Casitas Municipal Water District
WATER RESOURCES COMMITTEE
Baggerly/Spandrio

October 20, 2020 – 10:00 A.M.

This meeting will be held via teleconference
To attend the meeting please call
(888) 788-0099 or (877) 853-5247
Enter Meeting ID: 634 789 006 Passcode: 628845

Agenda

1. Roll Call
2. Public Comments
3. Board Comments.
4. Manager Comments.
5. Review Proposed Response to Significant Public Comments on the June 2020 Casitas MWD Draft Comprehensive Water Resources Plan (CWRP)
6. Discussion of Casitas MWD's Water Efficiency Allocation Program (WEAP).

Right to be heard: Members of the public have a right to address the Board directly on any item of interest to the public which is within the subject matter jurisdiction of the Board. The request to be heard should be made immediately before the Board's consideration of the item. No action shall be taken on any item not appearing on the agenda unless the action is otherwise authorized by subdivision (b) of ¶54954.2 of the Government Code.
If you require special accommodations for attendance at or participation in this meeting, please notify our office in advance (805) 649-2251, ext. 113. (Govt. Code Sections 65954.1 and 54954.2(a). Please be advised that members of the Board of Directors of Casitas who are not members of this standing committee may attend the committee meeting referred to above only in the capacity of observers, and may not otherwise take part in the meeting. (Govt. Code Section 54952.2(c)(6)

CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM

TO: WATER RESOURCES COMMITTEE

FROM: MICHAEL FLOOD, GENERAL MANAGER

SUBJECT: REVIEW PROPOSED RESPONSE TO SIGNIFICANT PUBLIC COMMENTS ON JUNE 2020 DRAFT COMPREHENSIVE WATER RESOURCES PLAN

DATE: 10/13/20

RECOMMENDATION:

It is recommended the Water Resources Committee review a proposed response to significant public comments on State Water Project options in the June 2020 Draft Comprehensive Water Resources Plan

BACKGROUND AND DISCUSSION:

The Board of Directors authorized a consulting services agreement with Stantec in January 2019 to prepare the Comprehensive Water Resources Plan (CWRP). An overview of the draft plan was presented at a Board Workshop held on February 8, 2020, and the draft report was released for public review from June 26, 2020 through August 24, 2020. The draft CWRP incorporates discussions from 14 public meetings held with the Water Resources Committee prior to its release.

Several public comments were received, which were provided to the Water Resources Committee on September 15, 2020 and the Board of Directors on September 23, 2020. Based on review of comments, staff is recommending a revised draft plan be prepared.

In response to comments, staff have developed a phased implementation strategy for imported water options, along with costs of each phase. In addition, staff have been meeting regularly with Calleguas Municipal Water District staff to better understand issues and options related to our agency's respective water systems.

Staff are requesting feedback from the Water Resources Committee regarding the attached phased implementation strategy for the Casitas-Calleguas Interconnection.

Casitas Municipal Water District
Draft Comprehensive Water Resources Plan
Phased Implementation Strategy
for Casitas-Calleguas Interconnection

The June 2020 Draft Comprehensive Water Resources Plan (CWRP) evaluates over thirty different water supply options, and makes recommendations on future water supply portfolio based on several criteria including technical, cost, and environmental factors.

The CRWP is a high-level strategic document to help guide water resources planning efforts. The projects included in the evaluation are conceptual and further study regarding feasibility and design is necessary. The recommended projects may evolve as new information becomes available. As such, annual implementation updates are suggested, with updates to the CWRP occurring on a 5-year basis aligned with updates to the Urban Water Management Plan.

Since the release of the June 2020 Draft CWRP, additional questions were raised regarding project SWP 04 (Casitas-Calleguas Interconnection), which was a recommended concept in the plan. SWP 04 allows Casitas to receive State Water deliveries through a potable water pipeline connection to Calleguas, and then through a dedicated pipeline across the City of Ventura to the Casitas distribution system (**Figure 1**).

While SWP 04 is the recommended project, segments of the project could be implemented in phases, and allow Casitas flexibility to continue to evaluate the costs and benefits of other alternatives (e.g. SWP 01, SWP 02, and SWP 05) which depend on actions of other water agencies. **Figure 2** presents a graphic of key implementation actions supporting an adaptive plan, and **Table 1** shows the relation of each segment to other alternatives.

Segment 1: Ventura SWP Interconnection

Segment 1 represents a shared pipeline from East Ventura to Springville, and would be a joint project between Calleguas, Casitas, and City of Ventura. Various pipe sizes are under evaluation since the constructed size would depend on the level of

joint participation. A 24-inch pipeline is being evaluated for the City of Ventura, Casitas and Calleguas use, and a 36-inch pipeline is being evaluated to include additional capacity dedicated to Casitas. If Casitas participates in construction of the project, the capital costs to Casitas are assumed to include 1/3 of the City of Ventura's costs and an additional incremental cost of upsizing the pipeline from 24 inches to 36 inches if Casitas decides to do so.

- Estimated Capital Cost to Casitas: $18 million
- Conceptual pipe size: 36 inches (costs reflect Casitas' 1/3 cost share of the City of Ventura's costs of the project, plus costs of upsizing the pipeline from 24 inches to 36 inches)
- Length: Approximately 7 miles

The construction of Segment 1 supports future implementation of several SWP options, including SWP 01, SWP 04, SWP 05, and potentially SWP 02. All of these options require additional infrastructure with the exception of SWP 05.

With construction of Segment 1, Casitas could explore partnering with the City of Ventura to implement an In-Lieu program (SWP 05), in which the City of Ventura receives more State Water in lieu of taking deliveries from Lake Casitas. Prior to implementation, the cost of an In Lieu Program must be evaluated with consideration of the revenue collected for sale of water to the City of Ventura, and costs for an in-lieu program would be subject to negotiation.

In order to support future implementation of SWP 02, additional study is needed to evaluate infrastructure needed for Calleguas to receive water from Lake Casitas during an imported water outage. Options for further evaluation include a potential bifurcation from the eastern side of Segment 1 with a new pipeline extension from Springville to Somis, or other system improvements to be constructed by Calleguas MWD to move water to Eastern portions of their system. Additional analysis is also needed to evaluate the increased water in Lake Casitas storage resulting from a regional SWP connection, and the amount of Lake Casitas storage that could be available to Calleguas during its imported water outage.

Segment 2: Casitas-Calleguas Interconnection

This would be a dedicated pipeline constructed by Casitas conveying water across the City of Ventura, from the Ventura SWP Interconnection (Segment 1) to the

Casitas-Ventura Interconnection (Segment 3). The City of Ventura is not anticipated to participate in the costs of this pipeline.

Estimated Capital Cost: $81 million

- Conceptual pipe size: 36 inches
- Length: Approximately 10.5 miles

Casitas could construct Segment 2 independently (SWP 04) or pursue cost-sharing opportunities with Calleguas (SWP 02). In order for Calleguas to benefit from cost-sharing, Casitas would need to provide backup water supplies to Calleguas during its imported water outage, and the Segment 2 pipeline would be designed to operate bidirectionally. Additional study is needed to evaluate the increased water in Lake Casitas storage resulting from a regional SWP connection, and the amount of water that would be available to Calleguas during its imported water outage.

Segment 3: Casitas-Ventura Interconnection

This project involves two pump stations and two reservoirs constructed by Casitas to convey water from the existing City of Ventura connection at Olive and Ramona to Casitas' transmission system. Depending on future implementation decisions (**Figure 2**), Segment 3 could be constructed with an initial capacity of 10 cubic feet per second (cfs) (Segment 3A), with expansion to the long-term capacity of 30 cfs (Segment 3B) for full implementation. This segment makes use of Casitas' existing pipeline and reverses the flow direction to feed Casitas' transmission system.

Segment 3A

- Estimated Capital Cost: $25 million
- Conceptual capacity: 10 cfs
- Segment 1 and Segment 3A represent the facilities required to implement SWP 01.

Segment 3B

- Estimated Capital Cost: $37 million (includes costs of 3A)
- Conceptual capacity: 30 cfs

Casitas could construct Segment 3B independently (SWP 04) or pursue cost-sharing opportunities with Calleguas (SWP 02). In order for Calleguas to benefit from cost-sharing, Casitas would need to provide backup water supplies to Calleguas during

its imported water outage. Additional study is needed to evaluate the increased water in Lake Casitas storage resulting from a regional SWP connection, and the amount of water that would be available to Calleguas during its imported water outage.

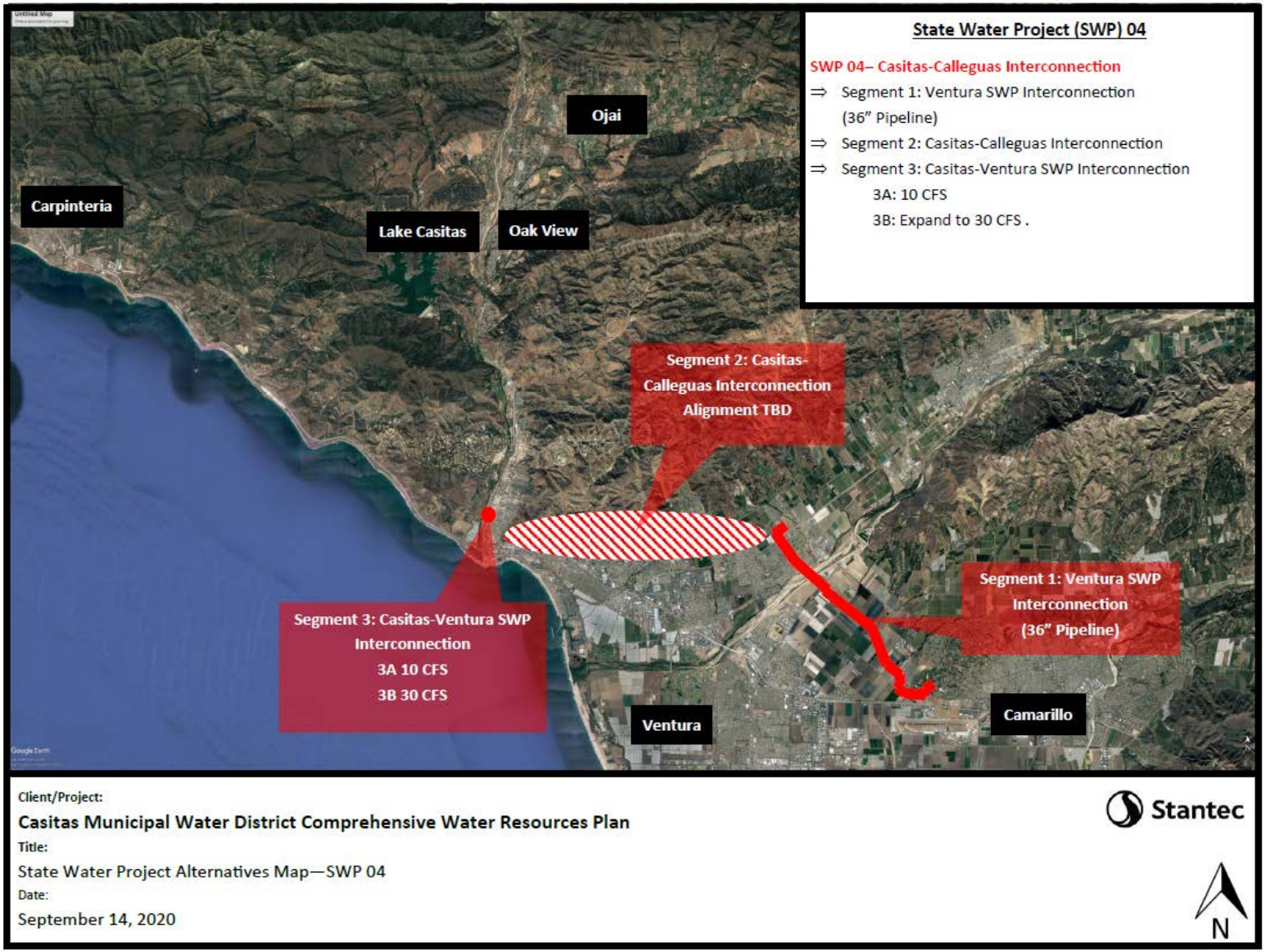
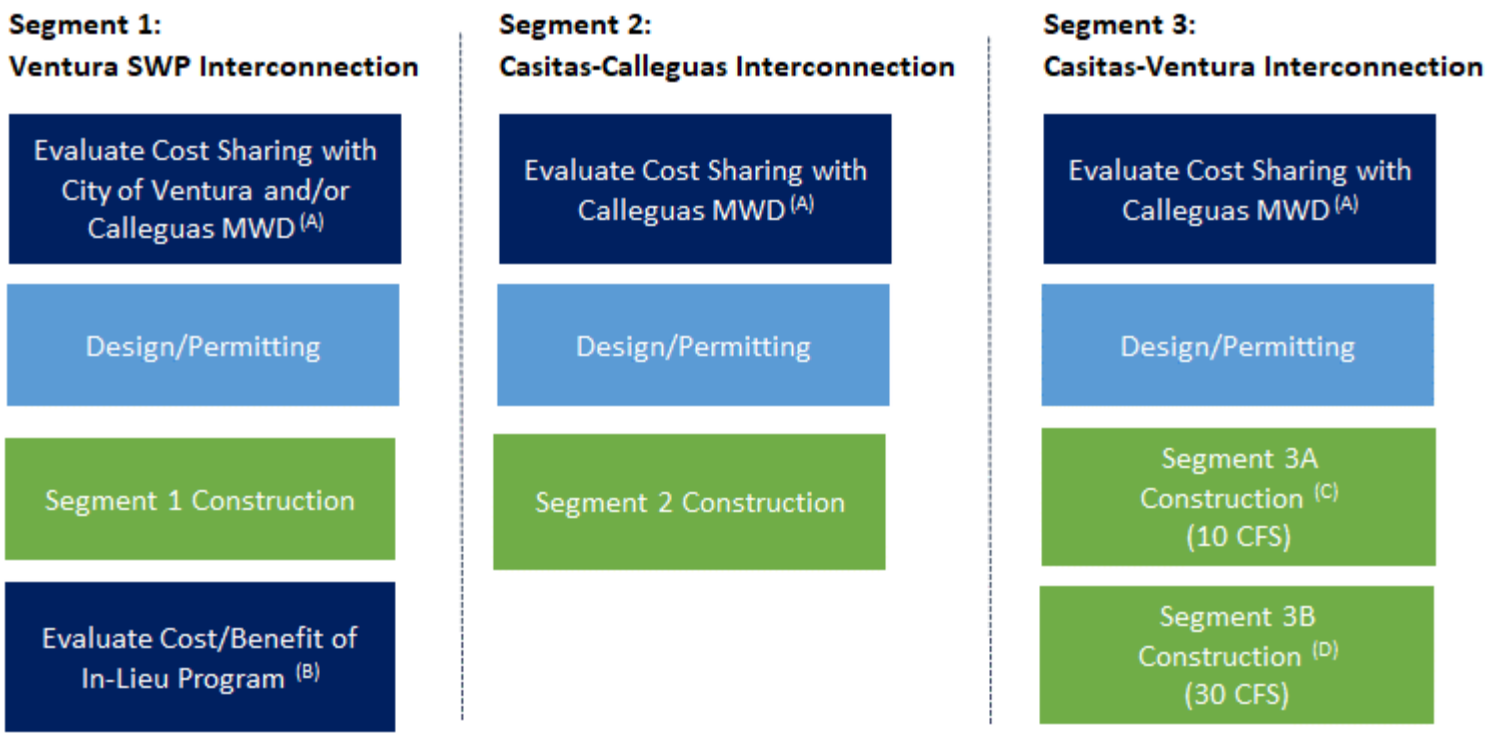


Figure 1. Conceptual Location of Segments 1 through 3



Notes:

(A) SWP 02 may be evaluated for potential cost-sharing with Calleguas MWD.

(B) Costs of In Lieu (SWP 05) would need to be compared against Casitas' revenue from City of Ventura water sales.

(C) Construct Segment 3A only if Segment 1 is constructed, and Segment 2 is not yet constructed, and the City of Ventura has constructed Eastside to Westside Waterline Project.

(D) Construct Segment 3B only if Segment 2 is being constructed.

Figure 2. Proposed Phased Implementation Strategy

Table 1. Relation of each Conveyance Segment to various Alternatives

Alternative	Conveyance Segment		
	Segment 1 – Ventura SWP Interconnection	**Segment 2 – Casitas-Calleguas Interconnection**	**Segment 3 – Casitas-Ventura Interconnection**
SWP 01 - City of Ventura State Water Project Interconnect and Casitas-Ventura State Water Project Interconnection	Upsize Ventura's planned 24-in pipeline to 36-in pipeline	Not used[A]	Construct 10 cfs capacity
SWP 02 - Calleguas Emergency Interconnection with Casitas	Casitas MWD and Calleguas MWD upsize Ventura's planned 24-in pipeline to 36-in pipeline[B]	Casitas MWD and Calleguas MWD construct 36-in pipeline	Casitas MWD and Calleguas MWD expand to 30 cfs capacity
SWP 04 - Casitas-Calleguas Interconnection	Upsize Ventura's planned 24-in pipeline to 36-in pipeline	Casitas MWD constructs dedicated 36-in pipeline	Construct 30 cfs capacity
SWP 05 - City of Ventura Supplemental Water or In-lieu	Upsize Ventura's planned 24-in pipeline to 36-in pipeline	Not used[A]	Not used

[A] Ventura constructs its own Eastside to Westside Waterline Project (which has limited to no benefit to Casitas)

[B] In order for Calleguas MWD to receive a sufficient volume of water to merit investment in the infrastructure, Calleguas MWD would need to construct its own Springville-Somis connection or make other improvements to convey water throughout its system.

MEMORANDUM

TO: Water Resources Committee

From: Michael L. Flood, General Manager

RE: **Discussion of Casitas MWD's Water Efficiency and Allocation Program (WEAP)**

Date: October 16, 2020

RECOMMENDATION:

The Water Resources Committee continue consideration of the WEAP.

BACKGROUND:

The District's Water Efficiency and Allocation Program was originally developed in response to a combination of historically high water demands and local drought conditions in the late 1980s.

The WEAP has been revised several times including most recently, April of 2019.

Casitas MWD's Comprehensive Water Resources Plan (CWRP) was released to the public in draft form in June 2020.

During the discussion of this item at the August 2020 and September 2020 Water Resources Committee Meeting, the Committee asked that this item be added to future Water Resources Committee agendas for discussion.

DISCUSSSION:

During the September 2020 Water Resources Committee meeting, the staff indicated that the Committee should consider health & safety aspects of the setting of WEAP restrictions, especially those that would be put into place for lake levels below the currently-considered threshold of 20,000 Acre-Feet.

20,000 Acre-Feet is the minimum operating volume of Lake Casitas that is contained within Casitas MWD's draft Comprehensive Water Resources Plan and has been discussed amongst the Committee members as a possible 'Stage 6'.

Health and Safety Demands:

While health and safety demands can take on a variety of definitions, the most recent drought in California (2014) produced this definition through the State's 2015 'CVP/SWP Drought Contingency Plan:

"*For clarity, Reclamation and DWR's consideration of these essential human health and safety needs includes adequate water supplies and water quality for drinking water, sanitation, and fire suppression, but does not extend to other urban water demands such as outdoor landscape irrigation."*

(https://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/2015_drought_contingency_plan.pdf)

This document further states that through polling of the twenty-nine State Water Contractors, an assumed health and safety demand could be calculated using a baseline of 55 gallons per capita per day.

The calculation of annual Health and Safety drinking water demands for Casitas' assumed population would be thus:

(70,000 people x 55 gal/capita/day x 365 days)/325,850 gal per Acre-Foot = **4,313 AF/Year**

While this number is instructive and makes some intuitive sense as to the District's minimum Health and Safety demands, it should be checked against actual customer demand data. The customer demand data that would be relevant is that data that could be assumed to reflect actual customer demands when outside water uses are at their minimum.

Over the last three years, the minimum months were as follows:

October 2017 to October 2018: March 2018 – **384 Acre-Feet (12.5 Acre-Feet per Day)**

October 2018 to October 2019: February 2019 – **224 Acre-Feet (8.0 Acre-Feet per Day)**

October 2019 to October 2020: December 2019 – **274 Acre-Feet (8.8 Acre-Feet per Day)**

The average of these is 9.8 Acre-Feet per day or **3,565 AF/Year**.

Next we will look at the 'critical demand' numbers from the CWRP.

Additionally, the District's Water Efficiency and Allocation Program currently provides direct customers with 10 Units per Month (irrespective of the number of days) which for a household of four people translates to 61.5 gallons/capita/day.

Conducting the same calculation as before:

(70,000 people x 61.5 gal/capita/day x 365 days)/325,850 gal per Acre-Foot = **4,822 AF/Year**

This result could be considered high since demands for the District's wholesale customers would be at least partially provided by the resale entity.

2020 Casitas MWD Comprehensive Water Resources Plan (CWRP) and Critical Demands

While the WEAP contains 'critical demand use' estimates in order to set a minimum operating level for Lake Casitas, it doesn't inform Health and Safety-related demand actions for a proposed Stage 6.

It is instructive, however, to look at the demand estimates contained in Appendix D:

Table 7-1 from Appendix D estimates that 20,000 Acre-Feet would equal two years of critical demands would equal 7,875 Acre-Feet of demands per year (without evaporation):

Demand Category	2040 Critical Demand Use (AF/Year)
Direct Retail	1,350
Agricultural	3,600
Contract (Wholesale)	2,925
Total	**7,875**

This includes not only direct and wholesale demands but also 3,600 AF/Year of Agricultural demands.

Agricultural demands are unlikely to be part of the District's demand picture when outside uses are being restricted to any large degree such as Stage 6.

Direct Retail and Wholesale demands would then become **4,275 AF/Year**

Summary:

Estimated Health and Safety Demands (w/o evaporation):

1. State 55 gal/capita/day = 4,300 AF/Year
2. Casitas Three-Year Average Low = 3,565 AF/Year
3. WEAP 'Essential Use' = 4,822 AF/Year
4. Casitas CWRP Critical Demands (w/o Ag) = 4,275 AF/Year

Thus a Casitas MWD Health & Safety demand (without evaporation) should be considered to be between 3,600 AF/Year and 4,300 AF/Year and would be used as a demand target to manage customer allocations.

Policy Considerations for 'Stage 6'

Considering the goal of Stage 6 would be to bring the District's water demands down to Health and Safety levels:

1. Residential 'Non-Essential' allocations would be set to zero.

2. Irrigation of Commercial landscaping would be prohibited.

3. Close coordination with wholesale customers would be necessary.

4. Should WEAP actions be divided into prior to/after which CWRP projects are completed?

5. Should Agricultural demands be supported at any level?

6. The WEAP currently allows for approximately 61.5 gallons/per capita/per day of 'Essential Use'. Should this be adjusted for during Stage 6?

7. What is the role of new allocation assignment during Stage 6?

8. Will Casitas still be able to support water use for construction and dust control (i.e. issuance of temporary meters)?

9. Assuming some customers would have their services 'locked off', adjustments would need to be made to the associated service charges.

WATER EFFICIENCY AND ALLOCATION PROGRAM

Casitas Municipal Water District

April 24, 2019

SECTION 1: INTRODUCTION

In 1992 the Casitas Municipal Water District (Casitas) adopted a series of ordinances, resolutions, and a Water Efficiency and Allocation Program (WEAP) in response to the increasing water demands and declining water storage in Lake Casitas experienced during the 1987-1991 drought period. The collective work in 1992 set the starting point for a system of water allocation assignments and demand response criteria that are based on the level of water storage in Lake Casitas. Since 1992, there has been a significant outreach by Casitas to raise the public's awareness on the importance to conserve local water supplies, changes in the water supply and demand, regulatory compliance directives pursuant to the Endangered Species Act (ESA), and system outage events that temporarily activated Casitas' emergency response plan. All of these factors, including the responses and experiences of the current drought, are considered in the update of the Water Efficiency and Allocation Program.

1.1 Purpose and Principles of the Plan.

The purpose of this update of the WEAP is to provide guidance on water supply and demand strategies that (1) conserve the water supply of the Ventura River Project, Lake Casitas and other water resources that are in the direct control of Casitas, for the greatest public benefit, (2) mitigate the effects of a water shortage on public health and safety and economic activity, (3) allocate water use so that a reliable and sustainable supply of water will be available for the most essential purposes under all water storage conditions of Lake Casitas, and (4) adapt to changing conditions of water supply demand and constraints.

The WEAP describes the water demand reduction strategies and measures to address future water shortage conditions, promote water conservation and the efficient use of water, and the application of a conservation penalty to customers who waste water.

1.2 Relationship between this Document, Water Codes, and Other Plans.

This WEAP shall be guided by State regulations and planning requirements as provided by the California Water Code that provides Casitas with broad powers to implement and enforce regulations and restrictions for managing a water shortage (§71640-71644), to implement water conservation programs (§375--378), to implement allocation-based conservation water pricing (§370-374), and to declare a water shortage emergency(§350-359).

As required by Water Code Section 10632, this WEAP shall be integrated as a part of the Casitas Urban Water Management Plan (UWMP), as amended or updated every five years. The Casitas 2010 UWMP has been accepted and approved by the State Department of Water Resources. The UWMP provides an in-depth description of the Casitas water system, water resources and demands, and water supply reliability. For the purposes of integration and lessening the conflicts due to the replication of information, the WEAP shall rely on the updates of the Water Code Sections provided in the attached Appendices and UWMP, as amended or updated every five years.

SECTION 2: WATER SUPPLY AND DEMAND CONDITIONS

2.1 Water Supply.

The water supply for Casitas is derived from (1) the watersheds that flow directly and indirectly by diversion from the Ventura River of water during wet years to carryover storage in Lake Casitas for use during dry years, and (2) groundwater to the extent that Casitas has its own groundwater supply. The watersheds of the Ventura River region are subject to an extreme variation in the weather patterns, ranging from multiple years of drought to sometimes significant wet year events that are associated with El Nino conditions that add to the uncertainty of available local water supplies.

2.1.1 Surface Water.

The primary goal of Casitas is to provide a safe and reliable water supply. Due to the uncertainty of weather conditions that provide water to the local watersheds, a safe yield modeling has been implemented to provide guidance on water supply availability. The safe yield modeling criteria for the Casitas surface water supply provides a theoretical rate of decline in available water supply during a critical drought period, that if given a specific annual extraction rate from storage, that would reduce Lake Casitas to an exhausted minimum pool.

The sizing of Lake Casitas storage volume and the determination of the annual safe yield of water from Lake Casitas was originally determined by the Bureau of Reclamation in 1954, based on the hydrologic modeling for the critical drought period that started in 1919 and continued through 1936. The storage volume of the off stream reservoir, Lake Casitas, was set to be 254,000 acre-feet and the annual safe yield was determined to be 28,000 acre-feet. In 2004, Casitas recalculated the annual safe yield of Lake Casitas for the drought period of 1944 to 1965 based on newer knowledge of the diminished value of Matilija Reservoir and its impending removal, and the change in Robles Diversion operations resulting from the 2003 Biological Opinion established by the National Marine Fisheries Service pursuant to the federal Endangered Species Act. The recalculated annual safe yield of Lake Casitas was determined to be 20,840 acre-feet per year.

The safe yield trend for the 1944-1965 critical drought period is illustrated in Figure 1, with the assumption that the critical drought period begins with a full reservoir. The modeling applies the hydrology, river diversions operations, and lake evaporation for the period (1944-1965) that contribute to the Lake Casitas storage. The safe yield is a constant extraction rate from lake storage that contribute to the decline in Lake Casitas storage during the critical drought period, taking lake storage from full capacity to a minimum pool condition. Based on the safe yield model with a continuous and steady extraction rate, or safe yield, of water at 20,840 acre-feet each year, Lake Casitas would decline from full storage to minimum pool in approximately twenty years.

Also included in Figure 1 is the Recovery Period of Lake Casitas, which illustrates the actual filling rate experienced at Lake Casitas during the 1959 to 1978 period. The recovery of the Lake Casitas volume during the Recovery Period that is illustrated in Figure 1 cannot be assumed as the normal or common sequence given the variability of the rainfall amounts in the Ventura River watershed, constraints, and other influences to Lake Casitas inflow and storage. Casitas may experience elevated water supply risks that could be associated with a delay in the start of the recovery period while at minimum pool in Lake Casitas, or there could be a condition where the critical drought period begins with a partially recovered storage level in Lake Casitas.

The availability of the Lake Casitas supply can be influenced or impacted by long-term droughts, changes to lake water quality, and/or changes to diversion and storage conditions. The safe yield of Lake Casitas and annual water availability may need to be reconsidered in the future as a result of changing conditions or new information that differs from the present conditions.

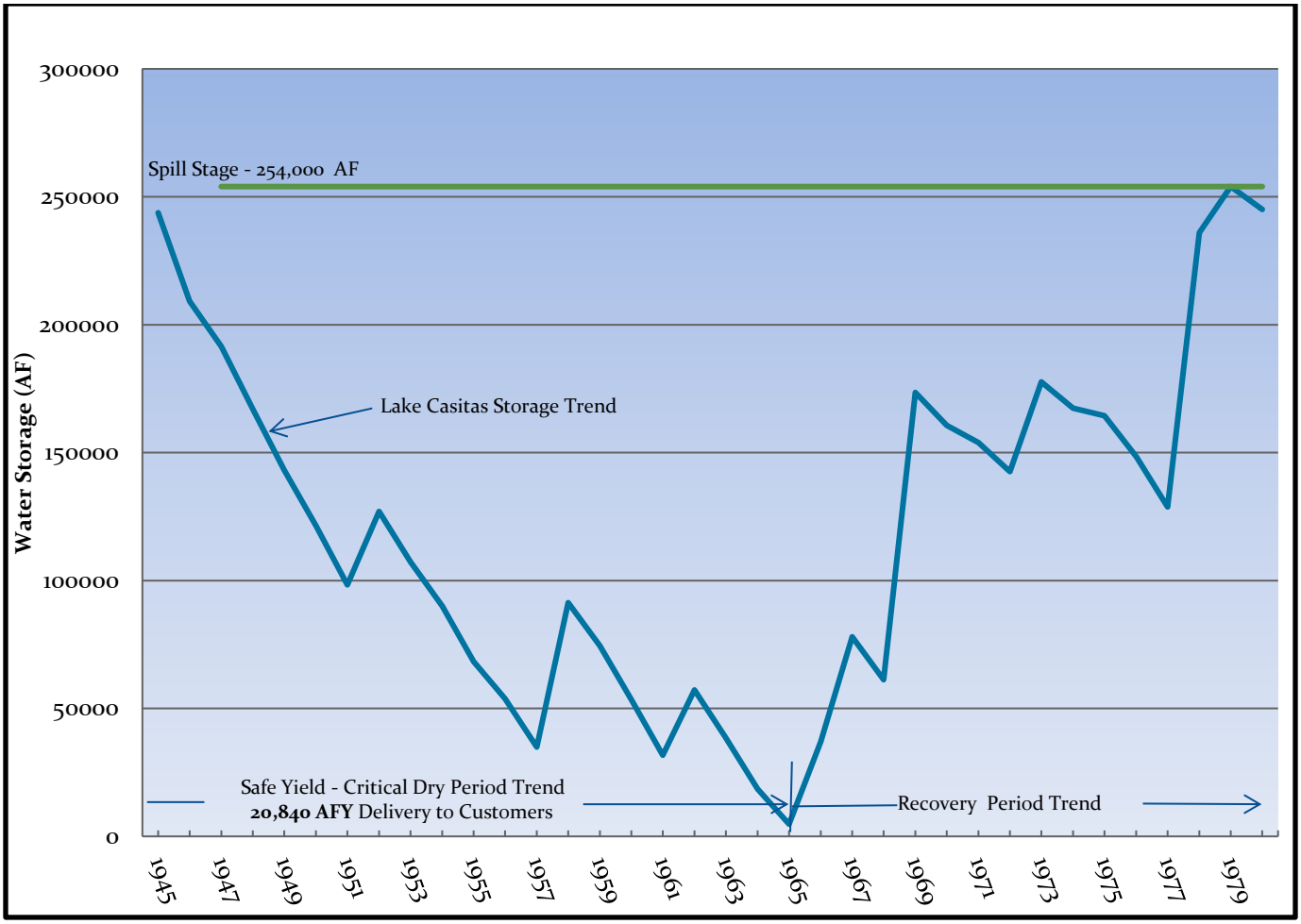


Figure 1 – Lake Casitas Safe Yield Storage and Recovery Period Trends

2.1.2 Groundwater.

Within Casitas' district boundaries, there are several local groundwater basins that are primary and critical sources of water supply for other local water purveyors (public, mutual and private), individual residential use and agriculture. During extended periods of drought with several years of less than average rainfall (20-inches) the local groundwater basins can become depleted due to pumping, natural drainage and evapotranspiration. The Lake Casitas surface water supply serves as a back-up water supply to the groundwater supply during times of extended drought.

Table 1 – Groundwater Basins of the Ventura River Watershed

Groundwater Basin	Acres	Max. Capacity (AF)	Approx. Safe Yield (AF/Yr.)
Upper Ojai	2,840	5,681	Unavailable
Ojai Valley	6,471	85,000	5,026

Upper Ventura River	9,360	35,118	9,482
Lower Ventura River	6,090	8,743	2,130

Source: Ventura River Watershed Council

The groundwater basins have demonstrated an ability to recharge rapidly in any one year with sufficient rainfall events, upon which time groundwater becomes the preferred source for those with well pumping access to the groundwater basins.

2.2 Water Demand.

The Casitas Board of Directors has established that the average long-term demand upon Lake Casitas must not exceed the annual safe yield of Lake Casitas supply. As a result of the 1987-1991, multi-year drought that resulted in water demands exceeding the annual safe yield, Casitas implemented specific actions in 1992 to limit water demands. The actions included the declaration of a voluntary twenty percent reduction in water demand, the assignment of water allocations based on 80 percent of FY1989-90 water usage that reflects a reduction in demand that comports more closely to safe yield of the Lake Casitas Supply, the implementation of water conservation measures to assist water users in adapting to less water consumption, and the limiting of new water service connections and expansions of agricultural plantings. Table 2 provides a comparison of classification water use, from prior to the action being taken by Casitas, to the level of water use during the recent drought. The FY 1989-90 water demand is recognized as being a high extreme water demand year at the end of the four year drought period.

Table 2 – Water Use Comparison by Customer Classification

Classification	No. of Service Connections			Water Demand – Lake Casitas (AF)		
	FY 1989-90	FY 2013-14		FY 1989-90	FY 2012-13	FY 2013-14
Residential	2424	2700		1603	1678	1738
Business	93	108		821	663	724
Industrial	12	9		155	23	22
Other	33	41		530	244	255
Resale Gravity	8	8		7724	4642	5614
Resale Pumped	15	15		1027	551	1182
Irrigation	253	251		11706	7978	9385
Interdepartmental	21	21		343	120	119
Temporary				11	13	55
Total	2,859	3,153		23,909	15,899	19,094

The local groundwater resources of the Ojai Valley and Ventura River provide on average 7,385 acre-feet per year (Daniel B. Stephens, 2010) to municipal, residential and agricultural pumpers. During multiple dry years, the groundwater basins become depleted and groundwater demands are met by supplementing groundwater supply from the Lake Casitas supply. In most cases, groundwater pumpers have a water service connection to Casitas as a backup supply of water. During any year or multiple dry year sequence of less than average rainfall, Casitas can anticipate that a portion of the 7,385 acre-feet of groundwater demand may be supplemented by the Lake Casitas supply. When groundwater basins are restored by rainfall events, groundwater pumpers convert back to the less expensive groundwater supply. The demand shifts are illustrated in Table 2 and Figure 2 for various classifications of water consumers. The FY 1989-90 and FY 2013-14 water demands occurred at the end of a three-year drought sequence.

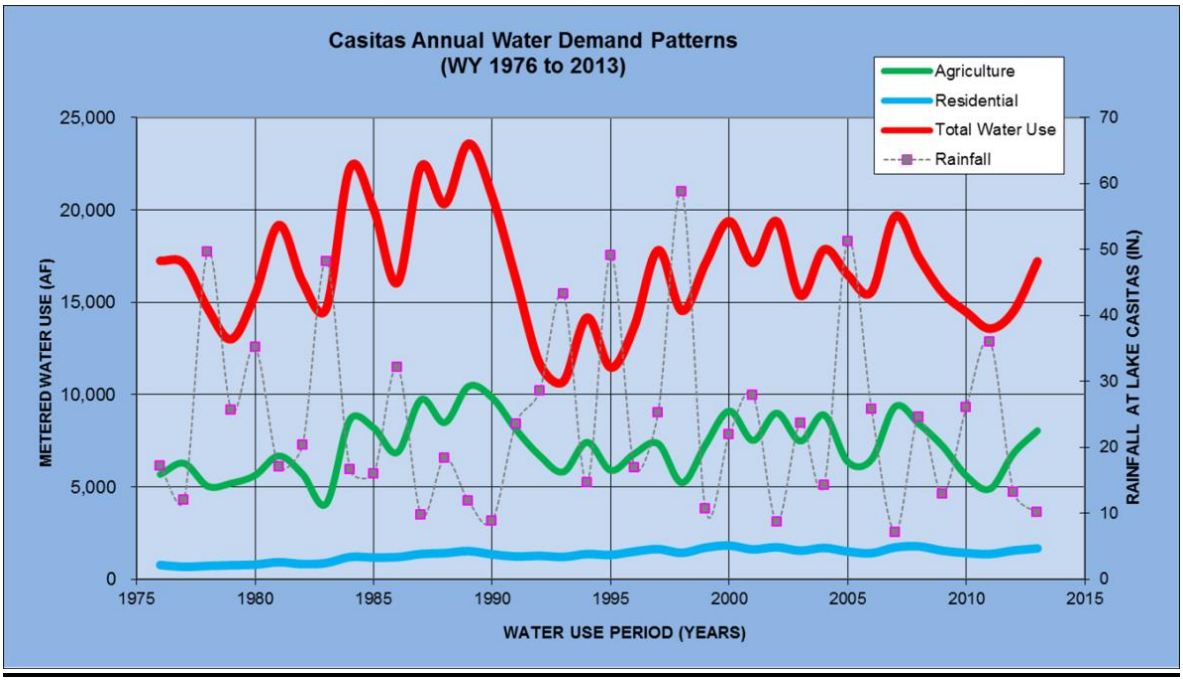


Figure 2 – Casitas Annual Demand Patterns

2.3 Priorities of Water Use.

Casitas recognizes the following priorities for potable water:

1) Public safety, health and sanitation;
2) Economic sustainability; and
3) Quality of life for the district'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 the western Ventura County. The non-essential water uses may be asked at any time to be curtailed during times of extreme water shortages.

Casitas 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 and the public may be faced with additional decisions on water use reductions that may impact the agricultural classification.

SECTION 3: WATER SHORTAGE EMERGENCY ACTIONS

3.1 Urban Water Contingency Analysis.

Water Code 10632 requires that the agency's Urban Water Management Plan provide an urban water shortage contingency analysis that includes specific elements that are within the authority of the urban water supplier. The required water shortage analysis is performed in the Casitas 2010 Urban Water Management Plan, and is further supported by this WEAP and the Casitas Emergency Response Plan, as amended.

3.2 Water Shortage Emergencies.

Water Code §350-359 provides that the governing body of a distributor of a public water supply may declare a water shortage emergency condition to prevail within the service area whenever it finds and determines that the ordinary demands cannot be satisfied without depleting water supplies to the extent that there would be insufficient water for human consumption. When deemed as a water shortage emergency in accordance with Water Code 350, Casitas shall follow the procedures provided by the Water Code in the implementation of the water shortage declaration and actions.

The State of California, through its authority under the Water Code and Government Code, may declare a water shortage emergency and require curtailment of water use that is above and beyond the requirements of the Casitas WEAP. Customers of Casitas must respond and comply with the orders of the State in a timely manner. A failure to comply may cause the State to impose fines and penalties that will be redistributed to the customers of Casitas in a manner determined by the Casitas Board of Directors.

3.3 Water Shortage Contingency Plan.

The District has prepared a Water Shortage Contingency Plan (Resolution 92-11), and further defined in the Casitas Urban Water Management Plan, 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 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 district-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 response to a short-term interruption of water supply may cause the implementation of the Casitas 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.

3.4 Water Waste Prohibitions on Certain Uses.

Water Code § 71640 provides the District the authority to restrict the use of district water during any emergency caused by drought, or other threatened or existing water shortage, and the district may prohibit the wastage of district water or the use of district water during such periods for any purpose other than household uses or such other restricted uses as the district determines to be necessary. The District may also prohibit use of district water during such periods for specific uses which it finds to be nonessential.

SECTION 4: STRATEGY FOR MANAGED WATER SUPPLY AND DEMAND

4.1 Strategy Principles.

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 District, 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 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.

To address the water shortage risk that may occur during an extended drought, the Casitas Board established in the Casitas Urban Water Management Plan of 1995 a series of five storage levels of Lake Casitas at which the Board could take actions to restrict the annual water extractions from Lake Casitas. The safe yield trend and the five stages of restrictive actions are illustrated in Figure 3.

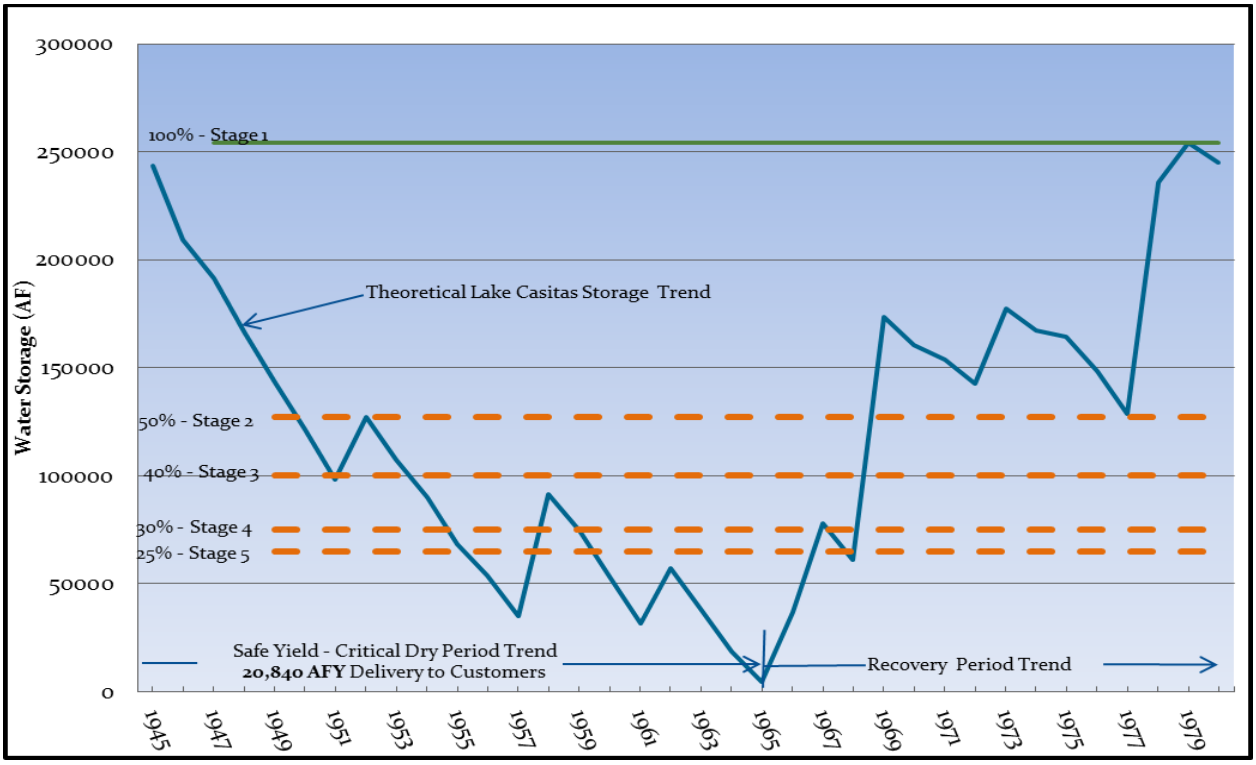


Figure 3 – Lake Casitas Safe Yield Storage Trend and Stages for Demand Reduction

4.2 Water Allocation Principles.

Each and every water service provided by Casitas 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 (WC § 372). The following principles are to be followed for the Casitas water allocations:

1) Each Casitas 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.

2) Allocation shall not mean an entitlement or imply water rights in favor of the customer.

3) 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.

4) The Casitas 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.

5) Water allocations provided by Casitas are assigned to property or water purveyors and are not transferrable from one property or water purveyor to another.

6) Casitas' water allocations shall not be sold, exported, bartered or traded by or between Casitas' customers.

7) Casitas 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.

4.3 Allocation Assignments to Water Service Classifications.

Casitas has established the definitions of water customer classifications as provided by the Casitas 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 by Casitas, Casitas may perform site specific water use audits and survey to determine the appropriate level of allocation to be assigned to any one service connection or customer. Water allocations may change by action of the Casitas 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:

Business

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 the 80% of the 1989-90 water use or the Fiscal Year 2012-13 water use.

Fire

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

Industrial

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 recorded for either the 80% of the 1989-90 water use or the Fiscal Year 2012-13 water use.

Interdepartmental

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 2012-13 water use.

Irrigation (Commercial Agriculture)

1) Water allocation shall be specified as an **annual** allocation based on a fiscal year (July 1st to June 30th).
2) 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 and the property owner. Casitas' records and mapping will be the standard for the identification of lands in irrigation prior to March 1, 1992.
3) 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 except under the terms and conditions of an approved addendum to the Application for Water Service to provide an aggregation variance. The customer may apply for the aggregation of allocations and water volume for accounts serving contiguous parcels under a single ownership, subject to the conditions of the Casitas addendum to the Application for Water Service. The aggregation variance must be approved and on file for the current year during which the variance is applicable. The issuance of the aggregation variance is subject to the discretion of the General Manager.
4) 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 2012-13 or (2) eighty (80) percent of recorded water volume metered to the account in fiscal year 1989-90, neither of which shall exceed a water volume of 3 acre-feet per acre applied to the qualifying acreage.
5) 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.

Multi-Family Residential

1) Stage 1 water allocations are assigned to each existing Multi-Family Residential account by either a recorded agreement or based on the standards set in 1992 by Casitas.
2) The Multi-Family 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 Multi-Family Residential allocation is provided for health and sanitation and shall be set at **84 units per year per dwelling,** distributed evenly each month as 7 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 Multi-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 follows:

Month	July	August	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June
% of Total Annual Allocation	.17	.17	.12	.05	.05	.05	.02	.02	.02	.10	.10	.12

The part of the Multi-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 **84 units per year per year per dwelling,** and be constant for 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;

Other

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% of the 1989-90 water use or the Fiscal Year 2012-13 water use.

Resale

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, 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 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 do not exceed their annual water allocation from Casitas.
5) The allocation assignment from Casitas 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 Casitas.
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 to assure the continued availability of water for health and safety purposes.

Residential

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.

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 each month 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 follows:

Month	July	August	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June
% of Total Annual Allocation	.17	.17	.13	.05	.05	.05	.02	.02	.02	.10	.10	.12

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:
    a. The essential health and sanitation portion of the residential allocation shall be set at **120 units per year,** and be constant for each month of the year;
    b. Non-essential portion of the annual residential allocation shall be based on actual irrigated landscape area of the parcel with a maximum limit to 1.99 acres (86,684 square feet) of irrigated landscape area and set as follows:
        i. For the first 5,000 square feet of irrigated landscape area, 15 gallons per square foot;
        ii. For the next 10,000 square feet of irrigated landscape area, 10 gallons per square foot
        iii. For the next increment up to 71,684 square feet of irrigated landscape area, 3 gallons per square foot;

Temporary

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 Board of Directors approves a limited continuance of the temporary service.

4.4 Allocation Adjustments.

A Casitas customer may request the reconsideration of their initial assigned Stage 1 water allocation within 60 days of the adoption of the WEAP 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 District. 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 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.

4.5 Standards for a Water Allocation Adjustment.

Water allocation adjustments may be considered by Casitas 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:

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

Water allocations will not be adjusted to accommodate:

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

Agricultural Irrigation Allocation Adjustment Standards:

a. Limited to acreage planted in commercial agricultural production prior to March 1, 1992. Casitas 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.
b. Comparative (same crop type and average use of various parcels) crop usage in FY2012-13 for full irrigation, not to exceed 3 AF/AC/YR, which is located within a 1-mile circumference of the parcel seeking the appeal for a change in water allocation.

4.6 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 Board of Directors. The determination by the Board of Directors shall be final.

4.7 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 Board of Directors meeting. The determination that water is or is not available shall be within the determination of the Board of Directors. 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 Board of Directors, the supply of water is definite enough to provide the assurance to the County of Ventura that there is a forty year supply.

4.8 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' 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 CMWD project supply or additional new supplies, supplies shall be allocated in accordance with the following criteria:

a) 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.

b) All applicants seeking an allocation shall provide Casitas 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 shall determine meter size and amount of allocation based upon reasonable and necessary needs and Casitas' Rates and Regulations.

c) The amount of water to be allocated shall be at Casitas' 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 District and as amended. The amount of water required for the project may be calculated and submitted for the consideration of Casitas by a civil engineer, registered in the State of California, representing the project proponent.

SECTION 5: STAGED DEMAND REDUCTION IMPLEMENTATION

5.1 Staged Demand Reduction Principles.

The primary source of water that is available to the Casitas Municipal Water District 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 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 District 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:

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

5.2 Water Resource Conditions and Actions.

The General Manager shall report to the Board of Directors each year *(April)* 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 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. Casitas shall make such determinations public and follow with appropriate and timely notification of all customers. Casitas has established the implementation of various Stages of action based on the amount of water in storage in Lake Casitas, as shown in Table 3. An action to declare and implement a Stage may be by either an action by Casitas Board of Directors based on unanticipated changing lake supply conditions or by the following schedule in Table 4.

Table 3 – Stage Conditions

Stage	Stage Title	Lake Casitas Storage - %	Lake Casitas Storage Action Level (acre-feet)
1	Water Conservation	100% - 50%	237,761 to 118,880
2	Water Shortage Warning	50% - 40%	118,880 to 95,104
3	Water Shortage Eminent	40% - 30%	95,104 to 71,328
4	Severe Water Shortage	30% - 25%	71,328 to 59,440
5	Critical Water Shortage	25% - 0%	59,440 to 3,000

Table 4 - Stage Action Schedule

Target Dates	**Action**
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 Board of Directors. Publish a notice of a public hearing if changes are recommended.
Late April	Casitas Board of Directors 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.

5.3 Demand Reduction Goals and Measures.

The demand reduction goals and measures begin with Stage 1, where reasonable and appropriate water allocation assignments are made to each Casitas service connection and the end water users are implementing the 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 reduction of the allocation during the duration of the declared Stage condition.

Demand Reduction Stage	**1**	**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
% Lake Storage	100% - 50%	50% - 40%	40% - 30%	30% - 25%	25% - 0%
Water Use Reduction Response Goal	20%	20%	30%	40%	50%
Residential & Multi-Family Residential Essential Use Non-essential Use	 0% 20%	 0% 20%	 0% 30%	 0% 40%	 0% 50%
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%

5.4 Stage Adjustments to Allocations.

The five stages of storage in Lake Casitas and the initial guideline for water allocation adjustments for each classification at each Stage are presented in Table 5. Upon recommendation of the General Manager and approval of the Board of Directors at the onset of a specific Stage, the District shall apply appropriate demand reduction factors to the allocations for each customer classification, as deemed necessary. The Board of Directors retain 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 5. 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 5 – Staged Water Demand Reductions for Water Classifications

Note: Initial Stage 1 Allocations include a 20% reduction from the 1989-90 demands.

Essential Use Allocations will remain the same and not adjusted, except as otherwise determined by the Board to be a necessity to preserve water supply during extreme conditions. The measures to

achieve the demand reduction goal may be selected from a menu of options as provided in Table 6, or should water supply conditions become worse than anticipated the Casitas Board may adopt more stringent requirements as deemed necessary.

5.5 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.

5.6 Water Rates and Conservation Penalty.

a. The Casitas Board of Directors shall annually consider the setting or adjustment of water rates that reflect the cost of water service, consistent with State law.

    1. Casitas has implemented a tiered inclining rate structure for the Residential and Multi-family Residential classifications that represents the proportional cost of service that is attributable to the parcel that is served water.

b. The Casitas 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 imposed to curtail the potential for adverse effects of excessive water consumption.

c. Upon determination of a change in the Demand Reduction 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.

d. Revenues recovered from the Conservation Penalty will supplement Casitas' water conservation costs, provide revenue for water shortage related projects, and cover costs associated with implementing changes to the WEAP as directed by the Board.

5.7 Appeals for Exception to Staged Adjustments of Allocation or Conservation Penalty Assessment.

a. A Casitas customer may file an appeal for:

    1. An Exception to Staged Adjustment of Allocation, as provided in Section 5.4 above; or
    2. The assessment of a Conservation Penalty, as provided in Section 5.6 above

    by submitting a written appeal, on a form provided by Casitas, directly to the General Manager or his/her designee.

b. The following paragraphs provide the criteria or reasons for an appeal for an Exception to Staged Adjustments of Allocation and an appeal for an Exception to Staged Adjustments of Allocation may be granted for one or more of the following reasons:

1. The staged adjustment would cause a condition affecting the health, sanitation, fire protection, or safety of the customer or the public;
2. Strict application of the water allocation adjustment 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. The customer is a hospital or health care facility using industry best management practices;
4. The business has already implemented environmental sustainability measures and water conservation measures reducing water consumption to the maximum extent possible.

c. The customer must support their reason for an appeal for an Exception to Staged Adjustments of Allocation with supporting documentation or substantial evidence demonstrating the need for an exception. A failure to provide supporting documentation or evidence shall result in a denial of the appeal.

d. The appeal for an Exception to Staged Adjustments of Allocation will be first reviewed, approved or denied, by the General Manager or his/her designee. The decision of the General Manager or his/her designee shall be reported to the customer/appellant in written form. If the customer is not satisfied with the General Manager or his/her designee's decision, the customer/appellant must request, within 10 days of the date of the General Manager or his/her designee's decision, that the appeal be placed on the agenda of the Casitas Board of Directors for their review and determination based on the criteria set forth in Section 5.7(b)(1)-(4). The determination by the Casitas Board of Directors shall be final.

e. The following paragraphs provide the criteria and process for an appeal from a Conservation Penalty:

1. An appeal for relief of a Conservation Penalty may only be considered when a natural disaster such as a wildfire, earthquake, flood or landslide or other naturally occurring phenomenon which directly causes a leakage or leakage event.

2. The customer must file their appeal to the Casitas Municipal Water District Board of Directors' Appeals Panel.[1] A request for review and an evidentiary hearing must be made in writing and submitted to the District within thirty (30) days of date the Casitas bill with the Conservation Penalty was issued by the District. Upon receipt by the District, a review and evidentiary hearing will be placed on the next agenda of the Appeals Panel.

3. The appeal of a Conservation Penalty must explain why the leakage or leakage event was caused by a naturally occurring event such as wildfire, earthquake, flood or landslide.

4. The customer/appellant must support their reason for an appeal from a Conservation Penalty with supporting documentation or substantial evidence demonstrating the circumstances for the appeal. A failure to provide supporting documentation or evidence shall result in a denial of the appeal.

[1] The Appeals Panel is a Board-appointed committee composed of three (3) Board members who are authorized to conduct evidentiary hearings, make findings and render decisions in accordance with this section of the Water Efficiency and Allocation Program. This is in accordance with California Water Code Sections 71300, 71301 and 71305.

5. The General Manager or his/her designee will review the appeal and the documentation or evidence provided by the customer supporting the appeal. The General Manager or his/her designee may request additional information from the customer. Following a review of the appeal, the General Manager shall make a recommendation to the Appeals Panel. A copy of the General Manager's recommendation will be provided to the customer/appellant.

6. If a review and evidentiary appeal hearing is properly requested before the Appeals Panel, the customer/appellant shall have an opportunity to state their case and present evidence supporting their appeal. Following the customer's presentation of the grounds for appeal, the Appeals Panel shall review the General Manager's recommendation on the conservation penalty appeal and determine whether to grant the appeal in full, apportion the penalty, or deny the appeal based on the following:

   A. The documentation and/or evidence provided by the customer in their initial written appeal;
   B. The basis of the General Manager's recommendation as provided in the General Manager's written explanation of the grounds for the recommendation; and
   C. Any additional circumstances the Appeals Panel determines to be relevant during the evidentiary hearing.

7. In order to approve an appeal of a Conservation Penalty, the Appeals Panel must make the following findings:

   A. The customer provided documentation or substantial evidence that the Conservation Penalty could not be avoided by circumstances within the customer's reasonable control;
   B. The General Manager's written recommendation is valid or invalid in light of the customer's documentation or evidence provided; and
   C. The reason for the appeal is not to accommodate for leakage or a leakage event within the control of the customer.

8. If the appeal for a Conservation Penalty is approved by the Appeals Panel, the Appeal Panel shall determine if the Conservation Penalty is denied in whole or in part.

9. Following the review and the evidentiary hearing, the Appeals Panel shall provide a written determination with findings to the customer within thirty (30) days of the hearing either approving, denying or apportioning the appeal. The Appeals Panel's determination is final and binding on the customer.

SECTION 6: EXPORT OF CASITAS WATER

Water Code Section 71611 authorizes Casitas to sell water under its control for use only within the jurisdictional boundaries of the Casitas Municipal Water District. The unauthorized export and use of Casitas water beyond the Casitas district boundaries can have significant negative impacts on the Casitas water supply reliability, and therefore shall be prohibited unless specifically authorized in writing by the Casitas Board of Directors. All customers receiving Casitas water into water

conveyance systems which cross Casitas boundaries shall meet the following requirements as a condition of service:

1) Customers shall submit to Casitas a certified report on the last day of each month that demonstrates that no Casitas water was transported or used outside Casitas boundaries during the prior month without written approval by Casitas.
2) Customer shall install and maintain approved metering devices and shall be required to account for all Casitas water delivered in the customer's system.
3) In the event Casitas water is exported during any month, the customer shall be billed for exported water at five (5) times the Casitas rate for the Temporary Service classification.
4) In the event the customer fails to comply with the conditions of service stated in the above (1) and/or (2), all water purchased in excess of the allocation shall be considered exported water and shall be billed in accordance with the foregoing.
5) This Section, Export of Casitas Water, is in effect at all times.
6) The exceptions to the export are during a declaration by the Board of Directors of surplus water, and limited to the surplus water or exchange agreement between the Board of Directors and other party.

Continuing or reoccurring violations of this section by any Casitas customer may result in the restriction or disconnection of water service to the customer.

Table 6 – Stage Actions and Water Demand Reduction Measures

Water Shortage Condition	Key Casitas Communications and Actions	Customer Demand Reduction Measures	Penalties And Rates
Stage 1 Supply Range 100% - 50% Voluntary Demand Reduction **To Stage 1 Allocation**	• 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.	• Water conservation practices requested of all customer classifications. • Adhere to Water Waste Prohibition Ordinance and State of California laws and regulations regarding water waste • Adhere to assigned water allocation or less.	• Consider and implement Conservation Penalty for water use in excess of allocation. • Consider rates for revenue stabilization and cost of service.
Stage 2 Supply Range 50% - 40% Mandatory Demand Reduction to Stage 1 Allocation	• 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.	• Continue all Stage 1 measures. • Landscape watering advised 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.	• Consider and implement Conservation Penalty for water use in excess of allocation – response to reduced allocation. • Consider rates for revenue stabilization and cost of service.
Stage 3 Supply Range 40% - 30% Demand Reduction From Stage 1 Allocation **10%**	• Declare Stage 3 • Implement demand reductions for each customer classification. • Expand and intensify public information campaign. • Provide regular briefings, publish monthly consumption report. • Hire additional temporary staff in customer service and conservation. Water waste enforcement.	• Continue with Stage 1 and 2 measures. • Reduced water allocations. • Landscape watering advised to one (1) watering day per week.	• Consider and implement Conservation Penalty for water use in excess of allocation – response to reduced allocation. • Consider rates for revenue stabilization and cost of service.
Stage 4 Supply Range 30% - 25% Demand Reduction From Stage 1 Allocation **20%**	• Declare Stage 4 • Implement demand reductions for each customer classification. • Continue to provide regular media briefings. • Open drought information center.	• Continue with Stage 1 through 3 measures. • Reduced water allocations. • Landscape watering advised to one (1) watering day per week. • Consider prohibition of filling swimming pools and fountains. .	• Consider and implement Conservation Penalty for water use in excess of allocation – response to reduced allocation. • Consider rates for revenue stabilization and cost of service.
Stage 5 Supply Range 25% - 0% Demand Reduction From Stage 1 Allocation **30%**	• 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. • Consider further Staged reductions and other future Board actions	• Continue with Stage 1 through 4 measures. • Reduced water allocations. • Rescind Temporary meters issued.	• Consider and implement Conservation Penalty for water use in excess of allocation – response to reduced allocation. • Consider rates for revenue stabilization and cost of service.