



Board of Directors

Brian Brennan, Director
Richard Hajas, Director
Neil Cole, Director

Mary Bergen, Director
Pete Kaiser, Director

CASITAS MUNICIPAL WATER DISTRICT
Meeting to be held at the

District Office
1055 Ventura Ave. Oak View, CA 93022
www.casitaswater.org

Join Zoom Meeting
<https://us06web.zoom.us/j/98414854813?pwd=UXhtWS9zdm83ZU5CazNXenlEVEIRUT09>
Meeting ID: 984 1485 4813 Passcode: 757052

To participate via telephone please call (888) 788-0099 or (877) 853-5247
Enter Meeting ID: 984 1485 4813# Passcode: 757052#

October 25, 2023 @ 5:00 PM

Right to be heard: Members of the public have a right to address the Board directly on any item of interest to the public which is within the subject matter jurisdiction of the Board. The request to be heard should be made immediately before the Board's consideration of the item. No action shall be taken on any item not appearing on the agenda unless the action is otherwise authorized by subdivision (b) of §54954.2 of the Government Code and except that members of a legislative body or its staff may briefly respond to statements made or questions posed by persons exercising their public testimony rights under section 54954.3 of the Government Code.

Special Accommodations: If you require special accommodations for attendance at or participation in this meeting, please notify our office 24 hours in advance at (805) 649-2251, ext. 113. (Govt. Code Section 54954.1 and 54954.2(a)).

1. CALL TO ORDER
2. ROLL CALL
3. PLEDGE OF ALLEGIANCE

4. AGENDA CONFIRMATION
5. PUBLIC COMMENTS - Presentation on District related items that are not on the agenda - three minute limit.
6. CONSENT AGENDA
 - 6.a. Accounts Payable Report.
[Accounts Payable Report.pdf](#)
 - 6.b. Minutes of the October 11, 2023 Board Meeting.
[10 11 2023 Min.pdf](#)
7. ACTION ITEMS
 - 7.a. Set Casitas MWD Reserve amounts for the 2023-2024 Fiscal Year as per the staff recommendation.
[Board Memo for Setting of Reserves 102523.pdf](#)
[Reserves ending Balance FY23 ATT1 102523.pdf](#)
 - 7.b. Authorize a budget of \$200,000 for Ojai Avenue Connections at Fox Canyon Channel as part of the West and East Ojai Avenue Pipeline Replacement Project, Specification No. 19-411 and authorize the General Manager to issue a purchase order to the lowest responsible bidder.
[Ojai Avenue Fox Canyon Channel_20231025.pdf](#)
 - 7.c. Assign a Casitas MWD Matilija Dam Removal Ad-Hoc Committee.
8. INFORMATION ITEMS
 - 8.a. Hydrology Report.
[Hydrology Sept 2023.pdf](#)
 - 8.b. Recreation Committee Minutes.
[Rec Minutes 101023.pdf](#)
 - 8.c. Comment letter to State Water Resources Control Board regarding the Proposed Making Conservation a California Way of Life Regulation.
[FINAL_Casitas_Comment Letter_Mkg Wtr Conserv Cal way Life_10.17.23.pdf](#)
 - 8.d. ACWA Letter to State Water Resources Control Board regarding Making Water Conservation a CA Way of Life.
[ACWA Coalition Comment Letter_Making Water Conservation a CA Way of Life_10.17.23.pdf](#)

- 8.e. State Water Project Intertie Report.
[SWP Intertie Project Cost 9-30-23.pdf](#)
- 8.f. CFD 2013 Report.
[CFD 2013-1 Project Cost 9-30-2023.pdf](#)
- 8.g. Investment Report.
[Investment Report FY2024 September.pdf](#)
- 8.h. Adjudication Charges Report.
[Adjudication Charges YTD 9.30.23.pdf](#)
- 8.i. Consumption Report for July and August 2023.
[Consumption 2023-2024.pdf](#)
- 8.j. January Storm 2023 Accumulated Cost Summary.
[Board Memo January 2023 Storms.pdf](#)
- 9. GENERAL MANAGER COMMENTS
- 10. BOARD OF DIRECTOR REPORTS ON MEETINGS ATTENDED
- 11. BOARD OF DIRECTOR COMMENTS PER GOVERNMENT CODE SECTION 54954.2(a).
- 12. CLOSED SESSION
 - 12.a. CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION (Government Code Section 54956.9(a) Santa Barbara Channelkeeper v. State Water Resources Control Board, City of San Buenaventura, et al.; and City of San Buenaventura v Duncan Abbott, et al., Cross Complaint; Superior Court of the State of California, County of Los Angeles, Case No. 19STCP01176.
- 13. ADJOURNMENT

CASITAS MUNICIPAL WATER DISTRICT
General Fund Check Authorization
Checks Dated 10/05/23 - 10/18/23
Presented to the Board of Directors For Approval October 25, 2023

Check	Payee		Description	Amount
001233	Payables Fund Account	# 9759651478	Accounts Payable Batch 101123	\$ 1,049,592.46
001237	Payables Fund Account	# 9759651478	Accounts Payable Batch 101823	\$ 665,928.91
				<u>\$ 1,715,521.37</u>
001235	Payroll Fund Account	# 9469730919	Estimated Payroll 11/02/23	\$ 250,000.00
001236	Payroll Fund Account	# 9469730919	Estimated Payroll 11/16/23	\$ 250,000.00
				<u>\$ 2,215,521.37</u>

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

The above numbered checks,
001233-001237
have been duly audited is hereby certified as correct.

Janyne Brown, Chief Financial Officer

A/P Fund

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

001233 A/P Checks: 051135-051200
A/P Draft 000687
Voids:
051171 - Meiners Oaks Ace Hardware - Continuation of detail of check #051170

001237 A/P Checks: 051201-051270
A/P Draft 000688-000694
Voids:
051242 - Meiners Oaks Ace Hardware - Continuation of detail of check #051241
051243 - Meiners Oaks Ace Hardware - Continuation of detail of check #051241



Janyne Brown, Chief Financial Officer

CERTIFICATION

Payroll disbursements for the pay period ending 10/14/23

Pay Date 10/19/23

have been duly audited and are
hereby certified as correct.

Signed: Jayne Brown

Jayne Brown

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
C-CHECK	VOID CHECK	V	10/11/2023			051171		
C-CHECK	VOID CHECK	V	10/18/2023			051242		
C-CHECK	VOID CHECK	V	10/18/2023			051243		

* * T O T A L S * *

	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	0	0.00	0.00	0.00
HAND CHECKS:	0	0.00	0.00	0.00
DRAFTS:	0	0.00	0.00	0.00
EFT:	0	0.00	0.00	0.00
NON CHECKS:	0	0.00	0.00	0.00
VOID CHECKS:	3	VOID DEBITS 0.00		
		VOID CREDITS 0.00	0.00	0.00

TOTAL ERRORS: 0

VENDOR SET: 01	BANK:	TOTALS:	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
			3	0.00	0.00	0.00
BANK:		TOTALS:	3	0.00	0.00	0.00

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01288	ENVIRONMENTAL SYSTEMS I-94548549 ArcGIS Drone Map Annual Sub	D	10/11/2023	1,750.00		000687		1,750.00
01483	CORVEL CORPORATION I-100623-CMWD Corvel Claim - 10/03-10/06/23 I-101723-CMWD Corvel Claims - 10/10-10/16/23	D	10/18/2023	10,142.98 7,769.25		000688 000688		17,912.23
05918	National Gear Repair, Inc. I-11253 Robles Gearbox Repair - EM	D	10/18/2023	12,370.50	244.80CR	000689		12,125.70
00128	INTERNAL REVENUE SERVICE I-T1 202310162236 Federal Withholding I-T3 202310162236 SS Withholding I-T4 202310162236 Medicare Withholding	D	10/18/2023	44,679.35 40,214.78 11,066.93		000690 000690 000690		95,961.06
00187	CALPERS I-PBB202310162236 PERS BUY BACK I-PBP202310162236 PERS BUY BACK I-PEB202310162236 PEPRA EMPLOYEES PORTION I-PEM202310162236 PERS EMPLOYEE PORTION MGMT I-PER202310162236 PERS EMPLOYEE PORTION I-PRB202310162236 PEPRA EMPLOYER PORTION I-PRR202310162236 PERS EMPLOYER PORTION	D	10/18/2023	130.46 161.96 12,442.24 1,955.07 6,904.87 12,329.83 13,654.96		000691 000691 000691 000691 000691 000691 000691		47,579.39
00180	S.E.I.U. - LOCAL 721 I-COP202310162236 SEIU 721 COPE I-UND202310162236 UNION DUES	D	10/18/2023	2.50 872.50		000692 000692		875.00
00049	STATE OF CALIFORNIA I-SDI202310162236 CASDI Withholding I-T2 202310162236 STATE WITHHOLDING (CA)	D	10/18/2023	1,960.72 16,986.35		000693 000693		18,947.07
05790	STATE OF OREGON I-OST202310162236 OR STATE TRANSIT TAX I-T2 202310162236 STATE WITHHOLDING (OR)	D	10/18/2023	6.14 453.08		000694 000694		459.22
00004	ACWA JOINT POWERS INSURANCE AU I-0700702 Health Insurance 11/23	R	10/11/2023	154,737.38		051135		154,737.38
00012	ALL-PHASE ELECTRIC SUPPLY CO. I-5665-1043140 Grd Rcpt Nema6-50R - UT	R	10/11/2023	139.56		051136		139.56
00323	ALLIANT INSURANCE SRVCS, INC I-2080 Special Liability Insurance	R	10/11/2023	94,006.50		051137		94,006.50

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
03044	Amazon Capital Services							
I-16GT-Q4GY-6CVW	Office Supplies - LCRA	R	10/11/2023	27.23		051138		
I-16K4-3H1M-1JXF	Chainsaw - LCRA	R	10/11/2023	52.56		051138		
I-1J1C-KQFL-44TJ	Toner - WP	R	10/11/2023	501.90		051138		
I-1NRD-3VMY-9LFV	Chainsaw Chaps - LCRA	R	10/11/2023	53.61		051138		
I-1RLD-G1YH-3KVH	Dish Soap - PL	R	10/11/2023	69.94		051138		705.24
06060	Ameriflex							
I-INV656724	FSA Admin Fee	R	10/11/2023	96.00		051139		96.00
00014	AQUA-FLO SUPPLY							
I-SI2191694	4" ABS DMV 90 Ell - LCRA	R	10/11/2023	369.58		051140		
I-SI2195065	Ball Valve & Shovel - UT	R	10/11/2023	758.17		051140		1,127.75
01703	ARNOLD LAROCHELLE MATTHEWS							
I-8800	Metter #5088-001	R	10/11/2023	4,192.00		051141		4,192.00
03429	AT&T							
I-3871052804	Acct#8310013074846	R	10/11/2023	8.00		051142		8.00
00021	AWA OF VENTURA COUNTY							
I-06-15170	CCWUC Education Training	R	10/11/2023	30.00		051143		30.00
00756	BOARD OF EQUALIZATION							
I-093023	Use Tax Return 15300115	R	10/11/2023	49.00		051144		49.00
06158	Justin Burgess							
I-100923	Safety Boot Stipend	R	10/11/2023	205.00		051145		205.00
09182	CalPERS							
I-100000017304348	Unfunded Acrued Liab 10/23	R	10/11/2023	68,078.75		051146		68,078.75
00707	CHARLES P. CROWLEY CO.							
I-31824	Dosing Pump - LAB	R	10/11/2023	6,175.73		051147		6,175.73
05774	CliftonLarsonAllen LLP							
I-3903851	Audit Service 22-23	R	10/11/2023	19,000.00		051148		19,000.00
00058	COAST TO COAST							
I-53715	Screws & Pipe Straps - UT	R	10/11/2023	4.39		051149		4.39
01843	COASTAL COPY							
I-1079811	Copier Usage - LCRA	R	10/11/2023	161.52		051150		
I-1079876	Copier Usage - LCRA	R	10/11/2023	156.85		051150		318.37

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01856	CRAMER MARKETING/ FORMERLY DAT							
C-42743	Accrue Use Tax	R	10/11/2023	18.07CR		051151		
D-42743a	Accrue Use Tax	R	10/11/2023	18.07		051151		
I-42743	Tax Forms - ADM	R	10/11/2023	249.26		051151		249.26
00079	DANIELS TIRE SERVICE							
I-250129283	Tires - Unit 112	R	10/11/2023	818.38		051152		818.38
01764	DataProse, LLC							
I-DP22304034	UB Mailing - 09/23	R	10/11/2023	4,801.18		051153		4,801.18
02480	David Taussig & Associates, In							
I-2308194	D22-00115 CFD Tax Admin	R	10/11/2023	309.00		051154		309.00
00081	DELTA LIQUID ENERGY							
I-8677	Propane - LCRA	R	10/11/2023	251.33		051155		251.33
06127	Dion & Sons, Inc							
I-SP21333	Diesel - LCRA	R	10/11/2023	3,482.74		051156		
I-SP21334	Gas - LCRA	R	10/11/2023	2,720.73		051156		6,203.47
06076	Dodos Design							
I-8976	Uniform Shirts - UT	R	10/11/2023	2,762.32		051157		
I-8977	Set Up for Screen	R	10/11/2023	320.00		051157		3,082.32
00086	E.J. Harrison & Sons Inc							
I-485	Acct#500891963	R	10/11/2023	440.87		051158		440.87
00086	E.J. Harrison & Sons Inc							
I-768	Acct#500766090	R	10/11/2023	1,014.36		051159		1,014.36
05937	Enterprise FM Trust							
I-FBN4852463	Vehicle Maintenance	R	10/11/2023	14,379.76		051160		14,379.76
00091	ERNST & YOUNG LLP							
I-US01U001354267	Client#0012205436	R	10/11/2023	1,429.00		051161		1,429.00
00095	FAMCON PIPE & SUPPLY							
I-S100112068.001	Fire Hydrant Out of ServiceBag	R	10/11/2023	281.53		051162		281.53
00093	FEDERAL EXPRESS							
I-8-270-16581	Shipping - LAB	R	10/11/2023	30.21		051163		30.21

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
06156	Adrie Ferrell							
I-1328029	Camping Cancellation - LCRA	R	10/11/2023	145.50		051164		145.50
02720	Garda CL West, Inc.							
I-10755109	Armored Truck Service - DO	R	10/11/2023	217.21		051165		217.21
00115	GRAINGER, INC							
I-9859950512	Hand Pail Pump - WP	R	10/11/2023	34.18		051166		34.18
00121	HACH COMPANY							
I-13757360	DPD Free Chlorine - UT	R	10/11/2023	458.86		051167		458.86
06159	Juan Pablo Hernandez							
I-100923	Safety Boot Stipend	R	10/11/2023	205.00		051168		205.00
02344	Janitek Cleaning Solutions							
I-50889A	Janitorial Service - DO	R	10/11/2023	2,630.78		051169		2,630.78
00151	MEINERS OAKS ACE HARDWARE							
C-058182	Mini Mats - LCRA	R	10/11/2023	128.61CR		051170		
C-058279	Ladder - UT	R	10/11/2023	278.84CR		051170		
I-057127	Stencils - WP	R	10/11/2023	2.92		051170		
I-057564	Pipe ABS - LCRA	R	10/11/2023	124.39		051170		
I-057598	Chain Oil - LCRA	R	10/11/2023	91.15		051170		
I-057599	Trash Bags - LCRA	R	10/11/2023	17.15		051170		
I-057638	Gloves & Adapter - LCRA	R	10/11/2023	16.74		051170		
I-057772	Mini Mats & Flat Steel - LCRA	R	10/11/2023	571.67		051170		
I-057889	Safety Boms & Electrical Tape	R	10/11/2023	51.24		051170		
I-058180	Valve Box & Adapter - LCRA	R	10/11/2023	520.01		051170		
I-058241	Ball Valve & Elbow - LCRA	R	10/11/2023	119.18		051170		
I-058262	Masking Tape - LCRA	R	10/11/2023	4.48		051170		
I-058270	Ladder - UT	R	10/11/2023	278.84		051170		
I-058276	Ladder - UT	R	10/11/2023	185.42		051170		1,575.74
03724	Michael K. Nunley & Associates							
I-1039085	Foothill Pipeline Instalation	R	10/11/2023	2,795.17		051172		
I-1039335	Foothill Pipeline Installation	R	10/11/2023	6,376.47		051172		9,171.64
03444	Mission Linen Supply							
I-520171480	Uniform Pants - PL	R	10/11/2023	42.89		051173		
I-520171481	Uniform Pants - MAINT	R	10/11/2023	26.26		051173		
I-520171484	Uniform Pants - TP	R	10/11/2023	57.52		051173		126.67

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05977	ODP Business Solutions, LLC							
I-329872645001	Ink - ADM	R	10/11/2023	111.21		051174		
I-335317740001	Office Supplies - ADMIN	R	10/11/2023	187.50		051174		298.71
01570	Ojai Auto Supply							
I-578220	Motor Oil - LCRA	R	10/11/2023	176.38		051175		
I-578272	Blue Def - LCRA	R	10/11/2023	31.72		051175		208.10
01882	OJAI BASIN GROUNDWATER							
I-093023	Quarterly Pumping Fee	R	10/11/2023	31,099.40		051176		31,099.40
00912	OJAI BUSINESS CENTER, INC							
I-20231528	Frame - PR	R	10/11/2023	68.10		051177		68.10
00165	OJAI LUMBER CO, INC							
I-2309-756099	Doug Fir - LCRA	R	10/11/2023	42.38		051178		
I-2310-756714	48" Stell Form Stake & Wire Me	R	10/11/2023	193.11		051178		
I-2310-756751	Wire Mesh - LCRA	R	10/11/2023	42.00		051178		277.49
00947	CITY OF OJAI							
I-100123	Encroachment Permits - ENG	R	10/11/2023	783.00		051179		783.00
01627	OSCAR'S TREE SERVICE							
I-63216	Tree Removal - LCRA	R	10/11/2023	7,500.00		051180		7,500.00
06160	Ashley Osler							
I-101123	Damage Claim	R	10/11/2023	2,378.28		051181		2,378.28
06154	Laurel Pearson							
I-1300112	Camping Cancellation - LCRA	R	10/11/2023	159.00		051182		
I-1300153	Camping Cancellation - LCRA	R	10/11/2023	159.00		051182		318.00
06149	Petru Corporation							
I-23-12039	Tilte Plant use Fee - ENG	R	10/11/2023	4,672.60		051183		4,672.60
00188	PETTY CASH							
I-100523	Replenish Petty Cash - DO	R	10/11/2023	442.67		051184		442.67
02187	Pitney Bowes Inc							
I-1023838858	Quarterly Postage Maint - ADM	R	10/11/2023	112.61		051185		112.61
05713	Pops Auto Repair							
I-0450	Smog Check - Unit 15	R	10/11/2023	80.00		051186		
I-0451	Smog Check - Unit 55	R	10/11/2023	80.00		051186		160.00

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
10042	PSR ENVIRONMENTAL SERVICE, INC							
I-11426	Gas Tank Inspection - DO	R	10/11/2023	250.00		051187		
I-11427	Gas Tank Inspection - LCRA	R	10/11/2023	250.00		051187		500.00
00788	QUINN COMPANY							
I-24188208	Rent Wheel Loader - Proj 931	R	10/11/2023	8,275.51		051188		8,275.51
06155	Karyn Rexhepi							
I-1300126	Camping Cancellation - LCRA	R	10/11/2023	159.00		051189		159.00
01172	RP BARRICADE							
I-63505	Safety Cones - PL	R	10/11/2023	1,055.14		051190		1,055.14
02756	SC Fuels							
I-2482973-IN	Gas & Diesel - DO	R	10/11/2023	9,825.33		051191		9,825.33
00215	SOUTHERN CALIFORNIA EDISON							
I-100423	Acct#700028645962	R	10/11/2023	133,662.67		051192		
I-100523	Acct#700030209177	R	10/11/2023	24,017.54		051192		
I-100523b	Acct#700028735181	R	10/11/2023	18,992.78		051192		
I-100923	Acct#700598317666	R	10/11/2023	38.91		051192		176,711.90
00048	STATE OF CALIFORNIA							
I-100223	State Water Plan Payment	R	10/11/2023	400,728.00		051193		400,728.00
06091	RedNova Labs, Inc.							
I-803540	StorEDGE FMS/Website Pro	R	10/11/2023	337.50		051194		337.50
06157	Liliana Vallejo							
I-1314874	Camping Cancellation - LCRA	R	10/11/2023	85.00		051195		85.00
00247	County of Ventura							
I-363568	Encroachment Permits PE23-0555	R	10/11/2023	180.00		051196		
I-363569	Encroachment Permit PE23-0556-	R	10/11/2023	180.00		051196		
I-363766	Encroachment Permit PE23-0802	R	10/11/2023	400.00		051196		760.00
01283	Verizon Wireless							
I-9945984500	Monthly Cell Charges - LCRA	R	10/11/2023	4,216.22		051197		
I-9945984862	Monthly Cell Charges - LCRA	R	10/11/2023	916.75		051197		5,132.97
00663	WAXIE SANITARY SUPPLY							
I-82003277	Hand Sanitizer - LCRA	R	10/11/2023	190.48		051198		190.48

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05028	Weck Analytical Environmental I-W3D2571 PFSA for WCMR5 - LAB	R	10/11/2023	675.00		051199		675.00
00330	WHITE CAP CONSTRUCTION SUPPLY C-10018842872 CR Sandbags - MAINT I-50023981402 Empty Sand Bags - MAINT	R	10/11/2023	40.95CR 148.70		051200 051200		107.75
02033	Abbot Industrial Supplies I-54558 Trash Bags - LCRA	R	10/18/2023	2,915.06		051201		2,915.06
01325	Aflac Worldwide Headquarters I-533740 Supplemental Insurance 10/23	R	10/18/2023	2,930.52		051202		2,930.52
00010	AIRGAS USA LLC I-5502815234 Gas Cylinder Rental - PL	R	10/18/2023	459.25		051203		459.25
00012	ALL-PHASE ELECTRIC SUPPLY CO. I-5665-1043125 Fittings - WP	R	10/18/2023	196.73		051204		196.73
03044	Amazon Capital Services C-1DQW-VVXJ-J6RX Scubapro Escape Snorkel Return I-1361-TDMH-47MN Hip Chain Metric - FISH I-16H4-HJGX-TGVD Ergonomic Chair - SAFE I-16QT-YNFX-WYMK Ignition Keys Replacement -MAI I-1GTK-Q79L-HNMC Blue Reflective Markers - UT I-1J7K-VX9Q-G4CN Office Supplies - LCRA I-1LMH-ML69-47HJ Ignition Replacement - MAINT I-1MKJ-WMPJ-47XK Smoke Detectors - MAINT I-1P4H-G4RM-YGXM Plate Holder - ADMIN I-1TFC-KF4K-RTW6 Blue Reflective Markers - UT I-1TMD-JTY1-NRDH Fiber Media Converter - IT I-1TNV-FC3V-4HXT Blue Reflective Markers - UT	R	10/18/2023	37.24CR 280.30 106.17 119.98 88.74 551.89 12.64 229.74 19.29 473.28 86.47 29.58		051205 051205 051205 051205 051205 051205 051205 051205 051205 051205 051205 051205 051205		1,960.84
00014	AQUA-FLO SUPPLY I-SI2199894 Coupling & 4" Pop-Up Rotor -LC	R	10/18/2023	142.56		051206		142.56
00840	AQUA-METRIC SALES COMPANY I-INV0097272 6" Omni Meter - UT	R	10/18/2023	6,130.17		051207		6,130.17
01666	AT & T I-000020650758 Acct#9391035542	R	10/18/2023	656.76		051208		656.76
00018	AT & T MOBILITY I-287290467941X1023 Acct#287290467941 I-287294256431X1023 Acct#287294256431 I-287327817962X1023 Acct#287327817962	R	10/18/2023	250.07 1,085.55 36.38		051209 051209 051209		1,372.00

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05140	Annette Ayala							
I-105	Ojai Ave Cultural Monitor -ENG	R	10/18/2023	7,912.00		051210		7,912.00
00030	B&R TOOL AND SUPPLY CO							
I-1900992560	Extension Chain - PL	R	10/18/2023	26.85		051211		
I-1900992944	18" {ry Bar W/ Handle - ENG	R	10/18/2023	55.92		051211		
I-1900993057	Chevron GST 32 Turbine Oil	R	10/18/2023	379.28		051211		462.05
05797	Baron Industries							
I-01 694522	7 Wire Plug & Socket - PL	R	10/18/2023	177.14		051212		177.14
05952	Burns Pacific Construction, In							
I-8727	W. & E. Ojai Ave Pipe Replace	R	10/18/2023	242,688.00		051213		242,688.00
02593	Cal-Coast Machinery							
I-107136	Service JD Tractor - Unit 119	R	10/18/2023	1,361.59		051214		1,361.59
05712	Caterpillar Financial Services							
I-092523	Backhoe Loader - GARAGE	R	10/18/2023	30,939.96		051215		30,939.96
00511	Centers for Family Health							
I-114910	Handlg & Convey - PL	R	10/18/2023	25.00		051216		25.00
03021	Central Communications							
I-000030-454-091	Call Center 09/23	R	10/18/2023	238.16		051217		238.16
00719	CORELOGIC INFORMATION SOLUTION							
I-82188739	Realquest Subscription	R	10/18/2023	137.50		051218		137.50
02041	Custom Mailing Solutions, Inc							
I-10021	Prop 218 Mailing - PR	R	10/18/2023	3,097.26		051219		3,097.26
01001	CUSTOM PRINTING							
I-168138	Prop 218 Mailer - Rate Changes	R	10/18/2023	1,340.63		051220		1,340.63
06127	Dion & Sons, Inc							
I-SP21323	Diesel - Portable Tank	R	10/18/2023	3,289.82		051221		3,289.82
05760	Dive/Corr, Inc							
I-2373	Arbolada Tank Inspection - PL	R	10/18/2023	4,450.00		051222		4,450.00
06008	Docu Products							
I-269292	Copier Usage - DO	R	10/18/2023	185.49		051223		185.49

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00086	E.J. Harrison & Sons Inc Acct#500546088	R	10/18/2023	1,922.52		051224		1,922.52
00086	E.J. Harrison & Sons Inc Acct#500890288	R	10/18/2023	101.93		051225		101.93
00086	E.J. Harrison & Sons Inc Acct#500139629	R	10/18/2023	750.12		051226		750.12
00095	FAMCON PIPE & SUPPLY Ball Valves - UT	R	10/18/2023	329.47		051227		
	I-S100113155.001 Breakoff Bolt & Nut 6" - UT	R	10/18/2023	238.10		051227		567.57
00013	FERGUSON ENTERPRISES INC 2" Vic Valves - TP	R	10/18/2023	1,852.92		051228		
	I-2971730 MVP Metering Cart - LCRA	R	10/18/2023	96.03		051228		1,948.95
00101	FISHER SCIENTIFIC Biological Indicator & MacConk	R	10/18/2023	122.29		051229		122.29
00104	FRED'S TIRE MAN Tires - Unit 315	R	10/18/2023	268.62		051230		268.62
02217	Greg Rents Jumping Jack - LCRA	R	10/18/2023	97.00		051231		97.00
00369	HARRINGTON INDUSTRIAL PLASTICS Barrel Pumps - Tp	R	10/18/2023	1,849.85		051232		1,849.85
02940	Holliday Rock Co, Inc. 25000PSI 3/8 Small Line - LCRA	R	10/18/2023	1,582.18		051233		1,582.18
00596	HOME DEPOT Stick Water Pump Return - PL	R	10/18/2023	1,154.01CR		051234		
	I-110228 Supplies for Awnings for EMC	R	10/18/2023	200.08		051234		
	I-1168815 12-Volt Batteries Pack - PL	R	10/18/2023	982.41		051234		
	I-5902175 Garage Storage - WP	R	10/18/2023	1,419.99		051234		
	I-6391734 Stick Pump - PL	R	10/18/2023	1,154.01		051234		
	I-730132 Submersible Water Pump - PL	R	10/18/2023	800.79		051234		
	I-7836910 Grinder/Batteries - PL	R	10/18/2023	534.11		051234		
	I-8956847 Drill Bit Kit & Powered Compac	R	10/18/2023	212.29		051234		
	I-9902903 Concrete Patcher - MAINT	R	10/18/2023	54.30		051234		4,203.97

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00894	HOSE-MAN, INC.							
I-00042812	Hose Assembly & Reducer - LCRA	R	10/18/2023	397.05		051235		397.05
00125	IDEXX DISTRIBUTION CORP							
I-3138183258	Colilert & QT2K - LAB	R	10/18/2023	2,049.21		051236		2,049.21
05799	Jack Henry & Associates Inc.							
C-4255264	RemitPlus Express - ADM	R	10/18/2023	1,506.30CR		051237		
I-104282	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4301989	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4317386	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4342548	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4367587	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4404187	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		
I-4418074	RemitPlus Express - ADM	R	10/18/2023	250.00		051237		243.70
00667	Kennedy/Jenks Consultants, Inc							
I-166201	Casitas Spillway Erosion - 928	R	10/18/2023	1,956.25		051238		
I-166711	Casitas Spillway Erosion - 928	R	10/18/2023	9,859.65		051238		11,815.90
09756	Low Price Auto Glass							
I-26702	Winshild - Unit E11	R	10/18/2023	450.00		051239		450.00
00329	MCMMASTER-CARR SUPPLY CO.							
I-15820505	Wire Rope - FISH	R	10/18/2023	133.26		051240		
I-15824642	Duct Hose - LAB	R	10/18/2023	547.45		051240		680.71
00151	MEINERS OAKS ACE HARDWARE							
I-053662	Bungee Cord & Tie Down Rtch	R	10/18/2023	70.27		051241		
I-053739	Gloves & Flat HR Plain - WP	R	10/18/2023	35.27		051241		
I-053801	Expoxy PC Super - WP	R	10/18/2023	14.62		051241		
I-055416	Paint & Box Cover - EM	R	10/18/2023	112.01		051241		
I-055659	Plywood - PL	R	10/18/2023	86.58		051241		
I-056131	Cooler & Air Fresher - PL	R	10/18/2023	79.44		051241		
I-056716	Utility Gloves - LCRA	R	10/18/2023	28.28		051241		
I-057064	Flashlight & Batteries - PL	R	10/18/2023	128.70		051241		
I-057070	Tote Utility - PL	R	10/18/2023	85.76		051241		
I-058039	Rope & Cabletie - LAB	R	10/18/2023	25.93		051241		
I-058464	Broom Handle - TP	R	10/18/2023	9.75		051241		
I-058562	Parts & Supplies - UT	R	10/18/2023	241.19		051241		
I-058767	Batteries & Padlock Lam - MAIN	R	10/18/2023	26.28		051241		
I-058781	Rescue Tape & Trash Bags - TP	R	10/18/2023	39.86		051241		
I-058797	Shovel - WP	R	10/18/2023	50.73		051241		
I-058921	Gloves & Driver Bit Set - UT	R	10/18/2023	85.42		051241		
I-058965	Snap Bolt & Single Cut Key - M	R	10/18/2023	11.26		051241		
I-059012	Gloves - ENG	R	10/18/2023	6.42		051241		
I-059101	Tie Down - PL	R	10/18/2023	36.45		051241		
I-059169	Wilco Squirrel Bait - MAINT	R	10/18/2023	97.58		051241		

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
I-059188	Tarp & Twine Nylon - WP	R	10/18/2023	121.00		051241		
I-059224	Battries - LCRA	R	10/18/2023	15.59		051241		
I-059330	Concrete & Gloves - LCRA	R	10/18/2023	54.82		051241		
I-059499	Gloves & Plastic Drop Cloth	R	10/18/2023	20.46		051241		
I-059541	Drill Bits & Couple - LCRA	R	10/18/2023	31.01		051241		1,514.68
03444	Mission Linen Supply							
I-520217004	Uniform Pants - PL	R	10/18/2023	42.89		051244		
I-520217005	Uniform Pants - MAINT	R	10/18/2023	26.26		051244		
I-520217008	Uniform Pants - TP	R	10/18/2023	57.52		051244		126.67
03701	MNS Engineers, Inc.							
I-84430	QSP W&E Ojai Ave. Pipeline-ENG	R	10/18/2023	2,143.75		051245		2,143.75
01570	Ojai Auto Supply							
I-579140	High Performance Racing - GARA	R	10/18/2023	23.33		051246		
I-579157	Air Filters - GARAGE	R	10/18/2023	25.77		051246		49.10
00884	OJAI TERMITE & PEST CONTROL, I							
I-243379	Monthly Rodent Control - TP	R	10/18/2023	78.00		051247		78.00
00169	OJAI VALLEY SANITARY DISTRICT							
I-25504	Cust #20594	R	10/18/2023	324.97		051248		324.97
00169	OJAI VALLEY SANITARY DISTRICT							
I-25582	Cust #52921	R	10/18/2023	59.12		051249		59.12
02053	Photo-Scan of Los Angeles, Inc							
I-32117	Door Repair - ADM	R	10/18/2023	326.25		051250		
I-32196	Movilization Charge - ADM	R	10/18/2023	290.00		051250		616.25
00823	POLYDYNE, INC.							
I-1775714	Cationic Polymer - TP	R	10/18/2023	21,621.60		051251		21,621.60
05713	Pops Auto Repair							
I-0453	Smog CHeck - Unit 08	R	10/18/2023	80.00		051252		
I-0454	Smog CHeck - Unit 34	R	10/18/2023	80.00		051252		
I-0457	Smog Check - Unit 28	R	10/18/2023	80.00		051252		
I-0460	Smog Check - Unit 52	R	10/18/2023	80.00		051252		
I-0461	Smog Check - Unit 09	R	10/18/2023	80.00		051252		
I-0463	Smog Check - Unit 47	R	10/18/2023	80.00		051252		
I-0464	Smog Check - Unit 50	R	10/18/2023	80.00		051252		
I-0465	Service Repair - Unit 73	R	10/18/2023	1,608.31		051252		2,168.31

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00790	PROFORMA							
I-BI85010892A	Uniform - LAB	R	10/18/2023	840.78		051253		840.78
00788	QUINN COMPANY							
I-PC010438432	Key - PL	R	10/18/2023	17.87		051254		17.87
00306	Rincon Consultants, Inc.							
I-51435	Arborist Service - PL	R	10/18/2023	945.25		051255		
I-51471	VTA-CARP Intertie Service -ENG	R	10/18/2023	507.50		051255		1,452.75
01172	RP BARRICADE							
I-63429	Safety Lights - Unit E14	R	10/18/2023	1,506.86		051256		1,506.86
01109	SALVADOR LOERA TRANSPORTATION							
I-13536	Fill Sand Mutual - PL	R	10/18/2023	641.00		051257		
I-13537	Fill Sand Main Yard - PL	R	10/18/2023	585.41		051257		
I-13538	Fill Sand Mutual - PL	R	10/18/2023	642.00		051257		
I-13539	Rock - MAINT	R	10/18/2023	1,160.00		051257		
I-13540	Fill Sand - PL	R	10/18/2023	1,170.00		051257		
I-13541	Fill Sand - PL	R	10/18/2023	638.00		051257		
I-166538	Rock - PL	R	10/18/2023	638.41		051257		5,474.82
06019	Silver Development & Associate							
I-23033	Plumbing for LAB Incubator	R	10/18/2023	4,450.00		051258		4,450.00
00725	SMART & FINAL							
I-3909120020903	Coffee - LCRA	R	10/18/2023	24.08		051259		24.08
00641	SWRCB-ELAP Fees							
I-EA-RE-0124-1696	ELAP Renewal Fee - LAB	R	10/18/2023	3,550.00		051260		3,550.00
01959	The Wharf							
I-112255	Hoodie & Swtshirt - UT	R	10/18/2023	193.82		051261		193.82
02323	Mitch Tull							
I-Oct 23	Reimbursement Expenses 10/23	R	10/18/2023	350.00		051262		350.00
01662	TYLER TECHNOLOGIES, INC.							
I-025-438477	Incode Annual Assa Fees 23-24	R	10/18/2023	47,800.90		051263		47,800.90
00825	USA BLUEBOOK							
I-INV00159573	Pipet & Chemkey Nitrite - LAB	R	10/18/2023	1,533.51		051264		1,533.51

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00330	WHITE CAP CONSTRUCTION SUPPLY							
I-10018839406	Cleaning Supplies - PL	R	10/18/2023	263.83		051265		263.83
05869	Wingate Earthworks Inc.							
I-090623	Asphalt Patching - ENG	R	10/18/2023	20,271.10		051266		20,271.10
06056	Ameriflex							
I-FSA202310162236	FSA Deduction	R	10/18/2023	1,042.28		051267		1,042.28
00102	FRANCHISE TAX BOARD							
I-G11202310162236	Payroll Deduction	R	10/18/2023	500.00		051268		500.00
00124	ICMA RETIREMENT TRUST - 457							
I-DCI202310162236	DEFERRED COMP FLAT	R	10/18/2023	1,765.83		051269		
I-DI%202310162236	DEFERRED COMP PERCENT	R	10/18/2023	119.71		051269		1,885.54
00985	NATIONWIDE RETIREMENT SOLUTION							
I-CUN202310162236	457 CATCH UP	R	10/18/2023	1,184.90		051270		
I-DCN202310162236	DEFERRED COMP FLAT	R	10/18/2023	8,467.91		051270		
I-DN%202310162236	DEFERRED COMP PERCENT	R	10/18/2023	435.78		051270		10,088.59

* * T O T A L S * *	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	133	1,521,661.70	0.00	1,521,661.70
HAND CHECKS:	0	0.00	0.00	0.00
DRAFTS:	8	195,854.47	244.80CR	195,609.67
EFT:	0	0.00	0.00	0.00
NON CHECKS:	0	0.00	0.00	0.00
VOID CHECKS:	0	VOID DEBITS 0.00		
		VOID CREDITS 0.00	0.00	0.00

TOTAL ERRORS: 0

VENDOR SET: 01	BANK: AP	TOTALS:	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
			141	1,717,516.17	244.80CR	1,717,271.37
BANK: AP	TOTALS:		141	1,717,516.17	244.80CR	1,717,271.37
REPORT TOTALS:			141	1,717,516.17	244.80CR	1,717,271.37

Void Check #50854 \$1,750.00
\$1,715,521.37

Adjudication Charge Fund Account

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

Adj. Checks: No checks cut during this period
Adj. Draft
Voids:



Janyne Brown, Chief Financial Officer

Minutes of the Board of Directors
Meeting held October 11, 2023

1. CALL TO ORDER

President Hajas called the meeting to order at 5:00 p.m.

2. ROLL CALL

Directors Brennan, Bergen, Kaiser and Hajas are present. Director Cole is absent. Also present are GM Flood, AGM Dyer, EA Vieira and Counsel McNulty.

3. PLEDGE OF ALLEGIANCE

President Hajas led the Pledge.

4. AGENDA CONFIRMATION

Confirmed as presented.

5. PUBLIC COMMENTS - Presentation on District related items that are not on the agenda - three minute limit.

None

6. CONSENT AGENDA

6.a. Accounts Payable Report.
[Accounts Payable Report.pdf](#)

6.b. Minutes of the September 13, 2023 Board Meeting.
[9 13 2023 Min.pdf](#)

The Consent Agenda was offered by Director Kaiser, seconded by Director Brennan and adopted by the following roll call vote:

AYES:	Directors:	Brennan, Bergen, Kaiser, Hajas
NOES:	Directors:	None
ABSENT:	Directors:	Cole

7. ACTION ITEMS

7.a. Authorize General Manager to Execute Cooperative Agreement for Maintenance of Stream Gage Equipment at Certain Locations in the Ventura River Watershed with Ventura County Public Works Watershed Protection District.
[Board Memo_Authorize Cooperative Agreement_20231011.pdf](#)
[Exhibit_4_Cooperative_Agreement.pdf](#)

On the motion of Director Brennan, seconded by Director Bergen, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Brennan, Bergen, Kaiser, Hajas
NOES:	Directors:	None
ABSENT:	Directors:	Cole

- 7.b. Authorize General Manager to Execute Memorandum of Agreement for Robles Diversion and Fish Passage Facility Preliminary Design with Ventura County Public Works Watershed Protection District.
[Board Memo_Authorize Memorandum of Agreement_20231011.pdf](#) [DRAFT_MOA_Casitas-WPD_WP-1-2023-0X_V2.pdf](#)

On the motion of Director Kaiser, seconded by Director Bergen, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Brennan, Bergen, Kaiser, Hajas
NOES:	Directors:	None
ABSENT:	Directors:	Cole

- 7.c. Authorize General Manager to Execute Staffing Agreement between Casitas Municipal Water District and Ojai Basin Groundwater Management Agency.
[Board Memo_Authorize Staffing Agreement_20231011.pdf](#)
[Complete_with_DocuSign_8a_CMWD-OBGMA_Staffin.pdf](#)

On the motion of Director Brennan, seconded by Director Bergen, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Brennan, Bergen, Kaiser, Hajas
NOES:	Directors:	None
ABSENT:	Directors:	Cole

- 7.d. Cancellation of the November 22, 2023 and December 27, 2023 Casitas MWD Regular Board Meetings.

On the motion of Director Brennan, seconded by Director Kaiser, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Brennan, Bergen, Kaiser, Hajas
NOES:	Directors:	None
ABSENT:	Directors:	Cole

8. INFORMATION ITEMS

- 8.a. Hydrology Report.
[Hydrology August 2023.pdf](#)
- 8.b. Recreation Committee Minutes.

The information items were received.

9. GENERAL MANAGER COMMENTS

GM Flood informed the board that the Governor signed AB 557 which allowed for permanent changes to the Brown Act to allow for remote meetings in the event of a declared emergency and changes the renewal requirement from 30 days to 45 days.

The board was reminded of the newsletter and the upcoming tours on Saturday, October 28 and Saturday November 4th.

10. BOARD OF DIRECTOR REPORTS ON MEETINGS ATTENDED

Director Brennan attended the Ventura River Watershed Council meeting. He will be attended the walk on the watershed this Saturday.

11. BOARD OF DIRECTOR COMMENTS PER GOVERNMENT CODE SECTION 54954.2(a).

None

President Hajas moved the meeting to closed session at 5:13 p.m.

12. CLOSED SESSION

- 12.a. Conference with Real Property Negotiator (§ 54956.8)
Property: APN's 008-0-160-460, 008-0-160-415, 008-0-160-355, 008-0-160-365, 008-0-210-030 and 008-0-160-480
Agency Negotiator: Michael Flood
Negotiating Parties: Casitas MWD and Abbott Ranch LLC, Barnard, Belmont West LLC, Brown Investments Inc/ Sanchez Richard R - Mary L, Brown Anthony.
Under Negotiation: Price and terms for temporary construction easements, permanent pipeline easements, and land purchase for the Ventura-Santa Barbara Counties Intertie.

President Hajas moved the meeting back into open session at 5:37 p.m. with Mr. McNulty stating the board met in closed session and no reportable action was taken.

13. ADJOURNMENT

President Hajas adjourned the meeting at 5:37 p.m.

Mary Bergen, Secretary

**CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM**

TO: BOARD OF DIRECTORS
FROM: MICHAEL FLOOD- GENERAL MANAGER
SUBJECT: Set Casitas MWD Reserve amounts for the 2023-2024 Fiscal Year as per the staff recommendation.
DATE: 10/20/2023

RECOMMENDATION:

Recommend the Board of Directors set reserves for the 2023/2024 fiscal year as recommended.

DISCUSSION:

Reserves for the fiscal-year-end 2022/2023 are calculated as follows:

Restricted:

Capital Facilities - Has been increased from \$322,327 to **\$324,412** a total of \$2,085.

CFD 2013-1Improvement Fund- Has been reduced from \$6,819,665 to **\$2,296,697** a total of \$4,522,968.

Adjudication Fund- Has been increased from \$127,982 to **\$488,688** a total of \$360,706.

OPEB- Has been increased from \$1,443,076 to **\$1,465,130** a total of \$22,054.

Un-Restricted:

Operating Reserve (Cash Flow) – Has been increased from \$4,408,985 to **\$4,586,431** a total of \$177,446.

Storm Damage - Has been reduced from \$2,346,282 to **\$0** a total of \$2,346,282.

Variation in Water Sales - Has been reduced from \$3,544,353 to **\$3,065,506** a total of \$478,847.

Capital Replacement - Has had no change and remains at **\$1,985,040.**

Conservation Penalty – Has been reduced from \$4,577,607 to **\$4,310,141** a total of \$267,466.

Alternate Water Supply – Has been reduced from \$1,107,797 to **\$0** a total of \$1,107,797.

The net change - The net change for restricted reserves from Fiscal Year End 2021 / 2022 to Fiscal Year End 2022 / 2023 is \$4,138,123 decrease. The net change for unrestricted reserves from Fiscal Year End 2021 / 2022 to Fiscal Year End 2022 / 2023 is \$4,022,946 decrease.

Staff recommends that the Board of Directors sets the District's Fiscal Year 2023/2024 reserve account amounts as listed above.

**Casitas Municipal Water District
Reserves / Restricted – Unrestricted
FY 2022/2023**

6/30/2023

General Balance - Mechanics Bank	3,633,175
Adjudication Balance- Mechanics Bank	488,688
OPEB 115 Trust	1,465,130
LAIF	485
U.S. Bank Custodial Account	10,626,152
U.S. Bank Money Market Account	8,647
County of Ventura Investment (C.O.V.I.)	3,071
CFD 2013-1 Improvement Fund	2,296,697
Total Reserves	18,522,045

Restricted:	
Capital Facilities	324,412
CFD 2013-1 Improvement Fund	2,296,697
Adjudication Fund	488,688
OPEB	1,465,130
Total Restricted	4,574,927
Un-Restricted (designated funds)	
Operating Reserve	4,586,431
Storm Damage	-
Variation in Water Sales	3,065,506
Capital Replacement	1,985,040
Conservation Penalty	4,310,141
Alternate Water Supply	-
Total Un-Restricted (designated funds)	13,947,118
Un-designated funds 06/30/2023	-
Total Un-Restricted	13,947,118
Total Reserves	18,522,045
	-

Restricted funds = Funds restricted by a third party and/or for Debt Service Fund.
Designated funds = Funds designated by Board for specific purpose.

**CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM**

TO: BOARD OF DIRECTORS
FROM: MICHAEL FLOOD, GENERAL MANAGER
SUBJECT: WEST AND EAST OJAI AVENUE PIPELINE REPLACEMENT,
SPECIFICATION NO. 19-411 – FOX CANYON CHANNEL
CONNECTIONS
DATE: 10/25/2023

RECOMMENDATION:

- Authorize a budget of \$200,000 for Fox Canyon Channel Connections as part of the West and East Ojai Avenue Pipeline Replacement Project, Specification No. 19-411 and authorize the General Manager to issue a purchase order to the lowest responsible bidder.

BACKGROUND:

The West and East Ojai Avenue Pipeline Replacement project, Specification No. 19-411, includes installation of approximately 6,210 feet of 8-inch water line in Ojai Avenue in several segments between Bristol Road and Gridley Road. Construction is currently underway and is expected to be complete by the end of December 2023.

Fox Canyon Channel is a concrete channel running north-to-south to the east of the skate park, crossing Ojai Avenue. The original design, included in the current pipeline construction contract, was to bore-and-jack under the channel to connect to the new pipeline on each side. A groundwater treatment system prior to discharge to the channel was also included. The bore-and-jack segment was eliminated from the current construction contract with a Work Change Directive; a deductive change order is currently being negotiated.

To ensure connectivity of the system and avoid two dead-ends, staff would like to instead connect each side of the new pipeline to the existing pipeline (circa 1973) on the south side of Ojai Avenue. Completion of these connections is urgent as Caltrans will be paving Ojai Avenue in late November/early December (depending on the weather). Quotes from contractors are being solicited and initial estimates are in the \$100,000-150,000 range.

FINANCIAL IMPACT:

The budget for fiscal year (FY) 2023-24 includes funds for the West and East Ojai Avenue Pipeline Replacement, Specification No. 19-411 in the amount of \$968,655. It is anticipated the deductive change order from the current contract will offset the cost of the connections.

**CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM**

TO: BOARD OF DIRECTORS
FROM: MICHAEL FLOOD, GENERAL MANAGER
SUBJECT: HYDROLOGIC STATUS REPORT FOR SEPTEMBER 2023
DATE: OCTOBER 25, 2023

RECOMMENDATION:

This item is presented for information only and no action is required. Data are provisional and subject to revision.

DISCUSSION:

Rainfall Data

	Casitas Dam	Matilija Dam	Thacher School
This Month	0.02"	0.03"	0.08"
Water Year (WY: Oct 01 – Sep 30)	47.93"	65.97"	45.86"
Average station rainfall to date	23.31"	28.23"	21.53"

Ojai Water System Data

Wellfield production	157.35 AF
Surface water supplement	0 AF
Static depth to water surface – Mutual #6	136.20 feet
Change in static level from previous month	- 63.64 feet

Robles Fish Passage and Diversion Facility Diversion Data

Diversion this month	0 AF
Diversion days this month	0
Total Diversions WY to date	52,537.25 AF
Diversion days this WY	197

Casitas Reservoir Data

Water surface elevation as of end of month	539.80 feet
Water storage last month	173,087 AF
Water storage as of end of month	171,701 AF
Net change in storage	- 1,386 AF
Change in storage from same month last year	+ 98,684 AF

AF = Acre-feet

AMSL = Above mean sea level

WY = Water year

CASITAS MUNICIPAL WATER DISTRICT
MINUTES
Recreation Committee
(this meeting was held virtually and in-person)

DATE: October 19, 2023
TO: Board of Directors
FROM: General Manager, Michael Flood
Re: Recreation Committee Meeting of October 13, 2023, at 1000 hours.

RECOMMENDATION:

It is recommended that the Board of Directors receive and file this report.

BACKGROUND AND OVERVIEW:

1. **Roll Call.**

Director Brian Brennan
Director Pete Kaiser
General Manager, Michael Flood
Park Services Manager, Joe Martinez
Division Officer, Joe Evans
Park Services Officer, Mitch Tull
Park Services Officer, RJ Faddis

2. **Public Comments.**

Gary Wolfe made comments regarding the clearing of shoreline brush in the area of the Santa Ana Boat ramps ahead of possible additional lake inflow during the next storm season.

GM Flood made comments regarding permits for shoreline brush clearing and indicated that further information would be provided at a future Committee Meeting.

3. **Staff discussion of planning for upcoming concession agreements**

PSM Martinez made comments regarding upcoming agreements with the rowing club and the issuance of a request for proposal in the next few months. He also mentioned the renewal of an agreement with the Rotary Club for the Wine Festival and various commercial operations licenses.

Director Brennan asked questions about a possible 'glam' camping vendor.

Director Kaiser asked questions regarding the rowing club RFP.

4. **Review of Recreation Report for August 2023.**

PSM Martinez went over the report with the Committee including visitation, revenue results, Casitas Water Adventure operations, vessel tagging, night fishing, ABA tournaments, new signage, and off-season maintenance activities.

Director Brennan asked questions about lifeguard recruiting, complaints on CWA closures and bonuses for returning lifeguards for next season.

Director Kaiser asked questions about camping cabins, lifeguard recruiting, and complimented staff on the new signage.

5. **Review of Incidents and Comments**

DO Evans gave updates on calls for service, disturbance calls, customer service calls, medical emergencies, a traffic collision on Hwy 150, wildlife calls, and the new Ranger calls-for-service statistics system being online.

Director Kaiser thanked staff for a great job and for the expertise staff has developed in handling difficult situations at the park.



October 17, 2023

James Nachbaur
Director Office of Research, Planning and Performance
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Proposed Making Conservation a California Way of Life Regulation

Dear Mr. Nachbaur:

Casitas Municipal Water District (Casitas) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the Draft Making Conservation a California Way of Life Regulation (Regulation). Casitas supports the Association of California Water Agencies redline recommendations supplied to you within their comment letter. In addition, Casitas is submitting the following comments regarding our unique circumstances.

Water conservation is a long-standing cornerstone policy of Casitas' local water management and Casitas is committed to continuing cost-effective conservation measures. Casitas' 2022 water production was 57% lower than 1989 levels, reflecting long-term efforts to improve water use efficiency. Despite these savings, the State Water Board draft regulations indicate that customers need to conserve more.

Casitas is concerned about whether the draft regulations are achievable, both in terms of conservation savings as well as financial implications. With major reductions in total water use, Casitas has seen a substantial reduction in revenue and financial reserves have been diminished.

Casitas requests that total water use reductions, including all types of customer water usage, be considered as an alternative compliance pathway, with consideration of ongoing conservation efforts over several decades. For Casitas, retail urban water use (Residential, Commercial, Industrial, and Institutional) makes up only 35% of total demand, and historically has been very consistent from year to year (Exhibit 1). Other types of customer demand that have contributed greatly to conservation efforts and preservation of Casitas' water supplies and are not being recognized in the State Water Boards draft regulations.

Casitas is committed to helping our customers use water efficiently, and we encourage the State Water Board to make substantive changes to the draft Regulations. Given the financial implications of the draft regulations, Casitas is requesting alternative compliance with consideration of total water savings.

Comment Letter – Proposed Making Conservation a California Way of Life Regulation

October 13, 2023

Page 2

Please don't hesitate to contact Tyrone LaFay, Public Relations and Conservation Manager, at tlafay@casitaswater.com or 805.649.2251.

Sincerely,

A handwritten signature in blue ink that reads "Michael Flood". The signature is written in a cursive style with a large, stylized "M" and "F".

Michael Flood
General Manager

- c: E. Joaquin Esquivel, SWRCB Chair
Dorene D'Adamo, SWRCB Vice Chair
Sean Maguire, SWRCB Member
Laurel Firestone, SWRCB Member
Nichole Morgan, SWRCB Member
Eileen Sobeck, SWRCB Executive Director
Eric Oppenheimer, SWRCB Deputy Director
Charlotte Ely, SWRCB Supervisor, Conservation and Efficiency

Exhibit 1

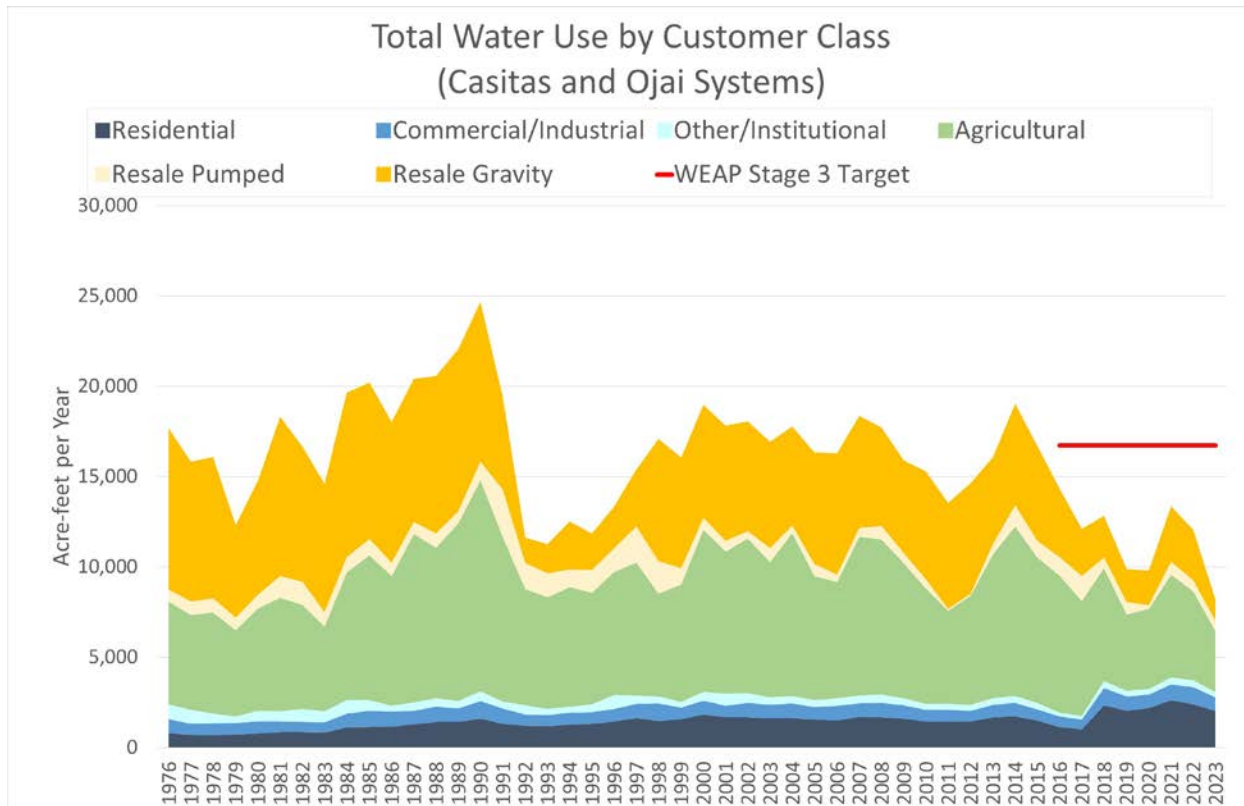
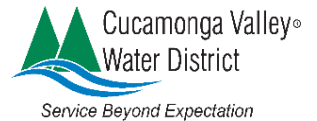
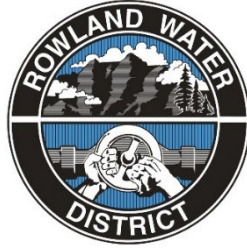


Exhibit 1 demonstrates the overall reduction in water use, with retail urban water use representing approximately 35% of total demand in recent years. Retail urban water use (residential, commercial, industrial, institutional) increased in 2017 with the acquisition of the Ojai Water System which also came with groundwater wells to supply those system demands. Despite the acquisition of the Ojai Water System, Casitas experienced a significant reduction in overall demands from other types of customers (Agricultural and Resale).



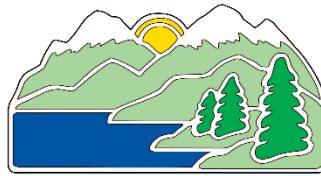




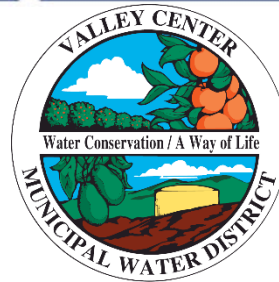
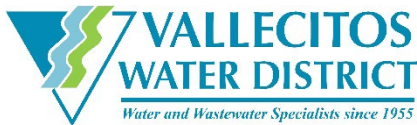
San Diego County Water Authority
And Its 24 Member Agencies



SOUTH COAST WATER DISTRICT
Partnering With The Community



Tahoe City Public Utility District



October 17, 2023

Submitted via: commentletters@waterboards.ca.gov

Courtney Tyler
Clerk to the State Water Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter — Proposed Making Conservation a California Way of Life Regulation

Dear Ms. Tyler,

The Association of California Water Agencies and the undersigned organizations appreciate the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the Draft Making Conservation a California Way of Life Regulation (Regulation). This comment letter (Comment Letter) is intended to provide constructive and comprehensive recommendations to the State Water Board to meaningfully advance water use efficiency, address urban retail water suppliers' constraints and concerns, and build on local and regional successes. We respectfully request the State Water Board's thoughtful consideration of our comments and recommendations, as supported by agency specific oral and written comments. We ask for the opportunity to work collaboratively with the State Water Board over the duration of the rulemaking to revise the draft Regulation to incorporate input from interested parties to support successful local and regional implementation.

This comment letter includes an Appendix with detailed suggested redline changes to the draft Regulation. We recognize the suggested redlines are one of many ways in which the draft Regulation could be modified to address suppliers' concerns. ACWA and the undersigned parties are committed to working with the State Water Board on revisions that support both the State's goals and water suppliers' successful implementation of a final Regulation. This Comment Letter is organized as outlined below:

SECTION 1. STATE & LOCAL PARTNERSHIP

SECTION 2. OVERARCHING POLICY CONCERNS & RECOMMENDATIONS

- I. Set Reasonable Timelines
- II. Recognize Data Errors & Limitations
- III. Provide Alternative Compliance
- IV. Align CII Performance Measures with Local Success
- V. Adhere to Legislative Requirements

SECTION 3. TECHNICAL CONCERNS & RECOMMENDATIONS

- I. Outdoor Standards
- II. CII Performance Measures
- III. Methodologies & Variances
- IV. Reporting

SECTION 4. APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS

SECTION 5. CLOSING REMARKS

SECTION 1: STATE & LOCAL PARTERSHIP

Water suppliers are on the front lines of managing the impacts of climate change to ensure a reliable water supply for California’s diverse beneficial uses. The actions that suppliers take will vary across California depending on local and regional supplies and conditions. As water suppliers implement diverse projects to advance existing and new supplies, they have also long recognized water use efficiency as an important tool for climate resilience.

Over the past several decades, water suppliers have been pioneering local and regional programs to advance efficiency and improve drought planning and response. These programs have been complemented by statewide efforts to standardize drought planning and response and set statewide water conservation targets. The Water Conservation Act of 2009 directed the State to achieve a 20% reduction in per capita water use by 2020. The Department of Water Resources (DWR) Report to the Legislature on the Status of the 2020 Urban Water Management Plans (UWMPs) found that “California surpassed the 20% reduction and reduced per capita urban water use by 32%. Of the 386 Urban Retail Water Suppliers that submitted retail UWMPs, 374 of these (97%) achieved their targeted 2020 water use reduction.”¹ While significant achievements have been made to use water wisely, the water community recognizes a continued effort toward greater efficiency is needed to prepare for more frequent and prolonged droughts and a hotter and drier climate.

As the State finalizes this new regulatory program to advance long-term water use efficiency, we ask that it recognizes water suppliers as a key partner to the State’s success. Compliance with the regulation will fall solely on water suppliers and their ratepayers. The ability of water suppliers to implement the Regulation successfully and cost-effectively will determine California’s success in advancing long-term water use efficiency. **We ask that the State Water Board work with ACWA and the water supplier community to address the policy and technical concerns outlined in this Comment Letter.**

Additionally, we ask for the State’s leadership to secure resources to support cost-effective compliance with a final Regulation. Given the timelines of the CII Performance Measures (PMs) and broader water use objectives, we encourage the State to provide technical resources, data, and funding as soon as possible. We believe that increasing flexibility and reducing reporting burdens in the draft Regulation can help reduce costs. However, the State should allocate dedicated resources to support water suppliers and Californians’ compliance. Additionally, the State should recognize and promote regional and statewide partnerships as a mechanism for suppliers to comply with the Regulation, particularly regarding the CII PMs. This will help leverage suppliers’ limited resources and advance local capacity.

SECTION 2: OVERARCHING POLICY CONCERNS & RECOMMENDATIONS

I. SET REASONABLE TIMELINES

We have significant concerns that the timelines proposed in the draft Regulation are not reasonable, do not support cost-effective compliance, and would not achieve the multi-benefits desired. The timelines proposed for both the outdoor water use standards and the CII PMs are problematic. In order to successfully implement programs that require long-term customer behavior change and significant

¹ [Status of 2020 Urban Water Management Plans \(ca.gov\)](#). A Report to the Legislature pursuant to Section 10644 of the California Water Code. January 2023.

investments, water suppliers require adequate time to: analyze existing water use efficiency programs; plan for cost-effective compliance with the standards, objectives and performance measures; budget for and staff programs; partner with customers and build partnerships, including targeted programs for disadvantaged communities (DACs); and allow for technology advancements. Furthermore, we are concerned that these timelines could have unintended consequences, such as impacts to urban tree health and disproportionate impacts to DACs and water affordability.

We anticipate the State Water Board will consider adoption of the draft Regulation August 2024 and the final Regulation would go into effect October 2024.² Starting 2025, within three months of the Regulation’s expected effective date, 42% of suppliers would need to achieve a water reduction. By 2030, 74% of suppliers would need to achieve reductions (with a third by greater than 20%); and by 2035, 82% of suppliers would need to achieve reductions (with over 40% of suppliers by greater than 20%).³ Suppliers’ water use objectives, and the associated required reductions, could change if suppliers obtain variances. However, we are concerned the timeline also unreasonably limits suppliers’ ability to collect and submit the required data to obtain the variances.

Table 1: Urban Retail Water Suppliers by Percent Reduction

Reductions needed to meet proposed objective	2025	2030	2035
	% of urban retail water suppliers		
No Reduction	58%	26%	18%
Less Than 5% Reduction	10%	9%	9%
5-10% Reduction	9%	10%	11%
10-20% Reduction	13%	23%	21%
20-30% Reduction	7%	16%	20%
Greater Than 30% Reduction	3%	16%	21%

Additionally, all suppliers would be required to begin compliance with comprehensive CII PMs beginning January 1, 2025: suppliers would be required to identify all disclosable buildings by January 1, 2025 and notify building owners; ban the irrigation of non-functional turf on all CII Landscapes by July 1, 2025; classify all CII customers (20% by 2026); identify CII large landscapes with mixed-use meters (MUMs) and either install dedicated irrigation meters or employ in-lieu water technologies (20% by 2026); and design and implement best management practices (BMPs) by January 1, 2025 (20% of the top 20% of CII classification by 2026)(see Table 1). The currently proposed completion of all CII PMs within a five-year period, beginning 2025, would require significant resources and create implementation challenges. For example, it is unclear how suppliers would accurately implement BMPs for the top 20% of each classification while classifying CII customers. The compressed timeline is unnecessary and further increases costs to suppliers.

² Enacted legislation directed the State Water Board to adopt the Regulation by June 30, 2022. We recognize that there are factors beyond the State Water Board’s control as to the current status of the draft Regulation. However, currently proposed compliance timelines do not reflect the delayed status of the Regulation.

³ Provisional Data State Water Resources Control Board. (Version 2.0, 2023-09-13). We note that this table does not include the CIIDIM Outdoor Standard, variances, or data errors so the % reduction by % supplier could change.

Table 2: Proposed Regulation’s Compliance Schedule

	2024	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	'35
Reg Effective	Fall											
Indoor Standard.		47					42					
Res. Outdoor Standard		0.8					0.63					0.55
CIIDIM Outdoor Standard					0.8		0.63					0.45
Water Loss												
Variances												
Non-Functional Turf		July										
Disclosable Buildings			20%		60%		100%					
CII Classification (22 proposed)			20%		60%		100%					
CII BMPs			20%		60%		100%					
CII MUMs: In-Lieu or DIM			20%		60%		100%					
Reporting	Jan. 1											

We understand that the enacting legislation does not allow the State Water Board to issue a civil liability penalty until 2027. Additionally, we appreciate that the State Water Board has a positive track record of utilizing its enforcement discretion. However, we believe the intent of the State Water Board should be compliance, not enforcement discretion. Significant consideration of reasonable timelines is necessary.

RECOMMENDATION # 1. Modify the proposed timelines for the outdoor standards to provide an additional 5 years for all suppliers to achieve compliance.⁴

RECOMMENDATION # 2. Provide 10 years for suppliers to complete all CII PMs, with CII Classification completed between 2025 – 2030, and CII Mixed-Use Meter and CII BMP completed 2030 – 2035. Unstacking the CII BMPs from the CII Classification will allow suppliers to spread limited resources over a 10-year period, while still meeting the goals of the Regulation.

II. RECOGNIZE DATA ERRORS & LIMITATIONS

We appreciate that the intent of this Regulation is to shift away from a one-size fits all approach to one that incorporates local characteristics. A challenge with the approach is that the accuracy of the statewide efficiency standards and water suppliers’ water use objectives requires more, verified data, including both statewide and local data. Inaccurate data can create water use efficiency objectives that do not provide the local flexibility the enacting legislation intended. Currently, observed data gaps and inaccuracies include landscape area measurements (LAM) and population, and the application of Model Water Efficient Landscape Ordinance (MWELO) principles, including effective precipitation and irrigation efficiency.

The draft Regulation’s methodology should recognize that there are and will continue to be inherent data quality limitations and variability that impact suppliers’ compliance with their water objectives. The

⁴ The State Water Board has the authority to make this change as the only statewide water use efficiency standard with a legislatively mandated timeline for implementation are the residential indoor water use standards, as required in SB 1157 (Freidman, 2022).

State Water Board has accounted for data quality and variability issues in other regulations, such as the Water Loss Regulation, which provided that “a supplier shall maintain, for each compliance assessment, real loss that is no greater than 5 gallons per connection per day above the supplier’s real water loss standard.”⁵

As discussed further in Section 3.I. of this Comment Letter, we continue to have concerns with the three methodologies DWR utilized and data DWR excluded to develop its recommendation of the residential outdoor standards. We also recommend that the State evaluate if the observed inequities among inland and coastal communities’ water use objectives are attributable to DWR’s methodologies for developing the outdoor standards, such as the trimmed data and application of MWEL0, compounded with local data limitations.

RECOMMENDATION # 3. Include a “Data Error Adjustment” (DEA) in the formula for calculating suppliers’ water use objectives. The DEA would be a percentage, either five or ten percent as determined below, added to a supplier’s budget for efficient indoor residential water use, efficient outdoor residential water use and efficient water use on a CII landscape with a dedicated irrigation meter (DIM) or equivalent technology, as follows:

$$WUO = (R_{\text{indoor}} + R_{\text{outdoor}} + CII_{\text{DIM}}) \text{DEA} + L + V + Pr + BPR$$

The DEA would recognize suppliers’ historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors. The magnitude of the DEA would reduce over time as suppliers achieve progress towards their water use objective. We are proposing a five percent DEA for suppliers achieving less than 20 percent reduction from SB X7-7, and a 10 percent DEA for suppliers achieving a reduction of 20 percent or greater from SB X7-7.

Additionally, we note concern that a supplier may not comply with its water use objective because it is unable to obtain the information required for variances due to resource or other limitations. The draft Regulation identifies the calculations and data requirements to submit to the State Water Board to seek a variance. Collecting this data, however, could require significant resources for suppliers. Prior to taking any enforcement action, the State should offer technical assistance to a supplier, which should include through regional and/ or statewide partners, to determine if the unique water uses in the supplier’s service area, for which variances are available, would bring the supplier into compliance. We again reiterate that the goal of this Regulation should be successful compliance, rather than enforcement actions or enforcement discretion.

RECOMMENDATIONS # 4. Clarify that if a supplier does not meet its water use objective because it is unable to obtain the information required for the variances, prior to the issuance of any enforcement action, technical assistance must be offered to the supplier.

III. PROVIDE ALTERNATIVE COMPLIANCE

Our understanding is that State Water Board staff included section 966(i) to serve as an alternative compliance pathway in response to concerns water suppliers continue to raise regarding unreasonable

⁵ [Water Loss Control Regulations](#). Adopted Oct. 14, 2022.

or unattainable water use objectives. We appreciate the intent of this provision and believe that an alternative compliance pathway will be essential for some suppliers. Meaningful advancement of water use efficiency is an important goal of the State’s Water Supply Strategy and the draft Regulation. However, some suppliers are confronting significantly larger water reduction requirements. Many of these suppliers are in the central valley and inland communities and may also serve disadvantaged communities or low-income households. Additionally, many of these communities have demonstrated a commitment to advancing water use efficiency, as mentioned in Section 1 of this Comment Letter, including achieving their targeted 2020 water use reduction.

In addition to the five-year extension that we recommend be provided to all suppliers to comply with the requirements of the draft Regulation, we recommend an alternative compliance pathway be provided to suppliers that would incur unreasonable cost and affordability impacts to meet their proposed water use objective. As currently proposed, the alternative compliance pathway is problematic for the following reasons:

- It does not address 2025 and 2030 compliance for suppliers. As shown in Table 1 of this Comment Letter, some suppliers will have significant reductions in 2025 and 2030. The current proposal does not resolve compliance concerns for these suppliers.
- The provision of five additional years does not resolve compliance concerns for some suppliers with an unreasonable or unattainable objective.
- The eligibility requirements for the currently proposed alternative compliance pathway would impose a significant cost burden on suppliers for actions that may not help achieve compliance. For example, the SITES rating system costs \$9,600 per site to implement.
- Special districts, which include a significant number of urban retail water suppliers, would be ineligible for the alternative compliance pathway because they do not qualify for the Standards for Tree City USA Recognition. 90% of ACWA’s 470 members are special districts.
- The requirement for suppliers to dedicate 40% of funding to DACs conflicts with Proposition 218, which would cause feasibility issues for water suppliers to utilize the pathway.

We have also heard variances characterized as an alternative compliance pathway that provide additional flexibility. The enacting legislation established variances to account for actual water used in a service area in order to provide suppliers with a more accurate water use objective. Accurately accounting for water use in a service area is very different than alternative compliance.

RECOMMENDATION # 5. The State Water Board should work collaboratively with ACWA, water suppliers and other interested parties to develop an “Alternative Compliance Pathway” that allows suppliers that have an unreasonable or unattainable water use objective to be eligible for an alternative objective and/or extension of time to comply. This pathway should balance the goals of achieving meaningful water savings and multi-benefits, while considering cost, affordability and suppliers’ good faith effort to offer proactive water use efficiency programs to address indoor and outdoor water use.

IV. ALIGN CII PERFORMANCE MEASURES WITH LOCAL SUCCESS

The draft Regulations' CII PMs should be aligned with existing local and regional CII conservation programs and lessons learned. Most urban retail water suppliers and their regional and statewide partners have extensive experience implementing water use efficiency programs for CII customers. Additionally, CII customer water use will vary significantly among suppliers, and consequently, so will the associated water savings from the overall CII sector and among CII customer types. Currently, the CII PMs impose one size fits all approaches to CII water use efficiency, as described below. We request that the CII PMs provide more flexibility to water suppliers to (1) build on existing local and regional programs, (2) remove prescriptive timelines, and (3) allow suppliers to focus on customers with the greatest water savings potential.

- A. Existing CII Programs: The draft Regulation does not recognize suppliers' and their regional and statewide partners existing water use efficiency programs that have resulted in already efficient mixed-use meters (MUM). Many suppliers offer existing mixed-use meter programs, practices and rebates, which may offer different in-lieu technologies and water management practices to those listed in 973(a)(1) and (2). Rather than impose MUM requirements that will duplicate existing efforts and expend resources without achieving significant additional savings, suppliers should be able to provide a list of existing programs, practices and rebates currently offered as an alternative.

RECOMMENDATIONS # 6. Allow existing CII conservation programs, made available either directly by the supplier or through regional, statewide, or other partnerships, to serve as an alternative to meeting the CII MUM PM requirements currently proposed. Allow suppliers to provide a list and crosswalk of current programs, practices, and rebates to the listed in-lieu technologies and water management programs.

- B. Prescriptive Implementation Schedules: The draft Regulation establishes a deadline to complete each CII PM, which is appropriate. However, the draft Regulation also prescribes a timeline to complete each PM by 20% and 60%. For example, section 972(c) would require that "each supplier shall classify at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030." Section 973(c) would require "for commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028 and one hundred percent compliance by 2030." This level of prescription removes suppliers' flexibility to achieve the broader goals cost-effectively and based on their unique CII customers and local conditions, as well as within the context of completing all the various requirements of the draft Regulation.

RECOMMENDATION # 7. Provide flexibility to suppliers to complete implementation of one hundred percent of CII PMs by removing prescriptive timelines. This includes CII classifications, CII MUMs and CII BMPs.

- C. Focused Water Savings: The draft Regulation directs suppliers to implement BMPs for the top 20% of each CII classification. We understand the intent is to target large CII water users to maximize water savings potential. However, this approach may have the unintended impact of steering efforts to CII customers with negligible water use. For example, the Energy Star Portfolio

Manager classification “warehouse/ storage” may account for a very small percent of a suppliers’ CII water use in a service area. However, suppliers would still be required to target customers at or above the 80th percent for water use in that classification category. The draft Regulation should provide flexibility for suppliers, either directly or through regional, statewide, or other partnerships, to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. This prescriptive requirement could impose an unnecessary burden on suppliers for minimal water savings.

We also recommend an exemption for suppliers from the CII BMP PMs whose CII potable water use is less than 10%. This will allow those suppliers to focus efforts and resources on residential actions to maximize water savings.

RECOMMENDATION # 8. Direct suppliers to implement programs, either directly or through regional, statewide, or other partnerships, for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification. Additionally, exempt suppliers with less than 10% CII potable water usage, based on a five-year average that is re-evaluated every five years, from BMP requirements.

V. ADHERE TO LEGISLATIVE REQUIREMENTS

Authorizing legislation AB 1668 and SB 606 (2018) (collectively referred to as Conservation Legislation) underwent a year and half of negotiations among diverse interested parties. We have significant concerns that provisions of the draft Regulation either contradict the requirements of the Conservation Legislation or exceed the authority delegated to the State Water Board. Specific concerns and recommendations include:

- A. Existing Landscapes: The Conservation Legislation states that the landscape efficiency factor (LEF) values should reflect a factor that allows for “the amount of water necessary to efficiently irrigate both new and existing landscapes” (Water Code Section 10609.9). The draft Regulation sets efficiency factors for residential use at 0.55 and for non-residential use at 0.45, which are the standards in the MWELO design standards. As detailed in Section 3.1. of this Comment Letter, we have provided data to both DWR and the State Water Board that indicates the proposed LEFs would not support existing landscapes. Because the draft Regulation would set the LEF too low to ensure enough available water for use on existing landscapes, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 9: Establish a LEF that will support existing and new landscapes.

- B. Irrigable Land: The Conservation Legislation requires outdoor efficiency standards to apply to “irrigable lands” (Wat. Code, § 10609.6 (2)(B)). The draft Regulation does not apply to “irrigable lands” as the statute requires. Instead, the draft Regulation only includes irrigable land that is currently being irrigated in its proposed outdoor standards. Section 968(b)(2)(B) inappropriately limits 20% of the irrigable, but not currently irrigated (INI), landscape area as eligible for inclusion in the objective until 2027, and even then, it is only allowed to be included if the supplier will surpass its objective target without it. Because the draft Regulation does not apply to all irrigable lands, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 10: Better reflect the statutory language with regards to land area used to calculate the urban water use objectives.

- C. Non-Functional Turf: Section 974(e)(1) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1, 2025. This language does not align with AB 1572 (Freidman, 2023), which the Governor signed on October 13, 2023. signature and would not ban the irrigation of non-functional turf for most CII Customers until January 1, 2028. This bill was a collaborative effort that was ultimately supported by a broad array of stakeholders, including ACWA. The language in the draft Regulation is not only unnecessary but would create confusion among water suppliers and CII customers. The draft Regulation is inconsistent with the State Water Board’s authorities within the law.

RECOMMENDATION # 11: Remove non-functional turf provisions from the draft Regulation.

- D. Reporting Year: The Conservation Legislation allows for water suppliers’ calculations to be based on “conditions for the previous calendar or fiscal year.” (Wat. Code § 10609.20, subd. (b).) Section 975 of the draft Regulation would require urban water supply reports to be based on conditions of the previous state fiscal year. A regulation cannot limit flexibility that a statute specifically allows. We additionally note that this is inconsistent with the State Water Board’s adopted Water Loss Regulation, which allows water loss audit reporting on either a fiscal or calendar year. Because the proposed Regulation would require water suppliers to report based on the state fiscal year, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 12: Allow suppliers to report either calendar year or fiscal year.

- E. Dedicated Funding for DAC: The draft Regulation section 966(i)(2)(e)(iv) would require that suppliers who want to pursue a five-year compliance extension must provide “dedicated funding for the creation and maintenance of climate-ready landscapes, with a minimum of 40 percent of program funds dedicated to low-income households and disadvantaged communities within the supplier’s service area.” This requirement would conflict with the requirements of Proposition 218 funding guidelines. Additionally, the Legislature in the 2022/2023 legislative session discussed this issue when considering Assembly Bill 1072 (Wicks 2023). Because of the issues associated with Proposition 218, the bill was ultimately held on suspense while still in the Assembly.

RECOMMENDATION # 13: Remove funding threshold requirements for low-income and DAC funding from the draft Regulation.

SECTION 3: TECHNICAL CONCERNS & RECOMMENDATIONS

I. OUTDOOR STANDARDS

In ACWA’s March 30, 2023, comment letter to the State Water Board on the draft Regulatory Framework, we provided input on DWR’s three methodologies utilized to develop its recommendation of an ETF of

0.63 by 2030. Additionally, we raised concerns with technical assumptions and policy decisions that underestimated current outdoor residential water use and overestimated feasibility from what is evident through real-world performance.⁶ We support a methodology that is based on real-world performance, horticultural and irrigation science, supports healthy landscapes, and minimizes unintended impacts. We note that detailed recommendations with redlines are provided in the Section 4 Appendix of this Comment Letter. High level recommendations are in bold below, consistent with detailed redlines in the Section 4 Appendix.

As mentioned in Section 2.II. of this Comment Letter, we recommend the State Water Board assess if the observed inequities among inland and coastal communities water use objectives could be attributable to DWR's methodologies for developing the outdoor standards, compounded with local data limitations. Additionally, as noted in Section 2.V. of this Comment Letter, we note the deviation of the draft Regulation from the requirements of the Conservation Legislation. These inconsistencies must be corrected to align the draft Regulation with the requirements of the law.

- A. Methodology Error 1: Horticultural Approach (Assumed 0.8 Irrigation Efficiency) – DWR's horticultural and irrigation science approach assumed 0.8 Irrigation Efficiency (IE). **The draft Regulation should reflect an outdoor residential water use efficiency standard based on an IE that ranges from 0.55 to 0.65**, based on accumulated data from water purveyors on actual irrigation system and performance through the various landscape programs implemented over ten or more years, recently completed field studies by UC Davis (Evapotranspiration Adjustment Factor Study (Agreement #4600008156)), and data by the Irrigation Association.
- B. Methodology Error 2: Statewide ETF Approach (Trimmed Data > 1.0) – DWR “trimmed” all existing landscape data outside of the range of 0.1 to 1.0 ETF because “it is not consistent with MWELo principles.” 80 percent of homes in California pre-date MWELo. MWELo design standards did not start being incorporated into landscape designs until after 2015. Trimming data based on MWELo design standards excluded existing landscapes prevalent throughout California and is inconsistent with the application of MWELo. **The draft Regulation outdoor standards should consider all real-world California landscape data to provide an accurate baseline.**
- C. Methodology Error 3: Theoretical Average Approach (Consistency with MWELo) – DWR analyzed a statewide ETAF by using the age distributions of housing stock and corresponding ETAF from MWELo Guidelines: 0.8 assumed for pre-1992, 1993 – 2009 assumed 0.8 ETAF, 2010 – 2015 assumed 0.7 ETAF, 2015 to 2020 assumed 0.55 ETAF, and 2021- 2030 assumed 0.55 ETAF. As described above, MWELo only applies to 20 percent of California's housing stock and developer-installed landscapes. This methodology assumes all homes are compliant with MWELo, which is fundamentally flawed. **This methodology should not inform the outdoor standards.**
- D. Effective Precipitation – Effective Precipitation is not required by MWELo (Title 23, Division 2.7, Section 494): “A local agency may consider Effective Precipitation (25% of annual precipitation) in

⁶ [ACWA and Coalition Comment Letter on the Draft Regulatory Framework](#) . March 30, 2023.

tracking water use.” The inclusion of Effective Precipitation in the outdoor standard is inconsistent with real-world irrigation practices. Landscapes are generally not designed to consider effective precipitation since it can be highly variable. Precipitation often falls during winter months when irrigation is not utilized (May through September) and can percolate below the root zone of the plant negating its beneficial effect to that plant’s watering needs. Additionally, precipitation is often not distributed evenly throughout a supplier's service area. Some areas may receive precipitation and other areas none, making it difficult to apply one effective precipitation rate at the water supplier level. **Effective Precipitation should be removed from the draft Regulation and outdoor standard.**

- E. Landscape Area Measurements – A key concern based on waters suppliers’ verification of LAM data is that residential LAMs are being overestimated and underestimated, which could have a significant impact on suppliers’ outdoor water use standard and overall objective. Improved data quality should be an important goal of the draft Regulation, as inaccurate data will further exacerbate feasibility challenges and sound decision making. **The draft Regulation should include a Data Error Adjustment to recognize data limitations and variability (see Recommendation # 3).**

- F. Irrigable vs. Irrigated – As discussed in Section 2.V of this Comment Letter, the Conservation Legislation requires outdoor efficiency standards to “apply to irrigable lands” (Water Code, § 10609.6 (2)(B)). In accordance with Water Code section 10609.6, DWR conducted a statistical analysis of outdoor water use, LAM and INI data. The data concluded that the INI area is being irrigated at one fifth or 20% of the irrigable area. This 20% should not be viewed as additional, but as area that is actually being irrigated. As a result, DWR correctly recommended that the calculation of annual outdoor water use must include 20% INI. DWR's findings were also based on the recognition that its analysis was only a snapshot in time and undercounting of irrigated area would continue unless multiple images are conducted over the analysis year. The removal of DWR's recommendation to include 20% for INI is statistically inaccurate and further exacerbates feasibility challenges with the outdoor standard. **The draft Regulation should reflect DWR’s recommendation with the inclusion of 20 percent INI. Suppliers would recalculate INI when DWR provides new LAM data.**

- G. Temporary Provisions: Recycled Water – Sites irrigated with recycled water generally do not change and are on dedicated irrigation meters (DIM), which suppliers already are required to measure by 2028. The requirement to annually apply for variances and temporary provisions places a significant burden on both State Water Board staff and suppliers. **Recycled water should not be a temporary provision.**

- H. Temporary Provisions: Pools –The residential factor for residential pools should be same as public pools, which is 1.0. Water evaporates at about 1.0. Not allocating enough water to residential pools effectively further reduces the residential outdoor budget. Most pools are not subject to MWLEO, as they are generally in backyards and existing prior to MWLEO. In addition to evaporation, water loss from pools includes splash out and water carried out on swimwear and people. Pool covers are generally not effective. During summer months when pools are

used daily, customers won't use covers. Metropolitan Water District's pool cover rebate program inspections found that many times the covers were in garages and had never been installed.

Residential pools should not be a temporary provision.

- I. MWELo: Newly Constructed Landscapes and Special Landscapes Areas (SLA) – The standards for newly constructed landscapes, including residential and CII landscapes with DIMs, point to factors identified in MWELo. Additionally, the standard for CII landscapes with DIMs that are special landscape areas point to the factor identified in MWELo. MWELo can be modified, which could impact suppliers' compliance with the Regulation and associated costs. Suppliers need certainty as they strive to implement this Regulation in the most cost-effective manner. **The draft Regulation should set these standards as LEFs, rather than refer to MWELo.** Additionally, the draft Regulation would require that suppliers demonstrate the existence of newly constructed landscapes through annual MWELo reporting. Many new residential landscapes are not subject to MWELo or MWELo reporting. MWELo reporting would be incomplete and would not accurately reflect newly constructed residential landscape area. **We request that the draft Regulation include DWR's recommended approaches to account for newly constructed residential and CII DIM landscape areas, which include on-the-ground measurement, remote sensing methods, and using service area level averages.**

II. CII PERFORMANCE MEASURES

A. CII Classification

- i. Energy Star: Suppliers worked closely with DWR to inform its CII Classification PM recommendations. DWR proposed 19 categories, in which they found "these categories are sufficient to address major CII water uses and provide adequate differentiation among different CII sectors to facilitate data collection and future references. However, the system will not be overly detailed to create undue burdens on urban retail suppliers for implementation." The draft Regulation is proposing 22 classifications, 18 Energy Star Portfolio Manager board categories and 4 additional proposed categories. Classifying CII customers will require significant supplier staff time and resources, including making changes to internal billing systems. The CII Classification PMs should be simplified to reduce the burden on suppliers, where possible. **The four additional proposed classifications that deviate from the Energy Star Portfolio Manager broad categories should be removed from the draft Regulation.**
- ii. Schedule for Completion: As discussed in Section 2.IV. of this Comment Letter, we recommend more flexibility be provided to suppliers to complete classifications by 2030. **The draft Regulation should remove schedules for classifying 20% of customers by 2026 and 60% by 2028.**
- iii. Classification of Existing Customers: It is unclear how existing versus new customers are considered within the five-year timeframe to complete all CII classifications. CII classification will be a significant lift for suppliers. Suppliers should focus on completing classifications for a static list of CII customers based on the time of the State Water Board's adoption of the final Regulation. The additional burden of

addressing influxes and changes of CII customers within the first five years of completing classifications could impair suppliers' ability to comply. **The draft Regulation should clarify that the initial classification of CII customers is based on existing customers at the time of the State Water Board's adoption of the Regulation. Suppliers must include any new CII customers after completing the initial classification of all CII customers.**

- iv. State Guidance: As a statewide PM, the State should develop guidance for all suppliers that will support consistent interpretation of SIC and NAICS codes as it applies to each Energy Star Portfolio Manager category. A standardized interpretation will lend itself to better data and overall implementation. **DWR should provide a guide to associate NAICS codes to the respective classification category prior to suppliers' implementing CII classifications.**

B. Large Landscapes with Mixed-Use Meter

- i. Timeline: DWR CII-LAM data will not be delivered until 2026. Suppliers need adequate time to review the data before coming into compliance. To implement this specific PM, suppliers would need to identify actual large landscape water use (e.g., remove the process water to see ACTUAL landscape water usage for CII). The compliance schedule for MUM conversion should account for every customer being a unique and specific project, requiring budget and time to implement, if a physical conversion is taking place. **As discussed in Section 2.I. of this Comment Letter, we request the timeline to complete MUM PM be from 2030 – 2035. Additionally, the draft Regulation should remove schedules for completing 20% of large landscapes by 2026 and 60% by 2028.**
- ii. Recognize Existing Programs: As discussed in Section 2.IV. of this Comment Letter, many suppliers have existing MUM programs, which may offer different in-lieu technologies and water management practices to those listed in 973(a)(1) and (2). **The draft Regulation should allow suppliers' existing CII conservation programs to serve as an alternative to meeting the CII MUM PM requirements currently proposed.**
- iii. "Offer" vs. "Employ:" The draft Regulation requires suppliers to "employ" actions and technologies for large landscapes. The term "employ" implies that suppliers will take up an action on a customer's behalf. Suppliers may offer programs, rebates, incentives and in-lieu technologies, but suppliers cannot require the customer to act or implement in-lieu water use technologies. **The draft Regulation should replace "employ" with "offer" to recognize suppliers' appropriate authorities.**
- iv. Efficient Water Use Technologies & Water Management Practices: We recommend technical changes to the specified water technologies that reflect on-the-ground best practices and actions that are within suppliers' authorities. For example, water suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. That is the responsibility of the customer and could be a liability for suppliers. Additionally, DWR recommended suppliers implement one in-lieu technology. However, the draft Regulation would require suppliers to

implement two in-lieu technologies. Requiring two is duplicative and does not necessarily generate more savings. **The draft Regulation section 973 should be updated to reflect the suggested redlines in the attached Appendix of this Comment letter.**

- v. Quantification of Volume of Water Use on CII MUMs: The draft Regulation would direct suppliers to estimate the volume of water use on CII large landscapes with MUMs. As a PM, suppliers should not be required to quantify MUM water usage, particularly because any quantification is inclusive of process water and the draft Regulation does not provide the appropriate time for suppliers to investigate customer water usage for a compliance determination. **This provision should be removed from the draft Regulation.**

C. Best Management Practices

- i. Disclosable Buildings: The draft Regulation would require suppliers to identify all disclosable buildings in their service area by January 1, 2025 and deliver specified information to each building owner. These requirements would place significant burden on suppliers' limited resources, without providing clear benefits or guaranteeing water savings. Our concerns include: (1) suppliers do not have or maintain square footage information to identify disclosable buildings; (2) square footage is well correlated with energy use, but not necessarily with water use, so this may not be an effective use of limited resources; (3) many suppliers currently provide monthly or bi-monthly water usage to customers in their bill with water use reports, or through an AMI portal. Sending duplicative data to customers, particularly those that will not utilize it, is not good use of suppliers' limited resources, (4) suppliers cannot determine what meter serves which buildings on an owner's parcel. Suppliers can associate meters with an account but they may not know the customer's use. Suppliers can't identify how much water use goes to each building if there are multiple buildings on one meter; and 5) the proposed timelines are not reasonable. **Proposed section 974(a) and (b) should be removed from the draft Regulation.**
- ii. Thresholds and De Minimis CII Water Use: As already discussed in Section 2.IV. of this comment letter, suppliers need flexibility to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. **The draft Regulation should direct suppliers to implement programs for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification. Additionally, suppliers with less than 10% CII potable water usage, based on a five-year average, should be exempt from BMP requirements.**
- iii. Non-Functional Turf: As discussed in Section 2.V. of this Comment Letter, Section 974(e)(1) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1, 2025, which is inconsistent with State Water Board's pending authority. **This provision should be removed from the draft Regulation.**

- iv. Timelines: As discussed in Section 2.I. of this Comment Letter, we have concerns with the requirement to complete BMPs while suppliers are completing CII Classification. Additionally, consistent with Section 2.IV. of this Comment Letter, suppliers should be able to best determine how to meet the broader BMP PMs requirements based on the unique local characteristics and existing programs. **The draft Regulation timeline should be modified to allow for suppliers to achieve 100 percent compliance with BMP PMs by 2035 and remove percentage completion requirements.**
- v. BMPs: We recommend technical changes to the specified water technologies that reflect on-the-ground best practices and actions that are within the authorities of water suppliers. For example, water suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. Additionally, we recommend AMI be specifically included. **The draft Regulation section 974 should be updated to reflect the suggested redlines in the attached Appendix of this Comment Letter.**

D. Methodologies & Variances

- i. Compliance & Alternative Compliance: As discussed extensively in Section 2.I., II., and III. of this Comment Letter, we are requesting changes to compliance provisions of the draft Regulation. We believe these changes preserve the intent of the draft Regulation to advance meaningful water use efficiency. **The draft Regulation should incorporate our recommendations that modify the timelines of the outdoor standards and CII PMs, include the DEA, and establish an Alternative Compliance Pathway.**
- ii. Variance Threshold: The draft Regulation currently proposes that an individual variance must represent 5% or more of the sum of a water supplier's budget. This threshold fails to recognize the cumulative impact unique water uses could have on suppliers' ability to comply with their water use objectives. Additionally, the five percent threshold could significantly restrict the ability of water suppliers that have unique water uses. The Conservation Legislation requires the State Water Board to establish appropriate variances for unique uses that can have a material effect on water use of an urban retail water supplier. Variances are not a "bonus" or "alternative compliance" mechanism. Variances are intended to provide suppliers with an accurate water use objective. **The draft Regulation should establish a cumulative threshold for variances of 5%.**
- iii. Variance Frequency: We are concerned the currently proposed variance pathway would be too onerous and expensive to an extent that would deter small to mid-sized agencies from seeking variances. The draft Regulation currently requires suppliers to submit requests for variances annually. Requiring annual submittal and approval of the variances would place a significant administrative burden on both suppliers and State Water Board staff and does not help advance actual water use efficiency. **The draft Regulation should allow for a suppliers' approved variance(s) be valid for five years.**

- iv. **Reporting:** The State Water Board should ensure that water suppliers' limited resources are not being shifted to complying with burdensome reporting requirements, rather than working with customers to achieve water savings. The State Water Board should consider the goals of AB 1755, the Open and Transparent Water Data Act, and AB 1668 requirements under Water Code Section 10609(c)(4), which direct the State to identify opportunities for streamlined reporting, eliminate redundant data submissions, and incentivize open access to data collected by urban and agricultural water suppliers, and the overall usefulness of data requested. We have concerns with the duplicative reporting to both DWR and the State Water Board. We think that state agencies should share datasets, rather than require duplicative reporting. Additionally, as noted in Section 2.V. of this Comment Letter, we have concerns with the removed flexibility for water suppliers to report on a fiscal year or calendar year. **We encourage the State to partner with the California Data Collaborative and California Water Data Consortium to identify strategies for streamlining data reporting and minimizing data quality concerns that would go into effect once the final Regulation is adopted.**

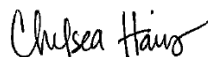
SECTION 4: APPENDIX: REDLINE RECOMMENDATIONS

The included Appendix of the Comment Letter provides detailed suggested redline changes to the draft Regulation. We recognize the suggested redlines are one of many ways in which the draft Regulation could be modified to address suppliers' concerns. ACWA is committed to working with State Water Board staff on revisions that support both the State goals and water suppliers' successful implementation of the Regulation.

SECTION 5: CLOSING REMARKS

We appreciate the opportunity to provide these written comments to the State Water Board on the draft Regulation. We ask for the opportunity to work collaboratively with the State Water Board over the duration of the rulemaking to revise the draft Regulation to incorporate input from interested parties to support successful local and regional implementation. Please do not hesitate to contact me at ChelseaH@acwa.com or (916) 206-4078 if you have any questions regarding our input.

Sincerely,



Chelsea Haines
Regulatory Relations Manager
Association of California Water Agencies

Alameda County Water District
American Water Works Association CA-NV
Association of California Water Agencies
Bay Area Water Supply & Conservation Agency

BellFlower-Somerset Mutual Water Company
California American Water
California Municipal Utilities Association
California Special Districts Association
California Water Association
Calleguas Municipal Water District
Camrosa Water District
Carmichael Water District
Casitas Municipal Water District
Citrus Heights Water District
City of Banning
City of Brea
City of Colton
City of Corona Utilities Department
City of Fountain Valley
City of Fullerton
City of Garden Grove
City of La Habra
City of La Verne
City of Oceanside
City of Newport Beach
City of Redding
City of Roseville
City of Sacramento
City of San Diego Public Utilities Department
City of Seal Beach
City of Shasta Lake
City of Susanville
City of Tustin
City of West Sacramento
City of Yuba City
Coachella Valley Water District
Contra Costa Water District
Cucamonga Valley Water District
Desert Water Agency
Diablo Water District
East Orange County Water District
East Valley Water District
Eastern Municipal Water District
El Dorado Irrigation District
El Toro Water District
Elk Grove District
Elsinore Valley

Georgetown Divide Public Utility District
Golden State Water Company
Gradient Water
Helix Water District
Indio Water Authority
Inland Empire Utilities Agency
Jurupa Community Services District
Laguna Beach County Water District
Lake Hemet Municipal Water District
Las Virgenes Municipal Water District
Liberty Utilities
Long Beach Utilities Department Logo
Marina Coast Water District
Mesa Water District
Metropolitan Water District of Southern CA
Mid-Peninsula Water District
Mission Springs Water District
Monte Vista Water District
Montecito Water District
Municipal Water District of Orange County
Orchard Dale Water District
Otay Water District
Padre Dam Municipal Water District
Palmdale Water District
Rancho CA Water District
Rosamond Community Services District
Regional Water Authority
Rowland Water District
Sacramento County Water Agency
Sacramento Suburban Water District
San Diego County Water Authority
San Gabriel Valley Water Company
Santa Clarita Valley Water Agency
Santa Fe Irrigation District
Santa Margarita Water District
Santa Rosa Water
South Coast Water District
South Tahoe Public Utility District
Sweetwater Authority
Tahoe City Public Utility District
Three Valleys Municipal Water District
Trabuco Canyon Water District
Triunfo Water & Sanitation District

Truckee Donner Public Utility District
Tuolumne Utilities District
Vallecitos Water District
Valley Center Municipal Water District
Walnut Valley Water District
West Basin Municipal Water District
West Kern Water District
West Valley Water District
Western Canal Water District
Western Municipal Water District
Yorba Linda Water District

CC: The Honorable E. Joaquin Esquivel, Chair, State Water Resources Control Board
The Honorable Dorene D'Adamo, Vice Chair, State Water Resources Control Board
The Honorable Laurel Firestone, State Water Resources Control Board
The Honorable Sean Maguire, State Water Resources Control Board
The Honorable Nichole Morgan, State Water Resources Control Board Ms. Eileen Sobeck,
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Ms. Charlotte Ely, Supervisor, Conservation and Efficiency, State Water Resources Control Board
Mr. Dave Eggerton, Executive Director, Association of California Water Agencies
Ms. Cindy Tuck, Deputy Director, Association of California Water Agencies

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

Reg Sec.	Sub. Sec.	Topic	Current Regulatory Text	Concern	Recommendation	Suggested Redline
965	(ee)	Definitions	(ee) "In-Lieu Technologies" are technologies that improve landscape water use efficiency by means other than the direct measure of water use. They include but are not limited to best management practices, audits, efficient irrigation devices, or irrigation budgets.	Some in-lieu technologies may not result in actual water savings, but can provide benefits (e.g., better data). The currently proposed definition for "in lieu technologies" is limited to technologies that improve water use efficiency.	Clarify that in-lieu technologies are technologies that aid in managing landscape water use.	(ee) "In-Lieu Technologies" are technologies that aid in managing improve landscape water use efficiency by means other than the direct measure of water use. They include but are not limited to best management practices, audits, efficient irrigation devices, or irrigation budgets.
965	NA	Definitions	NA	The proposed CII Performance Measures do not recognize suppliers existing water use efficiency programs and existing water use efficiency. Most suppliers have robust CII water efficiency programs that have resulted in meaningful savings within the CII sector. The Regulation should provide flexibility to local suppliers to build on existing programs and successes to avoid duplicative programs that may not be as effective at achieving water savings.	Add a definition for "Existing CII Conservation Program"	(iii) "Existing CII Conservation Program" is a program or set of programs currently offered or implemented by an urban retail water supplier or regional entity. Existing programs should be designed to achieve CII sector water use savings as a result of program element implementation, be adaptively managed by the supplier, and contain at least three of the major BMP categories identified in Section 974.
972	(b)	Classification -	(a) Urban retail suppliers shall annually classify commercial, industrial and institutional customers in accordance with Energy Star Portfolio Manager's broad categories. (b) In addition to Energy Star Portfolio Manager's broad categories, suppliers shall identify every CII customer associated with: (1) CII laundries (2) Large landscapes (3) Water recreation (4) Car wash. For every CII customer that operates a car wash in addition to its primary service and for which the car wash accounts for the majority of that customer's water use, the supplier shall also identify the customer's Energy Star Portfolio Manager property type.	Suppliers worked closely with the Department of Water Resource (DWR) to inform its CII Classification Performance Measure recommendations. DWR proposed 19 categories, in which they found "these categories are sufficient to address major CII water uses and provide adequate differentiation among different CII sectors to facilitate data collection and future references. However, the system will not be overly detailed to create undue burdens on urban retail suppliers for implementation." The draft Regulation is proposing 22 classifications, 18 Energy Star Portfolio Manager board categories and 4 additional proposed categories. Classifying CII customers will require significant supplier staff time and resources, including making changes to internal billing systems. The CII Classification Performance Measures should be simplified to reduce the burden on suppliers, where possible. Specifically, the four additional proposed classifications that deviate from Energy Star will place an additional burden on suppliers, without clear benefit or water savings.	Make classifications consistent with the Energy Star Portfolio Manager. Strike the additional four categories.	(a) Urban retail suppliers shall annually classify commercial, industrial and institutional customers in accordance with Energy Star Portfolio Manager's broad categories. (b) In addition to Energy Star Portfolio Manager's broad categories, suppliers shall identify every CII customer associated with: (1) CII laundries (2) Large landscapes (3) Water recreation (4) Car wash. For every CII customer that operates a car wash in addition to its primary service and for which the car wash accounts for the majority of that customer's water use, the supplier shall also identify the customer's Energy Star Portfolio Manager property type.
972	(c)	Classification	(c) Each supplier shall classify at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030. After 2030, the supplier shall maintain at least a 95% classification rate, as measured on an annual basis.	It is unclear how existing versus new customers are considered within the 5-year timeframe to complete all CII classifications. CII classification will be a significant lift for suppliers. Suppliers should focus on completing classifications for a static list of CII customers based on the time of the State Water Board's adoption of the Regulation. The additional burden to address influxes and changes of CII customers within the first five years of completing classifications could impair suppliers ability to comply.	Clarify that the initial classification of CII customers is based on existing customers at the time of the Board's adoption of the Regulation. Any new CII customers will be included once suppliers have completed their initial classification of all customers.	(c) Each supplier shall classify existing at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent of its CII customers by 2030. After 2030, the supplier shall maintain at least a 95% classification rate including any new CII customers , as measured on an annual basis.
972	(c)	Classification - Alternative Schedule	Same as above	CII customers among suppliers' service areas vary significantly. It may be more cost-effective or locally appropriate to complete all CII customer classification on a schedule different than the proposed Regulation.	Provide flexibility to suppliers to complete one hundred percent classification of CII customers by 2030. Remove prescriptive timeline requirements on how to complete one hundred percent classification.	(eb) Each supplier shall classify existing at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030. After 2030, the supplier shall maintain at least a 95% classification rate, including any new CII classification customers , as measured on an annual basis.
972	NA	Classification - State Guidance	NA	As a statewide performance measure, the State should develop guidance to all suppliers that will support consistent interpretation of SIC and NAICS codes as it applies to each Energy Star Portfolio Manager category. A standardized interpretation will lend itself to better data and overall implementation.	DWR should provide a guide to associate NAICS codes to the respective classification category prior to suppliers' implementing CII classifications.	(d) The Department will provide a guidance document to suppliers for classifying all SIC and NAICS codes within each broad Energy Star Portfolio Manager category no later than 2025.

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973	(a)	Mixed Use Meters - Exemptions	NA	The draft Regulation does not recognize suppliers' existing water use efficiency programs and practices and already efficient mixed-use meters. DWR's recommendations included 'Qualified Conditions and Exemptions,' that suggested narrowly defined exemptions from the mixed-use meter conversion requirements and implementation of the conversion threshold Performance Measure. The Regulation should support suppliers' existing successful program, and reduce requirements that will not achieve significant water savings but will require suppliers' to invest significant resources.	Include DWR's recommendations 'Qualified Conditions and Exemptions' (Recommendations for Dedicated Irrigation Meter Conversion...4-3). Clarify that these exempt landscapes are not required to meet the in-lieu water management practices for communications, system maintenance, and irrigation scheduling as they would already be considered implementing the In-Lieu Technologies Performance Measures. Additionally, include language to allow suppliers to submit a list of current programs, practices and rebates as an alternative to (973)(a)(1) and (2).	(3)Commercial, industrial, and institutional mixed use meters that meet the following criteria shall be considered exempt from the requirements of Section 973(a)(1) & 973(a)(2): (A) Landscapes exempt under MWEL0 (B) Non-irrigation water usage of no more than 5% of total water use (C) CII landscapes irrigated with a mixed-use meter and the estimated landscape water use satisfy the requirements of the landscape efficiency factors listed in Section 969, as appropriate, on a per-parcel basis, are considered to be implementing the In-Lieu Technologies PM and therefore exempt. (D) Suppliers may provide a list and crosswalk of current programs, practices, and rebates to listed in-lieu technologies and water management practices to satisfy programmatic requirements of 973(a)(1) and (2).
973	(a) and (c)	Mixed Use Meters - Employ	(a) same as above (c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing in-lieu water technologies, as assessed on an annual basis.	The draft Regulation requires suppliers to "employ" actions and technologies for large landscapes. The term "employ" implies that suppliers will take up an action on a customer's behalf. Suppliers may offer programs, rebates, incentives and in-lieu technologies, but suppliers cannot require the customer to act or implement in-lieu water use technologies. The final Regulation must recognize suppliers' appropriate authorities	Replace "employ" with "offer."	(a)(1) Suppliers shall employ offer for large landscapes that do not have DIMs at least two of the following efficient water use technologies: (2) Suppliers shall employ offer the following water management practices for large landscapes that do not have DIMs: (c)For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing offering in-lieu water technologies, as assessed on an annual basis.
973	(a)(1)	Mixed Use Meters - In-Lieu	(1) Suppliers shall employ for large landscapes that do not have DIMs at least two of the following efficient water use technologies:	DWR assessed and recommended a list of in-lieu technologies. DWR's recommendation did not require two in-lieu technologies to be implemented. Requiring two is duplicative and does not necessarily generate more savings.	Adopt DWR's recommendation that only 1 in-lieu technology be required.	(a)(1) Suppliers shall employ for large landscapes that do not have DIMs at least two one of the following efficient water use technologies:
973	(a)(1)(C)	Mixed Use Meters - In-Lieu	(C) Hardware improvements with enhanced performance and functions, including but not limited to metering technologies that allow suppliers to identify outdoor water use, smart irrigation controllers and pressure-regulated sprinkler spray heads.	"Hardware improvements" excludes software improvements, which can also aid in improving efficiency.	Include software improvements as an efficient water use technology.	(C) Hardware and software improvements with enhanced performance and functions, including but not limited to metering technologies that allow suppliers or customers to identify outdoor water use, smart irrigation controllers and pressure-regulated sprinkler spray heads.
973	(a)(1)(E)	Mixed Use Meters - In-Lieu	(E) Landscape plant palette transformation programs, including green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs	The requirement for green infrastructure that reduces wet-weather runoff and offsets irrigation needs in order to participate in lawn conversion programs could decrease participation.	It should be clarified that green infrastructure and swales and rain gardens aren't requirements for a lawn conversion program.	(E) Landscape plant palette transformation programs, which may include including green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs
973	(a)(2)(B)	Mixed Use Meters - In-Lieu	(2) Suppliers shall employ the following water management practices for large landscapes that do not have DIMs: (A) Communications (B) Irrigation systems maintenance (C) Irrigation scheduling	Suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. That's the responsibility of the customer and could be a liability for suppliers.	Revise language to recognize what is within the purview of suppliers.	(A) Communications (B) Irrigation systems maintenance guidance (C) Irrigation scheduling guidance

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973	(b)	Mixed Use Meters - Quantification	(b)(1) Urban retail water suppliers shall estimate the volume of water used on commercial, industrial, and institutional landscapes with mixed-use meters (CIIMUM) by multiplying the area of those landscapes (LALL) by net reference evapotranspiration (Net ETO), by a Landscape Efficiency Factor of 0.76, and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $CIIMUM = LALL \times Net\ ETO \times 0.76 \times 0.62$ (2) For purposes of this section, the area of the landscapes (LALL) shall include only landscapes associated with CII that have mixed-use meters and shall be quantified and substantiated by the supplier using data generated by the Department.	As a performance measure, suppliers should not be required to quantify mixed use meter water usage, particularly because any quantification is inclusive of process water and the Regulation does not provide the appropriate time for suppliers to investigate customer water usage for a compliance determination.	Strike this section.	(b) (1) Urban retail water suppliers shall estimate the volume of water used on commercial, industrial, and institutional landscapes with mixed-use meters (CIIMUM) by multiplying the area of those landscapes (LALL) by net reference evapotranspiration (Net ETO), by a Landscape Efficiency Factor of 0.76, and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $CIIMUM = LALL \times Net\ ETO \times 0.76 \times 0.62$ (2) For purposes of this section, the area of the landscapes (LALL) shall include only landscapes associated with CII that have mixed-use meters and shall be quantified and substantiated by the supplier using data generated by the Department.
973	(c)	Mixed Use Meters-Timeline	(c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one-hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing in-lieu water technologies, as assessed on an annual basis.	DWR CII-LAM data wont be delivered until 2026. Suppliers need adequate time to review the data and come into compliance. To implement this specific performance measure, suppliers would need to identify actual large landscape water use (e.g., remove the process water to see ACTUAL landscape water usage for CII) prior to implementation. The compliance schedule for MUM conversion should account for every customer being a unique and specific project, requiring budget and taking time to implement if a physical conversion is taking place. Additionally, we note general concerns with stacking all the CII Performance Measures on an overlapping 5-year compliance schedule.	Extend the 5-year timeline to complete mixed-use meter performance measures in order to provide time for suppliers' to review DWR CII-LAM data and complete CII Classifications. This will help reduce the resource burden on suppliers' of the compressed timeline to allow suppliers to more meaningfully engage with customers on in-lieu and meter conversion efforts.	(c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026 31 , at least sixty percent compliance by 2028 33 , and one-hundred percent compliance by 2030 35 . After 2030 5 , the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing offering in-lieu water technologies, as assessed on an annual basis.
973	(c)	Mixed Use Meters-Timeline	Same as above	It may be more cost-effective or locally appropriate to complete all MUM Conversion Performance Measures on a schedule different than the proposed Regulation.	Provide flexibility for suppliers to complete the 100 percent compliance within the 5 years, rather than twenty percent timeline. Allow supplier to submit an alternative schedule to the State Water Board that identifies how it will complete the performance measure within the 5 years.	(d) A supplier may submit to the Board by 2031 an alternative compliance schedule to either install dedicated irrigation meters of employ in-lieu water technologies for one-hundred percent of large landscapes customers by 2035, as an alternative to 973(c).

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974	(a)	BMPs - Disclosable Buildings	(a) Each supplier shall identify all disclosable buildings in their service area by January 1, 2025. (b)(1) For every customer for which the square footage of its building meets the definition of a disclosable building in section 1681 of the California Code of Regulations at title 20, a supplier shall complete the following: (A) For each meter, the supplier shall deliver to the building owner or Owner's Agent the last four characters of the meter serial number serving the building. (B) For each meter, the supplier shall identify, aggregate, and provide all water use data, in monthly intervals, for at least the previous calendar year, and all available data for the calendar year in which data is requested, by one of the following methods: (i) Suppliers not using ENERGY STAR Portfolio Manager's Data Exchange Services shall send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (ii) Suppliers using ENERGY STAR Portfolio Manager's Data Exchange Services shall provide the data by direct upload to the building owner's or Owner's Agent's ENERGY STAR Portfolio Manager account, or, at the building owner's or Owner's Agent's request, send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (2) Suppliers shall make annual progress in providing the information in paragraph (1) to the owners or Owner's Agents of disclosable buildings and shall provide the information for at least twenty percent of disclosable buildings by 2026, at least sixty percent by 2028, and one hundred percent by 2030.	This section would place significant burden on suppliers' limited resources, without providing clear benefits or guaranteeing water savings. Concerns include: (1) Suppliers do not have or maintain square footage information to identify disclosable buildings. (2) Square footage is well correlated with energy use, but not necessarily with water use, so this may not be an effective use of limited resources. (3) Many suppliers currently provide monthly (or bi-monthly) water usage to customers in their bill with water use reports, or through an AMI portal. This effort would be redundant. Sending duplicative data to customers, particularly those that will not utilize it, is not good use of suppliers' limited resources. (4) Suppliers cannot determine what meter serves which buildings on an owner's parcel. Suppliers can associate meters with an account but they may not know the he customer's use and cannot identify how much water use goes to each building if there are multiple buildings on the meter. (5) Proposed timelines are not reasonable.	Strike this language.	(a) Each supplier shall identify all disclosable buildings in their service area by January 1, 2025. (b)(1) For every customer for which the square footage of its building meets the definition of a disclosable building in section 1681 of the California Code of Regulations at title 20, a supplier shall complete the following: (A) For each meter, the supplier shall deliver to the building owner or Owner's Agent the last four characters of the meter serial number serving the building. (B) For each meter, the supplier shall identify, aggregate, and provide all water use data, in monthly intervals, for at least the previous calendar year, and all available data for the calendar year in which data is requested, by one of the following methods: (i) Suppliers not using ENERGY STAR Portfolio Manager's Data Exchange Services shall send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (ii) Suppliers using ENERGY STAR Portfolio Manager's Data Exchange Services shall provide the data by direct upload to the building owner's or Owner's Agent's ENERGY STAR Portfolio Manager account, or, at the building owner's or Owner's Agent's request, send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (2) Suppliers shall make annual progress in providing the information in paragraph (1) to the owners or Owner's Agents of disclosable buildings and shall provide the information for at least twenty percent of disclosable buildings by 2026, at least sixty percent by 2028, and one hundred percent by 2030.
974	(c)	BMPs - Thresholds	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	Suppliers need flexibility to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. Additionally, some CII classifications may have de minimis water use or are already efficient. The proposed methodology that suppliers' target the top 20% of water users for each CII classification is too prescriptive, ignores existing local and regional programs and efforts, and limits suppliers' ability to cost-effectively target customers with the greatest water savings potential.	Direct suppliers to implement programs for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification.	(c) For those CII customers at or above the 80th percentile for water use in each of the among all CII customers classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025 35 , existing or new design and implement a CII existing or new design and implement a CII conservation programs that includes at least one of the best management practices from each of paragraphs (1) through (5):
974	(c)	BMPs - Clarification	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	Language that requires suppliers to "offer" programs could be interpreted to not allow for regional, statewide or other partnerships that could help, cost-effectively achieve the CII BMP Performance Measures. We believe this is not the intent.	Make explicit that a supplier can comply with CII BMP Performance Measures by making programs available directly, or through regional, statewide or other partnerships.	(c) For those CII customers at or above the 80th percentile for water use in each of the among all CII customers classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025 30 , make available, either directly or through regional, statewide or other partnerships, existing or new design and implement a CII make available, either directly or through regional, statewide or other partnerships, existing or new design and implement a CII conservation programs that includes at least one of the best management practices from each of paragraphs (1) through (5):
974	(c)	BMPs - Clarification	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	The Regulation does not explicitly state that a single conservation program can satisfy the requirements for more than one BMP. We believe that is the intent, rather than requiring individual programs for each classification.	Make explicit that a single conservation program can apply to multiple BMPs.	(h) A single conservation program may satisfy the requirements for more than one best management practice from each of paragraphs (1) through (5) in subdivision (c).
974	(c)(1)(A)	BMPs - Clarification	(c)(1)(A) Direct contacts via site visits or phone calls	Suppliers may rely on other means of direct communication with customers, such as emails, video calls and direct mail. This provision should be broadened to allow other means of direct communication that suppliers' currently deploy.	Clarify language to include email, video calls and direct mail.	(c)(1)(A) Direct contacts via site visits, emails, video calls, direct mail , or phone calls
974	(c)(2)(A)	BMPs - Clarification	(c)(2)(A) Rebates and cost-sharing for replacing inefficient fixtures, equipment, irrigation systems or landscapes with water efficient ones	Innovative non-rebate incentives like financing are not included. These help advance water savings among CII Customers.	Make explicit that financing, cost-sharing and other innovative non-rebat incetnvies are eligible.	(c)(2)(A) Rebates, financing, cost-sharing and other innovative non-rebate incentives and cost-sharing for replacing inefficient fixtures, equipment, irrigation systems or landscapes with water efficient ones

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974	(c)(2)(A)	BMPs - Clarification	(2) Incentive best management practices.	Water-budget based rate structures and water budget-based management programs without a rate structure are not recognized. These help advance water savings among CII Customers.	Explicitly include water-budget based rate structures and water-budget based management programs without a rate structure are included in the "Incentive best management practices."	(D) Water budget-based rate structures (E) Water budget-based management program without a rate structure
974	(c)(3)(D)	BMPs - Clarification	(3) Landscape best management practices. (A) Landscape and irrigation management practices to promote improved water use efficiency (B) Irrigation system inspection and maintenance (C) Irrigation scheduling and maintenance training	It would be inappropriate for suppliers to maintain irrigation systems.	Remove language for suppliers to maintain CII customer irrigation systems, and instead include irrigation system maintenance training as a BMP.	(3) Landscape best management practices. (A) Landscape and irrigation management practices to promote improved water use efficiency (B) Irrigation system inspection and maintenance (C) Irrigation scheduling and maintenance training
974	(c)(3)(D)	BMPs - Clarification	(c)(3)(D) New development landscape inspection, workshops, and training	Landscape inspections, workshops and trainings should not be limited to new development.	Include new and existing landscapes as eligible.	(c)(3)(D) New development Landscape inspection, workshops, and training
974	(c)(3)(F)-(H)	BMPs - Clarification	(F) Programs to remove turf and replace it with climate-ready vegetation (G) Programs to decrease urban heat and reduce turf water use by planting trees (H) Programs to install green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs		Remove these options as landscape BMPs.	(F) Programs to remove turf and replace it with climate-ready vegetation water efficient plants, a sustainability feature designed to capture rainwater and reduce runoff, and a low application rate irrigation system. Most exposed soils must be covered with mulch (G) Programs to decrease urban heat and reduce turf water use by planting trees (H) Programs to install green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs.
974	(c)(5)(A)	BMPs - Clarification	(5) Operational best management practices. (A) Infrastructure changes (for example, smart meter replacement programs)	AMI is not included. AMI improves suppliers ability to collect accurate water usage data to detect leaks and improve water management.	Explicitly recognize AMI.	(5) Operational best management practices. (A) Infrastructure changes (for example, smart meter replacement programs, Automatic Meter Infrastructure (AMI))
974	(d)	BMPs	(d) For those commercial, industrial, and institutional customers that are at or above the 97.5th percentile for water use, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least two of the best management practices from each of paragraphs (1) through (5) in subdivision (c).	Customers at or above the 97.5th percentile for water use are already encompassed in the top 20% requirements of section 974(c). As proposed, this requirement does not recognize suppliers' current efforts to develop custom programs, in which these customers may already be efficiently using water. Additionally, conservation programs need to be offered broadly, not just limited to specific customers.	Strike this language. See section 974(c).	(d) For those commercial, industrial, and institutional customers that are at or above the 97.5th percentile for water use, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least two of the best management practices from each of paragraphs (1) through (5) in subdivision (c).
974	(e)(1)	Non-functional turf	(e) (1) Each urban retail water supplier shall ban the irrigation of non-functional turf with potable water on all commercial, industrial, and institutional (CII) landscapes in its service area by July 1, 2025. (2) Notwithstanding paragraph (1), a supplier is not required to ban the irrigation of nonfunctional turf on CII landscapes in its service area that is necessary to ensure the health of trees and other perennial non-turf plantings or that is necessary to address an immediate health and safety need. (3) Notwithstanding paragraph (1), a supplier may approve a request for continued irrigation of non-functional turf where the user certifies that the turf is a low water use plant with a plant factor of 0.3 or less, and demonstrates the actual use is less than 40% of reference evapotranspiration. (4) For purposes of this subdivision, CII landscapes include homeowners' associations, common interest developments, community service organizations, and other similar entities but do not include the residences of these entities' members or separate interests, as defined in section 4185 of the Civil Code.	This language does not align with AB 1572, which is currently pending the Governor's signature. If the Governor signs AB 1572, this language will not be necessary and its continued inclusion will cause confusion for suppliers and CII Customers.	Strike this language.	(e) (1) Each urban retail water supplier shall ban the irrigation of non-functional turf with potable water on all commercial, industrial, and institutional (CII) landscapes in its service area by July 1, 2025. (2) Notwithstanding paragraph (1), a supplier is not required to ban the irrigation of nonfunctional turf on CII landscapes in its service area that is necessary to ensure the health of trees and other perennial non-turf plantings or that is necessary to address an immediate health and safety need. (3) Notwithstanding paragraph (1), a supplier may approve a request for continued irrigation of non-functional turf where the user certifies that the turf is a low water use plant with a plant factor of 0.3 or less, and demonstrates the actual use is less than 40% of reference evapotranspiration. (4) For purposes of this subdivision, CII landscapes include homeowners' associations, common interest developments, community service organizations, and other similar entities but do not include the residences of these entities' members or separate interests, as defined in section 4185 of the Civil Code.

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974	(f)	BMPs - Timeline	(f) Suppliers shall make annual progress in meeting the requirements of subdivisions (c) and (d), with compliance of at least twenty percent by 2026, at least sixty percent by 2028, and one hundred percent by 2030.	We are proposing the CII Classification Performance Measure be completed between 2025 – 2030 and CII Mixed-Use Meter and CII BMP Performance Measures be completed 2030 – 2035. The currently proposed completion of all of the CII Performance Measures within the proposed five-year period, beginning 2025, would require significant resources and create implementation challenges. For example, it is unclear how suppliers would accurately implement BMPs for the top 20% of each classification while classifying CII customers. Unstacking the CII BMPs from the CII Classification will allow suppliers to spread limited resources over a 10 year period, while still meeting the goals of the Regulation. Additionally, the prescribed schedule for completing 20% of BMPs annually unnecessarily limits suppliers flexibility. Suppliers should be able to best determine how to meet the broader BMP Performance Measure requirements based on the unique local characteristics and existing programs.	Modify the timeline for suppliers to achieve 100 percent compliance with BMP Performance Measures by 2035. Remove prescriptive requirements of a percentage completion of CII BMP Performance Measures by years.	(f) Suppliers shall achieve make annual progress in meeting the requirements of subdivisions (c) and (d), with compliance of at least twenty percent by 2026, at least sixty percent by 2028, and one hundred percent compliance with subdivision (c) by 2035 30 . After 2035 30 , the supplier shall ensure at least 95% compliance, as assessed on an annual basis.
974	NA	BMPs - De Minimis	NA	Some suppliers have a very small amount of CII water usage. Consequently, the amount of effort required in this section will not yield meaningful water savings. We encourage the Regulation to recognize suppliers with de minimis CII water use, which should be less than 10% of total potable water usage, and exclude those suppliers from the requirements of this section. This will allow those suppliers to focus their resources where they better advance water use efficiency.	Exemption suppliers with less than 10% CII potable water usage from section 974.	(g) Suppliers with less than 10% CII potable water usage, based on a five year average that is re-evaluated every 5 years, shall be excluded from this section.

APPENDIX C: SUGGESTED REDLINE RECOMMENDATIONS
OUTDOOR STANDARDS

966	(i)	Outdoor Standard - Alternative Compliance (Same as "Methodologies" Tab Row 3)	<p>(i) Starting in 2035, a supplier meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040.</p> <p>(2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year.</p> <p>(C) The supplier verifies compliance with requirements of the G480 Water Conservation and Efficiency Program Operation and Management Standard established by the American Water Works Association.</p> <p>(D) The supplier verifies compliance with the Standards for Tree City USA Recognition.</p> <p>(E) The supplier manages a program dedicated to the creation and maintenance of climate-ready landscapes across its service area. Program elements shall include but are not limited to:</p> <p>(i) The supplier verifies annual conversion of no less than 0.1 percent of turf area into climate-ready landscapes.</p> <p>(ii) The supplier verifies use of a recognized, verifiable rating system, such as the ReScape Rated Landscape Scorecard or the Sustainable SITES Initiative, to assure its program is supporting climate-ready landscapes.</p> <p>(iii) The supplier verifies creation of or participation in regional and local</p>	<p>Our understanding is that this language is intended to serve as an Alternative Compliance Pathway for suppliers with a water use objective that would require a an unreasonable or unattainable reduction in water use and is intended to provide flexibility within the Regulation. This Alternative Compliance Pathway does not provide the necessary flexibility and is problematic as follows:</p> <p>(1) It does not address 2025 and 2030 compliance for suppliers. Some suppliers will be out of compliance with their objective beginning in 2025. This only addresses compliance in 2035.</p> <p>(2) 5 additional years will not resolve compliance for some suppliers. Some suppliers will require a pathway that includes an alternative objective and/or more than additional 5 years.</p> <p>(3) The eligibility requirements for the Alternative Compliance Pathway are cost prohibitive, and would divert suppliers' resources to actions that may not result in compliance -e.g., e.g. SITES rating system is \$9,600 per site to implement.</p> <p>(4) Special districts are ineligible for the Standards for Tree City USA.</p> <p>(5) Requirements to dedicate funding and 40% allocated to DACS conflicts with Proposition 218.</p>	<p>We request to work collaboratively with the State Water Board to develop an "Alternative Compliance Pathway" that provides suppliers with an unreasonable or unattainable objective to be eligible for an alternative objective and/or extension of time to comply. This pathway should balance the goals of achieving meaningful water savings and multi-benefits, while considering cost and affordability.</p>	<p>(i) Starting in 2035, a A supplier may be eligible for an Alternative Compliance Pathway for approval of the Board, that demonstrates a good faith effort toward improving water use efficiency and climate resiliency by meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040.</p> <p>(1) (A) The average median household income of the supplier's service area is less than or equal to 80 percent of the median household income of California.</p> <p>(B) The urban water use objective calculated by the supplier pursuant to subsection (b) would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(C) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 1.5 percent per year.</p> <p>(D) The supplier shows to the satisfaction of the board that it is unable to meet its urban water use objective because of the applicable outdoor standards identified in sections 968 and 969. The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users.</p> <p>(2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year.</p> <p>(C) The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. The supplier verifies compliance with requirements of the G480-Water Conservation and Efficiency Program Operation and Management Standard established by the American Water Works Association.</p>
968	(a)(3)	Outdoor Standard - Timeline	<p>(a)(1) Through June 30, 2030, the standard for efficient residential outdoor use (Soutdoor) shall be a landscape efficiency factor of 0.80.</p> <p>(2) Beginning July 1, 2030, and through June 30, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.63.</p> <p>(3) Beginning July 1, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.55.</p>	<p>The successful achievement of cost-effective multi-benefit landscape transformation programs requires water suppliers to analyze, design, resource and implement cost-effective water use efficiency programs. Additionally, the success of this Regulation requires long-term customer behavior change and significant investments. Educating Californians not only on the value of making these changes but also on the best, cost-effective manner to make these changes, while also supporting and expanding environmental multi-benefits requires time. Due to the delay of the Regulation and change in proposed standards from the Department of Water Resources' recommendations, suppliers and Californians are not being given a reasonable timeline to reduce water outdoor water use, which could result in impacts to shade trees and affordability, and disproportionate impacts to disadvantaged communities.</p>	<p>Modify the proposed timeline for the outdoor standard to provide an additional 5 years for all suppliers to achieve compliance, as follows:</p> <ul style="list-style-type: none"> - 0.8 LEF by 2030 - 0.63 LEF by 2035 - 0.55 LEF by 2040 	<p>(a) (1) Beginning January 1, 2030 and Beginning January 1, 2030 and through June 30, 20305, the standard for efficient residential outdoor use (Soutdoor) shall be a landscape efficiency factor of 0.80.</p> <p>(2) Beginning July 1, 20305, and through June 30, 203540, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.63.</p> <p>(3) Beginning July 1, 203540, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.55.</p>
968	(a)(5)	Outdoor Standard - New Res.	<p>(5) The standard for newly constructed residential landscapes (Snew) shall be the same factor as identified in section 492.4 for residential areas.</p>	<p>Water suppliers need certainty as they implement this Regulation most cost-effectively. MWLEO can be modified absent a regulatory process, which could significantly impact water suppliers overall compliance with the Regulation and associated costs, which would not be captured in the SRIA.</p>	<p>Set the standard for newly constructed residential landscapes at a LEF of 0.55, instead of to MWLEO.</p>	<p>(5) The standard for newly constructed residential landscapes (Snew) shall be the same factor as identified in section 492.4 for residential areas a landscape efficiency factor of 0.55.</p>
968	(b)(2)(B)	Outdoor Standard - INI	<p>(B) Through June 30, 2027, a supplier may include in its residential landscape area up to twenty percent of the supplier's unique square footage of Irrigable Not Irrigated area provided by the Department to the Board on October 3, 2022, if the supplier's actual urban water use for the reporting year, calculated in accordance with section 10609.22, is greater than the urban water use objective calculated pursuant to section 966 without inclusion of Irrigable Not Irrigated area.</p>	<p>DWR conducted a statistical analysis of outdoor water use, LAM and INI data. The data concluded that the INI area is being irrigated at one fifth or 20 percent of the irrigable area. As a result, DWR correctly concluded that the calculation of annual outdoor water use must include 20 percent INI. Additionally, the inclusion of INI is consistent with the 2018 conservation legislation. Water Code §10609.6(a)(2)(B) directed "the standards shall apply to irrigable lands. The removal of DWR's recommended to include 20% for INI is statistically inaccurate.</p>	<p>DWR's findings was based on the recognition that its analysis was only a snapshot in time. It's follow-up analysis indicated that the snapshot missed 20% of the irrigated landscape that was irrigated either before or after the image was taken for the analysis. DWR recognized that this under counting of irrigated area would continue to be the case unless multiple images are conducted over the analysis year. This 20% should not be looked as additional, but as area that is actually being irrigated. Revert to DWR's recommendation with the inclusion of 20 percent INI. Suppliers would recalculate INI when DWR provides new LAM data.</p>	<p>(B) Through June 30, 2027, a A supplier shall include in its residential landscape area up to twenty percent of the supplier's unique square footage of Irrigable Not Irrigated area provided by the Department to the Board on October 3, 2022, if the supplier's actual urban water use for the reporting year, calculated in accordance with section 10609.22, is greater than the urban water use objective calculated pursuant to section 966 without inclusion of Irrigable Not Irrigated area.</p> <p>(1) If the Department provides updated landscape area data, a supplier would recalculate the inclusion of the suppliers' unique square footage of Irrigable Not Irrigated Area of twenty percent.</p>

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
OUTDOOR STANDARDS

968	(d)(2)	MWELO	(d)(2) The existence of newly constructed residential landscape area shall be demonstrated by referencing annual reporting required by section 495(b)(6), provided the report has disaggregated newly constructed residential landscapes from the total landscape area reported.	The Regulation would require that suppliers demonstrate the existence of newly constructed residential landscapes through annual MWELO reporting. The majority of new residential landscapes are not subject to MWELO or MWELO reporting. MWELO reporting will be incomplete and will not reflect accurately newly constructed residential landscape area. Gr	Allow for DWR's recommend approach to account for newly constructed residential landscape areas, which included on-the ground measurement, remote sensing methods, and using service area level averages.	(d)(2) The existence of newly constructed residential landscape area shall be demonstrated by using any of the following approaches to quantify irrigable landscapes areas for new landscapes: referencing annual reporting required by section 495(b)(6), provided the report has disaggregated newly constructed residential landscapes from the total landscape area reported. (A) On-the-ground measurement. (B) Using remote sensing methods to quantify irrigable landscape areas. (C) Using service area level averages. In this approach, urban retail water suppliers only need to identify the total number of new developments (Nnd) and average landscape areas for each class at the service area level. The following is an outline of the steps needed to estimate aggregate areas for new landscapes using this approach: (i) Calculate the sum of areas for each of the irrigation status classes delivered by DWR or alternative data source. This involves adding each one of the three classes across all residential parcels in the service area to derive aggregate areas (II-total, INI-total, and NI-total). (ii) Obtain the total number of existing residential parcels (Np) in the service area. (iii) Divide II-total, INI-total, and NI-total by Np to get average II, INI, and NI for the service area (II-avg, INI-avg, NI-avg). (iv) Multiply II-avg, INI-avg, and NI-avg by Nnd. This produces aggregate II, INI, and NI for new developments (II-nd, INI-nd, and NI-nd).
968	(g)(2) (h)(1)	SLA- Pools	(g)(1) An urban retail water supplier may, in calculating its annual urban water use objective, include budgets for temporary provisions for residential outdoor use if the supplier submits supporting information meeting the criteria described in subdivision (i). (2) Temporary provisions may be requested for: (A) water for existing pools, spas, and similar water features (B) water for the planting of new, climate-ready trees (C) water for the establishment of qualifying landscapes (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (1) A temporary provision for existing pools, spas and similar water features is available beginning January 1, 2035, until January 1, 2040. This provision (Prpool) shall be calculated by multiplying the square footage of existing pools, spas, and similar water features (Apool), by 0.08, by net reference evapotranspiration (Net ETO), and by a unit conversion factor of 0.62.	Residential pools should not be a temporary provisions. The residential factor for residential pools should be same as public pools, which is 1.0. Water evaporates at about 1.0. Not allocating enough water to residential pools effectively further reduces the residential outdoor budget. Most pools are not subject to MWELO, as they are generally in backyards and existing.	Strike language 968(g)(2)(A) and h(1). Add language to 968(c) that residential pools area.	(c)(3) Pools, spas and similar water features shall have a landscape efficiency factor of 1.0. (g)(1) An urban retail water supplier may, in calculating its annual urban water use objective, include budgets for temporary provisions for residential outdoor use if the supplier submits supporting information meeting the criteria described in subdivision (i). (2) Temporary provisions may be requested for: (A) water for existing pools, spas, and similar water features- (B) water for the planting of new, climate-ready trees (C) water for the establishment of qualifying landscapes (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (h)(1) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows:(1) A temporary provision for existing pools, spas and similar water features is available beginning January 1, 2035, until January 1, 2040. This provision (Prpool) shall be calculated by multiplying the square footage of existing pools, spas, and similar water features (Apool), by 0.08, by net reference evapotranspiration (Net ETO), and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $Prpool = Apool \times 0.08 \times Net\ ETO \times 0.62$ The square footage of existing pools, spas, and similar water features (Apool) shall be either (A) the value provided by the Department to the Board on October 3, 2022, or any updates thereafter, or (B) alternative data, if the supplier demonstrates to the Department and Board that the data are equivalent, or superior, in quality and accuracy to the data provided by the Department.
968	(h)(3))b (i)	SLA - Recycled Water	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information quantifying and substantiating each request, including showing how it protects beneficial uses of water; demonstrating that the amount of water requested was delivered by the supplier for the requested use; and verifying that the approval of the request would not jeopardize the ability of a permittee within the supplier's service area to comply with existing permit requirements; and (2) A description of efforts to prioritize water for existing trees, including, but not limited to rebate, direct install, and educational programs focused on transitioning from turf- to tree-centric irrigation systems that promote deep and healthy root growth. Tree-centric irrigation systems include but are not limited to soaker hoses, deep drip watering stakes, drip tubing, and emitters. (3) If the request is denied, the volume of water associated with the variance, provision, or special landscape area shall not be included in the objective.	Recycled water should not be a temporary provision. Sites irrigated with recycled water generally do not change and are on DIMs. The requirement to annually apply for a variances and temporary provisions places a significant burden to both State Water Board staff and water suppliers.	Recycled water should not be a temporary provision.	(h)(3)(b)(i) In order to receive approval for either a variance, or a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information quantifying and substantiating each request, including showing how it protects beneficial uses of water; demonstrating that the amount of water requested was delivered by the supplier for the requested use; and verifying that the approval of the request would not jeopardize the ability of a permittee within the supplier's service area to comply with existing permit requirements; and (2) A description of efforts to prioritize water for existing trees, including, but not limited to rebate, direct install, and educational programs focused on transitioning from turf- to tree-centric irrigation systems that promote deep and healthy root growth. Tree-centric irrigation systems include but are not limited to soaker hoses, deep drip watering stakes, drip tubing, and emitters. (3) If the request is denied, the volume of water associated with the variance, or a temporary provision, or the inclusion of special landscape areas shall not be included in the objective.
969	(c)(2)	SLA - Recycled Water	(2) In order to calculate an outdoor budget for CII landscapes with DIMs pursuant to this subdivision, a supplier may include special landscape areas for CII landscapes with DIMs only if the supplier submits supporting information meeting the criteria described in section 968 (i).	Same as above	Same as above.	(c) (2) In order to calculate a residential outdoor budget pursuant to this subdivision, a supplier may include residential special landscape areas only if the supplier submits supporting information meeting the criteria described in subdivision (i).

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS METHODOLOGIES

Reg. Sec.	Sub. Sec.	Topic	Current Regulatory Text	Concern	Recommendation	Suggested Redline
966	(c)	Methodology - WUE Formula	(c) The objective shall be composed of the sum of the following budgets: (1) A budget for efficient indoor residential water use (Rindoor) as described in section 967. (2) A budget for efficient outdoor residential water use (Routdoor) as described in section 968. (3) A budget for efficient water use on commercial, industrial, and institutional landscapes with dedicated irrigation meters or equivalent technology (CIDIM) as described in section 969. (4) A budget for efficient real water losses (L) as described in section 970. (5) Budgets for any approved variances (V) and temporary provisions (Pr) as described in sections 967, 968, and 969. (6) A bonus incentive for potable reuse (BPR) as described in section 971.	The Regulation should recognize that there are and will continue to be inherent data quality limitations that impact suppliers' compliance with their water use objectives, such as landscape area measurement data, effective precipitation and population data. Currently, the Regulation does not account for data errors and variability. We note that the water loss performance standards do account for data variability.	Include a "Data Error Factor" (DEA) in the formula for calculating suppliers' urban water use objectives. The DEA would be a percentage, of either five or ten percent, applied to a supplier's budget for efficient indoor residential water use, efficient outdoor residential water use and efficient water use on a CI landscapes with a dedicated irrigation meter or equivalent technology, as follows: $WUO = (Rindoor + Routdoor + CIDIM)DEA + L + V + Pr + BPR$ The DEA would recognize suppliers' historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors. The magnitude of the DEA would reduce over time as suppliers achieve progress towards their water use objective. We are proposing a five percent DEA for suppliers achieving less than 20 percent reduction from SB X7-7, and a 10 percent DEA for suppliers achieving 20 percent or greater of reduction from SB X7-7.	(c)(7)A Data Error Adjustment (DEA) added to Rindoor, Routdoor, and CIDIM to account for variability in data accuracy. The percentage will be applied based on a comparison with SB X7-7 & targets as follows: (i) TIER 1: Suppliers achieving <= 20% reduction from SB X7-7: +5% of (Indoor + Routdoor + CIDIM budget) (ii) TIER 2: Suppliers achieving > 20% of reduction from SB X7-7: +10% of (Indoor + Routdoor + CIDIM budget)
966	(i)	Methodology - Alternative Compliance	See "Outdoor Standards" Tab Row 3.	See "Outdoor Standard" tab Cell E3.	See "Outdoor Standard" tab Cell F3.	(i) Starting in 2025, a supplier may be eligible for an Alternative Compliance Pathway for approval of the Board, that demonstrates a good faith effort toward improving water use efficiency and climate resiliency by meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040. (1) (A) The average median household income of the supplier's service area is less than or equal to 80 percent of the median household income of California. (B) The urban water use objective calculated by the supplier pursuant to subsection (b) would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22. (C) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 1.5 percent per year. (D) The supplier shows to the satisfaction of the board that it is unable to meet its urban water use objective because of the applicable outdoor standards identified in sections 968 and 969. The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. (2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22. (B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year. (C) The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. The supplier verifies compliance with requirements of the C480 Water Conservation and Efficiency Program Operation and Management.
966	NA	Methodology - Compliance	NA	A supplier may not comply with its water use objective because it is unable to obtain the information required for variances due to resource or other limitations. The State's goal should be for successful compliance with the Regulation. Prior to taking any enforcement action, the State should offer technical assistance to a supplier to determine if the unique water uses in its service area, for which variances are available, would bring the supplier into compliance.	Clarify that if a supplier does not meet its water use objective because it is unable to obtain the information required for the variances, prior to the issuance of any enforcement action, technical assistance must be offered to the supplier.	(j) If a supplier does not comply with section 966(a) because it is unable to obtain the information required in section 967(c) and 968(f) due to resource or other limits, prior to the issuance of any enforcement action, technical assistance must be made available to the supplier.
967	(c)	Variances - Eligibility	(b)(1) An urban retail water supplier may, in calculating its urban water use objective, include budgets for variances identified in paragraph (2) for residential indoor use, if: (A) The supplier submits supporting information meeting the criteria described in subdivision (e); and (B) The associated water use, for any individual variance, represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4).	The enacted legislation requires the State Water Board to establish appropriate variances for unique uses that can have a material effect on water use of an urban retail water supplier. The regulation currently proposes that an individual variance must represent 5% or more of the sum of a water suppliers budget. This threshold fails to recognize the cumulative impact unique water uses could have on suppliers' ability to comply with their water use objectives. Variances are not a "bonus" or "alternative compliance" mechanism. Variances were intended to account for unique water uses within suppliers' service areas in order to provide an accurate water use objective.	Establish a cumulative threshold for variances of 5%.	(b)(1) An urban retail water supplier may, in calculating its urban water use objective, include budgets for variances identified in paragraph (2) for residential indoor use, if: (A) The supplier submits supporting information meeting the criteria described in subdivision (e); and (B) The associated water use, for the sum of all any individual variances, represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4).
967	(d)	Variances - Recycled Water	(d) An urban retail water supplier may request a temporary provision to respond to negative impacts to wastewater collection, treatment, and reuse systems, if the supplier shows to the satisfaction of the Board that meeting the objective pursuant to section 966 would require adhering to the applicable residential indoor standard identified in Water Code section 10609.4 and that meeting the budget for efficient residential indoor use is causing challenges within wastewater collection, treatment, and reuse systems.	Recycled water is a permanent and long-term investment. The Governor's signing message for SB 1157 encourage the State Water Board to develop a variance to reflect local investments in recycled water and infrastructure.	Remove "temporary."	(d) An urban retail water supplier may request a temporary provision to respond to negative impacts to wastewater collection, treatment, and reuse systems, if the supplier shows to the satisfaction of the Board that meeting the objective pursuant to section 966 would require adhering to the applicable residential indoor standard identified in Water Code section 10609.4 and that meeting the budget for efficient residential indoor use is causing challenges within wastewater collection, treatment, and reuse systems.

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS METHODOLOGIES

967	(e)(1)	Variances - Eligibility	(e) In order to receive approval for a variance or a temporary provision for a given reporting year, an urban retail water supplier must submit to the Board, by October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following components:	We do not anticipate significant annual variability of water use associated with the variances. Requiring annual submittal and approval of the variances will place significant administrative burden on suppliers that does not achieve actual water savings, as well as the State Water Board.	Allow for variances, once approved, to be valid for five years.	(4) If a variance is approved it will be valid for a minimum of five years unless conditions change significantly. (5) If a variance has not been approved or denied by November 30 after submittal on October 1, the supplier can include the variance in its objective.
968	(e)(1)(B)	Variances - Eligibility	(e)(1) An urban retail water supplier may annually, in calculating its urban water use objective, include budgets for variances for residential outdoor water use if: (A) the supplier submits supporting information meeting the criteria described in subdivision (i); and (B) the associated water use, for any individual variance identified in paragraph (2)(A) through (C), represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4); or	Same as Cell E4.	Same as Cell F5.	(e)(1) An urban retail water supplier may annually, in calculating its urban water use objective, include budgets for variances for residential outdoor water use if: 13 (A) the supplier submits supporting information meeting the criteria described in subdivision (i); and (B) the associated water use, for the sum of all any individual variances identified in paragraph (2)(A) through (C), represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4); or
968	(h)(3)(B)(i)	Variances - Eligibility	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following:	Same as Cell E6	Same as cell F5	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information
975	(a)	Reporting - Fiscal Year	(a) Each urban retail water supplier shall submit to the Board, no later than January 1, 2024, and by January 1 every year thereafter, the report required by Water Code section 10609.24. The report shall reflect the conditions of the previous state fiscal year.	Water Code Section 10609.20 (b) states the objective calculation "shall be based on the urban retail water supplier's water use conditions for the previous calendar or fiscal year." However, the Regulation limits flexibility and would require suppliers report the conditions of the previous state fiscal year. It is unclear the benefit of requiring all suppliers to report on a fiscal year. Suppliers should be provided the discretion to report most accurately and cost-effectively to the State, based on available data. This would be consistent with water loss reporting which also provides suppliers discretion to report on either a fiscal or calendar year.	Provide flexibility for water suppliers to either report on a state fiscal year or calendar year, consistent with the water code.	(a) Each urban retail water supplier shall submit to the Board, no later than January 1, 2024, and by January 1 every year thereafter, the report required by Water Code section 10609.24. The report shall reflect the conditions of either the previous state fiscal year or calendar year.



Casitas Municipal Water District
State Water Project - Interconnect Project Costs
As of 9/30/23

Project No:	Project Name:	Costs paid to date	Encumbered	Total Encumbered & Cost To Date
378	State Water Interconnect - Calleguas to Casitas	123,668	-	123,668
527	State Water Interconnect - Carpinteria to Casitas	2,857,997	1,015,633	3,873,630
606	State Water Interconnect - Ventura to Casitas	249,242	-	<u>249,242</u>
Project(s) Cost To Date:				<u><u>4,246,540</u></u>



Casitas Municipal Water District
CFD 2013-1 Improvement Fund - Series B

	Bonds Proceeds Received (1)	Interest Earned (2)	Expense (3)	Balance Series B (1)+(2)+(3)
2017 Subtotal	42,658,223.98	24,046.16	(36,886,093.06)	
TOTAL	42,658,223.98	24,046.16	(36,886,093.06)	5,796,177.08
2018 Subtotal	-	77,279.16	-	
TOTAL	42,658,223.98	101,325.32	(36,886,093.06)	5,873,456.24
2019 Subtotal	-	102,268.61	(1,486,814.43)	
TOTAL	42,658,223.98	203,593.93	(38,372,907.49)	4,488,910.42
2020 Subtotal	-	15,749.88	(4,404,999.69)	
TOTAL	42,658,223.98	219,343.81	(42,777,907.18)	99,660.61
2021 Subtotal	-	2.16	(99,662.60)	
TOTAL	42,658,223.98	219,345.97	(42,877,569.78)	0.17
2022 Subtotal	-	-	-	
TOTAL	42,658,223.98	219,345.97	(42,877,569.78)	0.17
2023 Subtotal	-	-	-	
TOTAL	42,658,223.98	219,345.97	(42,877,569.78)	0.17

Casitas Municipal Water District

CFD 2013-1 Improvement Fund - Series C

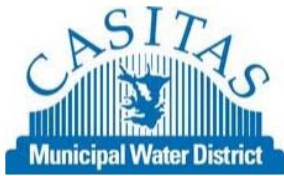
	Bonds Proceeds Received (1)	Interest Earned (2)	Expense (3)	Balance Series C (1)+(2)+(3)
2019 Subtotal	13,570,000.00	12,284.84	-	
TOTAL	13,570,000.00	12,284.84	-	13,582,285
2020 Subtotal	-	48,026.34	(1,362,971.53)	
TOTAL	13,570,000.00	60,311.18	(1,362,971.53)	12,267,339.65
2021 Subtotal	-	671.83	(4,812,722.59)	
TOTAL	13,570,000.00	60,983.01	(6,175,694.12)	7,455,288.89
2022 Subtotal	-	50,765.59	(3,708,377.36)	
TOTAL	13,570,000.00	111,748.60	(9,884,071.48)	3,797,677.12
2023 January		11,900.39	(404,631.59)	Project Reimbursement (Dec 2022)
February		11,090.90	(139,903.42)	Project Reimbursement (Jan 2023)
March		10,151.16	(221,789.13)	Project Reimbursement (Feb 2023)
April		10,928.48	(445,840.16)	Project Reimbursement (Mar 2023)
May		9,632.02	(24,770.87)	Project Reimbursement (Apr 2023)
June		10,270.84	(317,748.03)	Project Reimbursement (May 2023)
July		9,115.43	(229,283.28)	Project Reimbursement (June 2023)
August		8,783.86	(283,124.57)	Project Reimbursement (July 2023)
September		7,622.90	(273,887.19)	Project Reimbursement (August 2023)
October				
November				
December				
2023 Subtotal		89,495.98	(2,340,978.24)	
TOTAL	13,570,000.00	201,244.58	(12,225,049.72)	1,546,194.86

Summary of Expenses

CFD 2013-1 Improvement Fund - Series B&C

Purchase of Ojai System	34,481,628.00
Extension Contract	366,371.55
Meter Cost	2,038,093.51
Received Project reimbursements:	18,216,526.44
	55,102,619.50
	-

Total funds remaining for improvement Series B:	0.17
Total funds remaining for improvement Series C:	1,546,194.86
Total Funds Remaining	1,546,195.03
Received Project reimbursements:	18,216,526.44
Projects Cost YTD:	18,455,080.27
Projects Pending Reimbursement:	238,553.83
Total Funds Remaining less pending Reimbursement:	1,307,641.20



Casitas Municipal Water District
CFD 2013 - 1 Projects to be reimbursed to CMWD To Date
As of 9/30/2023

Project No:	Project Name:	Costs
400	Ojai System Masterplan	375,336
420	Sunset Place Pipeline Replacement	785,031
421	Cuyama, Palomar and El Paseo Roads Pipeline Replacement	2,170,277
422	South San Antonio Street and Crestview Drive Pipeline	89,258
423	West and East Ojai Avenue Pipeline Replacement	4,113,839
424	Running Ridge Zone Hydraulic Improvement	451,282
425	Well Rehabilitation Replacement	1,614,203
426	Valve & Appurtenance Replacement	1,136,797
427	Fairview Pipeline Replacement	527,850
428	Mutual Wellfield Pipeline	167,657
429	Grand Ave Pipeline	56,651
430	Signal Booster Zone Hydraulic Improvements	165,699
431	Emily Street Pipeline Replacement	1,055,085
432	Casitas-Ojai System Interties	78,159
522	Ojai Arc Flash Study	119,839
611	Mutual Replacement Well	438,973
411	Replace San Antonio #3 Well	29,760
506	Ojai SCADA UPS Units	11,448
509	Hypochlorite Tanks OS	24,187
511	Ojai Wellfield Cla-Vals	4,274
512	Well Monitoring Upgrades 07/2018	1,521
514	Ojai Wellfield Mag Meters 07/2018	18,877
433	Ojai 12" pipeline replac	2,015,232
434	Heidelberger PP Ret. Wal	148,381
435	Plesant Ave/Daily Rd Pip	62,645
436	OWS Tank/Valt Fall Impro	23,274
437	Wellfield VFDs	436,715
438	Lion St PL/ Fairview Conn	762,333
646	OWS Arbolada Tank	64,982
673	Mutual Well #7	1,474,255
674	San Antonio Filter Upgrade	26,265
705	Heidelberger Pump Plant Fire Flow	0
706	Wellfield Eqpt & Hardware	4,995
Project(s) Cost To Date:		<u>18,455,080</u>

**CASITAS MUNICIPAL WATER DISTRICT
TREASURER'S MONTHLY REPORT OF INVESTMENTS
09/30/23**

Type of Invest	Institution	CUSIP	Date of Maturity	Original Cost	Current Mkt Value	Rate of Interest	Date of Deposit	% of Portfolio	Days to Maturity
*TB	Federal Home Loan Bank	3130AIXJ2	6/14/2024	\$941,144	\$828,810	2.875%	8/2/2016	7.81%	254
*TB	Federal Home Loan Bank	3130A5VW6	7/10/2025	\$1,025,110	\$957,860	2.700%	5/10/2017	9.02%	640
*TB	Federal National Assn	31315P2J7	5/1/2024	\$809,970	\$715,474	3.300%	5/25/2016	6.74%	211
*TB	Farmer MAC	31315PYF0	5/2/2028	\$512,355	\$459,920	2.925%	11/20/2017	4.33%	1652
*TB	Federal Farm CR Bank	31331VWN2	4/13/2026	\$940,311	\$722,200	5.400%	5/9/2016	6.80%	913
*TB	Farmer MAC	3133EEPH7	2/12/2029	\$480,251	\$431,056	2.710%	11/20/2017	4.06%	1932
*TB	Federal National Assn	3135G0K36	4/24/2026	\$2,532,940	\$2,331,800	2.125%	7/6/2010	21.96%	924
*TB	Federal National Assn	3135G0ZR7	9/6/2024	\$1,488,050	\$1,358,814	2.625%	5/25/2016	12.80%	336
*TB	US Treasury Note	912828WE6	11/15/2023	\$723,061	\$662,819	2.750%	12/13/2013	6.24%	45
*TB	US Treasury Note	912797HM2	11/28/2023	\$983,581	\$991,570	5.320%	5/3/2023	9.34%	58
*TB	US Treasury Note	912797FJ1	11/9/2023	\$740,105	\$745,808	5.320%	5/10/2023	7.02%	39
*TB	US Treasury Note	912797FL6	11/24/2023	\$415,000	\$411,755	5.350%	11/24/2023	3.88%	54
Total in Gov't Sec. (11-00-1055-00&1065)				\$11,591,879	\$10,617,884			99.97%	
Total Certificates of Deposit:				\$0	\$0			0.00%	
**	LAIF as of 8/31/2023: (11-00-1050-00)		N/A	\$496	\$496	3.36%	Estimated	0.00%	
***	COVI as of 8/31/2023: (11-00-1060-00)		N/A	\$3,150	\$3,150	3.59%	Estimated	0.03%	
TOTAL FUNDS INVESTED				\$11,595,525	\$10,621,529			100.00%	
Total Funds Invested last report				\$11,657,107	\$10,647,928				
Total Funds Invested 1 Yr. Ago				\$10,672,444	\$9,630,294				
****	CASH IN BANK (11-00-1000-00) EST.			\$2,906,240	\$2,906,240				
	CASH IN Custody Money Market			\$66,057	\$66,057				
TOTAL CASH & INVESTMENTS				\$14,567,822	\$13,593,826				
TOTAL CASH & INVESTMENTS 1 YR AGO				\$19,796,196	\$18,754,047				
*CD	CD - Certificate of Deposit								
*TB	TB - Federal Treasury Bonds or Bills								
**	Local Agency Investment Fund								
***	County of Ventura Investment Fund								
	Estimated interest rate, actual not due at present time.								
****	Cash in bank								

No investments were made pursuant to subdivision (i) of Section 53601, Section 53601.1 and subdivision (i) Section 53635 of the Government Code.

All investments were made in accordance with the Treasurer's annual statement of investment policy.



**Casitas Municipal Water District
Adjudication Charge Summary Report**

	2020 July	2020 August	2020 September	2020 October	2020 November	2020 December	2021 January	2021 February	2021 March	2021 April	2021 May	2021 June	YTD
Revenue	(48,685)	(48,893)	(48,945)	(49,160)	(49,090)	(48,787)	(49,013)	(48,754)	(48,737)	(49,088)	(48,639)	(46,304)	(584,095)
Expenses													-
Legal	-	26,378	15,228	-	29,451	4,917	4,625	14,288	1,344	32,955	15,958	23,411	168,555
Other Pro Fees	-	-	-	-	-	-	20,322	14,782	-	-	7,813	82,257	125,175
Bank Fees/ Bad Debt	-	-	-	-	130	-	-	-	-	-	-	-	130
Net Total	(48,685)	(22,515)	(33,717)	(49,160)	(19,509)	(43,870)	(24,066)	(19,684)	(47,393)	(16,133)	(24,868)	59,364	(290,234)
Cash Collected	948	2,630	44,674	48,421	47,746	50,454	48,260	46,160	52,298	46,680	49,070	46,673	484,014
Cash Disbursed	-	(26,378)	(15,228)	(0)	(29,573)	(4,917)	(24,955)	(29,070)	(1,344)	(32,955)	(23,771)	(63,445)	(251,637)
Accounts Payable	-	-	-	-	(8)	-	8	-	-	-	(0)	(42,224)	(42,224)
Accounts Receivable	47,737	46,263	4,271	738	1,344	(1,667)	754	2,594	(3,561)	2,408	(431)	(369)	100,081
Net Total	48,685	22,515	33,717	49,160	19,509	43,870	24,066	19,684	47,393	16,133	24,868	(59,364)	290,235
	2021 July	2021 August	2021 September	2021 October	2021 November	2021 December	2022 January	2022 February	2022 March	2022 April	2022 May	2022 June	YTD
Revenue	(48,514)	(48,430)	(48,489)	(48,520)	(48,464)	(48,355)	(48,545)	(48,400)	(48,345)	(48,018)	(48,499)	(48,384)	(1,165,058)
Expenses													-
Legal	-	1,908	12,847	9,838	24,067	38,114	-	54,949	46,935	140,549	23,364	23,200	544,326
Other Pro Fees	-	10,122	5,718	13,835	22,554	27,345	45,786	20,995	14,643	32,509	3,525	40,547	362,753
Bank Fees/ Bad Debt	-	-	-	-	-	-	-	-	-	-	-	366	496
Net Total	(48,514)	(36,400)	(29,925)	(24,847)	(1,843)	17,104	(2,759)	27,545	13,233	125,040	(21,610)	15,729	(257,482)
Cash Collected	50,335	46,498	49,795	48,266	47,348	49,062	48,507	46,747	49,424	49,471	47,847	38,475	1,055,791
Cash Disbursed	(32,144)	(22,110)	(18,564)	(23,673)	(46,621)	(65,459)	(45,786)	(75,944)	(61,578)	(173,058)	(27,233)	(50,036)	(893,842)
Accounts Payable	32,144	10,079	-	-	-	(0)	(0)	-	-	0	(0)	(18,525)	(18,525)
Accounts Receivable	(1,821)	1,932	(1,306)	253.23	1,115	(707)	38	1,652	(1,079)	(1,453)	995	14,356	114,058
Net Total	48,514	36,400	29,925	24,847	1,843	(17,104)	2,759	(27,545)	(13,233)	(125,040)	21,610	(15,729)	257,483
	2022 July	2022 August	2022 September	2022 October	2022 November	2022 December	2023 January	2023 February	2023 March	2023 April	2023 May	2023 June	YTD
Revenue	(48,398)	(48,148)	(48,782)	(48,086)	(47,956)	(47,524)	(48,058)	(47,688)	(47,608)	(48,083)	(47,618)	(48,052)	(1,741,058)
Expenses													-
Legal	-	5,074	14,677	9,730	3,297	9,242	2,154	20,342	3,836	-	25,310	15,576	653,563
Other Pro Fees	-	-	-	-	-	-	-	-	-	25,034	8,364	5,042	401,193
Bank Fees/ Bad Debt	-	-	-	-	-	-	-	-	-	-	-	-	496
Net Total	(48,398)	(43,074)	(34,104)	(38,356)	(44,659)	(38,282)	(45,904)	(27,347)	(43,771)	(23,049)	(13,945)	(27,434)	(685,806)
Cash Collected	50,433	47,420	46,609	48,163	48,583	50,058	47,867	48,288	48,508	43,525	48,181	209	1,583,636
Cash Disbursed	(13,303)	(10,296)	(14,677)	(9,730)	(3,297)	(66,922)	(2,154)	(11,156)	(3,836)	(25,034)	(23,703)	45,033	(1,032,916)
Accounts Payable	13,303	5,221	-	-	-	0	-	-	-	-	-	(6,698)	(6,698)
Accounts Receivable	(2,035)	728	2,173	(77)	(627)	55,146	191	(9,785)	(900)	4,557	(10,533)	(11,110)	141,784
Net Total	48,398	43,074	34,104	38,356	44,659	38,282	45,904	27,347	43,771	23,049	13,945	27,434	685,806
	2023 July	2023 August	2023 September	2023 October	2023 November	2023 December	2024 January	2024 February	2024 March	2024 April	2024 May	2024 June	YTD
Revenue	(47,664)	(47,838)	6	0	-	-	-	-	-	-	-	-	(1,836,554)
Expenses													-
Legal	(0)	-	14,885	-	-	-	-	-	-	-	-	-	668,448
Other Pro Fees	-	-	3,762	-	-	-	-	-	-	-	-	-	404,955
Bank Fees/ Bad Debt	-	-	-	-	-	-	-	-	-	-	-	-	496
Net Total	(47,664)	(47,838)	18,653	0	-	-	-	-	-	-	-	-	(762,655)
Cash Collected	70,201	58,274	45,652	16,500	-	-	-	-	-	-	-	-	1,774,263
Cash Disbursed	(6,698)	-	(18,647)	-	-	-	-	-	-	-	-	-	(1,058,260)
Accounts Payable	6,698	-	-	-	-	-	-	-	-	-	-	-	0
Accounts Receivable	(22,538)	(10,436)	(45,658)	(16,501)	-	-	-	-	-	-	-	-	46,653
Net Total	47,664	47,838	(18,653)	(0)	-	-	-	-	-	-	-	-	762,656
Note: Data as of 10/05/2023	0.01	-	-	0.00	-	-	-	-	-	-	-	-	716,003



Consumption Report

Water Sales FY 2023-2024 (Acre-Feet)

Classification	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Month to Date	
													2023/ 2024	2022/ 2023
													Total	Total
AD Ag-Domestic	293	212	-	-	-	-	-	-	-	-	-	-	505	770
MAD Ag-Domestic Multi	9	9	-	-	-	-	-	-	-	-	-	-	18	30
AG Ag	181	120	-	-	-	-	-	-	-	-	-	-	301	478
C Commercial	103	78	-	-	-	-	-	-	-	-	-	-	181	245
DI Interdepartmental	20	19	-	-	-	-	-	-	-	-	-	-	39	29
F Fire	-	-	-	-	-	-	-	-	-	-	-	-	-	0
I Industrial	2	2	-	-	-	-	-	-	-	-	-	-	4	2
OT Other	26	21	-	-	-	-	-	-	-	-	-	-	47	60
R Residential	206	200	-	-	-	-	-	-	-	-	-	-	406	465
RM Residential Multi	28	29	-	-	-	-	-	-	-	-	-	-	57	66
RS - P Resale Pumped	6	5	-	-	-	-	-	-	-	-	-	-	11	103
RS - G Resale Gravity	50	46	-	-	-	-	-	-	-	-	-	-	96	229
TE Temporary	3	2	-	-	-	-	-	-	-	-	-	-	5	6
Total	925	744	-	-	-	-	-	-	-	-	-	-	1,670	2,483
CMWD	766	586	-	-	-	-	-	-	-	-	-	-	1,352	2,109
OJAI	160	158	-	-	-	-	-	-	-	-	-	-	318	374
Total 2022 / 2023	1,141	1,342	1,359	1,034	638	356	281	205	185	352	592	712	N/A	8,198

**CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM**

TO: BOARD OF DIRECTORS
FROM: MICHAEL FLOOD, GENERAL MANAGER
SUBJECT: JANUARY 2023 STORM ACCUMULATED COST SUMMARY
DATE: 10/25/2023

RECOMMENDATION:

Receive and file.

BACKGROUND:

The storm of January 9th/10th 2023 caused damage to several facilities operated by the District with the most significant being the Robles Forebay, Robles Cutoff Wall, Marion Walker Treatment Plant Desilting Basin, Rincon backcountry road, and the Matilija Conduit.

The District has accumulated approximately \$2.9M in cost related to temporary mitigations and repairs to the affected facilities.

Casitas has applied for reimbursement of these costs with the Federal Emergency Management Agency (FEMA).

DISCUSSION

The Accumulated cost breakdown is as follows:

Labor (Direct):	\$ 415,877
Materials:	\$ 279,964
Permits:	\$ 5,518
Outside Contracts:	\$ 2,009,028
Encumbrances:	\$ 185,322
Est. Pending Invoices:	<u>\$ 62,214</u>
Total:	\$ 2,957,923

Casitas expects that given the nature and timeframe of these expenses, the District will receive between 75%-100% reimbursement of this amount from FEMA.