

From: [Ron Munds](#)
To: [DWR Water Use Efficiency](#)
Subject: Water Shortage Planning
Date: Tuesday, October 4, 2016 8:30:51 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)

Hello,

After listening to the meeting yesterday, 10/4, I wanted to submit a few comments and observations on water shortage planning from my perspective. My comments are based on my experience in preparing 15 UWMP during 2015 cycle (I was working for water consulting company until July of this year) and my previous job experience at the City of San Luis Obispo (for 27 years).

- As was pointed out by several speakers, the group you have at the table are doing a relatively good job at water shortage planning. The water agencies on the UAG, with the exception of maybe Santa Cruz and a couple of others, aren't exposed to the problems small/medium agencies experience that aren't connected to a medium/large wholesaler. This was also evident in the comments made by other large water agencies that spoke at the meeting (i.e. Contra Costa, Irvine Ranch).
- A guidebook is a great idea; each agency that I prepared a plan for, including the water shortage section, had differing circumstances which was dependent on the source of water. Small to medium size agencies with groundwater as their sole source of water many times had difficulty establishing a baseline for what their "normal" water supply status was and had trouble developing meaningful triggers to the various stages in their existing plans. Many times it was an exercise in using pumping records, hydrographs, input from operators and climatic data to develop the triggers; not an easy exercise for these smaller agencies.
- No matter how much water agencies complain, periodic reporting to the state is a necessary evil. As much as water agencies state they don't need the state's involvement, without this oversight, the conservation levels achieved during 2015-16 would not have been possible. I appreciate how DWR staff listened to the comments and I'm confident that you will reach a compromise in what is required.
- Technical assistance geared towards smaller agencies is needed to conduct the stress tests and forecasting water supplies.
- Though climate change and drought are the drivers behind this current effort, the need for planning for interruption of water supply from catastrophic events is really needed, especially for agencies dependent on a large wholesale agency. The retail agencies many times didn't have viable backup plans if a catastrophic event occurred.

- The exchange of water use/supply data between intermediary wholesalers (not MWD) to retailers and vice a versa is lacking. When I was developing UWMP for agencies supplied by these wholesaler, the supply and demand numbers to develop short and long term projections seemed to lack in depth analysis which I felt lead to erroneous data (garbage in garbage out). I believe this led inadequate or maybe unrealistic water shortage contingency plans.
- I would require an agency to better demonstrate their regulatory authority to implement their water shortage plans. Vague emergency ordinances led to delays when agencies went before their governing boards to implement their water shortage plans. The upfront work needs to be done well in advance of the emergency. Again, this is for smaller agencies not the ones speaking at the meeting or on the UAG.

Thank you for the opportunity to comment!

Ron

<p>SLO County Public Works</p> 	<p>Ron Munds <i>Principle Environmental Analyst</i> Water Resource Group Phone: (805) 781-5259 Website Twitter Map</p>	<p>APWA</p> 
--	---	---
