

BLUE LAKE SPRINGS MUTUAL WATER COMPANY

DROUGHT ACTION PLAN

Purpose. This Drought Action Plan serves as a detailed work plan for Blue Lake Springs Mutual Water Company staff, not only during drought conditions, but before and after as well. It includes specific actions for management of the water supply and demand, addresses the impacts associated with drought, and facilitates the timely implementation of effective drought responses.

Adoption. This Drought Action Plan for Blue Lake Springs Mutual Water Company with Water Supply Conditions, Drought Stages; Objectives, and Response Actions was adopted by the Blue Lake Springs Mutual Water Company's Board of Directors on May 10, 2014.

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1.0 INTRODUCTION

1.1 Purpose of Plan

This 2014 Drought Action Plan (Plan) serves as a detailed work plan for the Blue Lake Springs Mutual Water Company staff in order to prepare for and address drought conditions. Included in the Plan are specific actions regarding the management of water supply and demand. It addresses the impact associated with drought and instigates a drought response that is timely and effective.

1.2 Summary of Drought Stages

All declarations of drought stages occur by action of the BLSMWC Board of Directors.

The three stages of the Drought Action Plan depend upon BLSMWC water supply conditions. For normal water supply conditions, BLSMWC would continue to implement water conservation measures and prohibit water waste.

1.3 Applicable Water Codes

During times of water shortage, there are actions Blue Lake Springs Mutual Water Company may take. Several California Water Code Sections grant authority to the water purveyor to declare drought conditions and implement drought stages. Included below are summaries of specific actions required during water shortage conditions; however, the official California Water Code should be referenced for the complete language of the section.

Section 350 – The governing body of the water purveyor may declare a water shortage emergency condition whenever it determines that ordinary demands cannot be satisfied without depleting supplies to the extent that there would be insufficient water for human consumption, sanitation, and fire protection.

Section 353 – When the governing body has declared a water shortage emergency condition within its service area, it shall adopt regulations and restrictions on the delivery and consumption of water supplied for public use in order to conserve water supply for the greatest public benefit, with particular regard to domestic use, sanitation, and fire protection.
Section 355 – These regulations and restrictions shall remain in effect during the water shortage emergency condition, and until the water supply has been replenished or augmented.
Section 356 – These regulations and restrictions may prohibit new or additional service connections, and authorize discontinuing service to consumers willfully in violation of a regulation or restriction.

Section 357 – These regulations and restrictions prevail over any conflicting laws governing water allocations while the water shortage emergency condition is in effect.

2.0 COORDINATION & GUIDELINES

Blue Lake Springs Mutual Water Company's drought response will be managed by their Drought Response Team (DRT), which includes department heads and/or their appointed representative, legal counsel and the General Manager.

2.1 Drought Response Team

The Drought Action Plan emphasizes the importance of a DRT for drought management. Initially, the DRT should be made up of staff representing the following functions.

- Watermasters and Staff
- Finance and Customer Services
- Legal
- Public Outreach
- Water Efficiency

This list may be narrowed down due to staff availability and specific needs, as different functions may not be necessary in all situations nor at all times.

2.2 Role and Responsibilities

The DRT will be responsible for monitoring the activities with regards to general drought management, including issues of timing, policy, public relations, financial solvency, customer education, facility operations, environmental considerations, and public health. The Board of Directors should be updated by the General Manager at regular and special board meetings. During cases of extreme drought, updates may occur more often by email or by phone, consistent with the requirements of the Ralph M. Brown Open Meetings Act.

The DRT should meet periodically during normal water supply conditions to discuss updates and other important ongoing considerations. The group would meet more often as drought events occur and worsen. Another important component of the DRT function during the early stages of drought is to make preparations for subsequent stages.

2.3 Drought Guidelines and Definitions

There are a number of circumstances during a drought in which Blue Lake Springs Mutual Water Company would be required to make and implement decisions that are not solely based upon water supply availability, such as how long to stay in a drought stage, and how demand reductions should be quantified.

Overall Guidelines

Below is a list of drought guidelines developed to assist staff in managing the drought event.

- Drought stage demand reductions will be quantified by output at the water treatment plant during all stages; however, in Stages 3, meter reads may also be necessary to determine compliance with individual allocations and reduction targets.
- This Drought Action Plan should be reviewed and updated every 5 years (or as needed) due to changes in water supplies, operations, expected water demands or other relevant factors.

Early Actions

TRAINING – It is important that ongoing staff training be conducted before a drought occurs to discuss what is necessary for the enforcement of water waste prohibition, enforcement of mandatory or prohibited conservation measures, and answering questions related to water use.

BOARD UPDATES – The Board should be kept appraised of all drought monitoring and predicted water shortages. It is the responsibility of the General Manager to decide the best method for these updates

3.0 ONGOING ACTIVITIES

This Drought Action Plan addresses water management and customer service activities that would be modified during drought conditions. In this section, **Ongoing Actions** are defined as activities that are performed on a regular basis, even in non-drought conditions, that might change in the face of a drought being declared. There are a number of ongoing activities related to drought management. It will be the responsibility of the DRT members to ensure that these activities continue to occur in their respective areas during non-drought conditions, in order to be ready for a declaration of drought.

3.1 Watermasters and Operations Staff

The primary responsibility of the Watermasters and Operations Staff is to ensure the continued integrity of infrastructure throughout BLSMWC's service area, in addition to actively monitor potential drought conditions. Staff must stay abreast of changes during drought conditions, such as lower pressure, lower well levels, changes in demand patterns, and other potential impacts.

3.2 Finance and Customer Services

The primary responsibility of finance is to keep BLSMWC solvent when faced with the increased costs and potential for reduced revenues associated with a drought condition.

Ongoing Actions

- Establish procedures for implementing the drought rates.
- Inform the shareholders regarding potential drought rates.
- Enforce the water waste prohibition regulation.

3.3 Legal

The primary responsibility of administration and legal is to ensure that customer service continues and that actions are legal and defensible.

Ongoing Actions

- Ensure that BLSMWC follows applicable state law when declaring drought conditions, and include citations to pertinent legal authority in drought-related Board actions.
- Continue to enforce the water waste prohibition regulation.

3.4 Public Outreach

The efforts of public outreach are integral to the implementation of a successful Plan and management of a drought event. Public education is the most important activity when a drought does occur, because demand management will not be successful if shareholders are not adequately informed regarding the water situation and the requirements of the Blue Lake Springs Mutual Water Company drought stages. The most important time for public outreach and education is at the beginning of Stage 1.

Ongoing Actions

- Educate shareholders regarding water saving devices and practices.
- Educate shareholders regarding the overall challenges of providing a reliable water supply.

3.5 Water Efficiency

Water efficiency should work closely with public outreach as the activities required to meet water supply constraints are usually through the implementation of water efficiency practices or devices. Because there are ongoing mandated activities, a drought event will increase the number of tasks for which Water Efficiency is responsible. Some of which are activities required of shareholders while some are simply guidelines for shareholders to help them save water.

Ongoing Actions

- Enforce the water waste prohibition regulations.
- Educate shareholders regarding drought stages through bill inserts or a printed message on the bill, an article on the website or email messages.
- Develop a webpage for "Drought Stage" information, including an easy to understand explanation of when a drought is called and when a drought has ended.

4.0 STAGE 1 – WATER ALERT

Stage 1 is the initial stage where water supply conditions are only slightly restricted. This is a VOLUNTARY stage targeting up to a 10% demand reduction. The objectives in Stage 1 are to initiate shareholder awareness of the predicted water shortage and encourage conservation. Staff will implement an outreach program to educate customers regarding the status of BLSMWC's water supply and the predicted water shortage. This education should be done without alarming shareholders as there is not yet a true emergency.

4.1 Watermasters and Operations Staff

- Monitor water demands at the water treatment plant to assess the amount of water savings accomplished.
- Identify areas of low pressure, both present and projected, and communicate this to local fire protection agencies.

4.2 Finance and Customer Services

- Implement Stage 1 drought rates as approved by Board action on May 10, 2014.
- Implement a project code for use by all employees to track time and expenses for all drought-related activities.
- Identify baseline and target levels of water usage.
- Request assistance in programming and obtaining database information appropriate to the drought stage, shareholder requests, and cutback priorities.

4.3 Legal

- When determined appropriate by the General Manager of BLSMWC, prepare materials for the declaration of a water alert for approval by the Board of Directors, consistent with applicable state law.
- Track legislation relating to drought.

4.4 Public Outreach

• Create educational information regarding the stage of drought, what is expected from shareholders, and the consequences if demand reduction goals are not met.

- Ensure that shareholders are aware that drought conditions may worsen quickly, causing rapid progression through the drought stages.
- Ensure that the shareholders are aware of the water waste regulation and all associated penalties.
- Maintain drought information on the website and update throughout the drought.
- Use authorized email addresses and the "Blast Email" mass notification system as necessary to advise customers of water use restrictions or other drought alerts.

4.5 Water Efficiency

- Increase patrols for water waste and enforce Resolution No: 14-5-10 Adopt a Drought Action Plan passed by the Board of Directors on May 10, 2014 with the following actions:
- Encourage voluntary measures to decrease normal demand up to 10%.
- Voluntary restrictions on use.
 - Odd/Even outside watering. NO WATERING ON MONDAYS.
 - Odd/Even outside watering days implemented by addresses.
 - Even addresses water on Tuesday, Thursday and Saturday.
 - Odd addresses water on Wednesday, Friday and Sunday.
- NO outside watering between the hours of 10am and 6pm.
- MANDATORY NO WATERING OF FOREST TREES (BARK BEETLES).
- Implementation of Failure to Comply / Fines
 - First reported failure to comply with Resolution No: 14-5-10 Issue a written warning notice of the water waste violation and request that action be taken to stop the waste.
 - Second reported failure to comply with Resolution No: 14-5-10 Issue a second written notice and levy a fine on the violator's water bill of \$100
 - Third reported failure to comply with Resolution No: 14-5-10 Issue a third written notice and levy a fine on the violator's water bill of \$1,000.
- Increase educational efforts regarding water efficiency practices.

5.0 STAGE 2 – WATER WARNING

Drought Stage 2 action items are intended to increase shareholder understanding of worsening water supply conditions, enforce mandatory conservations measures and implement water use reduction measures to decrease "normal" demand by 20%. Stage 2 activities include a continuation of activities described under Stage 1 and new actions. The major emphasis by shareholder outreach and customer service is to elevate customer awareness of the supply situation and encourage continued savings to achieve the 20% demand reduction goal.

5.1 Watermasters and Operations Staff

• Assess the fiscal consequences and present need for a larger drought management staff, particularly of temporary workers.

5.2 Finance and Customer Services

• Consider adding customer service representatives to help with answering phones,

assisting in customer questions regarding drought restrictions, and possibly extending hours later into the evening.

5.3 Legal

• When determined appropriate by the General Manager, prepare materials for the declaration of a water warning for approval by the Board of Directors, consistent with applicable state law.

5.4 Public Outreach

- Increase public understanding of worsening water supply conditions and enforce mandatory conservation measures.
- Work to spread the word about drought and fire danger.
- Continue to update the Drought Stage website.
- Use authorized email addresses and the "Blast Email" mass notification system as necessary to advise customers of water use restrictions or other drought alerts.

5.5 Water Efficiency

- Enforce mandatory measures and implement water rationing to decrease "normal" demand by 20%.
- MANDATORY restrictions on use.
 - Odd/Even outside watering. NO WATERING ON MONDAYS.
 - Odd/Even outside watering days implemented by addresses.
 - Even addresses water on Tuesday, Thursday and Saturday.
 - Odd addresses water on Wednesday, Friday and Sunday.
- NO outside watering between the hours of 10am and 6pm.
- Fines remain the same as in Stage 1. Restrictors added to non-compliant shareholders.

6.0 STAGE 3 – WATER CRISIS

The objective of Drought Stage 3 actions are to reduce water demand by 50% through effective and consistent public outreach, enforce extensive restrictions of water use and implement water rationing. Protection of water supply for public health and safety purposes is the primary objective during Stage 3 drought conditions. This stage of drought will require much more staff time for policy enforcement with the shareholders. Because of the mandatory restrictions, Emergency Management Agency (EMA) notification is required and shareholder outreach and education will be the key in achieving the water savings goal.

6.1 Watermasters and Operations Staff

- As needed, implement and monitor emergency water distribution.
- Staff should consider the escalation of emergency management at the beginning of this stage.
- Contact the County's EMA regarding fire protection directives that are being implemented within the county. Remain alert to fire danger and water pressure considerations.

6.2 Finance and Customer Services

• Continue to monitor fiscal consequences in this drought stage.

6.3 Legal

• When determined appropriate by the General Manager, prepare materials for the declaration of a water crisis for approval by the Board of Directors, consistent with applicable state law.

6.4 Public Outreach

• Use authorized email addresses and the "Blast Email" mass notification system as necessary to advise customers of water use restrictions or other drought alerts.

6.5 Water Efficiency

- Enforce extensive restrictions on water use and implement water rationing to decrease demand by 50% of "normal" demand.
- Fines are DOUBLE the Stage 1 fines. Restrictors added to non-compliant shareholders.
- NO OUTSIDE WATERING ALLOWED

7.0 POST-DROUGHT ACTIONS

7.1 End of a Drought

Coming out of a drought can occur quickly or slowly, depending on the weather and the storage accumulated with any precipitation. It is very important to make clear to the public that one good storm will not reverse weeks or months of dry weather. The conditions that end a drought usually occur over time. Precipitation that occurs during the deepest of droughts can potentially put BLSMWC in a less severe stage of drought. If this occurs, and the DRT determines the present situation and probable future indicates a lessening of the drought, staff may recommend reducing the drought stage to the previous stage.

In the event that the drought severity lessens, it must be made explicitly clear to the shareholders which stage BLSMWC has moved to, why the change was made, and what the measurements are based upon. Effective public education will minimize conflicts with regard to fines for mandatory cutbacks, and for health and safety concerns. In addition, a lessening of drought severity must be communicated clearly to all staff, especially those with regular public interaction.

Declaring the end of a drought depends in large upon the judgement of staff. While this Drought Action Plan serves as a blueprint for actions in each stage of drought, it is not a rigid prescription for when and how to call a drought, or what actions to take in response. Those decisions must be made by informed and experienced staff, based upon the situation at the time, and approved by the Board of Directors.

7.2 Lessons Learned

When a drought is completely over, and operations are back to normal, it is important to review what worked, what did not work, and how the overall drought response can be improved. The first step must be an examination of the stages, objectives, and response

actions. A discussion among DRT members and implementing staff is imperative to get a complete picture.

7.3 Financial Analysis

BLSMWC should analyze the financial considerations following a drought, which is an important way to gauge the success of drought management activities. A detailed financial assessment of both the costs and revenue incurred during a drought are important.

7.4 Report to the Board

The concluding task in any drought management effort is the final report to the Board. Because the Board reports directly to the shareholders, it is important for the Board members to be able to convey to the shareholders the successes of the drought management. This report may also be released to all shareholders, as successful drought management is not possible without shareholder involvement, cooperation, and support.

Updated: April 16, 2021 to remove references to water meters being installed during fines.