

City of Santa Clara Water Shortage Contingency Plan

Prepared for

City of Santa Clara

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Table of Contents

1.0 Introduction	1
2.0 Water Supply Reliability Analysis	1
3.0 Annual Water Supply and Demand Assessment Procedures	1
3.1 Decision-Making Process	2
3.1.1 AWSDA Finding: Sufficient Water Supply to Meet Expected Demands	3
3.1.2 AWSDA Finding: Available Water Supply Will Not Meet Demands	3
3.2 Key Data Inputs	4
3.3 Assessment Methodology	5
4.0 Standard Water Shortage Levels	6
5.0 Shortage Response Actions	7
5.1 Demand Reduction Actions	8
5.2 Additional Mandatory Restrictions	10
5.2.1 Water Features and Swimming Pools	10
5.3 Supply Augmentation and Other Actions	10
5.4 Locally Appropriate Operational Changes	11
5.5 Emergency Response Plan	11
6.0 Communication Protocols	12
6.1 Communication for Foreseeable Events	12
6.2 Communication for Unforeseeable Events	13
7.0 Compliance and Enforcement	13
7.1 Compliance and Enforcement Procedures	13
8.0 Legal Authorities	14
9.0 Financial Consequences of WSCP	14
10.0 Monitoring and Reporting	15
11.0 WSCP Refinement Procedures	15
12.0 Plan Adoption, Submittal, and availability	16

Table of Contents

LIST OF TABLES

Table 1. Schedule of Annual Water Supply and Demand Assessment (AWSDA) Activities.....	2
Table 2. Schedule of Decision-Making Activities if AWSDA Indicates Supply May Not Meet Demands.....	4
Table 3. Water Shortage Contingency Plan Levels (DWR Table 8-1).....	7
Table 4. Demand Reduction Actions (DWR Table 8-3 Retail)	9
Table 5. Supply Augmentation and Other Actions (DWR Table 8-2 Retail)	11

LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AMI	Advanced Metering Infrastructure
AMR	Automated Meter Reading
AWSDA	Annual Water Supply and Demand Assessment
City	City of Santa Clara
County	Santa Clara County
CWC	California Water Code
Director	Director of Water & Sewer Utilities
DWR	Department of Water Resources
ERP	Emergency Response Plan
HCF	Hundred Cubic Feet
Legislature	California State Legislature
MG	Million Gallons
SB	Senate Bill
SCMC	City of Santa Clara Municipal Code
SFPUC	San Francisco Public Utilities Commission
UWMP	Urban Water Management Plan
WSCP	Water Shortage Contingency Plan

Water Shortage Contingency Plan

1.0 INTRODUCTION

This plan presents the City of Santa Clara's (City) Water Shortage Contingency Plan (WSCP). The WSCP describes the City'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 City's legal authorities, communication protocols, compliance, and enforcement, and monitoring and reporting are included.

A water shortage may occur due to several reasons, such as climate change, drought, and catastrophic events. Drought, regulatory action constraints, and natural and manmade disasters may occur at any time. A water shortage means that the available water supply is insufficient to meet the normally expected customer water use.

In 2018, the California State Legislature (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 resulting longer and more intense droughts in California. The 2018 Water Conservation Legislation set new requirements for water shortage contingency planning.

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

2.0 WATER SUPPLY RELIABILITY ANALYSIS

The City's water supply planning analysis and reliability are discussed in the City's most recent UWMP. A summary of the City's existing and projected water use is provided in Chapter 4 of the UWMP. Its existing and planned water supplies by source are described in Chapter 6. And its water supply reliability assessment and the drought risk assessment are provided in Chapter 7. The City's seismic risk assessment and mitigation plan are discussed in Chapter 8.

The City conducts an annual water supply and demand assessment to plan for potential water shortages, as described below in Section 3.0. The analysis associated with this WSCP was developed in the context of the City's water supply sources and reliability.

3.0 ANNUAL WATER SUPPLY AND DEMAND ASSESSMENT PROCEDURES

Starting July 1, 2022, California Water Code (CWC) Section 10632.1 required water suppliers to conduct an Annual Water Supply and Demand Assessment (AWSDA) and submit an Annual Water Shortage Assessment Report to the Department of Water



Water Shortage Contingency Plan

Resources (DWR). The assessment is conducted for the current year’s upcoming dry season and the next year, assuming that the next year will be a dry year. This WSCP provides the procedures for the City to conduct its AWSDA. The findings from that assessment will provide information for City’s Annual Water Shortage Assessment Report.

The procedures provided in this section are intended to assist the City in planning for potential, foreseeable shortage in water supplies. These procedures provide the steps the City needs to take that may lead to declaring a water shortage emergency and associated water shortage level (see Section 4.0) and implementation of water shortage response actions (see Section 5.0).

3.1 Decision-Making Process

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

The City’s Water & Sewer Utilities Department is responsible for preparing the City’s AWSDA and Annual Water Shortage Assessment Report and for submitting the Annual Water Shortage Assessment Report to DWR by July 1 of each year. The Water & Sewer Utilities Department will gather key data inputs described in Section 3.2 and conduct the assessment in accordance with Section 3.3. Each year, the City performs the assessment based on the San Francisco Public Utilities Commission (SFPUC) and Valley Water’s anticipated water deliveries. After completing the AWSDA, City staff presents the Annual Water Shortage Assessment Report to the Water & Sewer Utilities Director for review.

In general, the City will follow the schedule of activities shown in Table 1 for conducting the AWSDA and 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 Annual Water Supply and Demand Assessment (AWSDA) Activities		
Schedule	Activities	Responsible Party
February	Obtain monthly water use data by customer type from Finance Department for previous year.	Water & Sewer Utility
February	Determine monthly water production data (surface water, potable groundwater, non-potable irrigation groundwater, recycled water) for previous year.	Water & Sewer Utility
February	Obtain population estimates for previous year from DOF (https://www.dof.ca.gov/Forecasting/Demographics/Estimates/)	Water & Sewer Utility
March	Complete analysis for previous year (supply and demand comparison, hydrologic and regulatory conditions, infrastructure constraints, etc.).	Water & Sewer Utility



Water Shortage Contingency Plan

Table 1. Schedule of Annual Water Supply and Demand Assessment (AWSDA) Activities		
Schedule	Activities	Responsible Party
March	Calculate projected unconstrained demand for current year and identify/describe projection methods (projected population growth, etc.).	Water & Sewer Utility
April	Identify projected hydrologic conditions for current year and obtain any anticipated surface water supply constraints from wholesalers for current year.	Water & Sewer Utility
April	Determine current conditions of groundwater supply and groundwater table to anticipate any groundwater supply constraints for current year.	Water & Sewer Utility
April	Complete analysis for current year based on a “dry year.” Determine the anticipated monthly water supply reliability for the current year using calculation spreadsheet.	Water & Sewer Utility
April	Determine if/when water supply shortages will occur and what WSCP stage the shortage will fall into. Determine what (if any) WSCP actions will need to be implemented to mitigate supply shortage.	Water & Sewer Utility
May	Prepare AWSDA presenting the findings and WSCP actions (if any) to be implemented.	Water & Sewer Utility
May / June	Present AWSDA findings to City Council, as needed.	Water & Sewer Utility
by July	Implement the WSCP actions as approved by City Council (if a water shortage is projected).	Water & Sewer Utility
July	Submit final AWSDA to DWR by July 1.	Water & Sewer Utility

Note: Months are approximate and may be adjusted based on climate and hydrologic conditions. July 1 due date is a firm date.

3.1.1 AWSDA Finding: Sufficient Water Supply to Meet Expected Demands

If the AWSDA finds 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. City staff will submit the Annual Water Shortage Assessment Report to DWR by July 1 of each year.

3.1.2 AWSDA Finding: Available Water Supply Will Not Meet Demands

Should the AWSDA find that available supply will not meet expected demands, the City will coordinate interdepartmentally, with the region’s other water service providers, and with Santa Clara County (County) for the possible proclamation of an emergency. The Water & Sewer Utilities Director or their designee will present the finalized assessment to City Council, 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.



Water Shortage Contingency Plan

Based on the findings of the AWSDA, if a water shortage condition exists, the City Council will adopt a resolution declaring a water shortage emergency and an associated water shortage condition and authorizing water shortage actions. The Water & Sewer Utilities will then prepare the City’s Annual Water Shortage Assessment Report, incorporating the City Council determinations and approved actions. The schedule of decision-making activities is provided in Table 2. The start and end dates and the activities shown in this table are approximate and may be adjusted as needed.

Schedule	Activities	Responsible Party
May	Based on finalized determinations of Annual Assessment regarding water shortage condition and recommended actions, prepare recommendations on water shortage condition determination and actions.	Water & Sewer Utility and City Manager
May	Prepare ordinances or resolutions approving determinations and actions.	Water & Sewer Utility and City Attorney
May	Coordinate interdepartmentally, with the region’s water service providers, and with the County for the possible proclamation of a local emergency.	Water & Sewer Utility
May	Based on determinations of the AWSDA, prepare the Annual Water Shortage Assessment Report with recommendations on water shortage condition. Submit to Water & Sewer Utilities Director.	Water & Sewer Utility
May	Present finalized determinations and recommendations to City Council, along with ordinances or resolutions approving determinations and actions.	Water & Sewer Utility and City Attorney
May / June	Receive presentation of finalized determinations and recommendations. Make determination of degree of emergency and act on resolutions that declare a water shortage emergency condition. Authorize water shortage response actions for implementation.	City Council
May / June	Revise AWSDA to include City Council determinations and approved actions.	Water & Sewer Utility
June	If a water shortage emergency condition is declared, implement the WSCP and the water shortage response actions as approved by City Council.	Water & Sewer Utility and City Attorney
July 1	Finalize AWSDA and Annual Water Shortage Assessment Report and submit to DWR (see Table 1).	Water & Sewer Utility

3.2 Key Data Inputs

The AWSDA is required to evaluate supply and demands for the current year and one subsequent dry year. The following key data inputs will be used to evaluate the City’s water supply reliability.



Water Shortage Contingency Plan

Planned water supplies are used as input to the AWSDA for the current year and the following one dry year. The subsequent dry year may be similar to a single dry year as defined in Chapter 7 of the City's most recently adopted UWMP. In planning for water supplies, the following factors are considered:

- Hydrological conditions
- Regulatory conditions
- Contractual constraints
- Surface water and groundwater quality conditions
- Groundwater well production limitations
- Infrastructure capacity constraints or changes
- Capital improvement projects implementation
- Development Planning

Planned water supply sources and quantities will be described and be reasonably consistent with the supply projections in Chapter 6 (Normal-Year Water Supply Characterization) of the City's most recent UWMP. Should the supply sources and projections deviate significantly from the UWMP, the City 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
- Population changes (e.g., due to development projects)
- Anticipated new demands (e.g., changes to land use)
- 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 City's most recent UWMP. Should the demand projections deviate significantly from the UWMP, the City will provide an explanation addressing the difference.

3.3 Assessment Methodology

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



Water Shortage Contingency Plan

The City 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 City's water supply in the current year and the following one dry year. The City'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 City will prepare response actions in accordance with this WSCP. If a water shortage is anticipated, the AWSDA findings will be presented to the City Council, along with recommended actions for City Council 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. A water shortage is the gap between available supply and projected demands.

Table 3 presents the City's water shortage levels, which align with the state's standard levels of water shortage. The City'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.



Water Shortage Contingency Plan

Table 3. Water Shortage Contingency Plan Levels (DWR Table 8-1)

<input checked="" type="checkbox"/>	Check the box if the Supplier uses the Standard six levels of water shortage. Proceed to the next table.		
Standard Shortage Levels	Percent Shortage Range	Suppliers Shortage Levels	Percent Shortage Range
1	Up to 10%	1	Up to 10%
2	Up to 20%	2	Up to 20%
3	Up to 30%	3	Up to 30%
4	Up to 40%	4	Up to 40%
5	Up to 50%	5	Up to 50%
6	>50%	6	>50%
NOTES:			

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

When the City anticipates or identifies that water supplies may not be adequate to meet the normal water supply needs of its customers, the City Council 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, as further described below.

5.0 SHORTAGE RESPONSE ACTIONS

CWC Section 10632(a)(4) requires shortage response actions that align with the defined shortage levels. The City’s shortage response actions consist of a combination of demand reduction, supply augmentation, and operational changes. The City’s suite of response actions depends on the event that precipitates a water shortage level, the



Water Shortage Contingency Plan

time of the year the event occurs, the water supply sources available, and the condition of its water system infrastructure.

In general, the City plans 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 City will 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.

Meters within the City's water system allow the City to compare current water demands with demand reduction goals and adjust its shortage response actions accordingly. The City water system is fully equipped with meters which can be read periodically to track the extent of the effectiveness of the City's response actions.

Water production and water use can be compared to previous periods. This continuous monitoring allows the City to assess water system demands and compare it with its water demand reduction goals. The City may then adjust its shortage response actions as needed to balance demands with available water supplies. For example, the City may intensify its public outreach or more vigorously enforce compliance with water use prohibitions if needed water demand reduction goals are not met for any specific shortage level. Conversely, the City may reduce public outreach frequency or decrease compliance actions if demand reduction goals are exceeded.

The shortage response actions discussed in the following sections may be considered as tools that allow the City to respond to water shortage conditions. Shortage response actions are initiated at the shortage levels shown and continue to be implemented at higher shortage levels. Because the City may continuously monitor and adjust its 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

During water shortage conditions, the City plans to reduce demand by implementing the actions shown in Table 4. Demand reduction actions are organized by the triggering water shortage level, and each action includes an estimate of how much its implementation will reduce the shortage gap. For each demand reduction action, Table 4 also indicates if the City uses compliance actions such as penalties, charges, or other enforcement. Demand reduction actions are initiated at the shortage levels shown and will continue to be implemented at higher shortage levels.



Water Shortage Contingency Plan

Table 4. Demand Reduction Actions (DWR Table 8-3 Retail)

Yes <input type="checkbox"/> the Supplier completing this table using the standard six levels? (yes/no)					
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?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement? For Retail Suppliers Only Drop Down List
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)		
1	Expand Public Information Campaign	Percentage	Studies have shown that a targeted public information campaign during a drought can reduce water use by 7 - 8%	--	Yes
1	Increase Water Waste Patrols	Percentage	0-1	--	Yes
1	Other	Percentage	Boosts the effectiveness of other methods - not readily quantifiable	Enforcement of permanent water use restriction Ordinance (Muni Code 13.15.080)	Yes
2	Increase Water Waste Patrols	Percentage	0-1	--	Yes
2	Other	Percentage	Boosts the effectiveness of other methods - not readily quantifiable	Enforcement of permanent water use restriction Ordinance (Muni Code 13.15.080)	Yes
2	Reduce System Water Loss	Percentage	0-10	--	Yes
2	Decrease Line Flushing	Percentage	0-1	--	Yes
2	Water Features - Restrict water use for decorative water features, such as fountains	Percentage	0-1	--	Yes
2	Other	Percentage	0-1	Decorative water features must use recirculating water	Yes
2	Other - Prohibit use of potable water for construction and dust control	Percentage	0-1	--	Yes
2	Other water feature or swimming pool restriction	Percentage	0-1	--	Yes
2	Other	Percentage	0-1	New irrigation connections restricted to recycled water	Yes
2	Other	Percentage	0-1	Irrigation of golf courses restricted to recycled water	Yes
2	Landscape - Limit landscape irrigation to specific days	Percentage	5-10	Outdoor watering days may be restricted based on water supply conditions	Yes
3	Other	Percentage	0-1	Potable water use for decorative water features prohibited	Yes
3	Other	Percentage	0-1	Irrigation of golf courses except greens and tees restricted, shall use recycled water if available	Yes
3	Implement or Modify Drought Rate Structure or Surcharge	Percentage	5-30	--	Yes
3	Increase Frequency of Meter Reading	Percentage	0-5	--	Yes
4	Other	Percentage	Boosts the effectiveness of other methods - not readily quantifiable	The City shall apportion the City's available supply of water among customers in the most reasonable manner possible and the rules and regulations for water service may be amended to deal with the water shortage emergency condition (Muni Code 13.15.140)	Yes
5	Other	Percentage	Boosts the effectiveness of other methods - not readily quantifiable	The City shall apportion the City's available supply of water among customers in the most reasonable manner possible and the rules and regulations for water service may be amended to deal with the water shortage emergency condition (Muni Code 13.15.140)	Yes
6	Other	Percentage	0-1	New pool construction and filling prohibited	Yes
6	Other	Percentage	0-1	New irrigation connections prohibited, recycled water allowed without restriction	Yes



Water Shortage Contingency Plan

5.2 Additional Mandatory Restrictions

In addition to the demand reduction actions listed in Table 4, the City has other water use restrictions and prohibitions that are enforced at all times listed under Section 1.C of the City's Potable and Recycled Water System Rules and Regulations.² The State also mandates certain prohibitions, and the City will enforce all such requirements.

5.2.1 Water Features and Swimming Pools

Water shortage response would focus on providing sufficient supply to meet health and safety needs for residential customers. Tempering the uses for water features and swimming pools will be based on the severity of the water shortage condition. The relative total water use from these sources would be a consideration for how water features would be restricted during specific water shortage conditions. Water features are a relatively small discretionary use and may be impacted at any time during a triggered water shortage condition.

The City distinguishes special water features, such as decorative fountains and ponds, differently from pools and spas. Special water features are regulated separately. The City's Potable and Recycled Water System Rules and Regulations Section 1.C requires recirculating water systems to be used for all water features. For decorative water features, recycled water shall be used where available. Covers are required on all new swimming pools and spas.

5.3 Supply Augmentation and Other Actions

The City has approximately 28.8 million gallons (MG) of potable water storage within the City's service area to manage daily operations and mitigate the effects of a short-term (days) water supply interruption. As part of the City's operations, the City repairs and replaces water distribution system infrastructure to reduce water system losses. Sources available to the City include an extensive local underground aquifer and imported water supplies delivered by two wholesale water agencies, SFPUC and Valley Water.

In a water shortage emergency, the City may increase groundwater supply or supplies from SFPUC and Valley Water. Supply augmentation and other actions that the City may implement during water supply emergencies are summarized in Table 5.

² Potable and Recycled Water System Rules and Regulations City of Santa Clara, November 2024, <https://www.santaclaraca.gov/our-city/departments-g-z/water-sewer-utilities>, last accessed April 15, 2026.



Water Shortage Contingency Plan

Table 5. Supply Augmentation and Other Actions (DWR Table 8-2 Retail)

Yes	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)	
1	Other Actions (describe)	Percentage	10	Increase groundwater use if needed, combined with demand reduction actions
2	Other Actions (describe)	Percentage	20	Increase groundwater use, SFPUC, and/or Valley Water to supplement supply that is deficient, combined with demand reduction actions
3	Other Actions (describe)	Percentage	30	Increase groundwater use, SFPUC, and/or Valley Water to supplement supply that is deficient, combined with demand reduction actions
4	Other Actions (describe)	Percentage	40	Increase groundwater use, SFPUC, and/or Valley Water to supplement supply that is deficient, combined with demand reduction actions
5	Other Actions (describe)	Percentage	50	Increase groundwater use, SFPUC, and/or Valley Water to supplement supply that is deficient, combined with demand reduction actions
6	Other Actions (describe)	Percentage	>50	Increase groundwater use, SFPUC, and/or Valley Water to supplement supply that is deficient, combined with demand

5.4 Locally Appropriate Operational Changes

During a water shortage of any level, the City may elect to implement operational measures to support implementation of the WSCP. This may include hiring temporary workers, reassigning staff, and/or increasing overtime to provide staffing for a range of efforts, such as conducting Water Waste Patrols, implementing the communication protocols, responding to customer service requests, scheduling, and conducting site assessments and consultations, processing incentive and rebate applications, and increasing compliance and enforcement efforts. The City may also elect to increase monitoring of potable water usage, lower water system pressure and limit water main flushing. 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 City’s water shortage levels outlined in Section 4.0 apply to both foreseeable and unforeseeable water supply shortage conditions, including catastrophic water shortage conditions.



Water Shortage Contingency Plan

The City'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 events. More specifically, it addresses responses for water system losses including current water emergency interconnections, water demands under earthquake emergency conditions and non-earthquake emergencies. The ERP also identifies seven categories of response and the criteria that triggers that specific response to occur.

The communication procedures are also outlined in the ERP. In response to a drought, the ERP outlines the procedures the City is recommended to follow which includes: initial actions, continuous assessment and response procedures and after action monitoring and reporting. Steps for deactivation and demobilization of activated triggers and response actions are also identified to facilitate recovery procedures and return to normal operation. In addition, the effectiveness of the ERP is evaluated by the Department staff on a periodic basis. This is to ensure that procedures and practices developed in the ERP are adequate and implemented properly. To protect the security of the City's water system, the ERP is retained by the City as a confidential document.

6.0 COMMUNICATION PROTOCOLS

In the event of a water shortage, the City must inform its customers, the general public and interested parties, and local, regional, and state entities. Communication protocols for foreseeable and unforeseeable events are provided in this section. In any event, timely and effective communication must occur for appropriate response to the event. City staff are provided with City email accounts and cell phones to communicate internally and externally.

6.1 Communication for Foreseeable Events

Water shortage may be foreseeable when the City conducts its AWSDA as described in Section 3.0. When the City determines the potential of a water shortage event, the City Council may determine and declare a water shortage emergency. The City will hold a duly noticed public meeting to present the current or predicted shortage. At the public meeting, the City Council will determine if a water shortage emergency condition exists and the degree of the emergency. The City Council will consider the shortage response actions triggered or anticipated to be triggered by the shortage level. As necessary, the City Council will act on the water shortage emergency declaration, associated water shortage level, and shortage response actions.

The City 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 City will coordinate interdepartmentally, with the region's water service providers, and with the County for the possible proclamation of a local emergency.
2. The City will issue a public notice for a City Council meeting during which the AWSDA findings and recommendations for a water shortage emergency and shortage response actions are presented.



Water Shortage Contingency Plan

3. The City will communicate actions to customers, the general public, and interested parties through a combination of bill stuffers and newsletters, website, press releases, and social media posts.
4. The City 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 earthquakes, fires, infrastructure failures, civil unrest, and other catastrophic events. The City's ERP provides specific communication protocols and procedures to convey actions during these events. The City may trigger these communication protocols, depending on the event. In general, communications and notifications will proceed along the identified chain of command. All City staff are provided their communication responsibilities. The ERP also provides a list of relevant contacts to notify at the local, regional, and state level.

7.0 COMPLIANCE AND ENFORCEMENT

This section describes how the City will ensure compliance with and enforcement of provisions of this WSCP. The City's procedures include protocols for treatment of violations and actions associated with more egregious levels of violation. The procedures include appeal and exemption processes.

7.1 Compliance and Enforcement Procedures

When a water shortage is anticipated, the City Council will adopt a resolution declaring a water shortage emergency condition and the regulations and restrictions that should be enforced in response to the declared water shortage level.

The City is metered system-wide, at production facilities and at each customer connection. Thus, water use can be quantified and compared to determine users' extent of compliance to water reduction requirements. The City may also become aware of non-compliance through water waste reporting by the general public, the City's dedicated water waste hotline, City staff inspections, and/or manual review of customer use data.

Upon receiving a water waste complaint, City staff will investigate the offending site's water use history and make site visits to determine the cause of the waste. City staff will then reach out to the site to educate them on the City's water waste policies and help them get into compliance. In addition, City staff uses this opportunity to further educate businesses and residents on current water conservation programs and what opportunities there may be to increase their water efficiency. While outreach and education typically brings most water wasters into compliance, the City does retain the ability to levy fines of up to \$1,000 and the installation of a flow restrictor to frequent offenders, per the City of Santa Clara Municipal Code (SCMC) 13.15.220.

The Director of Water & Sewer Utilities or their designee is responsible for enforcement and penalties. Water users or property owners can appeal the notice of violation or the



Water Shortage Contingency Plan

administrative fee by submitting a written request for appeal to the Director of Water & Sewer Utilities, per the City's Potable and Recycled Water System Rules and Regulations.

8.0 LEGAL AUTHORITIES

SCMC Chapter 13.15 supports the City's ongoing water use restrictions, including provisions for enforcement. The SCMC does not contain provisions for additional restrictions on water use during water shortages. Should a water shortage occur, the City would need to adopt an emergency ordinance to restrict water use as needed. The emergency ordinance would support the City's water shortage contingency actions, including regulations and restrictions to be enacted in event of a water shortage.

At the time of a water shortage emergency, the City Council will, by resolution, declare a state of water shortage emergency and authorize implementation of the WSCP. A water shortage emergency declaration will be in effect upon proper findings made by the City Council and remain in effect until the City Council finds and declares by resolution that the water shortage emergency condition has abated, has changed in degree, or no longer exists.

When a water shortage is determined, the City will coordinate interdepartmentally, with the region's water service providers, and with the County for the possible proclamation of a local emergency in accordance with under California Government Code, California Emergency Services Act (Article 2, Section 8558).

In a duly noticed meeting, the City Council will 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 City 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 and compliance and enforcement actions described in Section 7.0.

9.0 FINANCIAL CONSEQUENCES OF WSCP

Because the City bills its customers in part per unit volume of water consumed, the City may experience a reduction in revenue upon implementation of water shortage levels. The City policy is to maintain adequate water fund reserves in the event water shortage and subsequent demand reduction measures impact the City's revenue.

To mitigate the financial impacts of reduced water sales during a drought, the City Council has the authority to impose a drought surcharge on water rates. This surcharge could be



Water Shortage Contingency Plan

a flat fee per hundred cubic feet (HCF) that is intended to provide the City's water utility with dependable revenues when water use reduction plans are in effect. The City has traditionally used a "postage stamp" rate for all water sales. With reduction in sales, the fixed costs will remain, imposing a loss on the utility (expenses in excess of revenues). An advantage to the drought surcharge is that it is designed and set to allow sufficient revenue to meet all costs for the utility while also achieving conservation. The water utility also has reserves that it has used in the past as a rate stabilization fund. These reserves are being used to help reduce the rate impact from ever-increasing wholesale costs and the lower water sales due to the recent drought and slow recovery of water use. Additionally, the Utility is currently developing a long range financial and rate stabilization plan. The water utility's reserves are intended to be at the level that is sufficient to cover short-term loss of revenues due to a drought or other short-term catastrophic loss of sales. Reserves are adequately funded as part of the rate setting process.

10.0 MONITORING AND REPORTING

The City water system is fully metered, from its water supply sources to individual customer meters. These meters may be used as monitoring tools for compliance and reporting purposes. The City's water system is fully set up for automated meter reading (AMR); the City plans to upgrade the entire system to AMI as soon as reasonably possible. AMI would allow the City to monitor customer water usage in real time as necessary for assessing compliance with demand reduction actions and helping customers achieve reduction goals.

If reduction goals are not met through implementation of the WSCP (during any water shortage level), the Director of Water & Sewer Utilities (Director) will notify the City Council, and more stringent action will be taken. Additionally, if it is determined that this WSCP requires refinements to achieve reduction targets, the City will revise the WSCP according to the procedures discussed in Section 11.0 and then adopt it and make it available as discussed in Section 12.0.

11.0 WSCP REFINEMENT PROCEDURES

This WSCP is an adaptive management plan. It is subject to refinements as needed to ensure that the City'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 City may adjust its response actions and may modify its WSCP. When a revised WSCP is proposed, the revised WSCP will undergo the process described in Section 12.0 for adoption by the City Council and distribution to the County, its customers, and the general public.

Feedback from City staff and the public is important in refining or incorporating new actions. The City seeks input from staff who interface with customers to gauge the effectiveness of its response actions and for response action ideas. The City seeks input from its customers and the general public through its website and through regularly scheduled City Council meetings.



Water Shortage Contingency Plan

Customer water meter data may be evaluated for each customer sector or each individual customer. The City tracks water use violations and may evaluate their frequency to determine restrictions that customers may not be able to meet. This evaluation may also show water demand reduction actions that customers may effectively implement.

12.0 PLAN ADOPTION, SUBMITTAL, AND AVAILABILITY

The WSCP may be adopted concurrently with the City's UWMP, by separate resolution, and may be revised and adopted at any time by the City. Prior to adoption, a duly noticed public hearing is conducted. A hard copy and electronic copy of the WSCP will be submitted to DWR within 30 days of adoption.

No later than 30 days after submittal to DWR, copies of the WSCP will be available at the City's offices. A copy will also be provided to the County. An electronic copy of this WSCP will also be available for public review and download on the City's website.