



## **SECTION 1 – INTRODUCTION**

### **1.1 PURPOSE**

The Casitas Municipal Water District (Casitas MWD) is pleased to release this combined Urban Water Management Plan/Agricultural Water Management Plan (UWMP/AWMP). The Casitas MWD is required to prepare the UWMP as per requirements by the California Department of Water Resources. The Casitas MWD does not meet the requirements of an agricultural water supplier, but is voluntarily including elements of the AWMP in this document. The UWMP elements comply with requirements in California Water Code (Section 10610-10656). The AWMP elements comply with requirements of SB X7-7 Water Conservation Act (California Water Code, Section I, Part 2.55, Division 6, Section 10608.48-10608.64), Agricultural Water Management Planning Act of 1986 (California Water Code, Section I, Part 2.8, Division 6, Section 10800-10853), Agriculture Water Measurement Regulation (California Code of Regulations, Title 23, Section 597), and Governor Brown’s Executive Order B-29-15. Casitas MWD chose to prepare a combined UWMP/AWMP since there are many similar requirements for each document.

Provided below is an introduction to both the Urban Water Management Planning Act and the Agricultural Water Management Planning Act.

### **1.2 URBAN WATER MANAGEMENT PLANNING ACT**

#### **1.2.1 Summary**

This combined UWMP/AWMP meets the requirements for the UWMP as per California Water Code (Section 10610-10656) which requires urban water suppliers to prepare an UWMP to promote water conservation and efficient water use. This UWMP provides planning information on the reliability and future availability of the Casitas MWD water supply. This UWMP is a public statement of the goals, objectives, and strategies needed to maintain a reliable water supply for the Casitas MWD’s customers. It is important to understand that this UWMP should be viewed as a long-term, general planning document, rather than as policy for supply and demand management.

Primary objectives of this UWMP include the following:

- Quantify anticipated water demands over a 20-year period
- Identify and quantify water resources over a 20-year period
- Summarize reliability of water resources for existing and future demands, in normal, dry, and multiple dry years, over a 20-year period
- Summarize water conservation and efficient water use programs.

This UWMP provides information on present and future water supplies and demands, and provides an assessment of Casitas MWD’s water resource needs. It serves as a long-range planning document for Casitas MWD’s water supply. Droughts, limited supplies, environmental demands - all of these factors must be taken into consideration to provide a safe and reliable water supply for western



**CMWD UWMP AND AWMP - 2016 UPDATE**

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Ventura County. The intention of the UWMP is to demonstrate Casitas MWD's water supply reliability over the next 25 years in 5-year increments. The plan addresses Casitas MWD's water system and includes a description of water supply sources, magnitudes of historical and projected water use, and a comparison of water supply to water demands during a normal water-year, single-dry water-year, and multiple dry water-years. It also describes Casitas MWD's efforts to implement water conservation and water efficient uses for urban and agricultural water supplies. The combined UWMP/AWMP is Casitas MWD's commitment to a long-term plan to ensure water reliability into the future. A copy of the current Urban Water Management Planning Act is provided in A copy of the Agricultural Water Management Planning Act is provided in **Appendix B**.

### **1.2.2 History**

In 1983, the California Legislature enacted the Urban Water Management Planning Act (AB 797; Water Code, Division 6, Part 2.6, Section 10610-10656). This Urban Water Management Planning Act requires water suppliers serving more than 3,000 customers or water suppliers providing more than 3,000 AF of water annually to prepare an UWMP to promote water demand management and efficient water use. Currently, the Casitas MWD serves more than 3,000 customers and provides more than 3,000 AF of water per year. The Urban Water Management Planning Act also required water suppliers to develop, adopt, and file an UWMP (or update) every five years until 1990. In 1990, the Legislature deleted this sunset provision (AB 2661). Accordingly, the UWMP must be updated a minimum of once every five years on or before December 31 in the years ending in 0 and 5. A copy of the current Urban Water Management Planning Act is provided in A copy of the Agricultural Water Management Planning Act is provided in **Appendix B**.

The Legislature enacted two measures that modified the Urban Water Management Planning Act in 1991. The first measure requires water suppliers to include an urban water shortage contingency analysis as part of its urban water management plan (AB 11). This measure also exempts the implementation of urban water shortage contingency plans from California Environmental Quality Act (CEQA). The second measure requires an UWMP to describe and evaluate water recycling activities, to be updated once every five years, include an estimate of projected potable and recycled water use, and to describe activities relating to water audits and incentives (AB 1869). Another provision of this bill requires agricultural water suppliers to include in their informational reports and water management plans a description of water recycling activities.

In 1993, the Legislature enacted a measure, which allows members of the California Urban Water Conservation Council (CUWCC) to submit to the state a copy of their annual report to the Council to satisfy current reporting requirements relating to urban water management plans (AB 892). The Legislature enacted two measures in 1994. The first measure authorizes an urban water supplier to recover in its rates the costs incurred in preparing its plan and implementing the reasonable water conservation measures included in the plan (SB 1017). Any best water management practice that is included in the plan that is identified in the "Memorandum of Understanding Regarding Urban Water Conservation in California" (CUWCC, 2000) is deemed to be reasonable. The second measure requires water suppliers to give greater consideration to recycled water in their urban management plans (AB 2853).



**CMWD UWMP AND AWMP - 2016 UPDATE**

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In 1995, the Legislature enacted two additional measures. The first measure requires urban water suppliers to include, as part of their urban water management plans, a prescribed water supply and demand assessment of the reliability of their water service to their customers during normal, dry, and multiple dry water years (AB 1845). The assessment shall compare total water supply sources available to the supplier with the total projected water use over the next 20 years, in 5-year increments. It also requires the supplier to provide the water service reliability assessment to any city or county within which it provides water within 60 days of the adoption of its urban water management plan. The second measure made the following changes to the Urban Water Management Plan Act (SB 1011):

- Revised the components required to be included in the plan.
- Required urban water suppliers to update their plans at least once every five years on or before December 31 in the years ending in 5 and 0.
- Required urban water suppliers to include a prescribed water supply and demand assessment.
- Required suppliers to encourage active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during preparation of the plan.
- Required the urban water supplier, prior to adopting the plan, to make the plan available for public inspection and hold a public hearing thereon.
- Deleted the provision requiring action alleging failure to adopt a plan to be commenced within 18 months after commencement of urban water service after January 1, 1984.
- Defined “demand management” and “recycled water,” revised the definition of “plan”, and deleted the definition of “conservation.”
- Exempted suppliers who were implementing a conservation program from conducting a cost-benefit analysis of those conservation programs.
- Required the Department of Water Resources to submit a report to the Legislature summarizing the status of plans on or before December 31 in the years ending in 1 and 6.

In September of 2000, the Legislature approved AB 2552, which required urban water suppliers to submit their UWMPs to cities and counties where the water supplier provides water. The intent of this new requirement was to help ensure that city and county planning agencies have reliable water supply information on which to make growth decisions.

Additional changes approved in 2001 include AB 901, SB 221, SB 610, and SB 672. AB 901 required the UWMP to include information, relating to the water quality of source supplies and the manner in which the water quality affects water management strategies and supply reliability. This bill required the plan to describe plans to supplement a water source that may not be available at a consistent level of use. SB 221 prohibited a city or county from approving a residential subdivision of more than 500 units unless the city council or the board of supervisors provides written verification from the area’s



**CMWD UWMP AND AWMP - 2016 UPDATE**

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water service provider that a sufficient water supply is available for the development. SB 610 required additional information to be included as part of the UWMP for urban water supplies whose water supply includes groundwater. It required a city or county that determines that a development project is subject to the California Environmental Quality Act to identify any public water system that may supply water for the project and to request that system to prepare a specific water supply assessment. It required urban water suppliers to include in the UWMP a description of all water supply projects and programs that may be undertaken to meet total projected water use. This Bill required the DWR to take into consideration whether an urban water supplier has submitted an updated UWMP in determining eligibility for funds made available pursuant to any program administered by DWR. SB 672 required urban water suppliers to describe in the UWMP water management tools and other options used by that agency to maximize resources and minimize the need to import water from other regions.

There were many new requirements adopted by the State over the period 2005 to 2010, that must be included in this UWMP/AWMP including the following:

- 20x2020 analysis and compliance with Water Conservation Act of 2009 required of retail water suppliers.
- Water supplier must give at least 60-days advance notice to any City or county within which the supplier provides water supplies to allow opportunity for consultation on the proposed plan.
- Requires plan to include water use projections for single-family and multi-family residential housing needed for lower income and affordable households.
- Conditions eligibility for a water management grant or loan by DWR, SWRCB, or California Bay-Delta Authority on compliance with water demand management measures.
- Exempts projects funded by the American Recovery and Reinvestment Act of 2009 from the conditions placed on state funding for water management to urban water suppliers regarding implementation of water conservation measures that were implemented under AB 1420.
- Water suppliers that are members of the CUWCC and comply with the amended MOU, will be in compliance with the UWMP water demand management measures.
- Clarifies that "indirect potable reuse" of recycled water should be described and quantified in the plan.
- Requires urban wholesale water suppliers to include in UWMPs an assessment of present and proposed future measures, programs, and policies to achieve water use reductions.
- Grants urban water suppliers an extension for submission of UWMPs due in 2010 to July 1, 2011.



### 1.2.3 Recent Changes to UWMP Act

Recent changes to the UWMP include the following:

- Water suppliers required to provide narratives describing their water demand management measures, as provided. Requires retail water suppliers to address the nature and extent of each water demand management measure implemented over the past 5 years and describe the water demand management measures that the supplier plans to implement to achieve its water use targets.
- Urban water suppliers required to submit their 2015 plan to the DWR by July 1, 2016.
- The UWMP, or amendments to the plan, must be submitted electronically to the DWR.
- Requires the UWMP, or amendments to the plan, to include any standardized forms, tables, or displays specified by the DWR.
- Requires a plan to quantify and report on distribution system water loss.
- Water use projections must display and account for the water savings estimated to result from adopted codes, standards, ordinances, or transportation and land use plans, when that information is available and applicable to an urban water supplier.
- Urban water suppliers must include certain energy related information, including, but not limited to, an estimate of the amount of energy used to extract or divert water supplies
- Urban water suppliers must analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas.

A copy of the current Urban Water Management Planning Act is provided in **Appendix B**. Copies of the required data tables are provided in **Appendix E**.

## 1.3 AGRICULTURAL WATER MANAGEMENT PLANNING ACT

### 1.3.1 Summary

The California Agricultural Water Management Planning Act (Act) requires agricultural water suppliers to develop and adopt an AWMP (California Water Code, Section 10800-10853). The Casitas MWD does not meet the requirements of an agricultural water supplier, but is voluntarily including elements of the AWMP in this document. In addition, the AWMP must achieve the requirements of additional state regulations including but not limited to the following: California Water Code, Section 10608.48-10608.64; California Code of Regulations, Title 23, Section 597; and Executive Orders by the Governor of California. The AWMP must be updated every five years in the years ending in zero and five. As such, the AWMP is regarded as a guideline subject to revision, with each update incorporating new strategies and requirements in response to new legislation and other changing conditions. The AWMP will be submitted to the State of California Department of Water Resources (DWR) and Water Resources Control Board (SWRCB) for approval. A copy of the Agricultural Water Management Planning Act is provided in **Appendix C**.



## CMWD UWMP AND AWMP - 2016 UPDATE

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### 1.3.2 History

In 2012, 2013, 2014, and 2015 exceptionally dry conditions were experienced statewide. Annual precipitation in some of areas of the state dropped to their lowest point since record keeping began in the 1800s. Statewide reservoir storage is down significantly and impacts of four dry years in a row is felt everywhere.

On January 17, 2014, with California facing water shortfalls following the driest year in recorded state history, Governor Edmund G. Brown Jr. proclaimed a State of Emergency and directed state officials to take all necessary actions to prepare for these drought conditions. In the State of Emergency declaration, Governor Brown directed state officials to assist farmers and communities that are economically impacted by dry conditions and to ensure the state can respond if Californians face drinking water shortages. The Governor also directed state agencies to use less water and hire more firefighters and initiated a greatly expanded water conservation public awareness campaign (<http://www.saveourh2o.org/>).

Calendar year 2013 was California's driest year state-wide for records dating to the 1800s, and water conditions three months into a new year suggest the state's drought is pushing into its fourth consecutive year. The 2013-15 drought has resulted in increased public interest in Agricultural Water Management Plans (AWMPs) and water use efficiency. Due to the continuation of severe drought conditions, on April 1, 2015, through Executive Order B-29-151, Governor Brown directed agricultural water suppliers that supply water to more than 25,000 acres to include in their required 2015 agricultural water management plans a detailed drought management plan and quantification of water supplies and demands for the 2013, 2014, and 2015 to the extent data is available.

Governor Brown further directed agricultural water suppliers, including U.S. Bureau of Reclamation (USBR) contractors, which supply 10,000 to 25,000 acres of irrigated lands to each develop an AWMP and submit it to DWR by July 1, 2016. The Executive Order requires that these plans also include a detailed drought management plan along with quantification of water supplies and demands for the 2013, 2014, and 2015 years to the extent data is available. The Governor directed DWR to give priority in grant funding to this class of water suppliers for the development and implementation of the AWMPs.

In addition, the SWRCB allows urban water agencies to subtract their agricultural customers water use from monthly reporting requirements if they prepare an AWMP.

A copy of the Agricultural Water Management Planning Act is provided in **Appendix C**.

### 1.3.3 Recent Changes to AWMP Act

Recent changes to the AWMP include the following:

- Removal of Agricultural Water Management Council (Council) MOU process as an Agricultural Water Management Plan (AWMP) submittal option as the Council dissolved in the spring of 2013 and therefore no longer endorses plans.



**CMWD UWMP AND AWMP - 2016 UPDATE**

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- Addition of Governor Brown’s Executive Order B-29-15 (April 1, 2015), directing all agricultural water suppliers to include a detailed drought management plan in their AWMP, and to include quantification of water supplies and demands for 2013, 2014, and 2015. The Executive Order also directed all agricultural water suppliers that provide water to 10,000 to 25,000 irrigated acres to develop an AWMP and submit it by July 1, 2016. The Executive Order applies to all agricultural suppliers over the irrigated acreage threshold, including USBR contractors.

A copy of the Agricultural Water Management Planning Act is provided in **Appendix C**. Copies of the required data worksheets are provided in **Appendix F**.

**1.4 PLAN COORDINATION**

The Casitas MWD’s UWMP/AWMP must include the following:

- Coordinate the preparation of its plan with other appropriate agencies in the area, including other water suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practicable. (California Water Code, Section 10620(d)(2))
- Notify, at least 60 days prior to the public hearing on the plan required by Section 10642, any city or county within which the supplier provides water that the urban water supplier will be reviewing the plan and considering amendments or changes to the plan. Any city or county receiving the notice may be consulted and provide comments. (CWC, 10621(b))
- Provide supporting documentation that the UWMP or any amendments to, or changes in, have been adopted as described in Section 10640 et seq. (CWC, 10621(c))
- Provide supporting documentation that the urban water management plan has been or will be provided to any city or county within which it provides water, no later than 60 days after the submission of this urban water management plan. (CWC, 10635(b))
- Provide supporting documentation that the water supplier has encouraged active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the plan. (CWC, 10642)
- Provide supporting documentation that the urban water supplier made the plan available for public inspection and held a public hearing about the plan. For public agencies, the hearing notice is to be provided pursuant to Section 6066 of the Government Code. The water supplier is to provide the time and place of the hearing to any city or county within which the supplier provides water. Privately-owned water suppliers shall provide an equivalent notice within its service area. (CWC, 10642)
- Provide supporting documentation that the plan has been adopted as prepared or modified. (CWC, 10642)
- Provide supporting documentation as to how the water supplier plans to implement its plan. (CWC, 10643)



## CMWD UWMP AND AWMP - 2016 UPDATE

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- Provide supporting documentation that, in addition to submittal to CADWR, the urban water supplier has submitted this UWMP to the California State Library and any city or county within which the supplier provides water supplies a copy of its plan no later than 30 days after adoption. This also includes amendments or changes. (CWC, 10644(a))
- Provide supporting documentation that, not later than 30 days after filing a copy of its plan with the CADWR, the urban water supplier has or will make the plan available for public review during normal business hours. (CWC, 10645)

Casitas MWD has coordinated its UWMP/AWMP planning efforts with a number of agencies (see list in **Table 1-1**) to ensure the accuracy of the data and issues presented in this plan. **Table 1-2** lists the agencies that participated in the development of this UWMP/AWMP. Public comment was solicited on the Plan in the form of a community workshop and public hearing for the general public, taxpayers, water users, local governments, and state agencies.

### 1.5 PLAN NOTIFICATION AND PARTICIPATION

The Casitas MWD notified all the local agencies and organizations listed in **Table 1-1** regarding preparation of the UWMP/AWMP and planned public meeting dates and times (see **Appendix F Worksheet 1** for additional details). Casitas MWD encourages representatives from those organizations and the public to attend Casitas MWD's public meetings (**Table 1-2**). Casitas MWD invited comments from organizations and the public as well. The Casitas MWD mailed a letter on April 15, 2016 to all of the agencies listed in **Table 1-1** below in accordance with the requirement to provide notice to all cities and counties at least 60 days prior to the public hearing (see Appendix E Table 10-1 for additional details). The letter also indicated that the Draft UWMP/AWMP would be available for public review prior to a community workshop on May 18, 2016, available at Casitas MWD's website ([www.casitaswater.org](http://www.casitaswater.org)), and available at the Casitas MWD office located at 1055 Ventura Avenue, Oak View, California, 93022.

Casitas MWD encouraged active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the Plan. Casitas MWD's Winter 2016 newsletter was sent out in January 2016 to all 30,000 households within the Casitas MWD. This newsletter included the intention of Casitas MWD to hold a public hearing in June 2016 regarding the adoption of the 2016 UWMP/AWMP. Casitas MWD included an announcement in the customer billing statement for April 2016 for the community workshop and public hearing. Casitas MWD also posted an announcement to Casitas MWD's website at [www.casitaswater.org](http://www.casitaswater.org) for the workshop and public hearing. Casitas MWD noticed and advertised the public hearing in accordance with all of the requirements of the UWMP/AWMP. In addition, Casitas MWD provided an announcement on all customer's water bills regarding the meetings.





**TABLE 1-1  
LOCAL ORGANIZATIONS NOTIFIED**

- Carpinteria Valley Water District
- Faria Beach Homeowner’s Association
- Golden State Water Company
- Hermitage Mutual Water Company
- Meiners Oaks County Water District
- City of Ojai – City Manager
- Ojai Basin Groundwater Agency
- Ojai Pixie Growers Association
- Ojai Valley Land Conservancy
- Ojai Valley Sanitary District
- Ojai Valley News
- Oak View Library
- Rancho Del Cielo Mutual Water Company
- Rincon Water & Road Works
- Senior Canyon Mutual Water Company
- Siete Robles Mutual Water Company
- Sisar Mutual Water Company
- Sulphur Mountain Road Water Association
- Tico Mutual Water Company
- Ventura County Resource Conservation District
- Ventura County Supervisor, Steve Bennett
- Ventura County Agricultural Commissioner
- Ventura County Watershed Protection District
- Ventura County Farm Bureau
- City of Ventura –City Manager
- Ventura Water
- Ventura Local Agencies Formation Commission
- Ventura River Water District
- Ventura River Watershed Coordinator



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**CMWD UWMP AND AWMP - 2016 UPDATE**

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**TABLE 1-2  
ORGANIZATION PARTICIPATION**

Agency	Notified of Plan Preparation	Requested Copy of Draft Plan	Commented on Draft Plan	Notified of Public Meetings	Attended Public Meetings	Sent Copy of Final Plan
California Department of Water Resources	NA	NA	NA	NA		✓
California State Water Resources Control Board						
California State Library	NA	NA	NA	NA		✓
Carpinteria Valley Water District	✓			✓		✓
Faria Beach Homeowner's Association	✓			✓		
Golden State Water Company	✓			✓		✓
Hermitage Mutual Water Company	✓			✓		
Meiners Oaks County Water District	✓			✓		
City of Ojai	✓			✓		✓
Ojai Basin Groundwater Agency	✓			✓		✓
Ojai Pixie Growers Association	✓			✓		
Ojai Land Conservancy	✓			✓		
Ojai Valley News						
Ojai Valley Sanitary District	✓			✓		
Oak View Library	✓	NA	NA	✓	NA	✓
Rancho Del Cielo Mutual Water Company	✓			✓		



**PUBLIC DRAFT**

**CMWD UWMP AND AWMP - 2016 UPDATE**

Agency	Notified of Plan Preparation	Requested Copy of Draft Plan	Commented on Draft Plan	Notified of Public Meetings	Attended Public Meetings	Sent Copy of Final Plan
Rincon Water & Road Works	✓			✓		
Senior Canyon Mutual Water Company	✓			✓		
Siete Robles Mutual Water Company	✓			✓		
Sisar Mutual Water Company	✓			✓		
Sulphur Mountain Road Water Assoc.	✓			✓		
Tico Mutual Water Company	✓			✓		
County of Ventura, Supervisor Bennett	✓			✓		
Ventura County Agricultural Comm.	✓			✓		
Ventura County Resource Conservation District	✓			✓		
Ventura County Watershed Protection District	✓			✓		✓
City of Ventura	✓			✓		✓
Ventura Water	✓			✓		
Ventura County Farm Bureau	✓			✓		
Ventura Local Agency Formation Commission	✓	✓		✓		✓
Ventura River Water District	✓			✓		
Ventura River Watershed Coordinator	✓	✓		✓		✓

Notes:

See **Appendix F Worksheet 1** for additional details.



**CMWD UWMP AND AWMP - 2016 UPDATE**

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**1.6 PLAN ADOPTION AND SUBMITTAL**

In accordance with the UWMP and AWMP requirements, Casitas MWD also encourages involvement of public and community groups in document review and public comments. Casitas MWD notified applicable local, County, and State agencies and organizations of the intent to prepare this UWMP/AWMP and hold a public workshop. Casitas MWD provided notification via newsletter to customers, direct letter, and via Casitas MWD website <http://www.casitaswater.org/calendar.php?id=11337943>. See **Appendix D** for a copy of the notification newsletter and letter. Casitas MWD held a community workshop on May 18, 2016 to provide a summary of the UWMP/AWMP and receive public comments and questions. Casitas MWD held a public hearing on June 22, 2016 in Casitas MWD's Board Room. The Board of Directors adopted the UWMP/AWMP following the public hearing. Proof of this public hearing is provided in **Appendix D**, which contains a copy of the resolution adopting the 2016 Urban Water Management Plan/Agricultural Water Management Plan. The UWMP/AWMP was then submitted to the California Department of Water Resources within the 30-day requirement.

**1.7 PLAN IMPLEMENTATION**

Following adoption of the UWMP/AWMP, Casitas MWD will utilize the UWMP/AWMP as a summary and resource for discussions regarding water demands, water supplies, and demand management. This UWMP/AWMP indicates that it is imperative for Casitas MWD to maximize its water resources, water use efficiencies, and minimize losses and inefficiencies because 100 percent of the water supply comes from local sources. This UWMP/AWMP document will assist Casitas MWD to address local water supply management issues. Implementing water conservation and demand management strategies will allow Casitas MWD to manage local water supplies throughout a long-term drought and avoid supply depletion. Details regarding the extensive Casitas MWD demand management programs are provided in **Sections 6 and 7**.

**1.8 REPORT FORMAT**

This UWMP/AWMP is divided into seven primary sections. Section 1 provides an introduction to the UWMP/AWMP. Section 2 describes the Casitas MWD's service area. Section 3 defines the Casitas MWD's water uses. Section 4 defines the Casitas MWD's water supplies. Section 5 defines the Casitas MWD's water supply reliability assessment. Section 6 summarizes the Casitas MWD's water shortage contingency planning. Section 7 describes Casitas MWD's demand management measures (i.e., water conservation and efficient water management practices).

This combined UWMP/AWMP is based upon the information required by the Urban Water Management Planning Act and California Agricultural Water Management Planning Act, as coordinated by the California Department of Water Resources (CADWR). Format of this UWMP/AWMP follows the DWR's Guidance Manuals for UWMP (2016) and AWMP (2015) to ensure and easily verify that the information presented here meets all of the DWR requirements.

The Casitas MWD is a wholesale agency. Casitas MWD prepared this UWMP/AWMP in compliance with the UWMP requirements for a wholesale agency.



**CMWD UWMP AND AWMP - 2016 UPDATE**

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**1.9 AUTHORIZATION**

The Casitas MWD authorized Milner-Villa Consulting (MVC) to provide consulting services related to preparation of this UWMP under an Agreement dated September 23, 2015 and Change Order No. 1 for preparation of the AWMP elements in accordance with California requirements.

**1.10 CONTACT INFORMATION**

A copy of the UWMP/AWMP will be available at Casitas MWD's website at <http://www.casitaswater.org> and available at the Casitas MWD office located at 1055 Ventura Avenue, Oak View, California, 93022. Please direct any questions regarding this UWMP/AWMP to Ron Merckling, Water Conservation/Public Affairs Manager for Casitas MWD, (805) 649-2251 extension 118, or [rmerckling@CMWDwater.com](mailto:rmerckling@CMWDwater.com).

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