

Woodland-Davis Clean Water Agency Water Shortage Contingency Plan

PREPARED FOR

Woodland-Davis Clean Water Agency



PREPARED BY



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Prepared for

Woodland-Davis Clean Water Agency

Project No. 376-40-25-19



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LIST OF ACRONYMS AND ABBREVIATIONS

2018 Water Conservation Legislation	Senate Bill (SB) 606 (Hertzberg) and Assembly Bill (AB) 1668 (Friedman)
AB	Assembly Bill
Agency	Woodland-Davis Clean Water Agency
Agency Board	Woodland-Davis Clean Water Agency Board of Directors
AWSDA	Annual Water Supply and Demand Assessment
Cities	Cities of Woodland and Davis
CWC	California Water Code
Davis	City of Davis
DWR	Department of Water Resources
ERP	Emergency Response Plan
Project Participants	City of Woodland, City of Davis, and University of California, Davis
SB	Senate Bill
UC Davis	University of California, Davis
UWMP	Urban Water Management Plan
Woodland	City of Woodland
WSCP	Water Shortage Contingency Plan

Water Shortage Contingency Plan

1.0 INTRODUCTION

This plan presents the Woodland-Davis Clean Water Agency (Agency) Water Shortage Contingency Plan (WSCP). The WSCP describes the Agency's strategic plan in preparation for and response to water shortages, with a goal to proactively prevent catastrophic service disruptions. It includes water shortage conditions and associated actions that will be implemented in the event of a water supply shortage. As part of the WSCP, the Agency's legal authorities, communication protocols, compliance, and enforcement, and monitoring and reporting are included.

A water shortage may occur for several reasons, such as drought, natural disasters, or other events that may reduce water supplies or impact water treatment and delivery systems. Drought, regulatory action constraints, and natural and manmade disasters may occur at any time. A water shortage is defined as the available water supply being insufficient to meet the normally expected customer water use.

In 2018, the California State Legislature enacted two policy bills, (Senate Bill (SB) 606 (Hertzberg) and Assembly Bill (AB) 1668 (Friedman)) (2018 Water Conservation Legislation), to establish a new foundation for drought planning to adapt to climate change and the anticipated longer and more intense droughts in California. The 2018 Water Conservation Legislation set new requirements for water shortage contingency planning.

The Agency's WSCP is consistent with the 2018 Water Conservation Legislation requirements. The Agency intends for this WSCP to be an adaptive management plan so that it may assess response action effectiveness and address emergencies and catastrophic events. Refinement procedures and adoption requirements are provided in this plan to allow the Agency to modify this WSCP outside of the Urban Water Management Plan (UWMP) process.

2.0 WATER SUPPLY RELIABILITY ANALYSIS

The Agency's Water Supply Reliability Analysis and Seismic Risk Assessment and Mitigation Plan is included in Chapter 8 of the Agency's latest adopted UWMP. The Agency's existing and projected water use (from Chapter 4 of the Agency's UWMP), existing and planned water supplies by source (from Chapter 6 of the Agency's UWMP), and the water supply reliability assessment and the Drought Risk Assessment (from Chapter 7 of the Agency's UWMP).

The Agency's sole water supply source is water from the Sacramento River. In general, the Agency's water supply conditions may be affected by the following:

- Local surface water availability (Sacramento River)
- Vulnerability to seismic events
- Changing environmental and regulatory requirements
- Climate change

3.0 ANNUAL WATER SUPPLY AND DEMAND ASSESSMENT PROCEDURES

Starting July 1, 2022, California Water Code (CWC) Section 10632.1 requires water suppliers to conduct an Annual Water Supply and Demand Assessment (AWSDA) and to submit an Annual Water Shortage Assessment Report. The assessment is conducted for the given year's upcoming dry season and the following year, with the assumption that the latter will be a dry year. This WSCP provides the procedures

for the Agency to conduct its AWSDA. The findings from that assessment provide information for the Agency’s Annual Water Shortage Assessment Report.

The procedures provided in this section are intended to assist the Agency in planning for potential, foreseeable shortages in water supplies, and to make a determination as to whether to declare a water shortage emergency in any given year. Specifically, this section describes the decision-making process, data inputs, and assessment methodology to be used in the Agency’s AWSDA.

3.1 Decision-Making Process

The Agency uses the decision-making process described in this section to consistently determine its water supply reliability on an annual basis. The Agency may adjust and improve this process as needed.

The General Manager, or his/her designee, is responsible for preparing the Agency’s AWSDA and Annual Water Shortage Assessment Report and for submitting the report to the Department of Water Resources (DWR) by July 1st of each year. The General Manager directs Agency staff to gather key data inputs described in Section 3.2 and conduct the assessment in accordance with Section 3.3. Demands will generally be based on delivery requests from the Agency’s Project Participants, the City of Woodland (Woodland), the City of Davis (Davis), and the University of California, Davis (UC Davis). Typically, by April of each year, the Agency finalizes its assessment based on the State Water Resource Control Board’s Term 91 curtailments and the U.S. Bureau of Reclamation’s reported Lake Shasta conditions. After completing the AWSDA, Agency staff presents the AWSDA and Annual Water Shortage Assessment Report to the General Manager for review. The General Manager then presents determinations and recommendations to the Agency Board of Directors (Agency Board) for approval.

In general, the Agency will follow the schedule of activities shown in Table 1 for conducting the AWSDA and any associated decision-making. These activities are described in further detail in the following subsections. Due to variations in climate and hydrologic conditions, the start and end dates shown in the table are approximate and may be adjusted as needed. The intent of the schedule is to allow shortage response actions to effectively address anticipated water shortage conditions in a timely manner while complying with the State’s reporting requirements.

Table 1. Schedule of Assessment and Decision-Making Activities			
Schedule	Task	Activity (ACT) or Decision (DEC)	Responsible Party
Assessment Activities			
Mid-March to Early April	Determine available water supply for current year and one subsequent dry year. Describe source and quantities considering factors affecting supply as described in Section 2.2.	ACT	Agency Staff
Mid-March to Early April	Plan for water demands for current year and one subsequent dry year. Demands will generally be based on Project Participants’ delivery requests. Describe demand types and quantities considering factors presented in Section 2.2.	ACT	Agency Staff
Mid-March to Early April	Using the methodology described in Section 2.3, calculate the Agency’s water supply reliability for the current year and one subsequent dry year.	ACT	Agency Staff

Table 1. Schedule of Assessment and Decision-Making Activities

Schedule	Task	Activity (ACT) or Decision (DEC)	Responsible Party
Mid-April	Complete AWSDA based on expected water deliveries, which may be constrained by Term 91 curtailments and/or Lake Shasta conditions.	ACT	Agency Staff
Late April-June	Review AWSDA and Annual Water Shortage Assessment Report and provide comments, if needed.	ACT	General Manager
Decision Making Activities If Assessment Shows Available Supply May Not Meet Expected Demands			
Mid-March to Mid-April	Based on finalized determinations of AWSDA regarding water shortage condition and recommended actions, prepare recommendations on water shortage condition determination and actions.	DEC	Agency Staff and/or Consultant
Mid-March to Mid-April	Prepare ordinances or resolutions approving determinations and actions.	DEC	Agency Staff and/or Consultant
Mid-March to Mid-April	Coordinate with the Project Participants, with the region’s water service providers, and with Yolo County for the possible proclamation of a local emergency.	DEC	General Manager
Mid-March to Mid-April	Based on determinations of the AWSDA, prepare the Annual Water Shortage Assessment Report with recommendations on water shortage condition. Submit the report to the General Manager.	ACT	Agency Staff and/or Consultant
April Agency Board Meeting	Present finalized determinations and recommendations to the Agency Board, along with ordinances or resolutions approving determinations and actions.	DEC	General Manager
April Agency Board Meeting	Receive presentation of finalized determinations and recommendations. Make determination of degree of emergency and authorize water shortage response actions for implementation. Adopt resolution(s) approving determinations and actions, as appropriate.	DEC	Agency Board
Mid-April	Review AWSDA and Annual Water Shortage Assessment Report and provide comments, if needed.	ACT	General Manager
Late May to Early June	If a water shortage emergency condition is declared, implement the WSCP and the water shortage response actions as approved by the Agency Board.	DEC	General Manager
January – April	Finalize water transfer requests and any new agreements, if needed. New agreements will require Agency Board approval.	ACT	Agency Board
Assessment and Report Submittal			
On or before July 1	Finalize AWSDA and Annual Water Shortage Assessment Report and submit to DWR.	ACT	General Manager

3.1.1 AWSDA Finding: Available Water Supply Will Meet Expected Demands

If the AWSDA produces a finding that available water supply will be sufficient to meet expected demands for the current year and one subsequent dry year, no further action is required. Agency staff will submit the Annual Water Shortage Assessment Report to DWR by July 1 each year. The subsequent dry year may be similar to a single dry year as defined in Chapter 7 of the Agency's most recently adopted UWMP.

3.1.2 AWSDA Finding: Available Water Supply Will Not Meet Expected Demands

If the AWSDA produces a finding that available supply will not meet expected demands, the Agency will coordinate with the Project Participants, with the region's other water service providers, and with Yolo County for the possible proclamation of a water shortage emergency. The General Manager, or his/her designee, will present the finalized assessment to the Agency Board, along with recommendations on water shortage condition determination and actions. Recommended actions may include declaration of a water shortage emergency, declaration of a water shortage condition, and water shortage actions.

Based on the findings of the AWSDA, the Agency Board will determine if a water shortage condition exists and, if needed, will adopt a resolution declaring a water shortage emergency and an associated water shortage condition, and will authorize appropriate water shortage actions. Agency staff will then prepare the Agency's Annual Water Shortage Assessment Report, incorporating Agency Board determinations and approved actions.

3.2 Key Data Inputs

The AWSDA is required to evaluate supply and demand conditions for the current year and one subsequent dry year. The key data inputs described in this section will be used to evaluate the Agency's water supply reliability.

Planned water supplies are used as input to the AWSDA for the current year and the following one dry year. In planning for water supplies, the following factors are considered:

- Hydrological conditions
- Regulatory conditions
- Water rights constraints
- Surface water quality conditions
- Water system infrastructure capacity constraints or changes

Planned water supply sources and quantities will be described and be reasonably consistent with the supply projections in Chapter 6 (Water Supply Characterization) of the Agency's most recent UWMP. Should the supply sources and projections deviate significantly from the UWMP, the Agency will provide an explanation addressing the difference.

Planned unconstrained water demands are used as input to the AWSDA for the current year and the following one dry year. Unconstrained water demands are customer demands where no water conservation measures are in effect. In planning for water demands, the following factors are considered:

- Weather conditions
- Water year type

- Project Participant demand projections
- Pending policy changes that may impact demands
- Infrastructure operations

Planned water demands types and quantities will be described and be reasonably consistent with the demand projections in Chapter 4 (Water Use Characterization) of the Agency’s most recent UWMP. Should the demand projections deviate significantly from the UWMP, the Agency will provide an explanation addressing the difference.

3.3 Assessment Methodology

In preparing the AWSDA, the Agency will use the following assessment methodology and evaluation criteria to evaluate the Agency’s water supply reliability for the current year and the following one dry year.

The Agency will use the AWSDA Reporting Tables workbook provided by DWR as a resource in the WUEdata Portal¹ to plan for current year and future year demands. Planned supply and demand inputs described in Section 3.2 will be entered in the spreadsheet in annual increments, or closer time intervals as necessary during water shortage conditions.

Supply and demand will be compared to determine the reliability of the Agency’s water supply in the current year and the following one dry year. The Agency’s water supply for the current year and the following dry year will be determined reliable if water supplies are equivalent to or exceed projected unconstrained water demands. If water supply cannot meet anticipated water demands in the current year or the following dry year, the extent of the water shortage condition will be determined, and the Agency will prepare response actions in accordance with this WSCP. If a water shortage is anticipated, the AWSDA findings will be presented to the Agency Board, along with recommended actions for Agency Board consideration.

4.0 STANDARD WATER SHORTAGE LEVELS

To provide a consistent regional and statewide approach to conveying the relative severity of water supply shortage conditions, the 2018 Water Conservation Legislation mandates that water suppliers plan for six standard water shortage levels that correspond to progressive ranges of up to 10, 20, 30, 40, 50 percent, and greater than 50 percent shortages from the normal reliability condition. Each shortage condition should correspond to additional actions water suppliers would implement to meet the severity of the impending shortages.

The Agency’s 2025 UWMP includes five levels that address up to 50 percent gap and greater than a 50 percent gap between supply and demand. Table 2 (DWR Table 8-1) presents the Agency’s water shortage levels, which align with the State’s standard levels of water shortage. The Agency’s water shortage levels apply to both foreseeable and unforeseeable water supply shortage conditions.

¹ California Department of Water Resources. “Resources for Urban Water Suppliers.” https://wuedata.water.ca.gov/manage_resources.asp?reportType=urban, last accessed September 22, 2025.

Table 2. Water Shortage Contingency Plan Levels (DWR Table 8-1)

Standard Shortage Level	Percent Shortage Range
1	Up to 10
2	Up to 20
3	Up to 30
4	Up to 40
5	Up to 50
6	Greater than 50

As described in Section 3.0, the Agency will conduct an AWSDA to determine its water supply condition for the current year and a subsequent dry year. Preparing the AWSDA helps the Agency ascertain the need to declare a water shortage emergency and water shortage condition for foreseeable events. In certain cases, the Agency may need to declare a water shortage emergency due to unforeseen water supply interruptions.

When the Agency anticipates or identifies that water supplies may not be adequate to meet the normal water supply needs of the Project Participants, the Agency Board may determine that a water shortage exists and consider a resolution to declare a water shortage emergency and associated level. The shortage level provides direction on shortage response actions.

5.0 SHORTAGE RESPONSE ACTIONS

CWC §10632(a)(4) requires shortage response actions that align with the defined shortage levels. The Agency’s shortage response actions consist of a combination of demand reduction, supply augmentation, and operational changes. The Agency’s suites of response actions are dependent on the event that precipitates a water shortage level, the time of the year the event occurs, the water supply sources available, and the condition of its water system infrastructure.

Because the Agency is a finished water wholesaler, its water shortage response actions must be coordinated with the Project Participants. The Agency and the Project Participants plan to use a balanced approach, combining demand reduction, supply augmentation, and operational changes to respond to the event and the resulting water shortage level. The Agency will coordinate with the Project Participants to adapt its implementation of response actions to close the gap between water supplies and water demand and meet the water use goals associated with the declared water shortage level. For example, the Agency may intensify its public outreach or may advise the Project Participants to enforce water use restrictions more vigorously if water demand reduction goals are not met.

The Agency’s water system is fully metered from production to the delivery points of the Project Participants. Records of water deliveries to each Project Participant are prepared daily and can be used in combination with usage data for the Project Participants’ other water supplies to track the effectiveness of their combined response actions. Overall water production and water use can be compared to the previous year, month, or week. This continuous monitoring allows the Agency and the Project Participants to evaluate their demand reduction efforts in real-time and adjust shortage response actions accordingly.

The shortage response actions discussed in the following sections may be considered as tools that allow the Agency to respond to water shortage conditions. Shortage response actions are cumulative, such that

the actions initiated at the lower levels continue to be implemented at higher levels. Because the Agency and the Project Participants may continuously monitor and adjust their response actions to reasonably equate demands with available supply, the extent to which the gap between water supplies and water demand will be reduced by implementation of each action is difficult to quantify and is provided as an estimate. Certain response actions, such as public outreach and enforcement, support the effectiveness of other response actions and do not have a quantifiable effect on their own.

5.1 Demand Reduction Actions

Since the Agency operates as a wholesale water agency, it cannot set or enforce consumption limits at the customer (e.g., household) level. As a result, this WSCP does not include per capita allotment, penalties, or customer incentives for conservation for any customer sector. The Project Participants will provide their demand reduction response actions in their respective UWMPs.

For all the stages identified in Table 3 (DWR Table 8-3W), it is the responsibility of the Agency to inform the Project Participants in a timely manner of the timing and extent of water supply reductions and work with them to schedule deliveries of limited surface water supplies.

Table 3. Demand Reduction Actions (DWR Table 8-3W)

Yes	Is the Supplier completing this table using the standard six levels? (yes/no)			Additional Explanation or Reference (OPTIONAL)
Shortage Level	Demand Reduction Actions Drop down list These are the only categories that will be accepted by the WUEdata online submittal tool. Select those that apply.	How much is this going to reduce the shortage gap?		
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)	
Add additional rows as needed				
All Stages	Other	Volume	0	The Agency will defer to the Demand Reduction Actions of the Project Participants. The Agency will not impose separate Demand Reduction Actions.

DWR NOTES: Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Submittal Table 2-3.

5.2 Additional Mandatory Restrictions

As a wholesaler, the Agency does not have direct authority to institute water use prohibitions. The Agency will support mandatory restrictions imposed by the Project Participants on their customers and coordinate with the Project Participants to provide consistent public outreach messaging.

5.3 Supply Augmentation and Other Actions

Chapter 6 of the Agency’s most recent UWMP describes the Agency’s normal water supply portfolio, as well as dry-year and emergency supplies. The Agency uses entirely surface water supplies from the Sacramento River. In the event of a dry year or other water supply interruption, when the Agency’s primary and secondary water rights are insufficient to meet all the Agency’s Project Participant demands, the Agency will consider the option of purchasing additional water supplies from other upstream agencies for diversion from the Sacramento River via the Agency’s intake.

When a Term 91 curtailment is imposed, it may be unforeseeable; the timing of curtailment cessation normally will be unknown. In addition, the Cities of Davis and Woodland (Cities) will not be able to fully predict their retail demands during the curtailment period. The Agency and the Cities must work together to decide what assumptions should be made about curtailment duration and retail demands, and what surface water delivery schedule should be followed. Key considerations in making this determination include:

1. The start date of the Term 91 curtailment (expected or actual).
2. The assumed end date of the curtailment (usually October 31st or later).
3. The Lake Shasta year condition (normal or critical).
4. The assumed monthly retail water demands for each Project Participant.
5. The availability of the Project Participants’ other water supplies.

Table 4 (DWR Table 8-2W) lists the supply augmentation methods the Agency can utilize during each shortage level.

Table 4. Supply Augmentation and Other Actions (DWR Table 8-2W)

Yes	Is the Supplier completing this table using the standard six levels? (yes/no)			
Shortage Level	Supply Augmentation Methods and Other Actions by Water Supplier Drop down list These are the only categories that will be accepted by the WUedata online submittal tool	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)	
Add additional rows as needed				
All Stages	Transfers	Volume	Up to the full shortage gap	Work with the Project Participants to arrange for supplemental surface water supplies through water transfer agreements and/or alert the Project Participants that deliveries will be significantly reduced.
All Stages	Other Actions (describe)	Volume	See Note 1	Inform the Project Participants in a timely manner about the timing of Term 91 curtailments and Lake Shasta conditions, as determined by the State Water Resources Control Board and the U.S. Bureau of Reclamation, respectively.
All Stages	Other Actions (describe)	Volume	See Note 1	Work with the Project Participants to schedule surface water deliveries throughout the assumed curtailment period.
DWR NOTES: Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Submittal Table 2-3.				
NOTES: 1. It will be the responsibility of the Project Participants to make up any supply deficits during Term 91 curtailment periods. Informing the Project Participants about Term 91 curtailment and Lake Shasta conditions as well as working with them to schedule surface water deliveries provides the Project Participants with more flexibility, but does not lead to a quantified water shortage gap reduction, so no gap reduction estimate is provided. Actions introduced in a lower stage will also be used in higher stages, unless otherwise noted.				

5.4 Locally Appropriate Operational Changes

During a water shortage of any level, the Agency may modify its operations on a short-term or long-term basis in response to any water shortage condition. The Agency may take any one or a combination of the following actions:

1. Reduce pumping according to water rights restrictions that come with the various stages of drought.
2. Investigate supplemental surface water purchase options.

Operational changes will be considered at each level of water shortage to determine whether and when to implement such measures.

5.5 Emergency Response Plan

The Agency's water shortage levels outlined in Section 4.0 apply to both foreseeable and unforeseeable water supply shortage conditions, including catastrophic water shortage conditions.

The Agency's Emergency Response Plan (ERP) addresses catastrophic water shortage conditions. The ERP outlines response procedures associated with unforeseeable incidents such as a regional power outage, earthquake, infrastructure failure, and other such events. The ERP includes actions to be taken in preparation for, during, and recovery from such events. Water shortage emergency response is coordinated with Yolo County. To protect the security of the Agency's water system, the ERP is retained by the Agency as a confidential document.

The Agency's response planning for continued water service includes the use of standby generators, equipment, fuel storage tanks, and vehicles. Water storage, treatment, and pumping facilities have been constructed to meet earthquake safety standards.

6.0 COMMUNICATION PROTOCOLS

In the event of a water shortage, the Agency must inform the Project Participants, the general public, other interested parties, and local, regional, and State entities. Communication protocols for foreseeable and unforeseeable events are provided in this section. Timely and effective communication is necessary for appropriate response to the event.

6.1 Communication for Foreseeable Events

Water shortage events may be foreseeable when the Agency conducts its AWSDA as described in Section 3.0. When the Agency determines the potential of a water shortage event, the Agency will follow the communication protocols and procedures below and may trigger any of them at any water shortage level.

1. If a water shortage emergency is anticipated, the Agency will coordinate with Yolo County, and the Project Participants for the possible proclamation of a local emergency.
2. The Agency will issue a public notice for an Agency Board meeting, during which the AWSDA findings and recommendations for a water shortage emergency and shortage response actions are presented.

3. The Agency will communicate conditions to the general public using some or all of the following options, as needed at the various shortage levels: press releases, radio/television coverage, social media posts, and postings on the Agency's website.
4. The Agency will communicate actions to relevant local, regional, and State officials and entities primarily through email correspondence.

6.2 Communication for Unforeseeable Events

A water shortage may also occur during unforeseeable events such as Term 91 curtailments, Shasta Critical Year curtailments, earthquakes, fires, infrastructure failures, civil unrest, and other catastrophic events. The Agency's ERP provides specific communication protocols and procedures to convey actions during these events. The Agency may trigger these communication protocols, depending on the event. In general, communications and notifications will proceed along the identified chain of command. Notification decisions will be made under the direction of the General Manager. External communications will be managed by the Project Participants. The General Manager will work with the Project Manager/Plant Supervisor to notify regulatory agencies. The ERP also provides a list of relevant contacts to notify at the local, regional, and State level. To maintain the security of the Agency's water system, the ERP is maintained as a confidential document and may not be incorporated in this WSCP.

7.0 COMPLIANCE AND ENFORCEMENT

When supplies are insufficient, the Agency can ask the Project Participants to reduce demands, but the specific compliance and enforcement mechanisms are at their discretion. The Agency is committed to working with and supporting the Project Participants in implementing water shortage response actions.

8.0 LEGAL AUTHORITIES

The Agency has the legal authority to create, manage, and activate emergency plans and carry out the responsibilities of those plans under the California Emergency Services Act, which authorizes all political subdivisions below the State level (i.e., special districts, cities, and counties) to conduct emergency operations.

When a water shortage is determined, the Agency will coordinate with the Project Participants, and with the County for the possible proclamation of a local emergency in accordance with California Government Code, California Emergency Services Act (Article 2, §8558). The Agency Board will then hold a duly noticed public meeting to determine whether a water shortage emergency condition exists and, if so, the degree of the emergency and what regulations and restrictions should be enforced in response to the shortage. The Agency shall declare a water shortage emergency in accordance with CWC Chapter 3 of Division 1.

California Water Code Division 1, Section 350

The governing body of a distributor of a public water supply...shall declare a water shortage emergency condition to prevail within the area served by such distributor whenever it finds and determines that the ordinary demands and requirements of water consumers cannot be satisfied without depleting the water supply of the distributor to the extent that there would be insufficient water for human consumption, sanitation, and fire protection.

The water shortage emergency declaration triggers communication protocols described in Section 6.0 of this WSCP. The Agency will coordinate with the Project Participants on the level of compliance and enforcement actions needed to manage their customers' demands.

9.0 FINANCIAL CONSEQUENCES OF WSCP

The Agency's expenses are entirely reimbursed by the Project Participants. Accordingly, the Agency is indirectly at risk from financial impacts associated with water shortages. The Agency's financial viability is directly tied to that of the Project Participants.

The Project Participants anticipate revenue losses, and the Agency could experience increased expenses, during the potential water shortages described in this WSCP. Revenue losses result from decreased water sales due to reduced water use. Increased expenses can include supplemental water supply purchases undertaken by the Agency when surface water supplies are curtailed.

Water conservation directly affects the Project Partners' revenue stability, as the Cities of Davis and Woodland currently recover approximately 80 and 50 percent of their respective water system revenue through volumetric or consumption-based rates. The Project Participants prepare for these events through prudent financial planning, including water rate studies and the establishment of reserves to offset revenue losses. A water shortage surcharge could be enacted by the Project Participants' respective city councils to address revenue impacts from reduced use.

10.0 MONITORING AND REPORTING

In their respective UWMPs, the Agency's Project Participants detail their monitoring and reporting requirements and procedures that ensure appropriate data are collected, tracked, and analyzed to evaluate customer compliance with conservation goals. As discussed in Section 5.0 of this WSCP, the Agency's water system is fully metered, including production at its water treatment facilities and deliveries to the Project Participants.

The Agency will work collaboratively with the Project Participants to monitor surface water use and support their reporting.

11.0 WSCP REFINEMENT PROCEDURES

This WSCP is an adaptive management plan. It is subject to refinements as needed to ensure that the Agency's shortage response actions and mitigation strategies are effective and produce the desired results. Based on monitoring described in Section 10.0 and the need for compliance and enforcement actions described in Section 7.0, the Agency may adjust its response actions and may modify this WSCP. When a WSCP is revised, it will undergo the process described in Section 12.0 of this WSCP for adoption by the Agency Board and distribution to Yolo County, the Project Participants, and the general public.

12.0 PLAN ADOPTION, SUBMITTAL, AND AVAILABILITY

The WSCP may be adopted concurrently with the Agency's UWMP, or by separate resolution, and may be revised and adopted at any time by the Agency following a public hearing. An electronic copy of the WSCP will be submitted to DWR and the California State Library within 30 days of adoption.

No later than 30 days after submittal to DWR, an electronic copy will be provided to Yolo County and the Project Participants. An electronic copy of this WSCP will also be available for public review and download on the Agency's website.