



# Water Shortage Contingency Plan (Draft)

Sweetwater Authority  
*Chula Vista, California*

April 13, 2021





## Contents

Introduction .....	1
1 Annual Water Supply and Demand Assessment Procedures.....	1
1.1 Decision Making Process .....	2
1.2 Current and Projected Demands.....	2
1.3 Available and Projected Water Supply.....	2
1.4 Infrastructure Constraints.....	3
2 Six Standard Water Shortage Levels .....	3
3 Shortage Response Actions.....	3
3.1 Drought Response Plan .....	9
3.1.1 Level 1 Drought Watch.....	9
3.1.2 Level 2 Drought Alert.....	9
3.1.3 Level 3 Drought Alert.....	10
3.1.4 Level 4 Drought Critical.....	10
3.1.5 Level 5 Drought Emergency.....	10
3.1.6 Level 6 Drought Emergency.....	11
3.2 Determining Water Shortage Reductions.....	11
3.3 Catastrophic Supply Interruption Planning.....	12
3.3.1 SDCWA Water Shortage and Drought Response Plan .....	12
3.3.2 Authority Drought Response Plan.....	12
3.3.3 Authority Emergency Response Plan .....	13
4 Communication Protocols .....	14
4.1 Strategies for Communication.....	14
4.2 Catastrophic Communication .....	17
5 Compliance and Enforcement.....	17
6 Legal Authorities.....	18
7 Financial Consequences .....	19
8 Monitoring and Reporting.....	20
9 WSCP Refinement Procedures.....	20
10 Special Water Feature Distinction .....	20
11 Plan Adoption, Submittal, and Availability.....	20

## Tables

Table 1. Water Shortage Levels .....	3
Table 2. Restrictions and Prohibitions on End Uses.....	5
Table 3. Consumption Reduction Methods.....	11
Table 4. Communication Outline.....	15
Table 5. Penalties and Charges.....	18

## Acronyms

Authority	Sweetwater Authority
SDCWA	San Diego County Water Authority
UWMP	Urban Water Management Plan
Water Code	California Water Code
WSCP	Water Shortage Contingency Plan

# Introduction

This Water Shortage Contingency Plan (WSCP) presents Sweetwater Authority's (Authority) detailed proposal for how the Authority will act in the case of an actual water shortage condition.

In 2018, two long-term conservation bills, Senate Bill 606 and Assembly Bill 1668, were signed into law by Governor Jerry Brown, amending portions of the California Water Code (Water Code) related to water shortage contingency planning. The amended Water Code requires agencies to prepare and adopt a WSCP, as part its Urban Water Management Plan (UWMP) that contains the following elements:

1. Annual Water Supply and Demand Assessment Procedures
2. Six Standard Water Shortage Stages
3. Shortage Response Actions
4. Communication Protocols
5. Compliance and Enforcement
6. Legal Authorities
7. Financial Consequences
8. Monitoring and Reporting
9. Refinement Procedures
10. Special Water Feature Distinction
11. Plan Adoption, Submittal, and Availability

The WSCP will be re-evaluated at least every five years in coordination with the UWMP but could be updated more frequently based on lessons learned, new regulatory requirements, or other factors. This WSCP also discusses steps taken by the Authority's water supply wholesaler, the San Diego County Water Authority (SDCWA), during an extended drought or water emergency event.

## 1 Annual Water Supply and Demand Assessment Procedures

The amended Water Code requires that urban water suppliers conduct an annual water supply and demand assessment (Annual Assessment), beginning July 1, 2022. The Authority currently submitted monthly reports to the state on water usage and current water shortage contingency levels; however, the Annual Assessment is intended to assess projected water demands and supplies to determine if adequate supplies are available for each current year and one dry year. The annual assessment includes a process for determining water supply reliability and the Authority's ability to utilize shortage response actions should implementation be required.

Each year, the Authority determines its water supply and demand assessment by evaluating total local water supplies (groundwater, desalination, and surface water), as well as the water supply allocation from SDCWA. The Authority then compares total supplies to anticipated water demands for both the current year and one dry year to determine water supply reliability and whether water supply shortages may occur. The Authority will prepare and submit their annual assessment report to the state by July 1 of each year, starting in 2022.

## 1.1 Decision Making Process

Each year the Authority will use the following steps to determine, and subsequently report to the state, its water supply reliability.

- SDCWA announces member agency allocation determination for current year and any carryover or emergency storage supplies.
- Authority will determine available local supplies, exclusive of imported water supply, and also total available supplies.
- Authority will review known infrastructure constraints (including water quality conditions limiting local sources).
- Authority reviews and estimates current and projected water demands.
- Authority compares supply and demand and makes a determination of the water supply reliability for the current year and one dry year.
- Authority prepares and submits Annual Assessment Report to the state.

Evaluation criteria for the Authority's supplies, demands, and water shortage levels will include SDCWA's determination on regional supplies for its member agencies, local groundwater and surface water availability, storage, infrastructure constraints, and recent water demand trends.

## 1.2 Current and Projected Demands

The Annual Assessment will use the Authority's recent demand data and projections (adjusted by previous year active consumption) which considers demand, weather, population growth, and other influencing factors for the current year and following years.

## 1.3 Available and Projected Water Supply

The Authority will evaluate the current year available supply and one dry year available supply in its Annual Assessment. The available water supply evaluation will consider hydrological and regulatory conditions. Available supply from each water source will consider local surface water storage and emergency storage allocations, groundwater production from the previous year and potential projected groundwater production, desalinated water production from the previous year and projected production capacities, and imported water supplies as determined by SDCWA. SDCWA considers member agencies' local water supplies first before determining allocations of imported water to each member agency.

## 1.4 Infrastructure Constraints

The Authority’s existing water supply infrastructure includes surface water reservoirs, a water treatment plant and desalination facility, pipelines, storage tanks, pump stations, and groundwater wells. The Authority will evaluate existing water supply and capacities and any constraints for the current year and for one dry year. Infrastructure constraints may consider supply capabilities in the current year, such as shut-downs due to maintenance, construction impacts, and water quality impacts. Once constraints have been identified, the Authority will determine whether the total quantified water supply should be adjusted to account for these identified constraints.

## 2 Six Standard Water Shortage Levels

This WSCP revises the Authority’s stages of action defined in the Authority’s 2015 DRP to define six water shortage levels in response to revisions to the Water Code. These graduated water shortage levels specify water shortage response actions that the Authority can implement in response to shortages in water supply, as expressed by percentages.

Resolution 16-10 was adopted in 2016 to amend and adopt the Authority’s DRP, which contained a four-level drought response strategy that designated voluntary and mandatory consumption reduction methods to achieve a range of demand reduction goals. The Authority WSCP, developed as part of the 2020 UWMP process, redefined and updated the reduction goals, which are summarized in Table 1 and described in detail below:

**Table 1. Water Shortage Levels**

Water Shortage Level	Percent Reduction
Level 1: Drought Watch Condition (voluntary)	10
Level 2: Drought Alert Condition (mandatory)	20
Level 3: Drought Alert Condition (mandatory)	30
Level 4: Drought Critical Condition (mandatory)	40
Level 5: Drought Emergency Condition (State and Board Declared - mandatory)	50
Level 6: Drought Emergency Condition (State and Board Declared - mandatory)	> 50

## 3 Shortage Response Actions

Shortage response actions included in this WSCP are a mix of locally appropriate mandatory prohibitions on end use, demand reduction methods, supply augmentation, and operational change measures. Table 2 provides a summary of voluntary and mandatory prohibitions and consumption reduction methods that are implemented within the Authority service area in order to meet mandated water use restrictions. Customers

can select the specific water conservation measures/actions that are most appropriate for their setting; however, customers must abide by water waste prohibitions, water use reductions are mandatory, and monetary penalties may be levied on customers who do not meet reduction goals. The recent Authority Supplement to Sweetwater Authority Rates and Rules, adopted January 13, 2021 under Resolution 21-03, provides a tiered rate structure with increasing water rates for each level of drought response.



**Table 2. Restrictions and Prohibitions on End Uses**

Stage	Restrictions and Prohibitions on End Users	Additional Explanation or Reference	Penalty, Charge, or Other Enforcement?
Level 1	Other	Water should be used reasonable and productively at all times.	Yes
Level 1	Other - Customers must repair leaks, breaks, and malfunctions in a timely manner	Customers are to repair major water leaks immediately and minor leaks within 24 hours of discovery.	Yes
Level 1	Other - Prohibit use of potable water for washing hard surfaces	Customers are encouraged to restrict hose washing of paved areas.	No
Level 1	Other	Customers are encouraged to use an automatic shut-off nozzle when using a hand-held hose for irrigation, vehicle, or structure washing.	No
Level 1	Landscape - Restrict or prohibit runoff from landscape irrigation		Yes
Level 2	Landscape - Limit landscape irrigation to specific days	Customers are to restrict irrigation to no more than 2 days per week, which may include limitations to specific days of the week as determined by the Governing Board.	Yes
Level 2	Landscape - Other landscape restriction or prohibition	Customers are encouraged to limit lawn watering and irrigation sprinklers to no more than 10 minutes per watering station per day.	No
Level 2	Water Features - Restrict water use for decorative water features, such as fountains		Yes
Level 2	Other water feature or swimming pool restriction	Customers are encouraged to stop filling or re- filling pools, ornamental lakes and/or ponds, except to the extent needed to sustain aquatic life.	No
Level 2	CII - Restaurants may only serve water upon request		Yes
Level 2	CII - Lodging establishment must offer opt out of linen service		Yes

Stage	Restrictions and Prohibitions on End Users	Additional Explanation or Reference	Penalty, Charge, or Other Enforcement?
Level 2	Landscape - Other landscape restriction or prohibition	Customers are prohibited from irrigating ornamental turf on public street medians with potable water.	Yes
Level 2	Landscape - Other landscape restriction or prohibition	Customers are prohibited from irrigating with potable water landscapes outside newly constructed homes and buildings in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission and the Department of Housing and Community Development.	Yes
Level 3	Landscape - Limit landscape irrigation to specific days	Customers are to restrict irrigation to no more than 2 days per week, which may include limitations to specific days of the week as determined by the Governing Board.	Yes
Level 3	Landscape - Other landscape restriction or prohibition	Customers are encouraged to limit lawn watering and irrigation sprinklers to no more than 10 minutes per watering station per day.	No
Level 3	Water Features - Restrict water use for decorative water features, such as fountains		Yes
Level 3	Other water feature or swimming pool restriction	Customers are encouraged to stop filling or re-filling pools, ornamental lakes and/or ponds, except to the extent needed to sustain aquatic life.	No
Level 3	CII - Restaurants may only serve water upon request		Yes
Level 3	CII - Lodging establishment must offer opt out of linen service		Yes
Level 3	Landscape - Other landscape restriction or prohibition	Customers are prohibited from irrigating ornamental turf on public street medians with potable water.	Yes



Stage	Restrictions and Prohibitions on End Users	Additional Explanation or Reference	Penalty, Charge, or Other Enforcement?
Level 3	Landscape - Other landscape restriction or prohibition	Customers are prohibited from irrigating with potable water landscapes outside newly constructed homes and buildings in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission and the Department of Housing and Community Development.	Yes
Level 4	Other - Prohibit use of potable water for washing hard surfaces		Yes
Level 4	Other - Prohibit vehicle washing except at facilities using recycled or recirculating water		Yes
Level 4	Landscape - Restrict or prohibit runoff from landscape irrigation		Yes
Level 4	Landscape - Limit landscape irrigation to specific times	Customers shall only operate landscape sprinklers between the hours of 6 p.m. and 9 a.m.	Yes
Level 4	Landscape - Limit landscape irrigation to specific days	Customers are to restrict residential and commercial landscape irrigation to no more than 1 day per week.	Yes
Level 4	Landscape - Other landscape restriction or prohibition	Customers are to limit irrigation using sprinklers to no more than 10 minutes per watering station per day.	Yes
Level 4	Water Features - Restrict water use for decorative water features, such as fountains		Yes
Level 4	Other water feature or swimming pool restriction	Customers are encouraged to stop filling or re-filling pools, ornamental lakes and/or ponds, except to the extent needed to sustain aquatic life.	Yes
Level 5	Landscape - Prohibit all landscape irrigation		Yes
Level 6	Landscape - Prohibit all landscape irrigation		Yes



## 3.1 Drought Response Plan

The Authority's established drought levels are explained in the following sections. Table 1 and Table 2 provide a summary of the Authority's drought response levels, which align with the SDCWA Model Drought Ordinance.

According to the SDCWA Model Drought Ordinance:

“Triggers that identify the actions required to initiate a certain drought response level are included in the Model Drought Ordinance, which takes into account the relationship between the SDCWA and its member agencies. A certain drought response level may apply when SDCWA notifies its member agencies that a specific consumer demand reduction level is required. Factors that impact the demand reduction level include potential or actual cutbacks from MWD, the amount of member agency local supplies available, and the ability of SDCWA or its member agencies to secure supplemental supplies. Based on an action by the Board and notification from SDCWA, the member agency would declare the appropriate response level and implement water-use restrictions consistent with the declared response level.”

At each stage, the demand reduction measures will be implemented in varying combinations and monitored to ensure the demand reduction goals are met. During normal times, production figures are recorded daily and reported on a monthly basis. During Level 1, totals are reported weekly to the Director of Water Quality and monthly to the General Manager. In Levels 2 through 6, daily production figures will be reported to the Director of Water Quality who compares the weekly production to the target weekly production to verify that the reduction goal is being met and forwards reports to the General Manager. Monthly reports will be sent to the Governing Board. If reduction goals are not met, the General Manager will notify the Governing Board so that corrective action can be taken.

### 3.1.1 Level 1 Drought Watch

A Drought Watch condition may occur when a program is initiated by the SDCWA, Metropolitan, and/or the SWRCB to reach up to a 10 percent water use reduction goal. Authority customers are requested to reduce consumption up to 10 percent from the base. At this level, the current water pricing structure remains in effect with no imposition of allocation-based conservation water pricing. The General Manager shall declare a Drought Watch condition.

### 3.1.2 Level 2 Drought Alert

A Drought Alert condition may occur when a program is initiated by the SDCWA, Metropolitan and/or the SWRCB to reach up to a 20 percent water use reduction goal. Authority customers are requested to reduce consumption up to 20 percent from the base and required to comply with water conservation measures. The Governing Board has sole authority to declare a Level 2 Drought Alert condition and may also implement a revenue-neutral water conservation pricing structure. If during a Level 2 condition the Governing Board implements a revenue-neutral water conservation pricing structure,

then the Authority's policy titled "Adjustment to Customer's Water Bill" shall be suspended. The Governing Board may additionally declare a water shortage emergency, in the manner and on the criteria provided in Water Code Section 350 et. Seq. and adopt appropriate regulations and restrictions under such authority.

### 3.1.3 Level 3 Drought Alert

A Drought Alert condition may occur when a program is initiated by the SDCWA, Metropolitan and/or the SWRCB to reach up to a 30 percent water use reduction goal. Authority customers are requested to reduce consumption up to 30 percent from the base and required to comply with water conservation measures. The Governing Board has sole authority to declare a Level 3 Drought Alert condition and may also implement a revenue-neutral water conservation pricing structure. If during a Level 3 condition the Governing Board implements a revenue-neutral water conservation pricing structure, then the Authority's policy titled "Adjustment to Customer's Water Bill" shall be suspended. The Governing Board may additionally declare a water shortage emergency, in the manner and on the criteria provided in Water Code Section 350 et. Seq. and adopt appropriate regulations and restrictions under such authority.

### 3.1.4 Level 4 Drought Critical

A Drought Critical condition may occur when a program is initiated by the SDCWA, Metropolitan, and/or the SWRCB to reach up to a 40 percent water use reduction goal. Authority customers are requested to reduce consumption up to 40 percent from the base and required to comply with the water conservation measures set. The Governing Board has sole authority to declare a Drought Critical condition and may also implement a revenue-neutral water conservation pricing structure. If during a Level 4 condition the Governing Board implements a revenue-neutral water conservation pricing structure, then the Authority's policy titled "Adjustment to Customer's Water Bill" shall be suspended. The Governing Board may additionally declare a water shortage emergency, in the manner and on the criteria provided in Water Code Section 350 et. Seq. and adopt appropriate regulations and restrictions under such authority.

### 3.1.5 Level 5 Drought Emergency

A Drought Emergency condition may occur when a program is initiated by the SDCWA, Metropolitan, and/or the SWRCB to reach up to a 50 percent water use reduction goal. Authority customers are requested to reduce consumption up to 50 percent from the base and required to comply with water conservation measures. The Governing Board has sole authority to declare a Drought Emergency condition and may also implement a revenue-neutral water conservation pricing structure. If during a Level 5 condition the Governing Board implements a revenue-neutral water conservation pricing structure, then the Authority's policy titled "Adjustment to Customer's Water Bill" shall be suspended. The Governing Board may additionally declare a water shortage emergency, in the manner and on the criteria provided in Water Code Section 350 et. Seq. and adopt appropriate regulations and restrictions under such authority.

### 3.1.6 Level 6 Drought Emergency

A Drought Emergency condition may occur when a program is initiated by the SDCWA, Metropolitan, and/or the SWRCB to reach in excess of a 50 percent water use reduction goal. Authority customers are requested to reduce consumption by more than 50 percent from the base and required to comply with water conservation measures. The Governing Board has sole authority to declare a Drought Emergency condition and may also implement a revenue-neutral water conservation pricing structure. If during a Level 6 condition the Governing Board implements a revenue-neutral water conservation pricing structure, then the Authority’s policy titled “Adjustment to Customer’s Water Bill” shall be suspended. The Governing Board may additionally declare a water shortage emergency, in the manner and on the criteria provided in Water Code Section 350 et. Seq. and adopt appropriate regulations and restrictions under such authority.

## 3.2 Determining Water Shortage Reductions

In addition to the restrictions and prohibitions implemented under the WSCP, the Authority implements consumption reduction methods to reduce demands to achieve the needed or required water use reductions. Table 3 provides the consumption reduction measures implemented by the Authority.

**Table 3. Consumption Reduction Methods**

Stage	Consumption Reduction Methods by Water Supplier	Additional Explanation or Reference
All Levels	Expand Public Information Campaign	N/A
All Levels	Provide Rebates on Plumbing Fixtures and Devices	
All Levels	Provide Rebates for Landscape Irrigation Efficiency	
All Levels	Offer Water Use Surveys	
All Levels	Reduce System Water Loss	
Levels 2 through 6	May Implement or Modify Drought Rate Structure or Surcharge	
Levels 4 through 6	Moratorium or Net Zero Demand Increase on New Connections	
Levels 2 through 6	Other	When the Board declares a water shortage emergency, Sweetwater will establish water allocations for each property based on each property’s average historic water use during the Base period, less the percentage water use reduction goal to be achieved.

## 3.3 Catastrophic Supply Interruption Planning

### 3.3.1 SDCWA Water Shortage and Drought Response Plan

The SDCWA, in conjunction with its member agencies, developed a Water Shortage and Drought Response Plan (WSDRP) in 2006, which was subsequently updated in 2012, to guide water shortage and drought management activities in the event that the region faces supply shortages due to drought conditions. The goal of the WSDRP is to provide a balanced, flexible, systematic approach to identifying regional actions necessary to reduce water shortage impacts. The WSDRP includes three stages: voluntary supply management, supply enhancement, and mandatory cutbacks. During each of the stages, the SDCWA may implement voluntary or mandatory drought contingency measures to prepare and respond to drought conditions. The 2012 update to the WSDRP revised the regional supply allocation methodology for guiding decisions when normal demands cannot be met.

The WSDRP also includes provisions whereby the SDCWA would implement and utilize supplies governed by the Emergency Storage Project during a prolonged drought or other water shortage situation where imported and local supplies do not meet 75 percent of the SDCWA's member agencies urban demands. The Emergency Storage Project is a system of reservoirs, pipelines, and other facilities designed to store and move water around San Diego County in the event of a natural disaster. A natural disaster, such as an earthquake, could potentially disrupt water service in San Diego, especially because the pipelines that carry imported water to San Diego County from Metropolitan Water District cross several major fault lines. The Emergency Storage Project was designed to provide 90,100 AF of stored water for emergency purposes to meet the region's needs through at least 2045.

### 3.3.2 Authority Drought Response Plan

The response levels and water use reduction goals in the Authority WSCP are similar to those stipulated in the SDCWA Model Drought Response Ordinance and are therefore also similar to those of other agencies in the San Diego region. However, due to consistently low water demands within the Authority's service area compared to other parts of the region, the Authority's plan may differ from others in that it makes an effort to recognize and reward past conservation efforts of local customers. For example, during initial water shortage response levels, the Authority customers are encouraged to achieve water savings goals through self-directed actions, using a variety of potential conservation methods, instead of being penalized for non-compliance with mandatory water use restrictions.

For use during emergency conditions, such as drought or catastrophic interruptions in service where additional water use restrictions are necessary, the Authority has developed a six-level drought response plan in this WSCP allowing for water use cutbacks up to 50 percent or more, and has established an allocation method of rationing water during drought levels.

### 3.3.3 Authority Emergency Response Plan

A Vulnerability Assessment was completed for the Authority in 2003 that quantitatively identified the critical facilities and vulnerabilities of the Authority's water system. Though the Vulnerability Assessment addressed issues related to terrorism, the findings can be applied to a regional power outage, earthquake or other natural disasters as the same scenarios (i.e., loss of critical pump stations, etc.) were used to assess damage. Because the Vulnerability Assessment specifically points out system area weaknesses that could be used against the system and this UWMP is a publicly-available document, it is not included nor is any part of it reproduced in this UWMP.

The Authority's Emergency Response and Recovery Plan was updated in September 2020, subsequent to the Vulnerability Assessment, and complies with Section 1443 (b) of the Safe Drinking Water Act, as amended by the Public Health Security and Bioterrorism Preparedness Act of 2002. The plan has been designed for conformance with Homeland Security Presidential Directive 5 of the National Incident Management System and Government Code Section 8607 of the Standardized Emergency Management System and should be used in conjunction with the state and local emergency plans. The Emergency Response and Recovery Plan is too large to include as an appendix or to reproduce in this UWMP; however, a summary of portions relevant to the UWMP is provided below.

The Emergency Response and Recovery Plan was designed to prepare the Authority for a planned response to emergency situations associated with natural disasters, technological incidents, and national security emergencies in, or affecting, the Authority's facilities and service area. The plan describes the following:

- The Authority's emergency management organization which is required to assist in mitigating any significant emergency or disaster
- Authorities, policies, responsibilities, and procedures that are required to protect the health and safety of customers, personnel, and facility property
- Operational concepts and procedures associated with field response to emergencies, Emergency Operations Center activities, and the recovery process
- Implementation of the National Incident Management System for use within the United States, along with the Standardized Emergency Management System for use within the San Diego County operational area, regional, and State systems
- Multi-agency and multi-jurisdictional coordination, particularly between the Authority and local, state, and federal agencies in emergency operations
- Pre-event emergency planning as well as emergency operations procedures

Detailed procedures, including action plans, are addressed in the Emergency Response and Recovery Plan for extensive power or communications failure; water treatment failure at the Perdue Plant; imported water supply failure; structure failure of Authority's storage, pumping, and transmission facilities; physical, biological, or radiological contamination; natural disaster, bombs and explosions, and reservoir controlled releases.

## 4 Communication Protocols

The Authority, along with SDCWA and other member agencies, regularly engage in communication and outreach with the public on water supplies, water efficiency, and water conservation. Updated communication plans are necessary should supply conditions change as the Authority is required to implement stages of the WSCP.

The Authority communicates and coordinates with SDCWA during normal water supply scenarios and will continue to coordinate with SDCWA during drought conditions or times of limited water supply allocations to provide consistent communication and messaging to its customers. The communication protocol will align with strategies developed by SDCWA for each water shortage level, as presented in the SDCWA WSCP.

### 4.1 Strategies for Communication

During normal water supply conditions, the Authority will continue to promote water conservation tactics and water efficiency programs using standard ongoing communication protocols. When water shortage levels are triggered, the Authority will increase communication to reduce water use using methods that include measures within the Authority's conservation program and as outlined in Table 4.



**Table 4. Communication Outline**

Water Shortage Level	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
Demand Reduction Target	Up to 10%	Up to 20%	Up to 30%	Up to 40%	Up to 50%	Over 50%
District Communications	Update messaging to reflect conditions, district response, and needed actions from the public; coordinate with other agencies as appropriate	Update campaign and messaging to generate immediate actions/behaviors by public; coordinate with other agencies as appropriate	Update campaign and messages to raise awareness for more severe water-saving actions/behaviors by public; coordinate with other agencies as appropriate	Update campaign and messages to raise awareness for more severe and higher level water-saving actions/behaviors by public; coordinate with other agencies as appropriate	Update campaign and messages to reflect extreme or emergency condition and likely focus water use on health/safety need; coordinate with other agencies as appropriate	Update campaign and messages to reflect extreme or emergency condition and likely focus water use on health/safety need; coordinate with other agencies as appropriate
		Include increased conservation messaging on website and in standard outreach efforts.	Update elected officials, other key civic and business leaders of shortage	Conduct specialized outreach to reduce discretionary outdoor water use while minimizing landscape damage.	Promote available water assistance resources for vulnerable populations; specialized outreach to affected industries	Promote available water assistance resources for vulnerable populations; specialized outreach to affected industries
	Promote available rebates, classes, and workshops	Actively promote available rebates, classes, and workshops	Actively promote available rebates, classes, and workshops	Actively promote available rebates, classes, and workshops	Actively promote available rebates, classes, and workshops	Actively promote available rebates, classes, and workshops
		Targeted outreach to high water users	Outreach to key homeowner association building managers and landscape companies about restrictions and need for increased conservation	Specialized outreach and assistance to homeowners, landscape professionals, large-scale water users and high water users	Consider alternate emergency homepage	Implement emergency homepage
		Targeted outreach to specific customer classes	Targeted outreach to specific customer classes	Targeted outreach to specific customer classes	Targeted outreach to specific customer classes	Targeted outreach to specific customer classes



The Authority promotes water conservation in coordination with the Water Conservation Garden, neighboring water agencies, the Water Authority, and Metropolitan. Regional activities include: public service announcements, demonstration gardens, conservation strategy meetings, water awareness month activities, water efficiency workshops, and landscape water use classes and contests. The Authority independently distributes public information through its website, social media, bill inserts, on-hold telephone messages, annual Consumer Confidence Report, newsletters, news releases, brochures, keynote speakers, classroom presentations, facility tours, video library, and participation in year-round special events and community festivals. The Authority participates in regional drought, conservation, and environmental stewardship public outreach programs including the 20 Gallon Challenge, WaterSmart programs, Climate Change Workgroups, and city Clean- Green programs.

## 4.2 Catastrophic Communication

In the event of a natural disaster, infrastructure failure, or other situation that requires regional water use to be quickly prioritized for or limited to essential public health and safety needs, the Authority will immediately deploy or enhance appropriate communication strategies and tactics from WSCP Levels 1-6 as needed, and will consider additional strategies and tactics to reflect the need for urgent, emergency-driven water conservation.

# 5 Compliance and Enforcement

Penalties for violators of the drought response levels include notification followed by implementation of drought penalties consistent with Water Code Sections 377 and 356.

- Any customer who uses, causes to be used, or permits the use of water in violation of this Drought Response Plan during a Level 2 – Level 6 condition is guilty of a punishable offense. Violations of mandatory water waste prohibitions may be enforced through progressive administrative fines levied for each violation.
- Customers will be given one full billing cycle to come into compliance with target water allocations associated with each drought reduction stage. Failure to correct violations will result in administrative fines being levied.
- Should mandatory water use reductions and/or conditions be activated by resolution, any person who willfully uses, causes to be used, or permits the use of water in violation with the Drought Response Plan is guilty of an offense punishable as follows: Each violation may be prosecuted as a misdemeanor offense punishable by imprisonment in the county jail for not more than 30 days, or by a fine not exceeding 1,000 dollars, or by both. Willful violations may be enforced by discontinuing service to the property at which the violation occurs.
- The Supplement to Sweetwater Authority Rates and Rules, effective January 1, 2021, provides a tiered rate structure with increasing water rates for each level of drought response. The Authority's water rates were most recently increased in January 2021. The commodity rate for all water used increases as Levels 2 through

6 of the Drought Response Plan are initiated by the Governing Board to achieve mandatory water use reductions. Drought rates for the commodity charges set forth in the Schedule of Water Rates shall only be implemented if the Authority is in a declared drought Level 2 through 6 and the Governing Board adopts a resolution that makes the following findings and determinations: (1) the Authority has and/or will experience significant losses in revenues due to reductions in the amount of purchased water during the specified drought Level; (2) it is necessary to implement the drought rates to offset the impact of current and/or future revenues losses during the specified drought Level; (3) without the implementation of the drought rates there will be insufficient revenue to recover its costs of providing services.

Table 5 describes that penalties and charges that are levied when customers use excess water beyond the Target Water Allocation established for each property served by the Authority. As its service area is entirely metered, the Authority is able to accurately track water usage and consumption reduction through meter readings to ensure that consumption is in line with consumption reduction targets.

**Table 5. Penalties and Charges**

Penalties or Charges	Stage When Penalty Takes Effect
Progressive administrative fines for violating water waste prohibitions	Level 2
Financial and/or legal penalty for violating Target Water Allocations	Level 2
Drought Pricing – Implementation of the <i>Supplement to Sweetwater Authority Rates and Rules</i>	Levels 2-6

## 6 Legal Authorities

The Authority has the legal authority to implement and enforce its WSCP. California Constitution Article X, Section 2 and Water Code Section 100 provides that water must be put to beneficial use, the waste or unreasonable use or unreasonable method of use of water shall be prevented, and the conservation of water is to be exercised with a view of the reasonable and beneficial use thereof in the interest of the people and the public welfare. Sections of Water Code Chapter 3 commencing with Section 350 of Division 1, provide the authority for the governing body of a water agency to declare a water shortage and to adopt and enforce water conservation restrictions. (Wat. Code §§ 350-359, 375-378.0.) If necessary, the Authority shall declare a water shortage emergency in accordance with Water Code Chapter 3 of Division 1. Once having declared a water shortage, the Authority is provided with broad powers to implement and enforce regulations and restrictions for managing a water shortage. For example: Water Code section 375(a) provides:

*Notwithstanding any other provision of the law, any public entity which supplies water at retail or wholesale for the benefit of persons within the service area or area of jurisdiction of the public entity may, by ordinance or resolution adopted by a majority of the members of the governing body after holding a public hearing upon notice and*

*making appropriate findings of necessity for the adoption of a water conservation program, adopt and enforce a water conservation program to reduce the quantity of water used by those persons for the purpose of conserving the water supplies of the public entity.*

(Water Code Section 375(a).) CWC Section 375(b) grants the Authority with the authority to set prices to encourage water conservation.

With regard to water delivered for other than agricultural uses, the ordinance or resolution may specifically require the installation of water-saving devices that are designed to reduce water consumption. The ordinance or resolution may also encourage water conservation through rate structure design.

Pursuant to these authorities, the Authority Drought Response Plan prohibits waste and imposes water conservation requirements, including six stages of water shortage conditions and conservation requirements in each stage. The stages are consistent with Water Code section 10632(a)(3) and include the declaration of a water shortage emergency as appropriate in compliance with Water Code section 350.

The General Manager is authorized and directed to implement the provisions of the WSCP, which empowers the Authority to implement and enforce its shortage response actions identified herein.

The Authority shall coordinate with its service area cities that receive water supply services, for the possible proclamation of a local emergency under California Government Code, California Emergency Services Act (Article 2, Section 8558).

## 7 Financial Consequences

Section 10632(a)(8) of the Water Code requires a description of the financial consequences of, and responses for, drought conditions, including a description of potential revenue reductions and expense increases associated with activated shortage response actions and mitigation actions needed to address revenue reductions and expense increases associated with activated shortage response actions described in the Shortage Response Actions, as well as the cost of compliance with Chapter 3.3 (commencing with [Section 365](#)) of Division 1.

The Authority's revenue is directly related to sales of water. A reduction in water use throughout the service area in response to drought conditions would result in an associated reduction in revenues. The Authority's rate structure, which was revised in January 2021 with the adoption of Resolution No. 21-03, has a stable ratio of fixed to variable costs in order to buffer against the variability in use. Single-family residential commodity rates, which include SDCWA surcharges, are tiered per 100 cubic-feet of water to require high water users to pay higher rates. Commercial, industrial, institutional, government, landscape, construction and agricultural rates are fixed volumetric rates. Fixed fees include bi-monthly meter fees.

The Authority anticipates that capital outlay would be reduced to keep a surplus of revenues for each stage of drought response described above. During a drought, both revenues and expenses are reduced. For example, a reduction in water use would have

a corresponding reduction in the Authority expenditures for the treatment and distribution of the water supply at the Perdue Plant. Because revenues decrease faster than expenses, however, reductions in capital outlay are necessary. The Authority's policy has been to account for revenue from surcharges separately, and to use those monies only for water conservation activities or projects which explore or develop new water supplies.

To mitigate the financial impacts of a water shortage, the Authority has established drought pricing in the Supplement to Sweetwater Authority Rates and Rules. Initiated at Level 2, the Supplement to Sweetwater Authority Rates and Rules provides a tiered rate structure with increasing water rates for each level of drought response to provide needed revenue during periods of limited water deliveries.

## 8 Monitoring and Reporting

The Authority monitors how effective the combination of shortage response actions in each water shortage level through metered customer demand data. The Authority's water supplies are metered prior to entering the distribution system and at individual customer connections. The Authority will compare meter data with water use in prior months and during non-drought years to determine specific percentage goals for water consumption associated with the drought response levels have been achieved. If the goals are not being met, the Authority may choose to implement additional shortage response actions. The Authority also reports total monthly production and water use to the SWRCB.

## 9 WSCP Refinement Procedures

The WSCP will be re-evaluated at least every five years in coordination with the urban water management plan update, but the frequency of the re-evaluations could increase based on the needs of the Authority. Re-evaluations will be based on lessons learned, new statutory requirements, continued local supply development, or other factors.

## 10 Special Water Feature Distinction

The Authority's 2015 Drought Response Plan and this WSCP evaluate decorative and recreational water features separately from pools or spas. However, the Authority does not currently serve recycled water for use in recreational or decorative water features.

## 11 Plan Adoption, Submittal, and Availability

A public hearing, conducted by the Authority, was held on **XXX XX, 2021**, as a video conference. Members of the public were able to participate via a webinar link or telephone connection to listen and/or view the meeting proceedings and provide public comments and input on the draft WSCP. Following adoption of the WSCP, the Authority



will submit the plan to DWR and, no later than 30 days after filing the WSCP, the Authority will make the WSCP available to the public.