical water consumption recorded for either the 80% of the fiscal year 1989-1990 water use or the fiscal year 2012-2013 water use. An exception can be determined when usage is at or near zero during one of these periods. Estimated usage will be based on reasonable usage that does not include unauthorized expansion of facilities.

6.3.3.4 Interdepartmental

The following applies to “Interdepartmental” accounts:

- 1) Water allocation shall be specified as an annual allocation based on a fiscal year (July 1st to June 30th).
- 2) The annual allocations for individual Interdepartmental classification services shall be based on the fiscal year 2012-2013 water use. An exception can be determined when usage is at or near zero during one of these periods. Estimated usage will be based on reasonable usage that does not include unauthorized expansion of facilities.

6.3.3.5 Irrigation (Commercial Agriculture)

The following applies to “Irrigation” accounts:

- 1) Water allocation shall be specified as an annual allocation based on a fiscal year (July 1st to June 30th).
- 2) June 30th).
- 3) Qualifying acreage for each Irrigation account shall be limited to acreage that can be identified as under irrigation prior to March 1, 1992. There will be no allocation for irrigation acreage that has been expanded after March 1, 1992, except as otherwise approved in written and recorded agreement between Casitas MWD and the property owner. Casitas MWD's records and mapping will be the standard for the identification of lands in irrigation prior to March 1, 1992.
- 4) Allocation assignments to lands served by multiple meter services shall consider the proportion of the allocation that each meter is intended to serve. The aggregation of meter readings and allocations from multiple meters shall not be allowed.
- 5) The Stage 1 water allocation assigned to each Irrigation water account is the greater volume of either (1) the water use recorded at each meter service during fiscal year 2012-2013 or (2) eighty (80) percent of recorded water volume metered to the account in fiscal year 1989-1990, neither of which shall exceed a water volume of 3 acre-feet per acre applied to the qualifying acreage.
- 6) The residential water use for Agricultural/Domestic classification that is directly associated with the irrigation shall be considered as Irrigation for purpose of allocation assignments and meeting the demand reduction requirements for Irrigation.

6.3.3.6 Multiple-Family Residential

The following applies to “Multiple-family residential” accounts:

- 1) Stage 1 water allocations are assigned to each existing Multiple-Family Residential account by either a recorded agreement or based on the standards set in 1992 by Casitas MWD.



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- 2) The Multiple-Family Residential water allocation for each account shall be distributed by either a monthly or hi-monthly scheduling of the allocation.
- 3) A part of the Multiple-Family Residential allocation is provided for health and sanitation and shall be set at **120 units per year per dwelling**, distributed evenly as 10 units per month for each dwelling.
- 4) The essential water use portion of the allocation is not subject to adjustment by the Staged Demand Reduction Program, unless otherwise deemed by the Board to be a necessity during extreme water supply conditions or during emergencies.
- 5) The part of the Multiple-Family Residential allocation that is in excess of the essential allocation shall be specified as a monthly allocation and distributed proportionally to reflect varying seasonal water use, as indicated in **Table 6-1**:

**TABLE 6-1
ANNUAL DISTRIBUTION OF SEASONAL ALLOCATION FOR RESIDENTIAL ACCOUNTS**

Month	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Percent of Total Annual Allocation	0.17	0.17	0.13	0.05	0.05	0.05	0.02	0.02	0.02	0.10	0.10	0.12

Notes:
Source, CMWD, 2016.

The part of the Multiple-Family Residential allocation that is in excess of the essential allocation is subject to adjustment by the Staged Demand Reduction Program.

- 6) Where not previously assigned a residential allocation, a residential allocation shall be based on the following:
 - a) The essential health and sanitation portion of the residential allocation shall be set at **120 units per year per year per dwelling**, and distributed evenly as 10 units each month of the year.
 - b) Non-essential portion of the annual residential allocation shall be based on a maximum limit of 1.99 acres (86,684 square feet) of irrigated landscape area and set as follows:
 - i. For the first 5,000 square feet of landscape area, 15 gallons per square foot;
 - ii. For the next 10,000 square feet of landscape area, 10 gallons per square foot
 - iii. For the next increment up to 71,684 square feet of landscape area, 3 gallons per square foot.



6.3.3.7 Other

The following applies to “Other” accounts:

- 1) Water allocation shall be specified as an **annual** allocation based on a fiscal year (July 1st to June 30th).
- 2) Allocation assigned by recorded agreement; or
- 3) Where not defined by recorded agreement, the lesser of historical water consumption of either the 80 percent of the 1989-1990 water use or the Fiscal Year 2012-2013 water use. An exception can be determined when usage is at or near zero during one of these periods. Estimated usage will be based on reasonable usage that does not include unauthorized expansion of facilities.

6.3.3.8 Resale

The following applies to “Resale” accounts:

- 1) Water allocation shall be specified as an **annual** allocation based on a fiscal year (July 1st to June 30th).
- 2) The Stage 1 allocation for each individual Resale customer shall be mutually agreed to by each water agency and Casitas MWD, be incorporated into a memorandum of understanding (MOU), and assigned to provide water to supplement the Resale agency's primary source of water supply. An annual adjustment to the allocation assignment may be a condition of the MOU.
- 3) An objective of a MOU is to achieve parity between the Resale agency customers and Casitas MWD customers in applying similar overall water use restrictions and financial penalties in each Stage.
- 4) The Resale agency shall determine the reliability of its water sources and ensure that the annual water requirements from Casitas MWD do not exceed their annual water allocation from CMWD.
- 5) The allocation assignment from Casitas MWD shall not be used by the Resale agency for growth within the Resale service area, unless additional allocation for growth is authorized by written agreement with CMWD.
- 6) The Resale agency shall implement water conservation measures in accordance with the State's or California Urban Water Conservation Council's Best Management Practices, responsibly maintain water system metering and pipeline systems to reduce water losses, and when necessary or when asked to do so, implement water demand reduction measures similar to or more restrictive than those imposed by Casitas MWD to assure the continued availability of water for health and safety purposes.

6.3.3.9 Residential

The following applies to “Residential” accounts:

- 1) Stage 1 water allocations are assigned to each existing Residential account by either a recorded agreement or based on the standards set in 1992 by Casitas MWD.



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- 2) The Residential water allocation for each account shall be distributed by either a monthly or bi-monthly scheduling of the allocation.
- 3) A part of the Residential Allocation is provided for health and sanitation and shall be set at **120 units per year**, distributed evenly as 10 units per month for each dwelling.
- 4) The essential water use portion of the allocation is not subject to adjustment by the Staged Demand Reduction Program, unless otherwise deemed by the Board to be a necessity during extreme water supply conditions or during emergencies.
- 5) The part of the Residential Allocation that is in excess of the essential allocation shall be specified as a monthly allocation and distributed proportionally to reflect varying seasonal water use, as indicated in **Table 6-1**. The part of the Residential Allocation that is in excess of the essential allocation is subject to adjustment by the Staged Demand Reduction Program.
- 6) Where not previously assigned a residential allocation, a residential allocation shall be based on the following:
 - b) The essential health and sanitation portion of the residential allocation shall be set at **120 units per year per year per dwelling**, distributed evenly as 10 units each month of the year.
 - c) Non-essential portion of the annual residential allocation shall be based on a maximum limit of 1.99 acres (86,684 square feet) of irrigated landscape area and set as follows:
 - i. For the first 5,000 square feet of landscape area, 15 gallons per square foot;
 - ii. For the next 10,000 square feet of landscape area, 10 gallons per square foot
 - iii. For the next increment up to 71,684 square feet of landscape area, 3 gallons per square foot.

6.3.3.10 Temporary

The following applies to “Temporary” accounts:

- 1) There is no water allocation assigned for the Temporary classification. Temporary water service is not property related on a permanent basis.
- 2) Temporary water use is limited for a short-term of six months or less, for such purposes as construction projects, or short-term water supply emergencies, or temporary backup water to non-metered agricultural parcels.
- 3) Temporary meters that are issued to serve supplemental commercial irrigation shall be temporarily allocated water based on the allocation assignment provided at the time of the application for the Temporary service based on the same water use standards as provided for the Irrigation classification, and reduced by Stage conditions. The allocation does not extend beyond the period of the temporary water service application of six (6) months, unless the Casitas MWD Board of Directors approves a limited continuance of the temporary service.



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6.3.4 Allocation Adjustments.

A Casitas MWD customer may request the reconsideration of their initial assigned Stage 1 water allocation where the request does not include a consideration for either an expansion in the area of use or new construction. The customer shall submit a water allocation adjustment application in order to have their request considered by the General Manager of the Casitas MWD. The information contained on the application may be subject to an audit and, if necessary, additional documentation may be required in order to substantiate the requested adjustment.

Adjustments to water allocations that have been assigned through a recorded Water Service Agreement between the property owner, or prior property owner, and Casitas MWD must proceed through an amendatory agreement, will be subject to the capital facility charges for the amount of water provided as the allocation adjustment, and subject to the availability of water allocations.

Adjustments to water allocations will not be granted in amounts that exceed 80 percent of the FY 1989-90 metered usage of water by the meter service account without prior Board approval.

6.3.5 Standards for a Water Allocation Adjustment

Water allocation adjustments may be considered by Casitas MWD during initiation of the WEAP that appropriately assigns a Stage 1 allocation, to ensure that the needs of the water customer are reasonably balanced against the purpose of this Plan. Water allocations may be considered for adjustment for the following:

- Correction of irrigable area square footage;
- Correction of number of dwelling units (Multi-family accounts only);
- Exemption granted for a licensed in-home childcare or elderly care facility.

Water allocations will not be adjusted to accommodate the following:

- Pools, ponds, spas, or hot tubs;
- In-home businesses or hobbies that use an increased amount of water;
- Gardens and orchards;
- Homeowner's Association requirements for turf areas in excess of that water allocation specified by Casitas MWD for a Residential classification;
- Where an allocation has been assigned through a recorded agreement.

Agricultural Irrigation Allocation Adjustment Standards include the following:

- Limited to acreage planted in commercial agricultural production prior to March 1, 1992. Casitas MWD shall also consider the assignment of an appropriate allocation to lands that are verified as being in a crop rotation status, or temporarily in a fallowed state, having been in a planted status prior to March 1, 1992.



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- Comparative (same crop type and average use of various parcels) crop usage in fiscal year 2012-2013 for full irrigation, not to exceed 3 AF/acre/year, which is located within a 1-mile circumference of the parcel seeking the appeal for a change in water allocation.

6.3.6 Appeals Process

Customers that are denied an adjustment of water allocation may request a review of the request by submitting a written appeal to the Casitas Water Resources Manager stating the nature of the appeal. The appeal shall be reviewed by the Casitas Water Resources Manager and a recommendation shall be reported to the General Manager. The decision of the General Manager shall be reported to the customer in written form. If the customer is not satisfied with the General Manager's decision, the customer must request within 10 days that the appeal be placed on the agenda of the Casitas MWD Board of Directors. The determination by the Casitas MWD Board shall be final.

6.3.7 Availability of Allocations

The determination of supplies being available for issuance of new allocations of water shall be made upon staff recommendation at a regular Casitas MWD Board of Directors meeting. The determination that water is or is not available shall be within the determination of the Casitas MWD Board. The determination that a supply is available shall be based upon more detailed information about existing supplies, the availability of new supplies, new water supply projects, or contracts or proposed contracts for additional supplies where, in the opinion of the Casitas MWD Board, the supply of water is definite enough to provide the assurance to the County of Ventura that there is a forty-year supply.

6.3.8 Allocation for New or Expanded Water Uses

A customer may request a change to a water allocation assignment for the purposes of obtaining new or expanded use of water that is associated with a new building permit, new or existing conditional use permit, or agricultural irrigation acreage expansion. The approval of an addition or change to the water allocation for new and/or expanded water allocation is subject to Casitas MWD's discretion on the limits of available water allocation and subject to the charges for new and/or expanded water allocation.

When the Board of Directors determine that additional new water supplies are available, either from the safe yield of the existing Casitas MWD project supply or additional new supplies, supplies shall be allocated in accordance with the following criteria:

- No single property owner or applicant for the given type of service (municipal, industrial or agricultural) shall receive a new water allocation greater than 10 percent of the total new available supply or the minimum standard residential allocation, whichever is greater. If the applicant's allocation requirements are not fully met, the applicant may maintain a position of priority until more water is available.
- All applicants seeking an allocation shall provide Casitas MWD with a detailed description of the project, the use of water for which the water is sought, and information on peak flow and annual water requirements. Casitas MWD shall determine meter size and amount of allocation based upon reasonable and necessary needs and Casitas MWD's Rates and Regulations.



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- The amount of water to be allocated shall be at Casitas MWD's sole discretion. The assignment of an allocation shall be limited to the availability of water from the Lake Casitas safe yield, and be based on current water demand factors as adopted by the Casitas MWD and as amended. The amount of water required for the project may be calculated and submitted for the consideration of Casitas MWD by a civil engineer, registered in the State of California, representing the project proponent.

6.4 STAGED DEMAND REDUCTION PRINCIPLES

6.4.1 Staged Demand Reduction Principles

The primary source of water that is available to the Casitas MWD is the amount of water stored behind Casitas Dam, forming Lake Casitas. The quantity of water stored in Lake Casitas is dependent upon the local hydrology, watershed conditions, diversions from the Ventura River, and the outflow from lake evaporation and water deliveries to beneficial uses. There may be times during which Casitas MWD must consider implementing staged water demand reductions to ensure a sustainable water supply and prevent a complete depletion of water supply in Lake Casitas. The Casitas MWD has assigned five stages of water storage in Lake Casitas that serve as a guidance to triggering the implementation of water use reduction goals and measures. The overarching goals of the Staged Demand Reduction Program are the following:

- 3) conserving the water supply for the greatest priority and public benefit; and
- 4) mitigating the effects of a water shortage on public health, safety, and economic activity.

6.4.2 Water Resource Conditions and Actions.

The General Manager shall report to the Board of Directors each year with an assessment of the current water storage in Lake Casitas and local groundwater basins, current water use trends, predicted weather conditions, and an evaluation of current water use reduction goals. The time of the reporting can be each April, as the rainfall season is ending and water resources can be evaluated at the maximum for the year, or as Lake Casitas storage reaches a change in Stage action level.

The Casitas MWD Board of Directors may, at their sole discretion, declare that a Stage condition of water supply in Lake Casitas exists and implement the appropriate demand reduction goals and measures in response to current and/or predicted water availability conditions. The resolutions will address a particular water shortage with the appropriate guidelines, procedures and regulations, and to announce to the public the implementation of the Water Shortage Contingency Plan. Provisions of the resolution shall be developed and implemented in a timely manner to provide water service during emergency conditions to all of Casitas MWD's customers in a fair and equitable manner and in recognition of the given conditions.

Casitas MWD has established the implementation of various Stages of action based on the amount of water in storage in Lake Casitas, as shown in **Table 6-2** (see also **Appendix E Table 8-1**). As previously noted in **Section 4.2**, the safe-yield from the Lake Casitas Project is 20,840 acre-feet.



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An action to declare and implement a Stage may be by either an action by Casitas MWD Board based on unanticipated changing lake supply conditions or by the following schedule in **Table 6-3**.

**TABLE 6-2
STAGE CONDITIONS**

Stage	Stage Title	Lake Casitas Storage (%)	Lake Casitas Storage Action Level (AF)
1	Water Conservation	100% to 50%	254,000 to 127,000
2	Water Shortage Warning	50% to 40%	127,000 to 100,000
3	Water Shortage Eminent	40% to 30%	100,000 to 75,000
4	Severe Water Shortage	30% to 25%	75,000 to 65,000
5	Critical Water Shortage	25% to 0%	65,000 to 3,000

Notes:
Source, CMWD, 2016.

**TABLE 6-3
STAGE ACTION SCHEDULE**

Target Dates	
June – April	Monitor water demands, rainfall, reservoir level trend, groundwater trends, and diversion and runoff amounts.
Early April	Staff presents water status report and a recommendation to the Casitas MWD Board. Publish a notice of a public hearing if changes are recommended.
Late April	Casitas MWD Board formally declares a Stage, and/or water shortage emergency, adopts recommendations for demand reduction actions.
May	Customer Notification of change in Stage, allocation, and conservation surcharge.
June	Stage demand reduction actions are effective and are implemented.

Notes:
Source, CMWD, 2016.

6.4.3 Demand Reduction Goals and Measures.

Demand reduction goals and measures begin with Stage 1, where reasonable and appropriate water allocation assignments are made to each Casitas MWD service connection. End water users are encouraged to implement Best Management Practices that conform to State requirements for water conservation and water use efficiency measures. Upon determination of a Stage 2 condition and continuing through Stage 5 conditions, the primary actions to achieve the demand reduction goal is the adjustment of allocations that were made available for each classification during Stage 1 by a



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reduction of the allocation during the duration of the declared Stage condition. See **Table 6-4** for staged water demand reductions by customer classification.

6.4.4 Stage Adjustments to Allocations.

The five stages of storage in Lake Casitas (see **Table 6-2**) and the initial guideline for water allocation adjustments for each classification at each Stage are presented in **Table 6-4**. Upon recommendation of the General Manager and approval of the Board of Directors at the onset of a specific Stage, the Casitas MWD shall apply appropriate demand reduction factors to the allocations for each customer classification, as deemed necessary. The Board retains the sole discretion to make allocation changes as a result of declaring a change in Stage, or during any Stage, that are more or less severe than that provided in **Table 6-4**. Examples of applying this discretion may include, but not be limited to, the change in any water resource conditions or the demand reduction goals are not being attained by the customer classification.

**TABLE 6-4
STAGE WATER DEMAND REDUCTIONS FOR WATER CLASSIFICATIONS**

Demand Reduction Stage (1)	1 (2)	2	3	4	5
Volume range of Lake Casitas	254,000 to 127,000	127,000 to 100,000	100,000 to 75,000	75,000 to 65,000	65,000 to 3,000
Percent Lake Casitas storage	100% - 50%	50% - 40%	40% - 30%	30% - 25%	25% - 0%
Water use reduction response goal	20%	20%	30%	40%	50%
Residential and Multiple-family Residential					
Essential use	0%	0%	0%	0%	0%
Non-essential use	20%	20%	50%	80%	100%
Business	20%	20%	30%	40%	50%
Industrial	20%	20%	30%	40%	50%
Other	20%	20%	30%	40%	50%
Resale	20%	20%	30%	40%	50%
Irrigation	20%	20%	30%	40%	50%
Interdepartmental	20%	20%	30%	40%	50%

Notes:

- (1) Source, CMWD, 2016.
- (2) Initial Stage 1 Allocations include a 20% reduction from the 1989-1990 demands.

Essential use allocations will remain the same and not adjusted, except as otherwise determined by the Casitas MWD Board to be a necessity to preserve water supply during extreme conditions. Measures to achieve the demand reduction goal may be selected from a menu of options as provided in **Table 6-5**, or should water supply conditions become worse than anticipated the Casitas MWD Board may adopt more stringent requirements as deemed necessary.



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**TABLE 6-5
STAGE ACTIONS AND WATER DEMAND REDUCTION MEASURES**

Water Shortage Condition	Key CMWD Communications And Actions	Customer Demand Reduction Measures	Penalties and Rates
<p>Stage 1</p> <p>Supply Range: 100%-50%</p> <p>Demand Reduction: 0%</p> <p>(80% of 1989 use)</p>	<ul style="list-style-type: none"> • Initiate public information and advertising campaign. • Publicize ways to reduce water consumption. • Coordinate conservation actions with other water purveyors and cities. • Perform water audits and promote water efficient use/conversions. • Conduct water workshops. • Temporary staffing for public inquiries, as needed. 	<ul style="list-style-type: none"> • Water Conservation practices requested of all customer classifications. • Adhere to Water Wise Prohibition Ordinance. • Adhere to assigned water allocation or less. 	<ul style="list-style-type: none"> • Consider and implement conservation penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.
<p>Stage 2</p> <p>Supply Range: 50%-40%</p> <p>Demand Reduction from Stage 1 Allocation: 20%</p>	<ul style="list-style-type: none"> • Declare Stage 2 • Implement demand reductions for each customer classification. • Intensify public information campaign. • Optimize existing water resources. • Intensify leak detection. • Develop appeals staffing. • Consult with major customers to develop conservation plans and water use audits. 	<ul style="list-style-type: none"> • Continue all Stage 1 measures. • Landscape watering restricted to two (2) watering days per week. • Require water audits for large water users; implement recommendations of the water audits. • Businesses display “save water” signage. • Increase public information. 	<ul style="list-style-type: none"> • Consider and implement conservation penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.
<p>Stage 3</p> <p>Supply Range: 40%-30%</p> <p>Demand Reduction from Stage 1 Allocation: 30%</p>	<ul style="list-style-type: none"> • Declare Stage 3 • Implement demand reductions for each customer classification. • Expand and intensify public information campaign. • Provide regular briefing, publish monthly consumption report. • Hire additional temporary staff in customer service, conservation, and water distribution. Water waste enforcement. • Consider moratorium on new service connections. 	<ul style="list-style-type: none"> • Continue with Stage 1 and 2 measures. • Reduced water allocations. • Landscape watering restricted to one (1) watering day per week. • No landscape changes unless xeriscape. 	<ul style="list-style-type: none"> • Consider and implement conservation penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.



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Water Shortage Condition	Key CMWD Communications And Actions	Customer Demand Reduction Measures	Penalties and Rates
<p>Stage 4</p> <p>Supply Range: 30%-25%</p> <p>Demand Reduction from Stage 1 Allocation: 40%</p>	<ul style="list-style-type: none"> • Declare Stage 4 • Implement demand reductions for each customer classification. • Continue to provide regular media briefings. • Scale up appeals. • Open drought information center. 	<ul style="list-style-type: none"> • Continue with Stage 1 through 3 measures. • Reduced water allocations. • Landscape watering restricted to one (1) watering day per week. • Implement restrictive irrigation delivery schedule. • Minimal water for large landscapes. • Consider prohibition of filling swimming pools and fountains. • Implement restrictive irrigation delivery schedule and quantities greater than 60%. 	<ul style="list-style-type: none"> • Consider and implement conservation penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.
<p>Stage 5</p> <p>Supply Range: 25%-0%</p> <p>Demand Reduction from Stage 1 Allocation: 50%</p>	<ul style="list-style-type: none"> • Declare Stage 5 • Implement demand reductions for each customer classification. • Minimize outdoor water use and non-essential uses. • Implement aggressive public outreach and education program. • Implement crisis communications plan. • Coordinate with State and local agencies to address enforcement challenges. • Water Shortage Emergency declaration to be considered. 	<ul style="list-style-type: none"> • Continue with Stage 1 through 4 measures. • Reduced water allocations. • Rescind temporary meters issued. • No turf irrigation. • Implement restrictive irrigation delivery schedule and quantities greater than 50%. 	<ul style="list-style-type: none"> • Consider and implement conservation penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.

Notes:
Source, CMWD, 2016.

6.4.5 Customer Notification

The customers of each and every classification shall be notified in a timely and appropriate manner of any and all actions to declare and implement Demand Reduction Stage. The methods of communication to the customer shall be through direct mailings, public meetings, and billing information that provides the customer the comparison of water use with allocation.



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6.4.6 Water Use Reduction Monitoring

During the implementation of the Program, Casitas MWD will perform water use monitoring procedures. Casitas MWD monitors water use throughout the Casitas MWD service area through SCADA at the Casitas Dam source, all pump plants and reservoirs. In addition, all service connection to the Casitas MWD distribution system are metered and monitored on a month or bi-monthly basis. Casitas MWD can detect irregularly high water use within a pressure zone and inquiry and identify the location of the irregular water use. Significant customer increases in water use are investigated by Casitas MWD staff. In general, monitoring of water use is performed during each stage as follows, but may be intensified if conditions warrant:

6.4.6.1 Stages 1 through 4

Water supply conditions, production data and reservoir elevations are recorded daily. Daily and monthly totals are supplied through the Engineering Department and incorporated into the Water Supply Report. Monthly reports include usage and total allocations for each customer category. A list of individual customers whose usage exceeds their allocation is submitted to the Water Conservation Supervisor for monitoring and outreach to assist the customer in attaining the water use reduction goals.

6.4.6.2 Stage 5

Water use monitoring will occur as in Stages 1 through 4 and water production data from the Casitas Dam will be reported to the General Manager on a daily basis.

6.4.7 Water Rates and Conservation Penalty

The Casitas MWD Board of Directors shall annually consider the setting or adjustment of water rates that reflect the cost of water service, consistent with State law. Casitas MWD has implemented a four tier inclining rate structure for the Residential and Multiple-family Residential classifications that represents the proportional cost of service that is attributable to the parcel that is served water.

The Casitas MWD Board of Directors shall annually set the Conservation Penalty for each classification that will be applied to each individual customer billing for each unit of water that is in excess of the customer's allocation, or the adjusted allocation pursuant to a change in Stage. The Conservation Penalty is a regulatory fee that is imposed to curtail the potential for adverse effects of excessive water consumption. Upon determination of a change in Stage, or at such time the Board deems that the customer response does not appear to attain the desired demand reduction goals, the Board may consider the modification of the Conservation Penalty. Revenues recovered from the Conservation Penalty will supplement Casitas MWD's water conservation costs and provide revenue for water shortage related projects. Implementing changes to the WEAP (2015, copy provided in **Appendix K**) will require utility billing system software changes to incorporate the Stage allocations as directed by the Board, as well as including the water use information and Conservation Penalty into the normal billing process.

The Casitas MWD Board of Directors approved Resolution 15-30 which authorized implementation of a Conservation Penalty, imposed as a regulatory charge, be set at \$1.00 per each unit of water use



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that is in excess of the individual customer's assigned monthly water allocation to each Casitas MWD Residential and Multi-Residential account. This Conservation Penalty will be billed monthly for Residential and Multi-Residential accounts. A conservation penalty, imposed as a regulatory charge, of \$0.25 be applied to each unit of water use that is in excess of the assigned annual allocation to individual customers of the Agricultural, Agricultural-domestic, Industrial, Business, Interdepartmental, Other, and Resale accounts. This Conservation Penalty will be billed at the end of the fiscal year to each individual customer that has accrued an excess water use. A copy of Resolution 15-30 is provided in **Appendix K**.

6.4.8 Appeals for Exception to Staged Adjustments of Allocation

A Casitas MWD customer may request consideration of an exception to the staged adjustments of allocation based on the following findings being present:

- 1) The Staged adjustment would cause a condition affecting the health, sanitation, fire protection, or safety of the applicant or the public;
- 2) Strict application of the allotment provisions imposes a severe or undue hardship on a particular business, or renders it infeasible for a business or class of business to remain in operation;
- 3) Hospitals and health care facilities using industry best management practices are eligible for an exception;
- 4) The business has already implemented environmental sustainability measures reducing water consumption to the maximum extent possible.

An exception must be presented to the Casitas MWD in writing with supporting documentation or substantial evidence demonstrating the need for an exemption. The exemption application will be reviewed, approved or denied, by the Casitas Water Resources Manager. Customers that are denied an exemption may request a review of the request by submitting a written appeal to the Casitas MWD Water Resources Manager stating the nature of the appeal. The appeal shall be reviewed by the Casitas MWD Water Resources Manager and a recommendation shall be reported to the General Manager. The decision of the General Manager shall be reported to the customer in written form. If the customer is not satisfied with the General Manager's decision, the customer must request within 10 days that the appeal be placed on the agenda of the Casitas MWD Board of Directors. The determination by the Casitas MWD Board of Directors shall be final.

6.4.9 Current Stage

The Casitas MWD Board of Directors approved Resolution 16-XX on April 27, 2016, which authorized staff to implement Stage 3 measures. A copy of Resolution 16-XX is provided in **Appendix K**. Casitas MWD will select from a menu of options to achieve the Stage 3 demand reduction goal as provided in **Table 6-5**.



6.5 PREPARATION FOR INTERRUPTION IN WATER SUPPLY

This section of the UWMP/AWMP provides the actions to be taken by the urban water supplier to prepare for, and implement during a catastrophic interruption of water supplies, including but not limited to a regional power outage, an earthquake, or other disaster.

6.5.1 Casitas MWD Actions

The Casitas MWD has prepared a Water Shortage Contingency Plan (Resolution 92-11), that addresses emergencies under short-term catastrophic events, and long-term water shortages that may occur as a result of a prolonged drought. A water shortage emergency may be determined to exist in the event of a short-term interruption of water supply or as a result of long-term diminishment of the Lake Casitas water supply. A short-term interruption of water supply can be the result of earthquakes, regional power outages, landslides, or other major and minor events that impact Casitas MWD water facilities or supply. These events are more often a short term interruption of water supplies until the water system can be restored to the customers. A long-term or service area-wide condition may be the result of drought conditions or a reduction in local water supplies that will require long-term water supply-demand management. The Casitas MWD response to a short-term interruption of water supply may cause the implementation of the Casitas MWD Emergency Action Plan that is structured under the State's Standardized Emergency Management System (SEMS), in coordination with federal, state and county emergency response planning that provides the framework for an organized response to catastrophic events.

Catastrophic events include non-drought related events. In the occurrence of a catastrophic event involving facilities and/or water service area sources, Casitas MWD personnel must respond to the emergency in an organized and methodical manner. Casitas MWD has as its resource tool for emergency response the Casitas Dam Emergency Action Plan and the Casitas MWD Emergency Response Plan (2004a). Each plan has been prepared and practiced with federal, state, and county emergency response agencies to provide a coordinated response to emergency conditions. Casitas MWD has also performed vulnerability assessments for each facility and have improved facilities to lessen the potential impacts of catastrophic events. The Casitas Dam is of special interest and coordination with the United States Bureau of Reclamation due to its importance and risk. Each emergency plan provides specific levels of response for various conditions, making the response fit appropriately to the degree of the emergency, and providing for an escalation or de-escalation of the response to match conditions found in the event area. The emergency plan will be implemented at the local level, damage assessments conducted and reported, and if warranted, actions will be taken by Casitas MWD during and following the emergency event, and Casitas MWD may request additional assistance through the Ventura County Office of Emergency Services.

A key element to the Casitas MWD Emergency Response Plan (2004a) is the Communications section, which provides the public communications strategy, water quality notification plan, and directions for public and agency notifications in the event of a water emergency. In the event of a catastrophic interruption of water supply, the respective emergency plan will be implemented and the affected areas notified of water supply outages and/or water quality actions. Casitas MWD



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notification plan considers the use of direct telephone notification, media outlets (radio and television), posting individual service hang tags, and notification over the emergency broadcast network. Casitas MWD keeps and updates the contact information on an annual basis, or as the customer of record changes.

The Casitas MWD water system relies on Lake Casitas as the main source of water supply and the groundwater basin agencies as the backup water sources to Lake Casitas. It should be noted that the groundwater supplies are generally limited in storage capacity and ability to instantaneously deliver water to the Casitas MWD system, and interagency agreement is sought for specific and limited emergency conditions. Casitas MWD does have interconnection with most groundwater agencies in the Casitas MWD service area. Beyond the Lake Casitas source, Casitas MWD has approximately 22 million gallon of water storage in the distribution system to provide approximately three days of reserve water supply. Casitas MWD also has four portable water tanks (water buffalos), 500 gallons each, for placing in residential areas during isolated water outages. Casitas MWD may also employ contract water trucks to provide water to residential areas during major water outages. Casitas MWD will respond to water outages with a pipeline repair crew, contract pipeline crews, engineers, water quality and customer service personnel, and may request assistance from local, state, and federal agencies, as warranted.

6.5.2 Examples of Events That May Cause Interruption of Water Supply

Examples of short-term and long-term events that may result in a local water supply interruption include, but are not limited to, the following:

- Earthquake
- Power outage
- Chemical/toxic spill in Lake Casitas
- California Department of Drinking Water determination groundwater basin is contaminated
- Sudden deterioration of water quality in Lake Casitas
- Interruption of service due to pipeline break, loss of pumping plant, chlorination station, etc.
- Immediate hazard to public health
- Extensive local drought reducing levels in Lake Casitas
- Uncontrolled watershed burn resulting in flooding, thereby impacting water served from lake Casitas MWD due to one or more of the following:
 - * High turbidity
 - * Bacteriological quality
 - * High organic content
 - * Damage to distribution system.



6.5.3 Prohibitions, Penalties and Consumption Reduction Methods

In the event of a short-term emergency for which Casitas MWD has a definite plan and schedule to restore its system to pre-disaster condition, Casitas MWD may implement water use restrictions in accordance with the adopted Water Efficiency and Allocation Program (copy provided in **Appendix K**). Casitas MWD may further make requests of agricultural and resale accounts to move to alternate water sources and curtail water demands. If the emergency conditions persist, Casitas MWD may consider a shift to a more restrictive Stage of the Water Allocation and Efficiency Program, applying limits to water use allocations and incentive rates to meet water use goals during the emergency. Additional restrictions may be considered and implemented upon direction from the Casitas MWD Board to include, but not limited to, prohibiting the use of potable water for street cleaning. Additional action may include, but not limited to, the installation of flow restrictors or the shutoff of service in order to maintain enough water supply in the system for health and safety purposes.

6.5.4 Analysis of Revenue Impacts from Reduced Sales During Shortages

An analysis is required of the impacts of the actions and resulting from a catastrophic water shortage on the revenues and expenditures of the urban water supplier and proposed measures to overcome those impacts, such as development of reserves and rate adjustments.

In order to estimate a financial budget in the event of a local disaster, Casitas MWD evaluated the hypothetical scenario of the loss of 50 percent of the water supply. As noted in **Section 5**, the Casitas MWD water supply for a normal water-year is 20,840 AF. Annual commodity income from Casitas MWD sales of 20,840 acre-feet of water is approximately \$6,060,000 (Casitas MWD FY 2013 rates), and the fixed water service charge income of \$1,600,000. Total revenue from water sales and service charges is approximately \$7,660,000 (see **Table 6-6**). In the event of a catastrophic interruption of water supply, causing the Casitas MWD water sales to be reduced by 50 percent of a normal water-year, results in a revenue total of approximately \$3,830,000 and expenses of approximately \$5,203,000. In this hypothetical scenario, Casitas MWD could see a budget deficit of approximately \$1,373,000 per year, as indicated in **Table 6-6**. For Casitas MWD, the key reduction in costs are directly associated with the reduction in chemical purchase due to less water to treat and provide as potable water, and less energy to pump water to the various zones of service. In each case, the reduction in water sales is in direct relation to the reduction in chemical and electrical power purchases.

Casitas MWD has unrestricted reserves of \$14,710,000 in designated funds for cash flow, storm damage, variation in water sales, and capital improvements. The Casitas MWD Board of Directors could direct a portion of these funds be used to balance the budget. An increase in water rates could be considered by Casitas MWD with further understanding of the resultant revenue that may or may not be generated by this action. An increase in rates may result in less water demand and generate no more additional revenue to offset the budget deficit.



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**TABLE 6-6
ESTIMATED BUDGET IMPACT OF CATASTROPHIC EVENT**

	Normal Supply	Supply Deficit of 50 Percent
Water Supply	20,840 AF	10,420 AF
Percentage of Normal	100	50
Revenue:		
Commodity Charges	\$6,060,000	\$3,030,000
Service Charges	\$1,600,000	\$800,000
Total	\$7,660,000	\$3,830,000
Expenses:		
Salaries/ benefits	\$2,938,000	\$2,938,000
Fixed Services/Supplies	\$1,348,000	\$1,348,000
Variable Services/Supplies	\$1,834,000	\$917,000
Total	\$6,120,000	\$5,203,000
Budget Surplus (Deficit)	\$1,540,000	(\$1,373,000)

Notes:

Source, CMWD, 2016. All values estimated.

6.5.5 CMWD Operating Rules and Regulations

Casitas MWD is responsible for operation of the Lake Casitas, treatment plant, and the distribution system (see **Section 2.5** for details). A copy of the Casitas MWD’s Rates and Regulations for Water Service (2009) is available at the website: <http://www.drivecms.com/uploads/casitaswater.org/Rates%20&%20Regs%20Board%20Adopted%2012%2016%202009.pdf> . Copies of the Casitas MWD’s Rules and Regulations are also available upon request. See **Appendix F, Worksheets 10-18** for additional details related to Casitas MWD policies. In addition, water shortage allocation policies for the Casitas MWD are provided in **Section 6**. Copies of these documents are available from Casitas MWD upon written request.

The Casitas MWD prepared and maintains an Emergency Response Plan (2004a). The Emergency Response Plan includes extensive details for responding to numerous events such as catastrophic earthquakes, hydrological failure, sabotage, vandalism, bomb threat, water quality contamination, and a terrorist threat. Casitas MWD staff train regularly in order to properly respond to events and minimize the interruption of water supply.