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JUL 25 2017

Ventura County Grand Jury

Grand Jury
800 South Victoria Avenue
Ventura, CA 93009
(805) 477-1600
Fax: (805) 658-4523

grandjury.countyofventura.org

Response to Grand Jury Report Form

Report Title: Water Considerations for Cities

Report Date: May 8, 2017

Response by: Greg Nyhoff Title: City Manager

FINDINGS / CONCLUSIONS

- I (we) agree with the findings / conclusions numbered: C-04, C-05, C-06
- I (we) disagree wholly or partially with the Findings / Conclusions numbered: C-01, C-02, C-03, C-07
(Attach a statement specifying any portions of the Findings / Conclusions that are disputed; include an explanation of the reasons.)

RECOMMENDATIONS

- Recommendations numbered R-04 have been implemented.
(Attach a summary describing the implemented actions and date completed.)
- Recommendations number R-05 R-01, R-02, R-03 have not yet been implemented, but will be implemented in the future.
(Attach a time frame for the implementation.)
- Recommendations numbered _____ require further analysis.
- Recommendations numbered _____ will not be implemented because they are not warranted or are not reasonable.

Date: 7-19-17

Signed: *Greg Nyhoff*

Number of pages attached: 6

COUNCIL APPROVED	
<u>7/18/2017</u>	<u>MJ</u>
DATE	

Greg Nyhoff
City Manager



Office of the City Manager

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July 18, 2017

County of Ventura—Grand Jury
800 South Victoria Avenue
Ventura, CA 93009

Attn: Ms. Pamela Riss, Foreperson of the 2016-2017 Ventura County Grand Jury

Dear Ms. Riss:

The City of Oxnard received the report titled “Water Considerations for Cities” dated May 8, 2017. Enclosed please find the City of Oxnard’s responses to your inquiries. If you have any further inquiries, please do not hesitate to contact me.

Sincerely,



Greg Nyhoff, City Manager

Enclosure

cc: Ruth Osuna, Assistant City Manager
Daniel Rydberg, P.E., Public Works Director



Report title: Final Report: Water Considerations for Cities

Report Date: May 8, 2017

Response by: Greg Nyhoff Title: City Manager

Responses to Grand Jury Conclusions C-01 through C-07

C-01. Cities' water plans are based on historic water availability patterns which may no longer be applicable. Over the last 100 years, water availability from precipitation has been trending downward and may never return to what is considered averaged. [Underline added to conclusion to reflect which portion of the finding is disputed.]

Response: Partially Disagree. The City of Oxnard supplies include imported water from Calleguas Municipal Water District (Calleguas), imported groundwater from United Water Conservation District (UWCD), and groundwater from the City's wells. In the absence of better information, the City of Oxnard based future water supplies from Calleguas and UWCD on supplies available in 2015, after five years of drought. Supplies produced by the City of Oxnard were based on the 2015 Total Extraction Allocation (TEA) from the Fox Canyon Groundwater Management Agency (FCGMA) and phased expansion of the City's Groundwater Recovery Enhancement and Treatment (GREAT) project. The FCGMA is currently preparing a Sustainable Groundwater Management Plan (SGMP) in compliance with the Sustainable Groundwater Management Act. When the SGMP is completed (anticipated late 2017), Oxnard intends to update its UWMP with any new information regarding its groundwater allocation.

C-02. Cities' plans address the minimum, state-required, three-year drought scenarios. None of the UWMPs address a long term drought, even though the current drought has lasted over five years. [Underline added to conclusion to reflect which portion of the finding is disputed.]

Response: Partially Disagree. In the Water Supply Reliability Assessment (Section 7) of the 2015 UWMP, future supplies from CMWD and UWCD were based on 2015 drought conditions and were further reduced by the percentage decreased from 2010 to 2015. Though the Water Supply Reliability Assessment utilizes a three-year-drought period, the effect of the drought from 2010 to 2015 was applied to the available water supply in the scenario. In addition, the Water Supply Reliability Assessment in the 2015 UWMP did not assume any water conservation on the part of the public and showed supply deficits in certain years of these conservative scenarios. The deficit would be resolved with imported water from Calleguas, a Metropolitan Water District (MWD) member agency. MWD has invested significantly in storage and water supply diversification projects to provide reliability during droughts, which was borne out in the recent five-year drought.

C-03. Long term city plans are based on the optimistic view there will be as much water available in 2035 or 2040 as there was in 2010. Additional future water resources are not well-defined other than being described as imported water or coming from recycling and

conservation efforts. [Underline added to conclusion to reflect which portion of the finding is disputed.]

Response: Partially Disagree. As outlined in the above response to Conclusion C-01, the City of Oxnard did not assume 2010 water supplies would be available in the future. Water supplies from 2010 were only used to demonstrate compliance with State water use reduction metrics and as an indicator of supply loss from water purveyors in the period from 2010 to 2015. The City of Oxnard used 2015 data as the basis for wholesale water supplies, in the absence of better information. Sources of future water supplies are clearly outlined in the 2015 UWMP by agency and recycled water sources were identified in great detail in the City's documents for the GREAT program. The tables and water supply source terminology are dictated by California's Department of Water Resources (DWR) for purposes of reporting and consolidation.

C-04. Current and future ratepayers will bear the burden of the cost of building water purification facilities, desalination plants, desalters, recycling plants, additional pipelines, and storage facilities needed to ensure there is an adequate supply system in the future.

Response: Agree. Much of California is bearing the burden of a changing water picture. There is a cost associated with developing new and innovative water supplies, reducing reliance on imported water sources, and improving water supply resilience. The City of Oxnard has started this process while facing the challenges of developing new rates in an adverse legal climate with reduced revenue from water sales. Oxnard will continue to apply for grants and low-interest loans for projects in order to keep the costs to customers as low as practical. DWR has not asked for financial information in UWMPs for implementing new water supplies.

C-05. Since many of the Cities in the County rely on MWD wholesale water, Cities should base UWMPs on the wholesalers' prediction that retail water demand will outstrip total reliable water resources by 2040.

Response: Agree. The City of Oxnard assumed future supplies from wholesale agencies would reflect 2015 conditions and further reduced these supplies in future drought scenarios. The City of Oxnard welcomes future wholesale supply projections for the 2020 UWMP provided the assumptions used as the basis for the projections are valid and the projections are provided in a timely fashion allowing the City of Oxnard to meet DWR's submittal requirements. The referenced prediction by Metropolitan Water District is based on the assumption cities would do nothing to reduce demand or obtain additional water supplies. The 'do nothing' scenario is not realistic as MWD, CMWD, and Oxnard are continuing water conservation programs and implementing projects to increase water supply reliability.

C-06. The UWMPs use different sources for analyzing past and future populations. The inconsistency makes it difficult to compare plans, especially when cities have multiple retail providers. Some UWMPs even use different population sources within the same report.

Response: Agree. DWR Guidelines mandated use of U.S. Census data for historic data. The City of Oxnard complied with DWR guidance and used DWR's population tool to develop historic population data. This was important in demonstrating compliance with State-mandated

water use reductions. The City used internal planning documents for future population projections because:

- DWR suggested future projections be consistent with other City planning documents
- The City wished its projections to be consistent with the projections in the Public Works Integrated Master Plan (PWIMP) Documents
- The U.S. Census data did not appear to fully account for migrant populations, potentially under-predicting future water demand.

The City of Oxnard coordinated its population projection numbers with its wholesale suppliers for the 2015 UWMP.

C-07. Cities' water plans do not appear to adequately address catastrophic failures or interruptions within the system, such as:

- Infrastructure failures (dams)
- Major earthquake destruction
- Damage to the groundwater
 - Saltwater intrusion
 - Environmental disasters (oil or chemical spills)

[Underline added to conclusion to reflect which portion of the finding is disputed.]

Response: Partially Disagree. The City of Oxnard's plan for catastrophic failures, outlined in the 2015 UWMP, included:

- An ordinance-backed water use reduction plan tiered to percent of water supply lost.
- Diversification of water supplies to include local, regional and State water supplies.
- Development of redundancy in water supply lines.
- Emergency power for City-operated water supply sources.
- Accumulation of groundwater extraction credits for emergency use
- Emergency interties with the Port Hueneme Water Agency (PHWA), City of Port Hueneme, two interties with the Channel Islands Beach Community Services District, and two interties with Naval Base Ventura County.

Due to its geographical setting, it is difficult for the City of Oxnard to develop large-scale surface water supply reservoirs for emergency supply. The City of Oxnard is actively pursuing use of the Oxnard Plain Groundwater Basin for indirect recycled water reuse and storage, which would also help reduce saltwater intrusion. The City of Oxnard has also continued water conservation measures enacted as a result of the ongoing drought.

Oxnard, as well as all other water agencies, has an Emergency Response Plan which provides more detail on specific responses for emergency scenarios. Oxnard participates with nine of the ten Ventura County cities, the County, and several water agencies (including Calleguas Municipal Water District) every five years to develop a new Ventura County Multi-Hazard Mitigation Plan, most recently for a September 2015 update. This Plan assesses the risks posed by natural and human-caused hazards and establishes a mitigation strategy for reducing these risks. Hazards addressed include climate change, dam failure, drought, earthquake, flood,

landslide, tsunami, and wildfire. The plan may be found at <http://www.vcfloodinfo.com/pdf/2015%20Ventura%20County%20Multi-Hazard%20Mitigation%20Plan%20and%20Appendices.pdf>

Responses to Grand Jury Recommendations R-01 through R-05

R-01 The Grand Jury recommends the 10 city councils collaborate with all the County water purveyors to develop long-term plans to respond to catastrophic disruptions of water supplies.

Response: Will Be Implemented. The City of Oxnard participates in ongoing collaboration with Calleguas, UWCD and neighboring agencies to discuss and develop long-range plans in the event of catastrophic interruptions to water supplies including emergency inter-ties. In the next planning cycle, the City will add more detail regarding mitigation of catastrophic disruptions of water supplies. This recommendation will be implemented in the 2020 UWMP.

R-02. The Grand Jury recommends the 10 City Councils use the same data source when making population projections.

Response: Will Be Implemented. The City of Oxnard has coordinated its own population projection sources to create consistency between its 2015 UWMP, its PWIMP Project, and numbers utilized by its Planning Department. Future population projections were also coordinated with wholesale suppliers. DWR has already implemented standard guidelines for historic population estimates. Implementing common data for population across Cities may contradict local population estimates used for planning purposes, as planning figures may serve a different purpose requiring a more or less conservative estimate. However, the City will comment on the UWMP procedures for the next cycle and will coordinate with other agencies to synchronize population predictions as much as practicable. This recommendation will be implemented in the 2020 UWMP.

R-03. The Grand Jury recommends the 10 City Councils develop drought plans that extend at least 5 years.

Response: Will Be Implemented. As outlined in the response to Grand Jury Conclusion 2, (C-02), the City of Oxnard included the cumulative effect the drought period of 2010-2015 had on imported water supplies in the three-year drought scenario presented in the 2015 UWMP. It is expected the DWR will require a specific five-year drought scenario in the 2020 UWMP and the City of Oxnard will comply with this. This recommendation will be implemented in the 2020 UWMP.

R-04. The Grand Jury recommends the 10 City Councils extend drought conservation measures during non-drought years.

Response: Has Been Implemented. Because of the ongoing drought conditions in Ventura County, the City of Oxnard has not lifted drought conservation measures. The SGMP underway

may also impact the City's groundwater allocation and the City is taking a conservative approach until the SGMP is finalized.

R-05. The Grand Jury recommends the 10 City Councils ensure all future water availability plans clearly identify any potential water sources that are based on unfunded or unpermitted infrastructure.

Response: Will Be Implemented.

This recommendation will be implemented in the 2020 UWMP.

Conclusion

The City will forward the Grand Jury recommendations to DWR prior to the development of Guidelines for the 2020 UWMP. This will allow time to coordinate data between multiple cities and water purveyors, coordinate recommendations with cities and DWR, and build support for regional water planning and cooperation. The cities could collectively file a Regional UWMP for 2020 which would demonstrate regional water supply cooperation, reduce the individual burden on cities for UWMP development, and provide data consistency between cities and water purveyors throughout the region.