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**To:** [DWR Water Use Efficiency](#)  
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**Subject:** comments on Water Shortage Contingency Plan workshops  
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Good afternoon,

Thank you for hosting the Water Shortage Contingency Plan workshops. I wanted to pass along some initial thoughts about and reactions to the discussion draft and to the information presented in the workshops. These thoughts and reactions reflect input from myself, Tracy Quinn (NRDC), and Laurel Firestone (Community Water Center). In the interest of getting these to you as quickly as possible, I've provided these in bullet form. However, if you think that a formal letter would be more appropriate, please let me know.

1. The discussion draft should include evaluation of what is supposed to be in a Water Shortage Contingency Plan (WSCP), what is actually in them (based on a representative sample), and what else is needed. The draft could be further expanded to include interviews with water suppliers about what is and isn't working with their current drought response efforts. Revenue shortfalls associated with the drought must be addressed in these efforts. Specifically, the evaluation of WSCPs and interviews with water suppliers should examine (1) the strategies in place to mitigate revenue shortfalls prior to the onset of the drought and/or during the drought and (2) the effectiveness of these strategies.
2. The Executive Order calls for the updated WSCP requirements to respond to droughts lasting at least five years, as well as more frequent and severe periods of drought. Given the likely impacts of climate change, Contingency Plans should reflect planning for droughts of at least 10 years, as well as more frequent, and more severe droughts.
3. WSCPs should prepare for and address non-drought related shortages scenarios, such as those from wildfires and earthquakes, to ensure that communities have adequate emergency supplies under those scenarios.
4. WSCPs should prepare for a combination of drought and catastrophic events, i.e., the occurrence of a catastrophic event during a drought.
5. WSCPs should require water suppliers to have financial mechanisms, including rate structures and other tools, in place prior to the start of a drought to help water agencies manage revenue shortfalls that may occur during a drought. These financial mechanisms must be sufficient to respond to a drought of at least 10 years in duration.
6. WSCPs should include specific actions on education and communication strategies that can be used to inform customers about the water shortage and necessary actions.
7. The draft document states that "any regulations or statewide standards should focus on setting forth appropriate methodologies and identified necessary WSCP elements, but not dictate specific response strategies or risk tolerance thresholds." On the contrary, the state has a key role in assuring water supply availability by specifying a risk tolerance threshold. Indeed, the Executive Order calls out the need for common statewide standards.
8. The impacts of the drought were most severe for small water systems. Yet, WSCPs are only required for those suppliers serving 3,000 or more customer connections or those

providing more than 3,000 acre-feet of water annually. The Executive Order requires DWR to work with counties to facilitate improved drought planning for small water suppliers and rural communities. We urge DWR to work with small water suppliers and other stakeholders to develop planning requirements for these systems. Additionally, we urge DWR to start this process immediately to ensure that the needs to small water suppliers and rural communities are met.

Thank you,  
Heather

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