

From: [Drew Atwater](#)
To: [DWR Water Use Efficiency](#)
Subject: comments - UAG.docx - Hword
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Attachments: [comments - UAG.docx](#)

Good afternoon,

Attached are comments from Joone Lopez, General Manager of Moulton Niguel Water District and UAG member.

Cheers,
Drew



Drew Atwater | Director of Planning
27500 La Paz Road | Laguna Niguel, CA 92677
o: 949.831.2500 | d: 949.448.4027
e: DATwater@mnwd.com | visit us: www.mnwd.com

Based on the discussion during the September 19, 2016 Urban Advisory Group meeting, it was suggested that I submit in writing my comments regarding the Water Shortage Contingency Plan.

The unprecedented drought conditions that we're facing today offers a unique opportunity to build on the role of WSCPs. To date, they are adopted to respond to water shortage situations in any given area. The declaration of a statewide drought emergency by the Governor and his most recent executive order mandating a long-term efficiency framework for all Californians to make "conservation a way of life," is indicative of a new reality where the State is experiencing a multi-year drought and sustained water shortage conditions.

Unless conditions change drastically, there needs to be a long-term framework that mitigates, and ideally, avoids future emergency conditions. Therefore, the framework can be regarded as a way to address the ongoing shortage with the goal of avoiding emergencies, and a WSCP can be utilized when the shortage does reach a level of emergency. As noted by the State agencies, WSCPs need to be responsive, specific and effective, which requires some level of consistency that is achieved on a statewide basis. The consistency can be attained by requiring specific elements that ensures swift and specific actions, which can be identified by the State agencies based on their review of all the WSCPs, instead of prescribing specific stages based on a set of triggers that will likely vary among the regions or suppliers.

In this new reality, the framework serves as a mitigation strategy to address the shortage and avoid emergencies, while the WSCP is a tool for suppliers to use when the State does declare an emergency. Any such declaration should define the emergency and strive to articulate the specific, associated conditions in order to develop goals and/or actions to achieve relief from that emergency. For consistency, it would be helpful if the goals/actions could work within the framework. As an example, when an emergency is declared, based on the goal (i.e. amount of water that needs to be conserved), the efficiency targets could be modified to be consistent with the framework, and then the suppliers can activate their WSCPs and other tools to achieve the modified targets. How the suppliers use their tools can be determined based on their area and what works best as long as the targets are met. In some cases, where unique conditions exists, suppliers can apply for a variance, either to be exempt from meeting those targets or to demonstrate a reason for any action different than what is being required. The variance process will have specific criteria determined by the State agencies to ensure consistency in application and review of the request.

The enforcement component is also clear because suppliers would need to meet the specific required elements of the WSCP and meet the modified targets during an emergency. Developing the framework and WSCP in a manner that's complementary and consistent allows for broad understanding by the public and sets clear expectations statewide.