

Appendix A

DWR Submittal Tables

Submittal Table 8-1: Water Shortage Contingency Plan Levels

Submittal Table 8-2: Demand Reduction Actions

Submittal Table 8-3: Supply Augmentation Actions

DWR Submittal Table 8-1
Water Shortage Contingency Plan Levels

Shortage Level	Percent Shortage Range	Shortage Response Actions (Narrative description)
0	0% (Normal)	A Level 0 Water Supply Shortage –Condition exists when MWDOC notifies its water users that no supply reductions are anticipated in this year. MWDOC proceeds with planned water efficiency best practices to support consumer demand reduction in line with state mandated requirements and local MWDOC goals for water supply reliability.
1	Up to 10%	A Level 1 Water Supply Shortage – Condition exists when no supply reductions are anticipated, a consumer imported demand reduction of up to 10% is recommended to make more efficient use of water and respond to existing water conditions. Upon the declaration of a Water Aware condition, MWDOC shall implement the mandatory Level 1 conservation measures identified in this WSCP. The type of event that may prompt MWDOC to declare a Level 1 Water Supply Shortage may include, among other factors, a finding that its wholesale water provider (MET) calls for extraordinary water conservation efforts.
2	Up to 20%	A Level 2 Water Supply Shortage – Condition exists when MWDOC notifies its member agencies that due to drought or other supply reductions, a consumer imported demand reduction of up to 20% is necessary to make more efficient use of water and respond to existing water conditions. Upon declaration of a Level 2 Water Supply Shortage condition, MWDOC shall implement the mandatory Level 2 conservation measures identified in this WSCP.
3	Up to 30%	A Level 3 Water Supply Shortage – Condition exists when MWDOC declares a water shortage emergency condition pursuant to California Water Code section 350 and notifies its member agencies that up to 30% consumer imported demand reduction is required to ensure sufficient supplies for human consumption, sanitation and fire protection. MWDOC must declare a Water Supply Shortage Emergency in the manner and on the grounds provided in California Water Code section 350.
4	Up to 40%	A Level 4 Water Supply Shortage - Condition exists when MWDOC declares a water shortage emergency condition pursuant to California Water Code section 350 and notifies its member agencies that up to 40% consumer imported demand reduction is required to ensure sufficient supplies for human consumption, sanitation and fire protection. MWDOC must declare a Water Supply Shortage Emergency in the manner and on the grounds provided in California Water Code section 350.
5	Up to 50%	A Level 5 Water Supply Shortage - Condition exists when MWDOC declares a water shortage emergency condition pursuant to California Water Code section 350 and notifies its member agencies that up to 50% or more consumer imported demand reduction is required to ensure sufficient supplies for human consumption, sanitation and fire protection. MWDOC must declare a Water Supply Shortage Emergency in the manner and on the grounds provided in California Water Code section 350.

DWR Submittal Table 8-1
Water Shortage Contingency Plan Levels

6	>50%	A Level 6 Water Supply Shortage – Condition exists when MWDOC declares a water shortage emergency condition pursuant to California Water Code section 350 and notifies its member agencies that greater than 50% or more consumer imported demand reduction is required to ensure sufficient supplies for human consumption, sanitation and fire protection. MWDOC must declare a Water Supply Shortage Emergency in the manner and on the grounds provided in California Water Code section 350.
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NOTES:

DWR Submittal Table 8-2: Demand Reduction Actions				
Shortage Level	Demand Reduction Actions <i>Drop down list</i> <i>These are the only categories that will be accepted by the WUEdata online submittal tool. Select those that apply.</i>	How much is this going to reduce the shortage gap? <i>Include units used (volume type or percentage)</i>	Additional Explanation or Reference <i>(optional)</i>	Penalty, Charge, or Other Enforcement? <i>For Retail Suppliers Only</i> <i>Drop Down List</i>
0	Provide Rebates for Landscape Irrigation Efficiency	On-going Long Term-Conservation Savings Measure. Not applicable to Water Shortage Contingency Plan quantifiable savings.	Base level of support to retail agencies and their customers through Landscape Irrigation Efficiency rebates.	No
0	Provide Rebates on Plumbing Fixtures and Devices	On-going Long Term-Conservation Savings Measure. Not applicable to Water Shortage Contingency Plan quantifiable savings.	Base level of support to retail agencies and their customers through water saving device rebates.	No
0	Provide Rebates for Turf Replacement	On-going Long Term-Conservation Savings Measure. Not applicable to Water Shortage Contingency Plan quantifiable savings.	Base level of support to retail agencies and their customers through MWDOC's Turf Removal Program.	No
0	Reduce System Water Loss	On-going Long Term-Conservation Savings Measure. Not applicable to Water Shortage Contingency Plan quantifiable savings.	Base level of programatic support to retail agencies through MWDOC's Water Loss Program.	No
1	Expand Public Information Campaign	0 to 5% of total imported water use met by voluntary Demand Reduction	Expand Public Awareness to encourage residents and industries to reduce their usage of water.	No
1	Other	0 to 10% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Demand Reduction	No
1	Other	0 to 10% of total imported base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes
2	Expand Public Information Campaign	0 to 20% of total imported water use met by voluntary Demand Reduction	Increase Public Awareness efforts to encourage residents and industries to reduce their usage of water.	No
2	Other	0 to 20% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Recommended Demand Reduction	No
2	Other	0 to 20% of total imported base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes
3	Expand Public Information Campaign	0 to 30% of total imported water use met by voluntary Demand Reduction	Pursue an aggressive Public Awareness Campaign to encourage residents and industries to reduce their usage of	No
3	Other	0 to 30% of total imported water use met by voluntary Demand Reduction	Work with retail agencies to review and update as needed water waste prohibitions and ordinances to discourage unnecessary water usage.	No
3	Other	0 to 30% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Demand Reduction	No
3	Other	0 to 30% of total base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes
4	Expand Public Information Campaign	0 to 40% of total imported water use met by voluntary Demand Reduction	Pursue an aggressive Public Awareness Campaign to encourage residents and industries to reduce their usage of water.	No
4	Other	0 to 40% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Demand Reduction	No
4	Other	0 to 40% of total base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes

DWR Submittal Table 8-2: Demand Reduction Actions				
Shortage Level	Demand Reduction Actions <i>Drop down list</i> <i>These are the only categories that will be accepted by the WUEdata online submittal tool. Select those that apply.</i>	How much is this going to reduce the shortage gap? <i>Include units used (volume type or percentage)</i>	Additional Explanation or Reference <i>(optional)</i>	Penalty, Charge, or Other Enforcement? <i>For Retail Suppliers Only Drop Down List</i>
5	Expand Public Information Campaign	0 to 50% of total imported water use met by voluntary Demand Reduction	Pursue an aggressive Public Awareness Campaign to encourage residents and industries to reduce their usage of water.	No
5	Other	0 to 50% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Demand Reduction	No
5	Other	0 to 50% of total base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes
6	Other	0 to 50% of total imported water use met by voluntary Demand Reduction	Implement Voluntary Demand Reduction	No
6	Other	>50% of total base demand met by WSAP supply allocation	Implement Water Supply Allocation Plan	Yes
NOTES: Coordination with WEROC is anticipated to begin at Level 4 or greater. In the event of a short or long-term emergency MWDOC will utilize the WEROC Emergency Operations Plan and follow the detailed steps and process as specified.				

DWR Submittal Table 8-3: Supply Augmentation and Other Actions			
Shortage Level	Supply Augmentation Methods and Other Actions by Water Supplier <i>Drop down list</i> <i>These are the only categories that will be accepted by the WUEdata online submittal tool</i>	How much is this going to reduce the shortage gap? <i>Include units used (volume type or percentage)</i>	Additional Explanation or Reference <i>(optional)</i>
0 through 6	Other Actions (describe)	TBD	MWDOC will work in close coordination with MET on their supply augmentation projects during this time to ensure reliability for the service area.
NOTES:			

Appendix B

MWDOC Water Supply Allocation Plan

Municipal Water District of Orange County



Water Supply Allocation Plan

DRAFT
Revised 2016

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Section 1: Introduction

The Municipal Water District of Orange County (MWDOC) is dedicated to ensuring water reliability for the communities we serve. Hundreds of thousands of Orange County residents have taken advantage of our water conservation rebates to install water saving toilets, clothes washers, and other water saving devices. We continue to partner with our client agencies to develop new local supplies such as recycled water, brackish water desalting, ocean water desalination, and the Groundwater Replenishment System.

However, a combination of water supply challenges have brought about the possibility that MWDOC may not have access to the imported supplies necessary to meet the demands of its client agencies in the coming years. The following factors have dramatically impacted water supply conditions not only in Orange County, but all of Southern California:

- In CY 2013 many areas of California experienced the driest year on record. California received record low snowpack in FY 2014-15. On January 17, 2014, Governor Brown proclaimed a statewide drought emergency. On May 5, 2015, the State Water Resources Control Board adopted an emergency conservation regulations in accordance with the Governor's directive. The provisions of the emergency regulations went into effect on May 18, 2015. On February 2, 2016, the SWRCB will consider a resolution to extend the existing May 2015 Emergency Regulation as directed in the November 2015 executive order.
- The Colorado River is recovering from a long-term drought. Reservoirs along the river are less than half full. In the summer of 2015, Lake Mead water levels reached record lows. Supplies from this source have been reduced since 2003 and will continue to be limited.

To meet the imported water demands of its member agencies, the Metropolitan Water District of Southern California (MET) is quickly withdrawing supplies from surface and groundwater storage. Over the past three years, MET has drawn down 67% of its available reserves.

The recent dry conditions and the uncertainty about future supplies from the State Water Project have raised the possibility that MET will not have access to the supplies necessary to meet the imported water demands of its member agencies. As a result, MET has developed a Water Supply Allocation Plan that allocates wholesale imported water supplies among its 26 member agencies throughout Southern California.

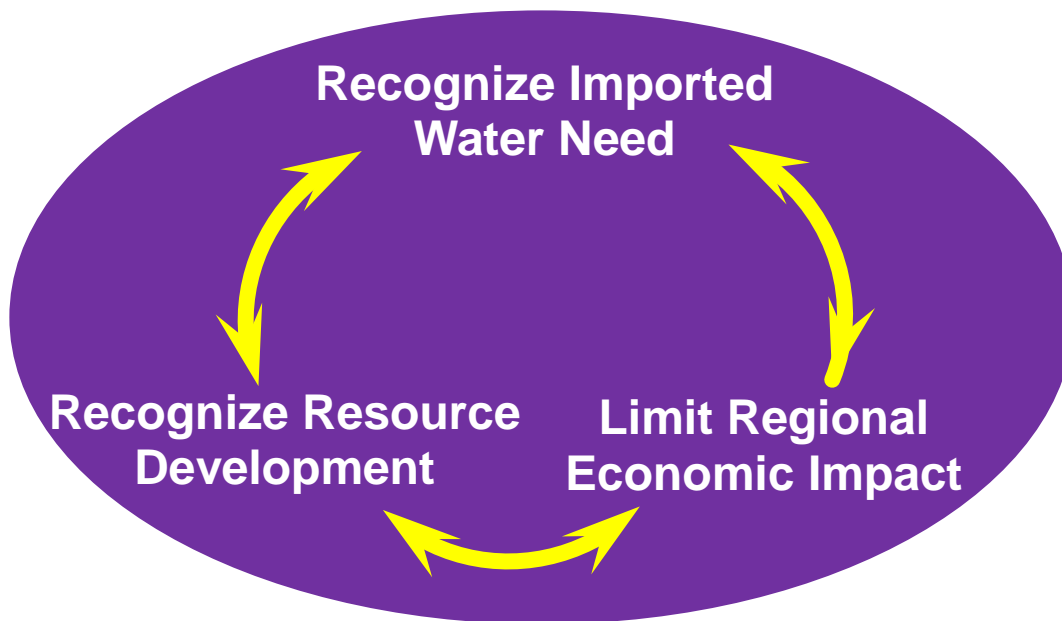
To prepare for the possibility of an allocation of imported water supplies from MET, MWDOC has worked in collaboration with its 28 client agencies to develop this Water Supply Allocation Plan to allocate imported water supplies at the retail level. This document lays out the essential components of how MWDOC plans to determine and implement each agency's allocation during a time of shortage.

Section 2: Metropolitan Water District's Water Supply Allocation Plan

In February 2008, MET approved a Water Supply Allocation Plan (WSAP) designed to allocate imported water to all of its member agencies during a shortage. In June 2014 MET convened a member agency working group to revisit the WSAP. The purpose of the working group was to collaborate with member agencies to identify potential revisions to the WSAP in preparation for mandatory supply allocations in 2015. There were eight working group meetings and three discussions at the monthly Member Agency Managers' Meetings. The WSAP follows the principles and considerations identified in MET's Water Surplus and Drought Management Plan, which calls upon the allocation of water in a fair and equitable manner to all of MET's member agencies. To the extent possible, this means developing a plan that minimizes regional hardship during times of shortage.

The MET WSAP seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level. To achieve this, it takes into account:

- The impact to retail customers and the economy
- Allowance for population and growth
- Change and/or loss of local supply
- Reclamation/Recycling
- Conservation
- Investments in local resources
- Investments in MET's facilities



The WSAP states that MET staff will go before the Board with a recommendation in April, from which the Board of Directors will make a determination on the level of the Regional Shortage. If the Board determines allocations are necessary, they will go into effect in July and remain for a twelve-month period. *Note: This schedule is at the discretion of the MET Board, and is subject to change.*

The recommendation to declare a regional shortage will be based upon water supply availability from the State Water Project, the Colorado River Aqueduct, and the amount of surface and groundwater storage remaining in MET's reserves. It will also take into account the implementation of MET's water management actions i.e. Five Year Water Supply Plan, extraordinary conservation efforts, the acceleration of local resource projects, and the purchases of water transfers.

A full copy of MET's Water Supply Allocation Plan as revised in December 2014 is available in Appendix B.

Section 3: Development Process

In preparation for possible allocation of imported water supplies from MET, MWDOC's Board first adopted the following policy principles to help guide staff and the client agency technical workgroup to develop a plan that is fair and equitable for everyone within its service area:

- **Seek best allocation available from MET**
- **Develop MWDOC Plan in collaboration with client agencies**
- **When reasonable, use similar method/approach as MET**
- **When MET's method would produce significant unintended result , use an alternative approach**
- **Develop accurate data on local supply, conservation, recycling, rate structures, growth and other relevant adjustment factors**
- **Seek opportunities within MWDOC service area to provide mutually beneficial shortage mitigation**

Client Agency Input

Between the months of September and January of 2014-15, MWDOC staff worked cooperatively with the client agencies through a series of technical workgroups to develop a formula and implementation plan to allocate imported supplies in the event that MET declares a regional shortage. These workgroups provided an arena for in-depth discussion of the objectives, mechanics, and policy aspects of the different parts of the Plan. MWDOC staff also met individually with a number of client agencies for detailed discussions on elements of the Plan. The discussions, suggestions, and comments expressed by the client agencies during this process played a key part in the development of this Plan.

The following MWDOC client agencies participated in the Technical Workgroup:

- **City of Buena Park**
- **City of Fountain Valley**
- **City of Garden Grove**
- **City of Huntington Beach**
- **City of Newport Beach**
- **City of Orange**
- **City of San Clemente**
- **City of San Juan Capistrano**
- **City of Tustin**
- **City of Westminster**
- **East Orange County Water District**
- **El Toro Water District**
- **Golden State Water Co.**
- **Irvine Ranch Water District**
- **Laguna Beach County Water District**

- **Mesa Water District**
- **Moulton Niguel Water District**
- **Orange County Water District**
- **Serrano Water District**
- **Santa Margarita Water District**
- **South Coast Water District**
- **Trabuco Canyon Water District**
- **Yorba Linda Water District**

In addition to the workshops, individual meetings were held between MWDOC staff and the following MWDOC client agencies to address more specific and agency-related questions.

These individual meetings provided MWDOC staff with a great deal of insight on exactly how a retail agency would implement allocations at the customer level. Such information was extremely valuable in our regional discussion at MET and in the development of this Plan.

Board of Directors Input

Throughout the Plan's development process, the MWDOC Board of Directors was provided with regular progress reports on the status of the Plan and the technical workgroup discussions. During the months the Plan was being developed, the Board Planning and Operations Committee was kept apprised of key issues regarding MET's and MWDOC's allocation plan. Moreover, the Committee played an integral part in the development of key implementation issues such as the appeal process and the surcharge rate structure.

Section 4: Water Supply Allocation Formula

The MWDOC Water Supply Allocation Model follows five (5) basic steps to determine an agency's imported supply allocation:

- Step 1: Determine Baseline Information
- Step 2: Establish Allocation Year Information
- Step 3: Assess the Shortage Reduction Stage (Based on MET's Declared Shortage Level)
- Step 4: Apply Allocation Adjustments and Credits in the areas of retail impacts, conservation, groundwater recharge.
- Step 5: Sum total allocations and determine retail reliability

A description of how the calculation is used in each step is described below:

Step 1 – Determine Baseline Information

In order to determine a client agency's retail demands and imported supply needs in the allocation year, the model needs to establish a historical base period for water supply and delivery data. The base period for each of the different categories of demands and supplies is calculated using data from fiscal years (July through June) ending 2013 and 2014.

The following is a description of the base period calculations:

Base Period Local Supplies: Local supplies for the base period are calculated using a two-year average (from fiscal years ending 2013 and 2014) of groundwater production, groundwater recovery, surface water production, and other non-imported supplies.

Base Period Wholesale (Imported) Firm Demands : Firm demands on MWDOC for the base period are calculated using a two-year average (from fiscal years ending 2013 and 2014) of full-service, and surface storage operating agreement demands.

Base Period In-lieu Deliveries: Base period in-lieu deliveries to client agencies are calculated using a two year average (from fiscal years ending 2013 and 2014) of In-lieu deliveries to long-term groundwater replenishment, conjunctive use, cyclic, and supplemental storage programs. In-lieu deliveries are not calculated as imported supplies from MET. They are calculated as local supplies to account for the corresponding reduction in base year local production that was required to take In-lieu deliveries.

Base Period Retail Demands: Total retail municipal and industrial demands for the base period are calculated by adding the Base Period Local Supplies, Base Period Wholesale Imported Firm Demands, and Base Period In-Lieu Deliveries.

Step 2 – Establish Allocation Year Information

In this step, the model adjusts for each member agency's water need in the allocation year. To do so, it adjusts the base period estimates for population growth and changes in local supplies.

The following is a description of how the allocation year information is established:

Allocation Year Retail Demands: Total retail M&I demands for the allocation year are calculated by adjusting the Base Period Retail Demands for growth. The method in which MWDOC determines each client agency's growth is through population increase s for the fiscal years ending 2013 to 2014¹. Based on the data received from California State University of Fullerton, Center for Demographic Research, MWDOC prorates each agency's population increase share to MWDOC's growth adjustment received from MET², as shown in Appendix C.

Growth Adjustment: The growth adjustment is calculated by taking the average percent of growth from fiscal years ending 2013 and 2014, as generated by the Center for Demographic Research at California State University, Fullerton.

Allocation Year Local Supplies: Allocation year local supplies include groundwater production, groundwater recovery, surface water production, and other imported supplies not from MET. In-lieu deliveries are considered as local supplies to account for the corresponding reduction in base year local production that was required to take in-lieu deliveries. Allocation year local supplies reflect a more accurate estimate of actual supplies in the allocation year, and in turn more accurately estimates an agency's demand for imported supplies.

Extraordinary Increased Production Adjustment: This adjustment accounts for extraordinary increases in local supplies above the base period. Extraordinary increases in production include such efforts as purchasing water transfers. In order not to discourage such extraordinary efforts, a percentage of the yield from these supplies is added back to Allocation Year Local Supplies in shortage levels as shown below. This has the effect of "setting aside" the majority of the yield for the agency who procured the supply. The percentage of the extraordinary increases in local supply corresponds according to the regional shortage level, as shown in Table 4.1.

¹ Although many options were discussed in the technical workgroup sessions, this option was chosen to best reflect the increase in water demand due to population growth as intended by MET's allocation formula for each client agency in the MWDOC service area.

² MET's growth adjustment is calculated by using the average of the last two year County-wide population growth rates, which include not only MWDOC's service area but also the cities of Fullerton, Anaheim, and Santa Ana.

Table 4.1
Extraordinary Increased
Production Adjustment

Regional Shortage Level	Regional Shortage Percentage	Extraordinary Increase Percentage
1	5%	5%
2	10%	10%
3	15%	15%
4	20%	20%
5	25%	25%
6	30%	30%
7	35%	35%
8	40%	40%
9	45%	45%
10	50%	50%

Step 3 – Calculate Initial Minimum Allocation Based on Declared Shortage Level

This step sets the initial allocation. After a regional shortage level is established, MWDOC will calculate the initial allocation as a percentage of adjusted Demand for Firm MET Supplies within the model for each client agency.

Regional Shortage Levels: The model allocates shortages of supplies over ten levels: from 5 to 50 percent, in 5 percent increments.

Initial (Wholesale Minimum) Allocation: The Wholesale Minimum Allocation is established to ensure a minimum level of imported supplies. The Wholesale Minimum Allocation ensures that client agencies will not experience shortages on the wholesale level that are greater than one-and-a-half times the percentage shortage of MET's regional water supplies. As illustrated in Table 4.2, the Wholesale Minimum Allocation percentage is equal to 100 minus one-and-a-half times the shortage level. The allocation is based on each agency's demand of firm MET water.

Table 4.2
Wholesale (Imported)
Supply Minimum Allocation

Regional Shortage Level		Wholesale Minimum Allocation
1		92.5%
2		85.0%
3		77.5%
4		70.0%
5		62.5%
6		55.0%
7		47.5%
8		40.0%
9		32.5%
10		25.0%

Step 4 – Assign Allocation Adjustments and Conservation Credit

In this step, the model assigns additional water to address disparate impacts at the retail level caused by an across-the-board cut of imported supplies. It also applies a conservation credit given to those agencies that have achieved additional water savings at the retail level as a result of successful implementation of water conservation devices, programs and rate structures.

Retail Impact Adjustment: The Retail Impact Adjustment is the factor used to address major differences in retail level shortages associated with across-the-board cuts. The purpose of this adjustment is to ensure that agencies with a high level of dependence on MET do not experience highly disparate shortages compared to other agencies when faced with a reduction in imported supplies. The Retail Impact Adjustment is calculated as the difference between the Regional Shortage Percentage and the Wholesale Imported Minimum Allocation. The amount of the adjustment each client agency receives is prorated on a linear scale, based on its dependence on imported water at the retail level. The prorated amount of allocation is referred to as the Retail Impact Adjustment Allocation. Table 4.3 below illustrates the maximum adjustment an agency may receive according to the regional shortage level.

Table 4.3
Retail Impact Adjustment

Regional Shortage Level	Regional Shortage Percentage	Retail Impact Adjustment Maximum
1	5%	2.5%
2	10%	5.0%
3	15%	7.5%
4	20%	10.0%
5	25%	12.5%
6	30%	15.0%
7	35%	17.5%
8	40%	20.0%
9	45%	22.5%
10	50%	25.0%

Unfortunately, the Retail Impact Adjustment MWDOC receives from MET may be less than the aggregate retail impact adjustment for its client agencies. To mitigate this difference, MWDOC decreases each client agency's retail impact adjustment according to their prorated share.

Conservation Demand Hardening Credit: The Conservation Demand Hardening Credit addresses the increased difficulty in achieving additional water savings at the retail level that comes as a result of successful implementation of water conserving devices and conservation savings programs. To estimate conservation savings, each member agency has a historical baseline Gallons Per Person Per Day (GPCD) calculated by the maximum usage from fiscal year ending 2004 to fiscal year ending 2014. Reductions from the baseline GPCD to the Allocation Year are used to calculate the equivalent conservation savings in acre-feet. The Conservation Demand Hardening Credit is based on an initial 10 percent of the GPCD-based Conservation savings plus an additional 5 percent for each level of Regional Shortage set by the Board during implementation of the WSAP. The credit will also be adjusted for:

- The overall percentage reduction in retail water demand
- The member agency's dependence on Metropolitan

The credit is calculated using the following formula:

$$\text{Conservation Demand Hardening Credit} = \text{Conservation Savings} \times (10\% + \text{Regional Shortage Level Percentage}) \times (1 + ((\text{Baseline GPCD} - \text{Allocation Year GPCD}) / \text{Baseline GPCD})) \times \text{Dependence on MWD Percentage}.$$

Minimum Per-Capita Water Use Credit: This adjustment creates a minimum daily gallons per capita (GPCD) water use threshold. Member agencies' retail -level water use is

compared to a total water use of 100 GPCD. Agencies that fall below this threshold receive additional allocation to bring them up to the minimum GPCD water use level³.

Step 5 – Sum Total Allocations and Calculate Retail Reliability

This is the final step in calculating an agency's total allocation for imported supplies. The model sums an agency's total imported allocation with all of the adjustments and credits and then calculates each agency's retail reliability compared to its Allocation Year Retail Demand.

Final Metropolitan Allocation: The final allocation of imported supplies to an agency for its retail demand is the sum of the Wholesale Imported Minimum Allocation, their Retail Impact Adjustment, their Conservation Demand Hardening Credit, and Per-Capita Adjustment Allocation (if applicable).

Total Metropolitan Supply Allocations: In addition to the WSAP Allocation described above, agencies may also receive separate allocations of supplies for seawater barrier and groundwater replenishment demands. Allocations of supplies to meet seawater barrier demands are to be determined by the MET Board of Directors independently, but in conjunction with the WSAP. Separating the seawater barrier allocation from the WSAP allocation allows the MET Board to consider actual barrier requirements in the Allocation Year and address the demand hardening issues associated with cutting seawater barrier deliveries. According to the principles outlined for allocating seawater barrier demands, allocations should be no deeper than the WSAP Wholesale Minimum Percentage implemented at that time. The WSAP also provides a limited allocation for drought-impacted groundwater basins based on the following framework:

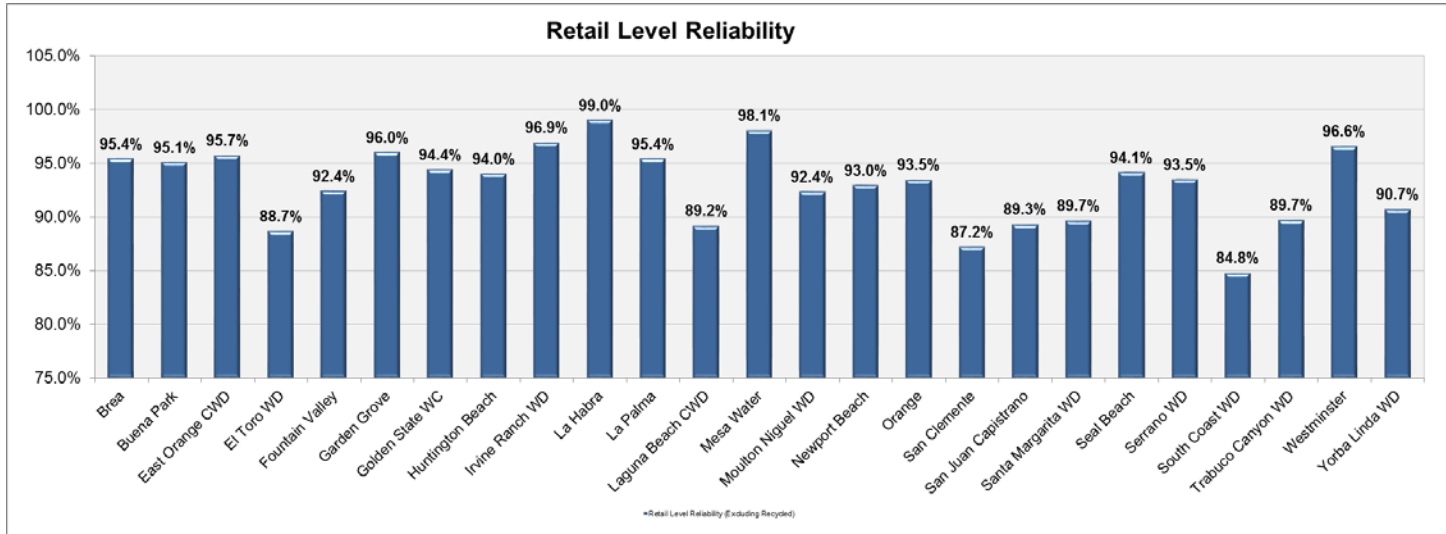
1. Metropolitan staff will hold a consultation with the requesting member agency and the appropriate groundwater basin manager to document whether the basin is in one of the following conditions:
 - a. Groundwater basin overdraft conditions that will result in water levels being outside normal operating ranges during the WSAP allocation period; or
 - b. Violations of groundwater basin water quality and/or regulatory parameters that would occur without imported deliveries.
2. An allocation is provided based on the verified need for groundwater replenishment. The allocation would start with a member agency's ten-year average purchases of imported groundwater replenishment supplies (excluding years in which deliveries were curtailed). The amount would then be reduced by the declared WSAP Regional Shortage Level.

Agency's Retail Reliability: This calculates an agency's total MET allocation versus their allocation year retail demands to determine their overall reliability percentage (supplies

³ Per capita water used based on Total Retail-Level Use and population data received from California State University of Fullerton, Center for Demographic Research

as a percentage of retail demand) under a regional shortage level. This percentage excludes recycled water supplies from an agency's total water supply. Figure 4.1 illustrates the MWDOC client agencies' reliability percentages under a stage 3 regional shortage level (15%).

Figure 4.1
MWDOC's Water Supply Allocation Plan
Stage 3 with a Regional Shortage of 15%*



Source: MWDOC Allocation Model Version 3.1 and assumes a BPP of 75%.

[*] These are estimated reliability percentages for MWDOC client agencies under a regional shortage stage 3 (15%) based on initial local supply data received from the client agencies and OCWDs' projected BPP for 2015/16.

Section 5: Plan Implementation

This section covers implementation issues which include: the appeal process, penalties rate structure and billing, tracking and reporting water usage, timeline and option to revisit the plan.

Allocation Appeals Process

The purpose of the appeals process is to provide client agencies the opportunity to request a change to their allocation based on new or corrected information. The grounds for appeal can include but are not limited to:

- Adjusting errors in historical data used in the Base period calculations
- Adjusting for unforeseen losses or gains in local supplies
- Adjusting for extraordinary increases in local supplies
- Adjusting for population growth rates
- Adjusting for credits with the Conservation base data, including Conservation Rate Structure

MWDOC anticipates that under most circumstances, a client agency's appeal will be the basis for an appeal to MET by MWDOC. MWDOC staff will work with client agencies to ensure that such an appeal is a complete and accurate reflection of the client agency's allocation and is properly reviewed by MET. To accomplish this, MWDOC will require the following information from the client agency submitting an appeal:

- Written letter (in the form of a letter or e-mail) from the client agency requesting an appeal
- Brief description of the type of appeal e.g. incorrect base data, loss/gain in local supply, extraordinary increase in local supply, adjustment in agency's conservation base data, or other
- Rationale for the appeal
- Quantity in acre-feet in question
- Verifiable documentation that supports the rationale i.e. billing statements, invoices for conservation device installations, Groundwater reports

To provide clarity of the process and ensure your appeal is properly handled, the following steps will occur:

Step 1 – Submit Appeal – Client agency will submit the necessary information, described above, to MWDOC.

Step 2 – Notification of Response and Appeal Meeting – Once MWDOC staff receives the appeal information, MWDOC will send a response and schedule a meeting with MWDOC staff and the client agency, within two weeks of receiving the information, to discuss the appeal in further detail.

Step 3 – Submittal to MET & MWDOC Board Notification – Using the information received from the client agency, MWDOC will prepare and submit the appeal to MET no later than one month of receiving the information. In addition, MWDOC staff will notify its Board of the submittal to MET.

Step 4 – MET Appeal Process - MWDOC will follow the terms of MET's appeal process, as described in Appendix B. Client agencies will also be invited, as deemed appropriate, by MWDOC to attend any meetings with MET on their appeal.

Step 5 –Client Agency Notification of MET's Decision – Once MET has made a determination of the appeal, MWDOC staff will notify the client agency of the decision and determine if additional actions are needed i.e. Appeal to MET Board.

In the event that MET denies the appeal, MWDOC staff will continue to work with the appealing agency to resolve their issue(s). Any action that will result in adjustments to client agency's allocation will be submitted to the Board for review and approval.

Allocation Surcharge Rates & Billing

MET's Surcharge Rates

MET will enforce its allocations through a tiered surcharge rate structure. MET will assess surcharge rates to a member agency that exceeds its total annual allocation at the end of the twelve-month allocation period, according to the rate structure below:

**Table 5.1: Metropolitan Water District
Allocation Surcharge Rate Structure
(FY2015/16 Rates)***

Water Use up to:	(1) Base Rate	(2) Surcharge Rate**	(1)+(2) = Total Rate
100% Allocation	Tier 1 (\$942/AF)	-	\$942/AF
100% < = 115%	Tier 1 (\$942/AF)	Tier 1 + (1,480/AF)***	\$2,422/AF
Use > 115%	Tier 1 (\$942/AF)	Tier 1 + (2,960/AF)***	\$3,902/AF

[*] The base rate shall be the applicable water rate for the water being purchased (Model shows CY 2016 rate).

[**] If MWDOC exceeds its allocation limit but is within its equivalent preferential right amount, MET will decrease the surcharge rate by one level.

[***] Surcharge rate is applied to water use in excess of an agency's WSAP allocation.

These surcharge rates will be assessed according to MET water rates in effect at the time of billing. Any surcharge funds collected by MET will be invested back to the MET member agency through conservation and local resource development.

MWDOC Surcharge Rates

As a water wholesaler, MWDOC has the opportunity to assess penalties in many different ways. A number of options were discussed and analyzed with the client

agencies and Board Committee members. The key components that helped guide development of a surcharge structure included:

- A financial incentive to discourage water usage above a client agency's allocation
- A surcharge rate structure that is administratively easy to understand and implement
- Surcharge rates that are fair and appropriate during a shortage

From these components and input received from both the MWDOC Board and the client agencies, a melded surcharge rate structure was recommended. This was mainly due to its "region-wide" style approach and similar structure to other MWDOC rates and charges.

MWDOC Surcharge Rate Structure – At the end of the allocation year, MWDOC would charge a surcharge to each client agency that exceeded their allocation. This surcharge would be assessed according to the client agency's prorated share (acre-feet over usage) of MWDOC surcharge amount with MET. Below is an example of how this surcharge rate structure would apply:



Under the melded surcharge rate structure, client agencies will only be assessed penalties if MWDOC exceeds its total allocation and is required to pay a surcharge to MET.

MWDOC Billing

During the allocation period, MWDOC billing will remain the same. Only at the end of the twelve-month allocation period will MWDOC calculate each member agency's total potable water use based on the local supply certification and MWDOC allocation model and determine which agencies exceeded their annual allocation. From those agencies that exceeded their allocation, MWDOC will assess surcharge rates according to the melded surcharge rate structure on their next water invoice.

Understanding that the penalties can be significant to a retail agency, MET and MWDOC will allow payment of these penalties to be spread over three monthly billing periods. Therefore, a third of the penalties will be applied each month to the agency's water invoice over a three-month period

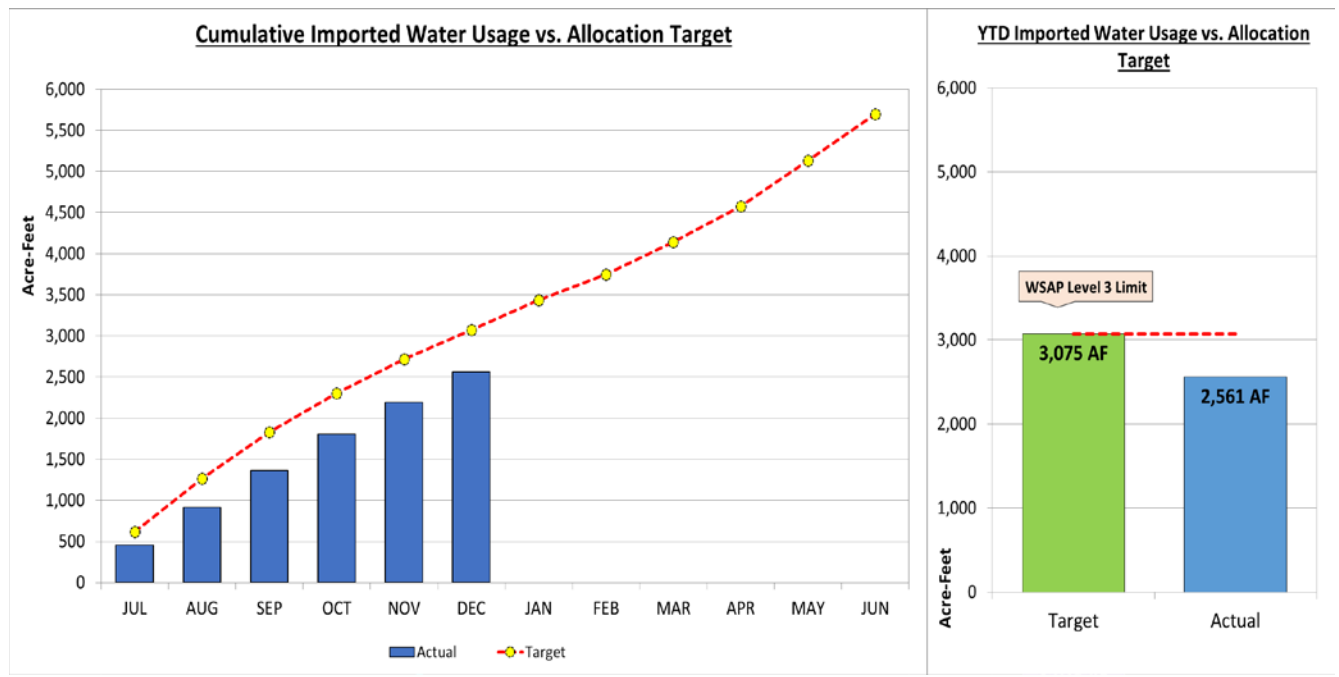
Tracking and Reporting

In preparing for allocations, it is important to track the amount of water the region and each client agency is using monthly. This data is important to help MWDOC and client agencies project their annual usage, evaluate their current demands, and avoid any over usage that will result in allocation penalties. MWDOC will provide water use monthly reports upon request or when necessary that will compare each client agency's current cumulative imported usage to their allocation target (Based off historical monthly percentages of imported usage). In addition, MWDOC will provide quarterly reports on its cumulative retail usage compared to its allocation baseline.

To develop these reports, MWDOC will need to work closely with each client agency to get their local supply data on a monthly basis. This data will not only be used by MWDOC to track monthly usage, but also by MET to assess MWDOC's total projected water demands.

Below in Figure 5.2 is an example of the type of monthly report MWDOC will provide to each client agency during the allocation period.

Figure 5.2
Example of a Client Agency's Monthly Usage Report



Key Dates for Implementation

If a regional shortage is declared, the allocation period will cover twelve consecutive months, e.g. July 1st of a given year through June 30. Barring unforeseen large-scale circumstances, the Regional Shortage Level will be set for the entire allocation period, which will provide the client agencies an established water supply shortage allocation amount. Figure 5.3 Illustrates the Metropolitan timeline for allocations during a two year period.

**Figure 5.3: Metropolitan Water District
Adopted Allocation Timeline**

Year	Month	Year 1 Board Allocation Decision	Year 1 Allocation Year	Year 2 Board Allocation Decision	Year 2 Allocation Year	
YEAR 1	January					
	February					
	March					
	April					
	May	Declaration	Effective Period Continuous Tracking of Member Agency Local Supply and Imported Water Use			
	June					
	July					
	August					
	September					
	October					
	November					
	December					
YEAR 2	January			Assess Penalties	Declaration	Effective Period Continuous Tracking of Member Agency Local Supply and Imported Water Use
	February					
	March					
	April					
	May					
	June					
	July					
	August					
	September					
	October					
	November					
	December					
YEAR 3	January					
	February					
	March					
	April					
	May					
	June					

It is important to note that MWDOC does not anticipate calling for allocation unless the MET Board declares a shortage through its WSAP; and no later than 30 days from MET's declaration will MWDOC announce allocation to its client agencies.

Revisiting the Plan

Calculating the amount of imported water each client agency receives during a water shortage is not an easy task. The key objective in developing this allocation plan is to ensure that a proper and fair distribution of water is given to each client agency. However, due to the complexity of this issue and the potential for unforeseen circumstances that may occur during an allocation year, MWDOC offers the opportunity to review and refine components of this plan where deemed necessary.

The MWDOC staff and client agencies have the opportunity to revisit the plan and offer any recommendations to the MWDOC Board that will improve the method, calculation, and approach of this plan.

MET has a similar process which will allow opportunity to review their plan when deemed necessary.

Appendix A

List of Acronyms:

AF- Acre-feet
M&I- Municipal and Industrial
MET-Metropolitan Water District of Southern California
SWRCB-State Water Resources Control Board
WSAP-Water Supply Allocation Plan

Definitions:

Extraordinary Increases in Production: water production efforts that increase local supplies during an allocation year such as purchasing water transfers.

Groundwater Recovery: The extraction and treatment of groundwater making it usable for a variety of applications by removing high levels of chemicals and/or salts.

In-lieu deliveries: MET-supplied water bought to replace water that would otherwise be pumped from the groundwater basin.

Overproducing groundwater yield: Withdrawal (removal) of groundwater over a period of time that exceeds the recharge rate of the supply aquifer. Also referred to as overdraft or mining the aquifer.

Seawater Barrier: The injection of water into wells along the coast to protect the groundwater basin from seawater intrusion. The injected water acts like a wall, blocking seawater that would otherwise migrate into groundwater basins as a result of pumping inland.

Appendix B

Metropolitan's Draft Water Supply Allocation Plan



MET Final Water
Supply Allocation PI

Appendix C

MWDOC Growth Adjustment Table per Client Agency

Population of MWDOC Retail Water Agencies

Water Agency	Jan-13	Jan-14	Avg of 2013 & 2014
Brea	41,129	42,181	41,655
Buena Park	82,053	82,364	82,209
East Orange CWD Retail Zone	3,233	3,247	3,240
El Toro WD	48,453	48,628	48,541
Fountain Valley	57,129	57,590	57,360
Garden Grove	175,096	175,873	175,485
Golden State Water Company	167,779	168,561	168,170
Huntington Beach	193,873	196,041	194,957
Irvine Ranch WD	357,781	369,724	363,753
La Habra	60,989	61,455	61,222
La Palma	15,890	15,946	15,918
Laguna Beach CWD includ. Emerald Bay Service District	20,130	20,204	20,167
Mesa Water	105,779	106,152	105,966
Moulton Niguel WD	168,301	169,405	168,853
Newport Beach	65,404	65,551	65,478
Orange	137,814	138,182	137,998
San Clemente	50,757	50,960	50,859
San Juan Capistrano	37,943	38,491	38,217
Santa Margarita WD	152,245	153,358	152,802
Seal Beach	23,543	23,618	23,581
Serrano WD	6,408	6,437	6,423
South Coast WD	34,672	34,816	34,744
Trabuco Canyon WD	12,588	12,640	12,614
Tustin	67,445	67,700	67,573
Westminster	92,939	93,322	93,131
Yorba Linda WD	73,378	73,990	73,684
Total of MWDOC Agencies	2,252,751	2,276,436	2,264,594

Source: Center for Demographic Research, CSU Fullerton, December 2014. CDR's estimates were based on the 2010 Census. Water agency counts were made for the actual area served, which may be different than the political boundary. Numbers are tied to the State Dept. of Finance numbers for total population of Orange County.

Water Agency	Growth % from 2012 to 2013	Growth % from 2013 to 2014	Avg Growth % 2013 to 2014
Brea	1.13%	2.56%	1.84%
Buena Park	0.62%	0.38%	0.50%
East Orange CWD Retail Zone	0.56%	0.43%	0.50%
El Toro WD	0.56%	0.36%	0.46%
Fountain Valley	0.71%	0.81%	0.76%
Garden Grove	0.19%	0.44%	0.32%
Golden State Water Company	0.87%	0.47%	0.67%
Huntington Beach	0.61%	1.12%	0.87%
Irvine Ranch WD	2.68%	3.34%	3.01%
La Habra	0.53%	0.76%	0.65%
La Palma	0.75%	0.35%	0.55%
Laguna Beach CWD includ. Emerald Bay Service District	0.60%	0.37%	0.48%
Mesa Water	0.58%	0.35%	0.47%
Moulton Niguel WD	0.78%	0.66%	0.72%
Newport Beach	0.51%	0.22%	0.37%
Orange	0.59%	0.27%	0.43%
San Clemente	0.55%	0.40%	0.48%
San Juan Capistrano	0.89%	1.44%	1.17%
Santa Margarita WD	0.55%	0.73%	0.64%
Seal Beach	0.59%	0.32%	0.45%
Serrano WD	0.60%	0.45%	0.52%
South Coast WD	0.61%	0.42%	0.51%
Trabuco Canyon WD	0.55%	0.41%	0.48%
Tustin	0.63%	0.38%	0.50%
Westminster	0.64%	0.41%	0.53%
Yorba Linda WD	1.11%	0.83%	0.97%
Total of MWDOC Agencies	0.95%	1.05%	1.00%

Appendix D

MWDOC Conservation Hardening Credit Table per Client Agency

Member Agency	GPCD Baseline	GPCD for 2014	Change in GPCD	AF Savings
Brea	288.58	246.61	41.97	1,983
Buena Park	199.59	165.57	34.02	3,138
East Orange CWD includ. Tustin	196.19	170.20	25.99	2,065
El Toro WD	214.96	185.54	29.42	1,748
Fountain Valley	192.48	184.64	7.84	506
Garden Grove	166.11	133.16	32.95	6,491
Golden State Water Company	175.11	146.27	28.84	5,445
Huntington Beach	163.73	141.79	21.94	4,818
Irvine Ranch WD	304.13	244.30	59.83	24,778
La Habra	160.60	150.19	10.41	717
La Palma	154.88	123.75	31.13	556
Laguna Beach CWD includ. EBSD	203.74	173.46	30.28	685
Mesa WD	191.25	166.35	24.90	2,961
Moulton Niguel WD	236.66	194.91	41.75	7,922
Newport Beach	258.85	239.36	19.49	1,431
Orange	231.08	210.84	20.24	3,134
San Clemente	198.09	178.51	19.58	1,118
San Juan Capistrano	236.93	206.65	30.28	1,306
Santa Margarita WD	235.06	201.77	33.29	5,719
Seal Beach	157.34	147.07	10.27	272
Serrano WD	485.61	468.88	16.73	121
South Coast WD	205.86	196.91	8.95	349
Trabuco Canyon WD	314.13	270.88	43.25	612
Tustin	191.31	164.21	27.10	2,055
Westminster	145.76	120.75	25.01	2,614
Yorba Linda WD	299.73	272.75	26.98	2,236

[*] The •GPCD Baseline• is the highest Ten-year average from 2004 to present, and includes Recycled water in order to normalize the conservation savings

Source: MWDOC 20% by 2020 OC Regional Alliance Model updated in 2014



WSAP GPCD.pdf

Appendix C

Notice of Public Hearing (Pending)



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Tom Herbel
Director of Public Works
City of Huntington Beach
2000 Main Street
Huntington Beach, ca 92648

Subject: MWD OC 2020 Urban Water Management Plan Update

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Robert J. Hunter
General Manager

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Director of Public Works
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Mike Belknap
Public Works & Community Services Director
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Mark Vukojevick
Utilities Director
City of Newport Beach
P.O. Box 1768
Newport Beach, CA 92660

Subject: MWD OC 2020 Urban Water Management Plan Update

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Christopher Cash
Director of Public Works
City of Orange
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Assistant General Manager



February 24, 2021

Tom Bonigutt
Public Works Director
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Thomas Toman
Director of Public Works
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Nabil Saba
Acting Public Works Director
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Steve Myrter
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Douglas Stack
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Jeffery M. Thomas
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Marwan Youssef
Director of Public Works
City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683

Subject: MWD OC 2020 Urban Water Management Plan Update

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

David Youngblood
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Dennis Cafferty
General Manager
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Michael Dunbar
General Manager
Emerald Bay Service District
600 Emerald Bay
Laguna Beach, CA 92651

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Ken Vecchiarelli
General Manager, Orange County
Golden State Water Company
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Paul Cook
General Manager
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Keith Van Der Maaten
General Manager
Laguna Beach County Water District
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Paul Shoenberger, PE
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General Manager

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Joone Lopez
General Manager
Moulton Niguel Water District
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Daniel Ferons
General Manager
Santa Margarita Water District
26111 Antonio Parkway
Rancho Santa Margarita, CA 92688

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Sincerely,

Harvey De La Torre
Assistant General Manager

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February 24, 2021

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General Manager
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Rick Shintaku
General Manager
South Coast Water District
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Laguna Beach, CA 92651

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Fernando Paludi
General Manager
Trabuco Canyon Water District
32003 Dove Canyon Drive
Trabuco Canyon, CA 92679

Subject: MWD OC 2020 Urban Water Management Plan Update

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Brett Barbre
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Harvey De La Torre
Assistant General Manager



February 24, 2021

James Treadaway
Public Works Director
Orange County
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Shaun Pelletier
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

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Public Works Director
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Harvey De La Torre
Assistant General Manager



February 24, 2021

Mark McAvoy
Public Works Director
City of Laguna Beach
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February 24, 2021

Ken Reynolds
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Harvey De La Torre
Assistant General Manager



February 24, 2021

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Harvey De La Torre
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February 24, 2021

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Thomas Wheeler
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Larry D. Dick
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Bob McVicker, P.E., D.WRE
Director

Karl W. Seckel, P.E.
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Jeffery M. Thomas
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General Manager

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Chris Kelley
City Engineer
City of Los Alamitos
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Mark Chagnon
Public Works Director
City of Mission Viejo
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Luis Estevez
Public Works Director
City of Placentia
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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Brendan Dugan
Public Works Director
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688

Subject: MWD OC 2020 Urban Water Management Plan Update

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Allan Rigg
Public Works Director
City of Stanton
7800 Katella Avenue
Stanton, CA 90680

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Harvey De La Torre
Assistant General Manager



February 24, 2021

Mike Knowles
Public Works Director
City of Villa Park
17855 Santiago Boulevard
Villa Park, CA 92861

Subject: MWD OC 2020 Urban Water Management Plan Update

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Sincerely,

Harvey De La Torre
Assistant General Manager



February 24, 2021

Jamie Lai
Public Works Director
City of Yorba Linda
4845 Casa Loma Avenue
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Harvey De La Torre
Assistant General Manager

Appendix D

Adopted WSCP Resolution (Pending)