



PUBLIC REVIEW DRAFT

2025 Urban Water Management Plan

Los Altos Suburban District
April 2026

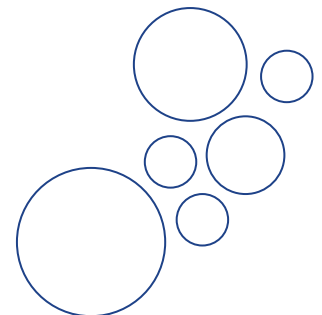


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List of Acronyms

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AF	acre-feet
AFY	acre-feet per year
AMI	Advanced Metering Infrastructure
AMR	Automatic Meter Reading
AWE	Alliance for Water Efficiency
AWWA	American Water Works Association
BARDP	Bay Area Regional Desalination Project
BMP	Best Management Practices
CAP	Customer Assistance Program
CCF	hundred cubic feet
CCR	California Code of Regulations
CII	Commercial, Industrial, and Institutional
CPUC	California Public Utilities Commission
CuSD	Cupertino Sanitary District
CUWCC	California Urban Water Conservation Council
CVP	Central Valley Project
CWC	California Water Code
DCR	Delivery Capability Report
DDW	Division of Drinking Water
DIMs	Dedicated irrigation meters
DMM	Demand management measure
DPR	Direct Potable Reuse
DWR	California Department of Water Resources
EBMUD	East Bay Municipal Utility District
EO	Executive Order
EPA	Environmental Protection Agency
FTE	full-time equivalent
GHG	Green House Gas
GPCD	gallons per capita per day
GPF	gallons per flush
GPSCD	gallons per service connection per day
GRC	General Rate Case
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWMP	Groundwater Management Plan

IPCC	Intergovernmental Panel on Climate Change
IPR	Indirect Potable Reuse
IRWMP	Integrated Regional Water Management Plan
kWh	kilowatt-hour
kWh/AF	kilowatt-hours per acre-foot
kWh/vol	kilowatt-hours per volume
MAR	Managed Aquifer Recharge
MAWA	Maximum Applied Water Allowance
MCCWL	Making Conservation a California Way of Life
MCL	Maximum Contaminant Levels
MG	million gallons
MGD	million gallons per day
MUMs	Mixed-use Meters
MWELO	Model Water Efficient Landscape Ordinance
NPR	Non Potable Reuse
P/MAs	Projects and Management Actions
PAWS	Protection and Augmentation of Water Supplies
PWS	Public Water System
RCP	Representative Concentration Pathways
RUWMP	Regional Urban Water Management Plan
RWF	Regional Wastewater Facility
RWQCP	Regional Water Quality Control Plant
SB	Senate Bill
SFPUC	San Francisco Public Utilities Commission
SGMA	Sustainable Groundwater Management Act
SWP	State Water Project
SWRCB	State Water Resources Control Board
TAZ	Traffic Analysis Zones
TCFD	Task Force on Climate-related Financial Disclosures
U.S.	United States
UWMP	Urban Water Management Plan
UWUO	Urban Water Use Objective
WEAP	Water Evaluation and Planning
WPCP	Water Pollution Control Plant
WSCP	Water Shortage Contingency Plan
WSFMP	Water Supply Facilities Master Plan
WTP	Water Treatment Plant
WWTP	Wastewater Treatment Plant
WY	Water Year

Chapter 1

Introduction and Overview

This Chapter discusses the importance and uses of this 2025 Urban Water Management Plan (UWMP or Plan), the relationship of this Plan to the California Water Code (CWC), the relationship of this Plan to other local and regional planning efforts, and how this Plan is organized and developed in general accordance with the California Department of Water Resources' (DWR's) 2025 UWMP Guidebook.¹ Specifically, this chapter contains the following sections:

1.1 Background and Purpose

1.2 Urban Water Management Planning and the California Water Code

1.3 Relationship to Other Planning Efforts

1.4 Plan Organization

1.5 Demonstration of Consistency with the Delta Plan for Participants in Covered Actions

1.6 Lay Description

1.1 Background and Purpose

California Water Service (Cal Water) is a public utility regulated by the California Public Utilities Commission (CPUC) that supplies water service to more than 2 million Californians through about 500,000 connections. Cal Water's 24 districts serve over 100 communities, spanning from the Chico District in the north to the Palos Verdes Peninsula in the south. California Water Service Group, Cal Water's parent company, also provides utility service to communities in Washington, New Mexico, Hawaii, and Texas. While water rates are set separately for each of Cal Water's 24 districts, oversight of the water rate setting process and district operations is provided by the CPUC.

This UWMP is a foundational document and source of information about Los Altos Suburban District's (also referred to herein as the "District") historical and projected water demands, water supplies, supply reliability and potential vulnerabilities, water shortage contingency planning, and demand management programs. Among other things, it is used as:

- A long-range planning document by Cal Water for water supply and system planning; and

¹ The 2025 UWMP Guidebook is available at: <https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Urban-Water-Management-Plans>

- A source for data on population, housing, water demands, water supplies, and capital improvement projects used in:
 - Regional water resource management plans prepared by wholesale water suppliers and other regional planning authorities (as applicable),
 - General Plans prepared by cities and counties, and
 - Statewide and broad regional water resource plans prepared by DWR, the State Water Resources Control Board (SWRCB), or other state agencies.

The District’s last UWMP was completed in 2021, referred to herein as the “2020 UWMP.” This Plan is an update to the 2020 UWMP and carries forward information from that plan that remains current and relevant, and provides additional information as required by subsequent amendments to the UWMP Act (CWC §10610 – 10657). Although this Plan is an update to the 2020 UWMP, it was developed to be a self-contained, stand-alone document and does not require readers to reference information contained in previous UWMP updates.

1.2 Urban Water Management Planning and the California Water Code

The UWMP Act requires urban water suppliers to prepare a UWMP every five years and to submit this Plan to DWR, the California State Library, and any city or county within which the supplier provides water supplies. All urban water suppliers, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet annually are required to prepare a UWMP (CWC §10617). For the purposes of the Plan, the terms “customer” and “connections” are used interchangeably.

The UWMP Act was enacted in 1983. Over the years, it has been amended in response to water resource challenges and planning imperatives confronting California. A significant amendment was made in 2009 as a result of the governor’s call for a statewide 20 percent reduction in urban water use by 2020, referred to as “20x2020,” the Water Conservation Act of 2009, and “Senate Bill [SB] X7-7.” This amendment required urban retail water suppliers to establish water use targets for 2015 and 2020 that would result in statewide water savings of 20 percent by 2020. Beginning in 2016, urban retail water suppliers were required to comply with the water conservation requirements in SB X7-7 in order to be eligible for state water grants or loans. Chapter 5 of this Plan contains the data and calculations used to determine compliance with these requirements.

In 2016, Governor Brown signed Executive Order (EO) B-37-16 Making Conservation a California Way of Life (MCCWL) and subsequently SB 606 and Assembly Bill (AB) 1668 were passed in 2018. A substantial revision to the UWMP Act was made through SB 606 and AB 1668. These changes include, among other things: (1) additional requirements for Water Shortage Contingency Plans ([WSCPs]; CWC §10640), (2) requirements for urban water suppliers to conduct a drought risk

assessments part of their future UWMPs to assess water supply reliability for a period of drought lasting five consecutive water years (WYs; CWC §10635(b)), and (3) conduct annual water supply and demand assessments to determine its water supply reliability for the current year and one dry year (CWC §10632(a)). These elements are included in Chapter 7 and Chapter 8 of this Plan. Additionally, SB 606 and AB 1688 set new requirements for urban water agencies to continue to increase water efficiency beyond SB X7-7. Beginning in 2024, agencies were required to report an annual Urban Water Use Objective (UWUO) to DWR as part of their Annual Water Use Reports.

The UWMP Act contains numerous other requirements that UWMPs must satisfy. **Appendix A** to this Plan lists each of these requirements and where in the Plan they are addressed.

1.3 Relationship to Other Planning Efforts

This Plan provides information specific to water management and planning by the Los Altos Suburban District. However, water management does not happen in isolation; there are other planning processes that integrate with the UWMP to accomplish urban planning. Some of these relevant planning documents include relevant city and county General Plans, Water Master Plans, Recycled Water Master Plans, Integrated Resource Plans, Integrated Regional Water Management Plans, Groundwater Management Plans, Groundwater Sustainability Plans (GSPs), and others.

This Plan is informed by and helps to inform these other planning efforts. In particular, this Plan utilizes information contained in city and county General Plans and local and regional water resource plans to the extent data from these plans are applicable and available.

1.4 Plan Organization

The organization of this Plan follows the same sequence as outlined in the 2025 UWMP Guidebook.²

Chapter 1 - Introduction and Overview

Chapter 2 - Plan Preparation

Chapter 3 - System Description

Chapter 4 - Water Use Characterization

Chapter 5 - SB X7-7 Baseline and Targets

² *ibid*

Chapter 6 - Water Supply Characterization

Chapter 7 - Water Supply Reliability Assessment

Chapter 8 - Water Shortage Contingency Planning

Chapter 9 - Demand Management Measures

Chapter 10 - Plan Adoption, Submittal, and Implementation

In addition to these ten chapters, this Plan includes a number of appendices providing supporting documentation and supplemental information. Pursuant to CWC §10644(a)(2), this Plan utilizes the standardized forms, tables, and displays developed by DWR for the reporting of water use and supply information required by the UWMP Act. This Plan also includes additional tables, figures, and maps to augment the set developed by DWR, as appropriate. The table headers indicate if the table is part of DWR’s standardized set of submittal tables.

1.5 Demonstration of Consistency with the Delta Plan for Participants in Covered Actions

Although not required by the UWMP Act, in the 2025 UWMP Guidebook,³ DWR recommends that all suppliers that are participating in, or may participate in, receiving water from a proposed project that is considered a “covered action” under the Delta Plan—such as a (1) multiyear water transfer; (2) conveyance facility; or (3) new diversion that involves transferring water through, exporting water from, or using water in the Sacramento-San Joaquin Delta (Delta)—provide information in their UWMP to demonstrate consistency with the Delta Plan policy WR P1, Reduce Reliance on the Delta Through Improved Regional Water Self-Reliance (California Code of Regulations, Title 23, Section 5003).

The Los Altos Suburban District derives its water supply from a combination of groundwater pumped from the Santa Clara Subbasin (Basin), purchased water from the Santa Clara Valley Water District (Valley Water), and recycled water. Valley Water imports surface water to the region through the South Bay Aqueduct of the California State Water Project (SWP) and the San Felipe Division of the federal Central Valley Project (CVP). Valley Water and its retailers, including Cal Water, anticipate participating in a covered action and are therefore required to demonstrate reduced Delta reliance. Appendix H of the draft Valley Water 2025 UWMP demonstrates Valley Water’s consistency with Delta plan Policy WR P1, Reduce Reliance on the Delta Through Improved Regional Water Self-Reliance.⁴ The reduced reliance analysis results show that Valley Water and its retailers are measurably reducing reliance on the Delta and improving regional self-

³ *ibid*

⁴ Valley Water, 2026. Draft 2025 Urban Water Management Plan, dated April 2026.

reliance, based on the percentage of Valley Water’s water supplies from the Delta Watershed. Detailed information regarding Delta Reliance and mitigation strategies is provided in Appendix H of the draft Valley Water 2025 UWMP and also in Section 6.10.2.

Additionally, Valley Water provided the following common language for inclusion in its retailers 2025 UWMPs:

- “Valley Water operates a complex and interconnected water supply system to conjunctively manage supplies from surface water (imported and local) and groundwater to meet countywide demand.
- As a retailer in Santa Clara County that uses groundwater and treated surface water, we rely on Valley Water activities to maintain sustainable supplies, including managed groundwater recharge and in-lieu groundwater recharge (e.g., treated surface water deliveries, demand management programs, and [San Francisco Public Utilities Commission] SFPUC supply)
- Valley Water’s conjunctive management of groundwater and surface water makes it very difficult to demonstrate reduced Delta reliance at a retailer level:
 - Valley Water uses water from the State Water Project (SWP), Central Valley Project (CVP), and local watershed runoff to meet groundwater recharge and water treatment plant needs, which in turn produce water for use by retailers and other users. The interconnected nature of the groundwater basins and blended use of sources in Valley Water infrastructure like reservoirs and pipelines make it infeasible to quantify imported water use at the retailer level.
 - Valley Water manages most of the water conservation programs for the County with the support of retailers. Retailers support the conservation programs through water rates and cost share agreements.
 - Valley Water and local retailers have recycled and purified water goals for the future. Future potable reuse would be added to surface supplies and may also augment groundwater supplies.
 - Valley Water projects an increased use of supplies captured locally, which can contribute to reduced reliance on the Delta. But given Valley Water’s conjunctive water management, these reductions cannot be allocated to individual retailers.
- Valley Water, with the support of all retailers including Cal Water, has made significant investments in demand management and local supplies to reduce Santa Clara

County's and thus Cal Water's reliance on the Delta (table). These investments include:

- Conservation and demand management
- Recycled and purified water
- Dam improvements/seismic retrofits to lift storage restrictions on local reservoirs
- Regional collaborations to increase self-reliance
- Through careful management and conjunctive use of local surface water and groundwater supplies, as well as increasing conservation and use of recycled and purified water, Santa Clara County (and by extension Cal Water) is reducing reliance on the Delta".⁵

1.6 Lay Description

CWC § 10630.5

Each plan shall include a simple lay description of how much water the agency has on a reliable basis, how much it needs for the foreseeable future, what the agency's strategy is for meeting its water needs, the challenges facing the agency, and any other information necessary to provide a general understanding of the agency's plan.

This 2025 UWMP is prepared for the Los Altos Suburban District, which serves drinking water to a population of approximately 63,559. The District meets the definition of an urban water supplier. Therefore, in accordance with CWC§10621(f), the District is obligated to develop and submit a UWMP to DWR.

This UWMP serves as a foundational planning document and includes descriptions of historical and projected water demands, and water supplies, and the resulting reliability during a set of defined water supply conditions over a 20-year planning horizon. This document also describes the actions the District is taking to promote water conservation, both by the District itself and by its customers (referred to as "demand management measures"), and includes a plan to address potential water supply shortages such as drought or other impacts to supply availability (the "Water Shortage Contingency Plan", included as **Appendix G**). This UWMP is updated every five years in accordance with state requirements under the UWMP Act and Amendments (Division 6 Part 2.6 of the CWC §10610 – 10656). Past plans developed for the District are available on the DWR Water Use Efficiency Data Portal website: <https://wuedata.water.ca.gov/>.

⁵ Valley Water Reduced Delta Reliance for Retailers Common Language, provided via email on March 19, 2026.

This document includes 10 chapters, which are summarized below pursuant to the requirements of the CWC §10630.5.

Chapter 1- Introduction and Overview

This chapter presents the background and purpose of the UWMP, identifies the Plan organization, and provides this lay description overview of the document. For agencies that rely on water from the Delta, this section also discusses and demonstrates consistency with the Delta Plan by the Delta Stewardship Council. Valley Water and its retailers, including Cal Water, anticipate participating in a covered action and are therefore required to demonstrate reduced Delta reliance. Based on information provided by Valley Water, Valley Water and its retailers are measurably reducing reliance on the Delta and improving regional self-reliance, based on the percentage of Valley Water’s water supplies from the Delta Watershed. Detailed information regarding Delta Reliance and mitigation strategies is provided in Appendix H of the draft Valley Water 2025 UWMP and in Section 6.10.2 of this Plan.

Chapter 2 - Plan Preparation

This chapter discusses key structural aspects related to the preparation of the UWMP, and describes the coordination and outreach conducted as part of the preparation of the Plan, including coordination with local agencies and other community organizations (i.e., City of Los Altos, City of Mountain View, City of Cupertino, City of Sunnyvale, City of Los Altos Hills, and Santa Clara County), Valley Water, the relevant Groundwater Sustainability Agency (GSA), and the public.

Chapter 3 - System Description

This chapter provides a description of the Los Altos Suburban District’s water system and the service area, including information related to the climate, population, and demographics. The District is located in the Santa Clara County. The District has a population of approximately 63,559 and has a climate characterized by mild summers and cool wet winters. The majority of the 16.3 inches of average annual precipitation falls between October and May. The District service area includes low, medium, and high density residential, mixed use, commercial, industrial, and municipal land uses. All water customers are considered urban (i.e., non-agricultural water users).

Chapter 4 - Water Use Characterization

This chapter provides a description and quantifies the Los Altos Suburban District’s current and projected demands through the year 2050. The District provides drinking water (also referred to as “potable water”) to customers as well as recycled water (also referred to as “non-potable water”). Water demands refer not only to the water used by customers, but also includes the

water used as part of the system’s maintenance and operation, as well as unavoidable losses inherent in the operation of a water distribution system. Water demand within the District averaged 10,583 acre-feet per year (AFY) in 2025. Taking into account historical water use, expected population increase and other growth, climatic variability, and other assumptions, water demand within the District is projected to increase to 10,802 AFY by 2050, a change of 2.0 percent compared to 2025. In dry year periods, water demands are expected to be somewhat higher, potentially up to 11,556 AFY by 2050 during an extended five-year drought.

Chapter 5 - SB X7-7 Baseline and Targets

In this chapter, the Los Altos Suburban District demonstrates compliance with its per capita water use target for the year 2020. The Water Conservation Act of 2009 (Senate Bill [SB] X7-7) was enacted in November 2009 and requires the state of California to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. In order to achieve this, each urban retail water supplier was required to establish water use targets for 2015 and 2020 using methodologies established by DWR. The District was in compliance with its 2020 water use target of 185 gallons per capita per day (GPCD), having reduced its water use in 2020 to 166 GPCD. The District continues to meet its 2020 target in 2025.

Chapter 6 - Water Supply Characterization

This chapter presents an analysis of the Los Altos Suburban District’s water supplies, as well as an estimate of water-related energy-consumption. The intent of this chapter is to present a comprehensive overview of the District’s water supplies, estimate the volume of available supplies over the UWMP planning horizon, and assess the sufficiency of the District’s supplies to meet projected demands under “normal” hydrologic conditions.

The sources of water supply for the District are a combination of purchased imported water, groundwater, and recycled water.

The District purchases treated surface water from Valley Water. Valley Water imports surface water to the region through the South Bay Aqueduct of the SWP and the San Felipe Division of the CVP.

The District pumps groundwater from the Santa Clara Subbasin (DWR Basin No. 2-009.02) of the Santa Clara Valley Basin. The Basin is not adjudicated, and is not considered by DWR to be critically overdrafted; however, the Basin has been prioritized by DWR as “high” priority. The Valley Water GSA, which manages the Santa Clara Subbasin, completed the Groundwater Management Plan for the Santa Clara and Llagas Subbasins (GWMP) as an Alternative GSP in December 2016 per the Sustainable Groundwater Management Act (SGMA). The Alternative GSP was approved by DWR on July 17, 2019. An amended GWMP was submitted to DWR in December 2021 (2021 Alternative GSP). In June 2024, DWR approved the 2021 Alternative GSP confirming

that the Alternative satisfies the objectives of SGMA and complies with related regulations. The District falls within the jurisdiction of the Valley Water GSA. A small portion of the District falls outside of the Basin.

The District also uses a small amount of recycled water from the Sunnyvale Water Pollution Control Plant and plans to continue this level of usage throughout the planning period.

Based on all available information, the combination of purchased imported water, groundwater, and recycled water supplies are expected to be sufficient to support the District's projected water demands through 2050 under normal year conditions.

Calculating and reporting of water system energy intensity is also required for the 2025 UWMPs. Energy intensity is defined as the net energy used for water treatment, pumping, conveyance, and distribution for all water entering the distribution system, and does not include the energy used to treat wastewater. The energy intensity for the District is estimated to be 368 kilowatt hours per acre-foot of water (kWh/AF).

Chapter 7 - Water Supply Reliability Assessment

This chapter assesses the reliability of the Los Altos Suburban District's water supplies, with a specific focus on potential constraints such as groundwater and surface water supply availability, water quality, and climate change. The intent of this chapter is to identify any potential constraints that could affect the reliability of the District's supply (such as drought conditions) to support the District's planning efforts to ensure that its customers are well served. Water service reliability is assessed during normal, single dry-year, and multiple dry-year hydrologic conditions. Based on this analysis, the District expects the available supplies to be sufficient to meet projected demands in all hydrologic conditions, excepting the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of the District's WSCP (see **Appendix G**).

Further, potential water quality issues are not expected to affect the quality of water served to the District's customers, as water quality is routinely monitored and the District is able to make all appropriate adjustments to its treatment and distribution system to ensure only high-quality drinking water is served.

Chapter 8 - Water Shortage Contingency Planning

This chapter describes the WSCP for the Los Altos Suburban District. The WSCP serves as a standalone document to be engaged in the case of a water shortage event, such as a drought or supply interruption, and defines specific policies and actions that will be implemented at various

shortage level scenarios (e.g., implementing customer water budgets and surcharges, or restricting landscape irrigation to specific days and/or times). Consistent with DWR requirements, the WSCP includes six water Shortage Levels to address shortage conditions ranging from up to 10 percent to greater than 50 percent shortage.

Chapter 9 - Demand Management Measures

This chapter includes descriptions of past and planned conservation programs that Cal Water operates within each demand management measure (DMM) category outlined in the UWMP Act, specifically: (1) water waste prevention ordinances, (2) metering, (3) conservation pricing, (4) public education and outreach, (5) distribution system water loss management, (6) water conservation program coordination and staffing support, and (7) “other” DMMs. Cal Water has developed a suite of conservation programs and policies, which address each DMM category.

Chapter 10 - Plan Adoption, Submittal, and Implementation

This chapter provides information on a public hearing, the adoption process for the UWMP and WSCP, the adopted UWMP and WSCP submittal process, Plan Implementation, and the process for amending the adopted UWMP and WSCP. Prior to adopting the Plan, Cal Water held a formal public hearing to present information on its Los Altos Suburban District UWMP and WSCP on June 1, 2026, 5:30 PM. This UWMP and the corresponding WSCP were submitted to DWR within 30 days of adoption and by the July 1, 2026 deadline.

Chapter 2

Plan Preparation

This chapter discusses the type of Urban Water Management Plan (UWMP or Plan) the California Water Service (Cal Water) Los Altos Suburban District (also referred to herein as the “District”) has prepared and includes information that will apply throughout the Plan. Coordination and outreach during the development of the Plan is also discussed. Specifically, this chapter includes the following sections:

- 2.1 Compliance with the UWMP Act
- 2.2 Regional Planning
- 2.3 Individual or Regional Planning and Compliance (Regional Alliance)
- 2.4 Plan Preparation, Standard Units, and Basis for Reporting
- 2.5 Coordination and Outreach

2.1 Compliance with the UWMP Act

The Los Altos Suburban District includes one Public Water System (PWS) as listed in **Table 2-1** (i.e., Los Altos Suburban PWS). Public Water Systems are the systems that provide drinking water for human consumption and are regulated by the California State Water Resources Control Board (SWRCB), Division of Drinking Water. The SWRCB requires that water agencies report water usage and other relevant PWS information via the electronic Annual Reports to the Drinking Water Program (eARDWP). These data are used by the state to determine, among other things, whether an urban retail water supplier has reached the threshold (3,000 or more connections or 3,000 acre-feet [AF] of water supplied) for submitting a UWMP. For the purposes of the Plan, the terms “customer” and “connections” are used interchangeably. In 2025, the District provided water through 18,572 connections and served 10,583 AF of water (**Table 2-1**). The District is therefore subject to the requirements of the UWMP Act.

Table 2-1. Public Water Systems (DWR Table 2-1)

Has there been a change in the number of affiliated Public Water Systems since the 2020 UWMP? (OPTIONAL)			No
Public Water System Number	Public Water System Name	Number of Municipal Connections 2025	Volume of Water Supplied 2025
			(AF)
CA4310001	Los Altos Suburban	18,572	10,583
Total		18,572	10,583
Notes:			

2.2 Regional Planning

Regional planning can deliver mutually beneficial solutions to all agencies involved by reducing costs for the individual agency, assessing water resources at the appropriate geographic scale, and allowing for solutions that cross jurisdictional boundaries. California Water Service (Cal Water) participates in regional water resources planning initiatives throughout California in the regions in which its 24 districts are located. Cal Water participated in the 2019 Update of the Bay Area Integrated Regional Water Management Plan (IRWMP), which covers the Los Altos Suburban District, and the Bay Area Water Supply and Conservation Agency's 2015 and 2025 Long-Term Reliable Water Supply Strategies. Cal Water also participates in the implementation of the current Alternative Groundwater Sustainability Plan (2021 Alternative GSP) for the Santa Clara and Llagas Subbasins. The District falls within the jurisdiction of the Valley Water GSA. A small portion of the District falls outside of the Santa Clara Subbasin.

2.3 Individual or Regional Planning and Compliance (Regional Alliance)

Urban water suppliers may elect to prepare individual or regional UWMPs. The Los Altos Suburban District has elected to prepare an individual UWMP (see **Table 2-2**).

This Plan has been prepared in general accordance with the format suggested in the California Department of Water Resources' (DWR's) 2025 UWMP Guidebook. Text from the UWMP Act has been included in text boxes at the beginning of relevant chapters of this UWMP. The information presented in the respective UWMP chapters, and the associated text, figures, and charts are collectively intended to fulfill the requirements of that sub-section of the UWMP Act. To the extent practicable, supporting documentation has also been provided in **Appendix A** through **Appendix I**. Other sources for the information contained herein are provided in the references section of the Plan.

Urban retail water suppliers may report on the requirements of the Water Conservation Act of 2009 (Senate Bill [SB] X7-7) individually or as a member of a “Regional Alliance.” Although the District is a member of a Regional Alliance, this UWMP provides information on the District’s compliance with its SB X7-7 water conservation targets as an individual urban retail water supplier.

Table 2-2. Plan Identification (DWR Table 2-2)

Select One or Both	Type of Plan		Name of Regional Alliance or RUWMP
<input checked="" type="checkbox"/>	Individual UWMP		
	<input checked="" type="checkbox"/>	Water Supplier is also a member of a SB X7-7 Regional Alliance	California Water Service – San Francisco Bay Regional Alliance
<input type="checkbox"/>	Regional Urban Water Management Plan (RUWMP)		
Notes:			
(a) The District is a member of a Regional Alliance; however, Table 5-1 provides information on the District's progress towards meeting its water conservation targets under SB X7-7 as an individual urban retail water supplier.			

2.4 Plan Preparation, Standard Units, and Basis for Reporting

CWC § 10608.12 (t)

“Urban retail water supplier” means a water supplier, either publicly or privately owned, that directly provides potable municipal water to more than 3,000 end users or that supplies more than 3,000 acre-feet of potable water annually at retail for municipal purposes.

CWC § 10617

“Urban water supplier” means a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. An urban water supplier includes a supplier or contractor for water, regardless of the basis of right, which distributes or sells for ultimate resale to customers. This part applies only to water supplied from public water systems subject to Chapter 4 (commencing with Section 116275) of Part 12 of Division 104 of the Health and Safety Code.

CWC § 10621 (a)

Each urban water supplier shall update its plan at least once every five years on or before July 1, in years ending in six and one, incorporating updated and new information from the five years preceding each update.

CWC § 10621 (f)

Each urban water supplier shall update and submit its 2020 plan to the department by July 1, 2021.

Per California Water Code (CWC) §10617, the Los Altos Suburban District is an urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 AF of water annually. The District is therefore obligated under CWC §10621(f) to develop and submit a UWMP to DWR by July 1, 2026. The District is an urban retail water supplier, as identified in **Table 2-3**. The District is not a wholesale water supplier.

Annual volumes of water reported in this UWMP are measured in AF and are reported on a calendar year basis (**Table 2-3**). Water use and planning data reported in this UWMP use calendar year 2025 as the selected twelve-month reporting period, consistent with the reporting period options provided in the 2025 UWMP Guidebook.

Per the 2025 UWMP Guidebook, the UWMP preparer is requested to complete a checklist of specific UWMP requirements to assist DWR’s review of the submitted UWMP. The completed checklist is included in **Appendix A**.

Further, consistent with the 2025 UWMP Guidebook, the terms “water use”, “water consumption”, and “water demand” are used interchangeably in this UWMP.

Table 2-3. Supplier Identification (DWR Table 2-3)

Type of Supplier (select one or both)	
<input type="checkbox"/>	Supplier is a wholesale supplier
<input checked="" type="checkbox"/>	Supplier is a retail supplier
Fiscal or Calendar Year (select one)	
<input checked="" type="checkbox"/>	UWMP Tables are in calendar years
<input type="checkbox"/>	UWMP Tables are in fiscal years
If using fiscal years provide month and date that the fiscal year begins (mm/dd)	
Units of measure used in UWMP (Select from the drop down list).	
Unit	AF
Notes:	

2.5 Coordination and Outreach

CWC § 10620 (d) (3)

Each urban water supplier shall coordinate the preparation of its plan with other appropriate agencies in the area, including other water suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practicable.

CWC § 10631 (a) A plan shall be adopted in accordance with this chapter that shall do all of the following:

Urban water suppliers shall coordinate with local or regional land use authorities to determine the most appropriate land use information, including, where appropriate, land use information obtained from local or regional land use authorities, as developed pursuant to Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code.

CWC § 10642

Each urban water supplier shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of both the plan and the water shortage contingency plan. Prior to adopting either, the urban water supplier shall make both the plan and the water shortage contingency plan available for public inspection and shall hold a public hearing or hearings thereon. ...

Coordination with other water suppliers, cities, counties, and other community organizations in the region is an important part of preparing a UWMP and a Water Shortage Contingency Plan (WSCP). This section identifies the agencies and organizations Los Altos Suburban District sought to coordinate with during preparation of this Plan.

2.5.1 Wholesale and Retail Coordination

CWC § 10631 (h)

An urban water supplier that relies upon a wholesale agency for a source of water shall provide the wholesale agency with water use projections from that agency for that source of water in five-year increments to 20 years or as far as data is available. The wholesale agency shall provide information to the urban water supplier for inclusion in the urban water supplier's plan that identifies and quantifies, to the extent practicable, the existing and planned sources of water as required by subdivision (b), available from the wholesale agency to the urban water supplier over the same five-year increments, and during various water-year types in accordance with subdivision (f). An urban water supplier may rely upon water supply information provided by the wholesale agency in fulfilling the plan informational requirements of subdivisions (b) and (f).

Urban retail water suppliers relying on one or more wholesalers for water supply are required to provide these wholesalers with information regarding projected water supply and demand. As shown in **Table 2-4**, the Los District derives portions of its water supply from the Santa Clara Valley Water District (Valley Water).

Table 2-4. Water Supplier Information Exchange (DWR Table 2-4)

Wholesale Water Supplier Name
Santa Clara Valley Water District
NOTES:

2.5.2 Coordination with and Notice to Other Agencies and the Community

CWC § 10620 (d) (3)

Each urban water supplier shall coordinate the preparation of its plan with other appropriate agencies in the area, including other water suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practicable.

CWC § 10642

Each urban water supplier shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of both the plan and the water shortage contingency plan. Prior to adopting either, the urban water supplier shall make both the plan and the water shortage contingency plan available for public inspection and shall hold a public hearing or hearings thereon. Prior to any of these hearings, notice of the time and place of the hearing shall be published within the jurisdiction of the publicly owned water supplier pursuant to Section 6066 of the Government Code. The urban water supplier shall provide notice of the time and place of a hearing to any city or county within which the supplier provides water supplies. Notices by a local public agency pursuant to this section shall be provided pursuant to Chapter 17.5 (commencing with Section 7290) of Division 7 of Title 1 of the Government Code. A privately owned water supplier shall provide an equivalent notice within its service area. After the hearing or hearings, the plan or water shortage contingency plan shall be adopted as prepared or as modified after the hearing or hearings.

The District coordinated with cities, counties, and other community organizations during preparation of this UWMP. Cal Water provided notice to these entities and the communities it serves 60 days prior to the public hearing it held on June 1, 2026, to present the draft of the UWMP, address questions, and receive comments. Cities and counties receiving the public hearing notification from the District as required per CWC §10621 (b) are listed in **Table 10-1** in Chapter 10 of this Plan.

Copies of correspondence with other agencies and public notices are provided in **Appendix B** and **Appendix C**, respectively.

Water suppliers are required by the UWMP Act to encourage active involvement of the community within the service area prior to and during the preparation of its UWMP. The UWMP Act also requires water suppliers to make a draft of the UWMP available for public review and to hold a public hearing regarding the findings of the UWMP prior to its adoption. In addition to sending notices to the agencies listed in **Table 2-4**, the District also notified the public of its intent to adopt its UWMP. The Public Review Draft of the 2025 UWMP was made available on Cal

Water's website on MM DD, 2026. Additional information on public participation, including information on noticing, is provided in Chapter 10.

2.5.3 Coordination with Land Use Authorities

CWC § 10631 (a) *A plan shall be adopted in accordance with this chapter that shall do all of the following:*

Urban water suppliers shall coordinate with local or regional land use authorities to determine the most appropriate land use information, including, where appropriate, land use information obtained from local or regional land use authorities, as developed pursuant to Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code.

Cal Water coordinated with the City of Los Altos, City of Mountain View, City of Cupertino, City of Sunnyvale, Town of Los Altos Hills, and Santa Clara County staff to review and confirm that appropriate land use assumptions were used to develop the UWMP demand projections. Correspondence with the land use authorities is included in **Appendix B**.

Chapter 3

System Description

CWC § 10631 (a)

A plan shall be adopted in accordance with this chapter that shall do all of the following:

Describe the service area of the supplier, including current and projected population, climate, and other social, economic, and demographic factors affecting the supplier's water management planning. The projected population estimates shall be based upon data from the state, regional, or local service agency population projections within the service area of the urban water supplier and shall be in five-year increments to 20 years or as far as data is available. The description shall include the current and projected land uses within the existing or anticipated service area affecting the supplier's water management planning. Urban water suppliers shall coordinate with local or regional land use authorities to determine the most appropriate land use information, including, where appropriate, land use information obtained from local or regional land use authorities, as developed pursuant to Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code.

This chapter provides a description of the California Water Service (Cal Water) Los Altos Suburban District (also referred to herein as the “District”) water system and service area, including climate, population, demographics, and land uses to help in understanding various elements of water supply and demand. This chapter includes the following sections:

- 3.1 General Description
- 3.2 Service Area Boundary Map
- 3.3 Service Area Climate
- 3.4 Service Area Population and Demographics
- 3.5 Land Uses within Service Area

3.1 General Description

The Los Altos Suburban District was formed in 1931 when Cal Water, a public water utility regulated by the California Public Utilities Commission (CPUC), purchased the Los Altos Water Company. The District supplies a combination of locally produced groundwater and purchased surface water from the Santa Clara Valley Water District (Valley Water), the region's wholesale water supplier. In total, the District currently has 20 wells, 41 storage tanks, 60 booster pumps, and 290 miles of pipeline delivering approximately 9 million gallons of water daily. The District delivers water to residential, commercial, industrial, and governmental customers. Residential customers account for most of the District's service connections and 68 percent of its water use.

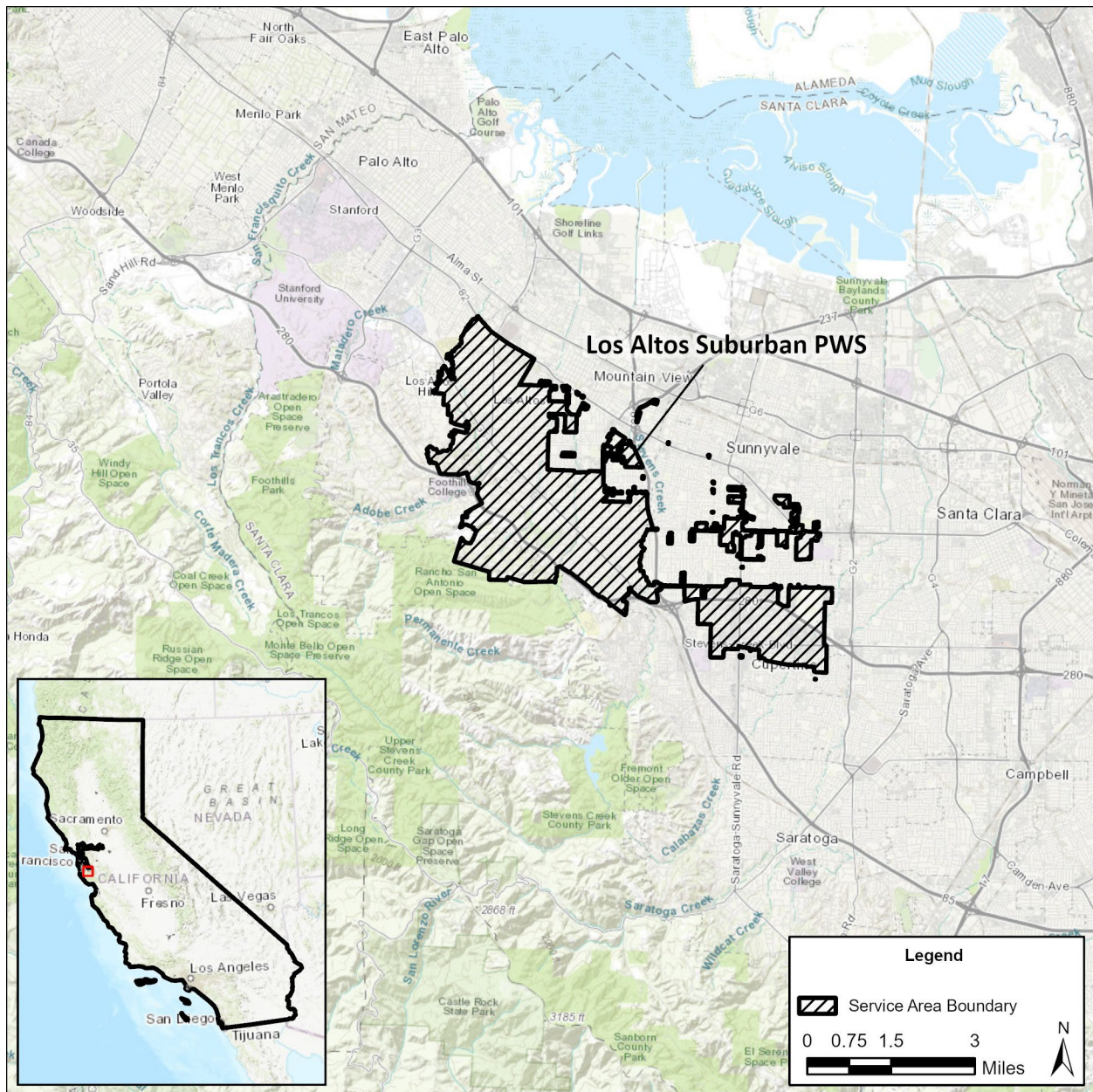
Non-residential water uses account for 26 percent of total demand, while distribution system losses account for the remaining amount.

3.2 Service Area Boundary Map

Figure 3-1 shows the location of the Los Altos Suburban District and its current service area boundaries. The District is located in northern Santa Clara County, approximately 45 miles south of the City of San Francisco. The District serves the City of Los Altos, fringe sections of the cities of Cupertino, Los Altos Hills, Mountain View, Sunnyvale and adjacent unincorporated areas of Santa Clara County. The cities of Palo Alto, Mountain View, Sunnyvale and Santa Clara own and operate water systems northeast and southeast of the District. Purissima Hills Water District is north of the Town of Los Altos Hills. Major transportation links in the District include Interstate 280, State Route 82, and State Route 85. The San Jose and San Francisco International Airports are located to the southeast and north of the District, respectively.

The District is built upon the San Francisco Bay Plain and abuts to the northern foothills of the Coastal Range. Major geological features located in the Los Altos region include the San Andreas, Berrocal, and Pilarcitos Faults situated just west of the District, and the Hayward and Calaveras Faults located east of the District across the San Francisco Bay. A major earthquake on any of these faults has the potential to disrupt water service in the District.

Figure 3-1. District Location and Service Boundaries



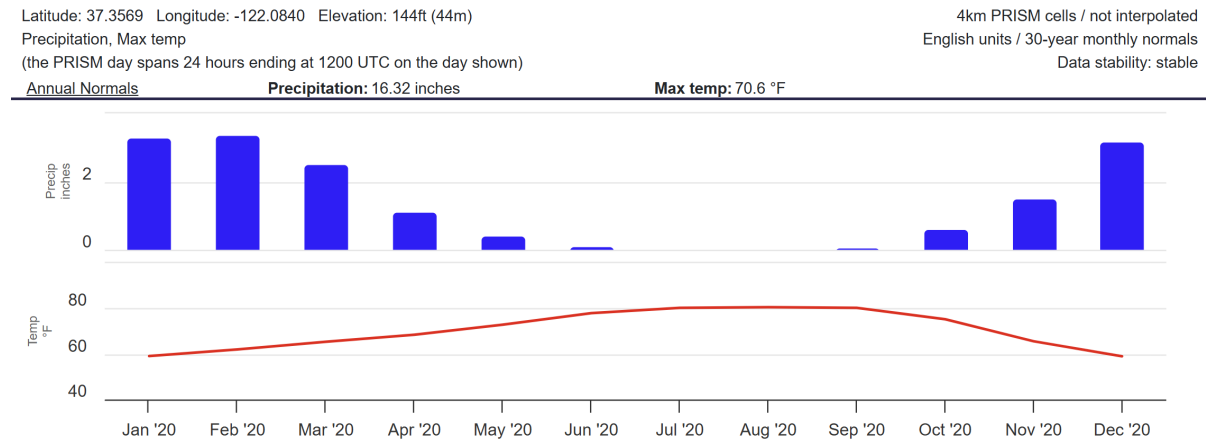
3.3 Service Area Climate

The Los Altos Suburban District’s climate is characterized by mild summers and cool wet winters (see **Figure 3-2**).⁶ Most rainfall occurs between October and May. Precipitation totals in the

⁶ Precipitation and temperature data downloaded from: <https://prism.oregonstate.edu/explorer/>. These data represent a 30-year period from 1991 through 2020. The x-axis reflects the end of the 30-year time series.

summer months are negligible. On average, the District receives 16.3 inches of rainfall annually. Maximum daily air temperature averages 80 degrees Fahrenheit during the summer months. In the winter, it averages 60 degrees Fahrenheit.

Figure 3-2. 30-Year Normals, Precipitation and Maximum Daily Air Temperature



Based on data from the Oregon State PRISM dataset for 1895–2024, annual rainfall varies considerably from year to year, as is typical across much of California. The standard deviation of annual rainfall is 5.7 inches—about 36 percent of the long-term average. Multi-year periods of below-average rainfall are common: since 1895, there have been 12 episodes lasting three or more consecutive years and two episodes lasting five or more years. The most recent five-year dry period occurred from 1987 through 1991. Despite the high variability, there is no statistically significant long-term trend in average annual rainfall, and the variance of annual rainfall has remained stable.

In contrast, temperatures in the District have been steadily warming. Since 1895, the average annual temperature has increased at a rate of approximately 0.01 degrees Fahrenheit per year. Mean annual temperature for the 2015–2024 period was 2.8 degrees Fahrenheit higher than for the corresponding 10-year period a century earlier. Although temperatures have risen, the variance in annual temperatures has remained fairly stable over time.⁷

3.4 Service Area Population and Demographics

The Los Altos Suburban District estimates that its service area population was 63,559 in 2025.

Population estimates are developed using U.S. Census Block population counts from the decennial Census. These counts are converted to average population per single-family and multi-

⁷ Because annual temperature exhibits a statistically significant upward trend, it is necessary to apply variance stability tests to the detrended temperature series. This ensures that the test evaluates stability in the variance around the trend, rather than confounding shifts in the mean with changes in variability.

family service, which are then applied to annual service counts for the years between decennial censuses. This approach is similar to the method used in the California Department of Water Resources (DWR) Population Tool, and comparisons between the two methods show that resulting population estimates typically differ by less than one percent.⁸

Current and projected service area populations are shown in **Table 3-1**. Population projections are based on population, housing, and employment forecasts through 2050 for Traffic Analysis Zones (TAZ) overlaying the District prepared by the Association of Bay Area Governments (ABAG) plus population associated with Water Supply Assessments for new development that may not be fully reflected in the ABAG growth estimates. Between 2025 and 2050, the service area population is projected to grow at an average rate of approximately 0.3 percent per year.

Table 3-1. Population – Current and Projected (DWR Table 3-1)

Population Served	2025	2030	2035	2040	2045	2050
	63,559	65,985	67,058	67,688	68,324	68,967

Demographics for the City of Los Altos (Los Altos or City), the principal city served by the District, are summarized in **Table 3-2**. These data are from the U.S. Census American Community Survey 2023 5-Year Estimates. Relative to the rest of California, the population of Los Altos is older and more racially homogeneous. Educational attainment in Los Altos is significantly higher than for the state as a whole, as is the median household income.

The stock of housing in Los Altos is older than for California as a whole. Approximately 79 percent of homes in Los Altos were built before 1990 compared to 72 percent for all of California. Homes built after 1990 are more likely to have plumbing fixtures that are compliant with state and federal water and energy efficiency standards.

⁸ California Water Service, 2016. 2015 Urban Water Management Plan: Chico District, dated June 2016.

Table 3-2. Demographic and Housing Characteristics

Demographics	City of Los Altos	California
Median Age (years)	46.0	37.6
Racial Makeup (%)		
White	51.8	38.1
Black or African American	1.0	5.4
American Indian and Alaska Native	0.1	1.4
Asian	37.5	16.1
Native Hawaiian	0.0	0.4
Some other race	1.9	18.9
More than two races	7.7	19.8
Hispanic or Latino (of any race) (%)	5.5	40.8
Educational Attainment (%)		
Bachelor's Degree or Higher	87.2	36.5
Primary Language Spoken at Home (%)		
English Only	93.5	82.7
Limited English-Speaking Households	6.5	17.3
Median Household Income (\$)	250,000+	96,334
Population below Federal Poverty Level (%)	3.1	12.0
Housing	City of Los Altos	California
Median Year Built	1964	1976
Year Housing Built (%)		
2010 or Later	10.3	6.9
2000 to 2009	5.9	11.1
1990 to 1999	5.2	10.3
Before 1990	78.6	71.6

3.5 Land Uses within Service Area

Current land uses within the Los Altos Suburban District is a mixture of low, medium, and high density residential, mixed use, commercial, industrial, public facilities, and parks/open space. Maps showing General Plan land use designations for communities served by the District are provided in **Appendix D**.

The District's population and service growth projections are tied to ABAG TAZ projections of population, housing, and employment. These projections, in turn, are developed by ABAG through detailed land use modeling of the Bay Area.⁹ The areas included in the ABAG land use model include all incorporated and unincorporated areas of the nine-county Bay Area. ABAG's land use model application is comprised of ten sub models:

1. Employment Transition Model
2. Household Transition Model
3. Real Estate Development Model
4. Scheduled Development Events Model
5. Employment Relocation Model
6. Household Relocation Model
7. Government Growth Model
8. Employment Location Choice Model
9. Household Location Choice Model
10. Real Estate Price Model

Parcels, or individual units of land ownership, provide the fundamental building block for the ABAG land use model. The land use database includes information linking the parcels to the TAZ they are within, buildings that are on them, their size, their monetary value, and their current planning constraints. The base year database contains 1.9 million buildings categorized into 14 different land use types, ranging from detached single-family housing to heavy industrial.

The ABAG land use model relies on current zoning for all parcels in the region as a representation of the land use controls in place in the base year. Zoning codes, general plans, and specific plans

⁹ Association of Bay Area Governments and Metropolitan Transportation Commission (2017). Land Use Modeling Report, Plan Bay Area 2040 Final Supplemental Report, dated July 2017. Accessed from: <http://files.mtc.ca.gov/library/pub/29736.pdf>

are processed by ABAG to obtain a consistent indication of each jurisdiction’s long-term vision for land use type, residential dwelling units per acre, and commercial floor-area-ratio.

Chapter 4

Water Use Characterization

This chapter provides a description and quantifies the California Water Service (Cal Water) Los Altos Suburban District’s (also referred to herein as the “District”) past, current, and projected water uses through 2050. For the purposes of the Urban Water Management Plan (UWMP or Plan), the terms “water use” and “water demand” are used interchangeably. This chapter is divided into the following subsections:

- 4.1 Non-Potable Versus Potable Water Use
- 4.2 Past, Current, and Projected Water Uses by Sector
- 4.3 Distribution System Water Loss
- 4.4 Climate Change Considerations
- 4.5 Coordinating Water Use Projections

Appendix E provides additional information and data related to the development of the water demand projections presented in this chapter.

4.1 Non-Potable Versus Potable Water Use

Potable and non-potable water uses are accounted for separately herein. Potable uses are served by the District’s potable water delivery system. Potable water deliveries comply with Title 22 Drinking Water Standards. Non-potable water uses include recycled and untreated raw water deliveries, such as tertiary treated recycled water or surface or groundwater supplies that do not meet potable drinking water standards. Uses of potable versus non-potable water are clearly distinguished in the tables included in this section of the Plan.

4.2 Past, Current, and Projected Water Uses by Sector

CWC § 10631 (d) (1) A plan shall be adopted in accordance with this chapter that shall do all of the following:

(d)(1) For an urban retail water supplier, quantify, to the extent records are available, past and current water use, over the same five-year increments described in subdivision (a), and projected water use, based upon information developed pursuant to subdivision (a), identifying the uses among water use sectors, including, but not necessarily limited to, all of the following:

(A) Single-family residential.

(B) Multifamily.

(C) Commercial.

(D) Industrial.

(E) Institutional and governmental.

(F) Landscape.

(G) Sales to other agencies.

(H) Saline water intrusion barriers, groundwater recharge, or conjunctive use, or any combination thereof.

(I) Agricultural.

(J) Distribution system water loss (d)(2) The water use projections shall be in the same five-year increments described in subdivision (a).

(d)(4)(A) Water use projections, where available, shall display and account for the water savings estimated to result from adopted codes, standards, ordinances, or transportation and land use plans identified by the urban water supplier, as applicable to the service area.

(d)(4)(B) To the extent that an urban water supplier reports the information described in subparagraph (A), an urban water supplier shall do both of the following: (i) Provide citations of the various codes, standards, ordinances, or transportation and land use plans utilized in making the projections. (ii) Indicate the extent that the water use projections consider savings from codes, standards, ordinances, or transportation and land use plans. Water use projections that do not account for these water savings shall be noted of that fact.

Demand within the Los Altos Suburban District's water service area is measured using water meters that are installed at each customer service connection. Demand within the service area is tracked and reported for the following sectors:

- **Single Family Residential:** Attached or detached dwelling units that are individually metered.

- **Multi-Family Residential:** Three or more dwelling units served by a common water meter.
- **Commercial:** Private enterprise customers other than large industrial customers.
- **Institutional/Governmental:** Institutional and governmental entities such as schools, administrative buildings, and publicly owned parks and landscaping.
- **Industrial:** Large industrial sites and water use.
- **Landscape:** Water meters classified exclusively for outdoor landscape irrigation.
- **Other:** Includes temporary meters, and miscellaneous customers not listed elsewhere.
- **Fire Service:** Water meters used for fire suppression or system maintenance. These meters typically do not have billed consumption.

Water use categories described in California Water Code (CWC) §10631(d)(1)(G) through (I)—listed below—were not included in the District’s water demand calculations because they do not apply to the system:

- Sales to other agencies;
- Sales for agricultural irrigation; and,
- Saline water intrusion barriers, groundwater recharge, or conjunctive use, or any combination thereof.

4.2.1 Past and Current Water Use

CWC §10631

(d)(1) For an urban retail water supplier, quantify, to the extent records are available, past and current water use... based upon information developed pursuant to subdivision (a), identifying the uses among water use sectors...

Table 4-1 and **Figure 4-1** show water uses from 2021 through 2025 in acre-feet (AF). Total demand in 2025 was 10,619 AF, of which 97 percent was potable water demand and 3.0 percent was non-potable demand, comprised of a small amount of recycled water for non-residential uses. Discussion of potential future use of recycled water is provided in Section 6.5.

Residential customers constitute the majority of the District’s service connections and account for roughly 68 percent of total water use. Non-residential demands, including non-potable, represent about 26 percent, while distribution system losses account for the remaining amount.

Per capita water use in the District has declined steadily since the early 2000s. Between 2000 and 2025, water use per person decreased by 43 percent (**Figure 4-2**), falling from 260 gallons per

capita per day (GPCD) to 149 GPCD. Despite service area population growth during this period, total demand decreased by approximately 4,400 AF—going from just over 15,000 AF in 2000 to 10,619 AF today.

Several factors have contributed to this long-term reduction in per capita use. Tiered residential pricing was adopted in 2009, strengthening incentives for efficient household water use. Additionally, beginning in 2012, Cal Water tripled conservation program expenditures, expanding customer access to tools and resources that support water-use efficiency. Lastly, state and federal efficiency standards have significantly reduced water use from toilets, showers, clothes washers, and other plumbing fixtures.

Collectively, these actions have resulted in a sustained reduction in per capita water use across the service area. These trends are expected to continue and are incorporated into the demand projections presented in the next section.

Table 4-1. Demands for Potable and Non-Potable Water - Actual (DWR Table 4-1)

Use Type	Additional Description (as needed)	Level of Treatment When Delivered (OPTIONAL)	Historical Water Use				
			2021	2022	2023	2024	2025
			(AF)	(AF)	(AF)	(AF)	(AF)
Single Family		Potable	7,967	7,012	6,502	6,726	6,608
Multi-Family		Potable	641	600	596	612	583
Commercial		Potable	2,090	2,085	1,980	2,008	1,969
Institutional		Potable	470	419	438	459	455
Industrial		Potable	3	2	3	3	2
Landscape		Potable	0	0	0	0	0
Other		Potable	8	6	2	3	17
Losses	(a)	Potable	691	636	709	776	708
Commercial	Recycled	Non-Potable	127	121	128	251	277
Losses	Recycled	Non-Potable	0	0	0	0	0
Subtotal Potable			11,871	10,760	10,229	10,588	10,342
Subtotal Non-Potable			127	121	128	251	277
Total			11,998	10,881	10,357	10,839	10,619
Notes:							
(a) Sum of potable real and apparent losses and authorized unbilled consumption from water loss reports.							
(b) The total demand in DWR Table 4-1 may not be equal to the volume supplied in DWR Table 2-1 and total supply in DWR Table 6-8 for Calendar Year 2025 due to estimations of water loss based on historical state-reported water loss values.							

Figure 4-1. Annual Total Water Demand by Sector

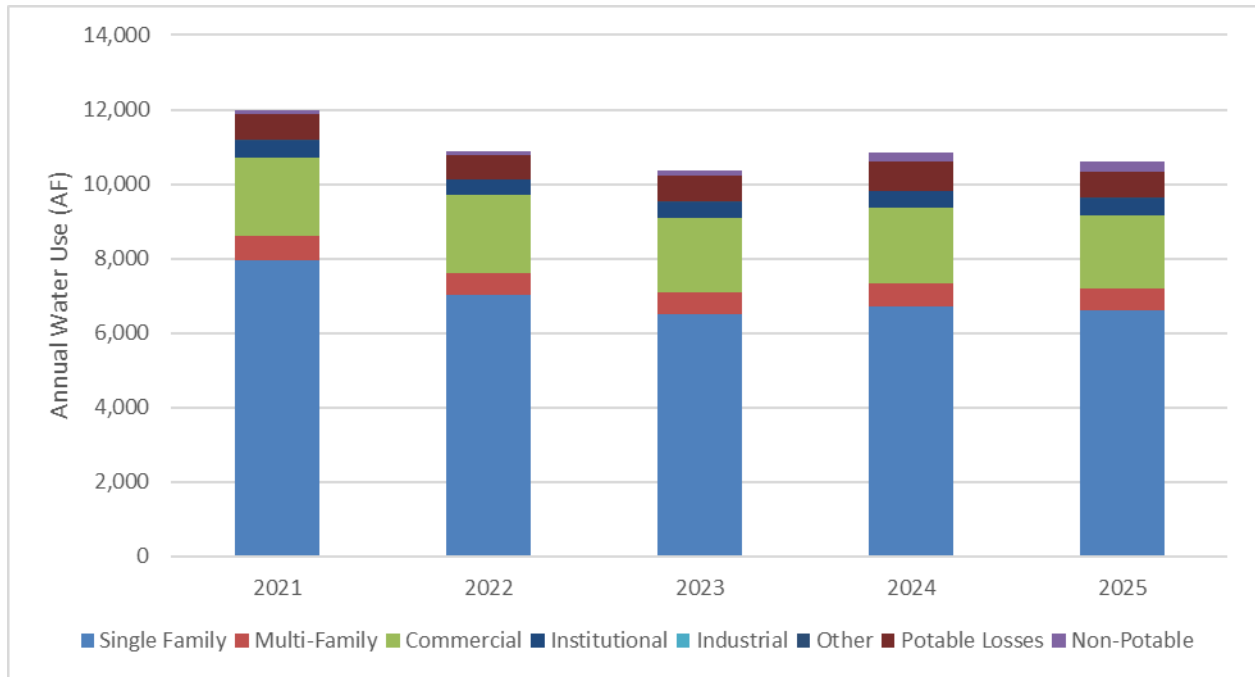
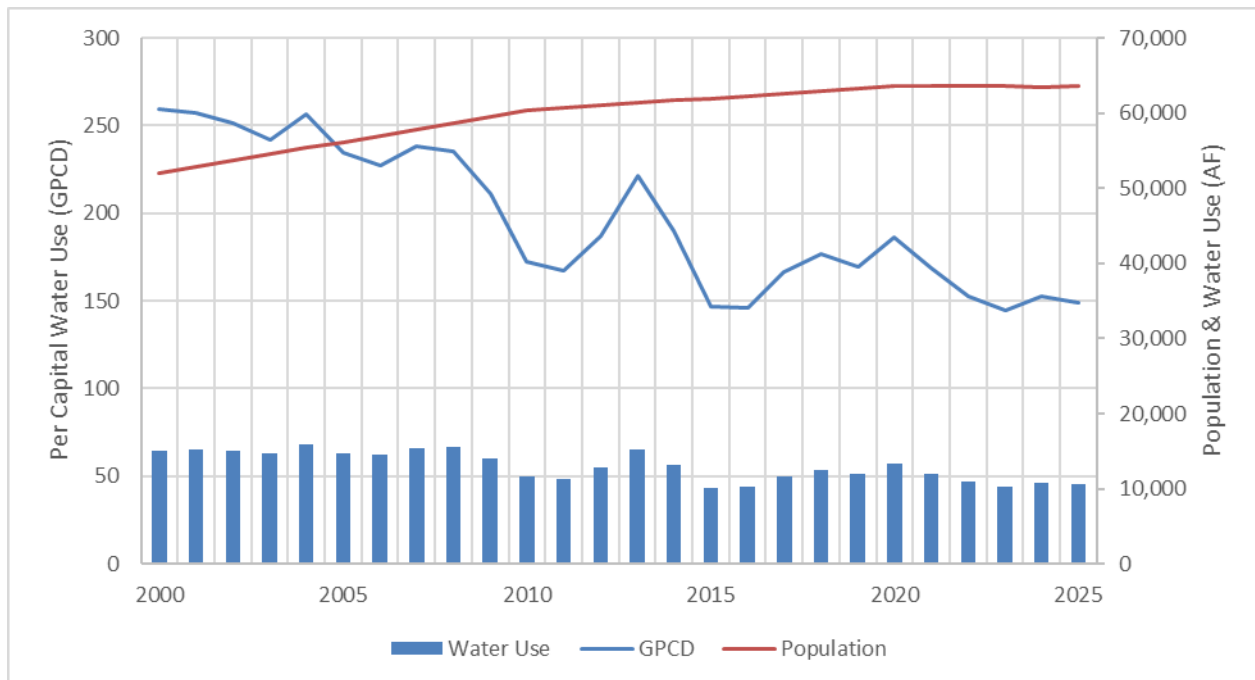


Figure 4-2. Annual Per Capita Water Use



4.2.2 Projected Water Use

Table 4-2 and **Figure 4-3** show projected water uses in five-year increments through 2050. Future water uses are projected by combining forecasts of future water services with forecasts of expected water use per service. The forecasts of future services are aligned with the population, housing, and employment forecasts described in Section 3.4. Separate growth rates were developed for residential and non-residential services based on these regional projections. Between 2025 and 2050, the total number of services is expected to increase from approximately 18,500 to about 19,600, a rate of growth generally consistent with the projected increase in service area population.

Baseline forecasts of expected use per service are calibrated to average usage for the previous three years. The baseline forecasts are then adjusted over the forecast period for expected changes in usage associated with:

1. **Passive water savings** that are primarily driven by plumbing codes and appliance standards that affect both the turnover of existing appliances and fixtures and the installation of new ones.
2. **Active water savings** that are driven by the continued implementation of District conservation programs.
3. **Behavioral responses to higher water service costs** that are driven by customer responsiveness to changes in marginal water prices and projected increases in water service costs over the forecast period.
4. **Water loss standards compliance** that is translated into a reduction in expected loss per service connection (see **Table 4-6**).

These adjustments are described in greater detail in the next section.

Despite projected service area population growth of 0.3 percent per year, total demand is projected to remain largely unchanged through 2050, increasing by less than 200 AF. As shown in **Figure 4-4**, per capita demand is projected to continue declining, though at a more gradual pace than in previous decades, as many of the most accessible conservation opportunities—such as low-efficiency plumbing fixtures—have already been realized.

Table 4-2. Use for Potable and Non-Potable Water – Projected (DWR Table 4-2)

Use Type	Additional Description (as needed)	Level of Treatment When Delivered (OPTIONAL)	Projected Water Use				
			2030	2035	2040	2045	2050
			(AF)	(AF)	(AF)	(AF)	(AF)
Single Family		Potable	6,510	6,458	6,475	6,523	6,578
Multi-Family		Potable	634	646	657	671	685
Commercial		Potable	2,127	2,151	2,137	2,125	2,116
Institutional		Potable	443	440	438	435	434
Industrial		Potable	3	3	3	3	3
Landscape		Potable	0	0	0	0	0
Other		Potable	8	8	8	8	8
Losses	(a)	Potable	719	727	734	741	748
Commercial	Recycled	Non-Potable	221	223	225	227	230
Losses	Recycled	Non-Potable	0	0	0	0	0
Subtotal Potable			10,444	10,433	10,451	10,507	10,572
Subtotal Non-Potable			221	223	225	227	230
Total			10,665	10,656	10,676	10,735	10,802
Notes:							
(a) Sum of potable real and apparent losses and authorized unbilled consumption. Assumes compliance with state water loss standards by 2028.							

Figure 4-3. Projected Annual Water Demand by Sector

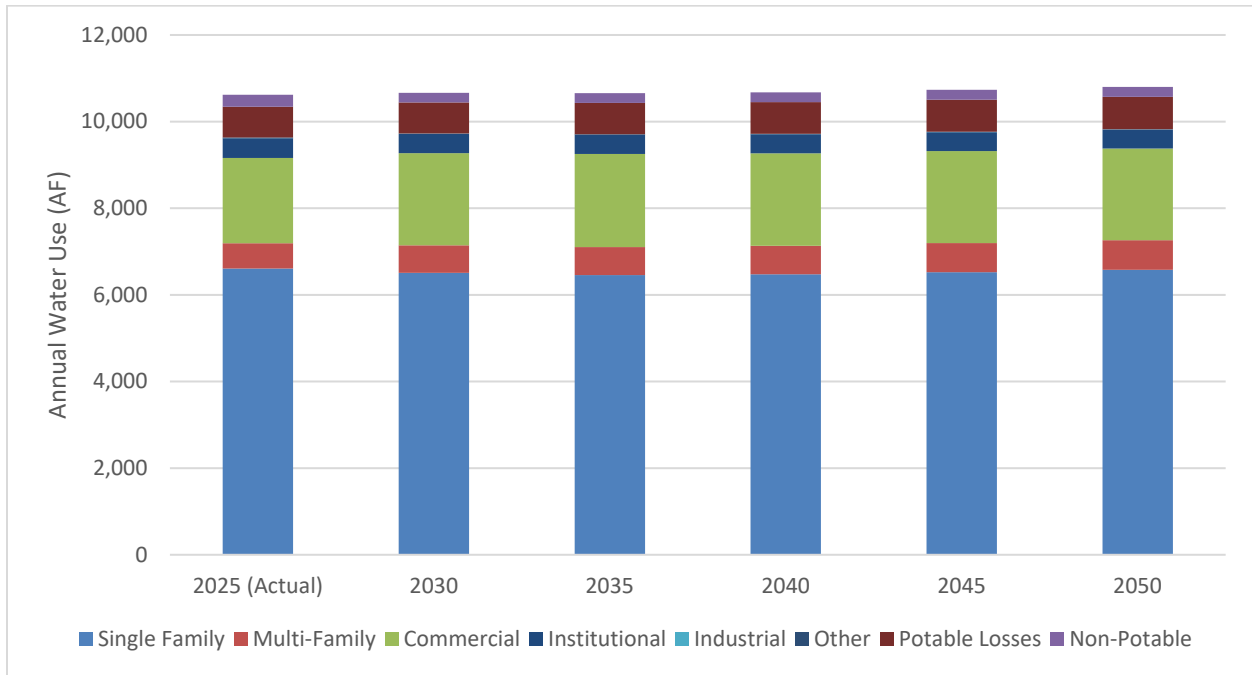
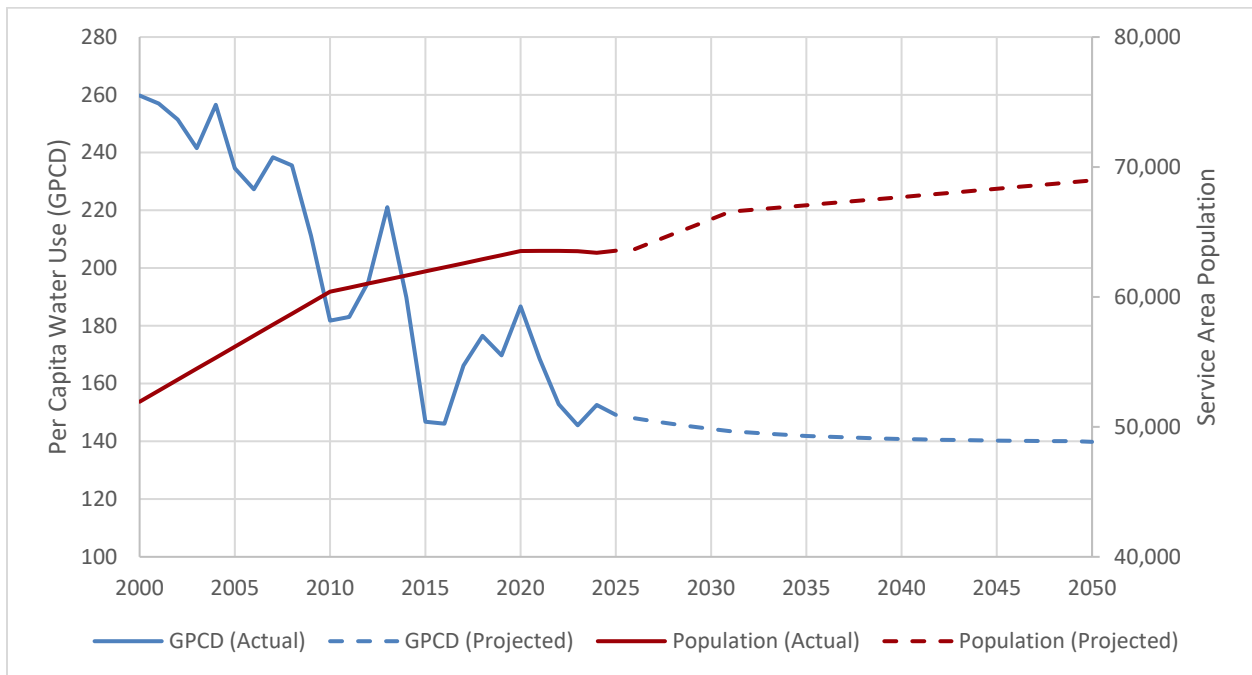


Figure 4-4. Projected Per Capita Water Use



4.2.3 Adjustments to Projected Water Uses

As noted in the previous section, four adjustments were made to projected water usage:

1. **Passive water savings** from plumbing codes and appliance standards.
2. **Active water savings** from implementation of the District’s conservation programs.
3. **Behavioral responses to higher water service cost.**
4. **Water loss standards compliance.**

This section describes the data and methods underlying these adjustments as well as their relative magnitudes.

Table 4-3. Use for Potable and Non-Potable Water – Projected (DWR Table 4-3)

Are Future Water Savings Included in Projections?	Yes
If "Yes" to above: State the section or page number, in the cell to the right, where citations of the codes, ordinances, or otherwise are utilized in demand projections are found.	Section 4.2.3
Are Lower Income Residential Demands Included in Projections?	Yes
OPTIONAL If the method for accounting Lower Income Residential Demands has been included, provide page number where this accounting can be found.	See notes
<p>Notes:</p> <p>(a) All District residential customers, regardless of income level, are metered and thus the demands of residential customers with lower incomes are fully included in the single- and multi-family water uses shown in DWR Table 4-2.</p>	

(1) Passive Water Savings Adjustment

 CWC §10631(d)(4)

(A) Water use projections, where available, shall display and account for the water savings estimated to result from adopted codes, standards, ordinances, or transportation and land use plans identified by the urban water supplier, as applicable to the service area.

(B) To the extent that an urban water supplier reports the information described in subparagraph (A), an urban water supplier shall do both of the following:

(i) Provide citations of the various codes, standards, ordinances, or transportation and land use plans utilized in making the projections.

(ii) Indicate the extent that the water use projections consider savings from codes, standards, ordinances, or transportation and land use plans. Water use projections that do not account for these water savings shall be noted of that fact.

The passive water savings adjustments reflect the effects of the following codes and regulations:

- **Assembly Bill (AB) 715 (2007)** requires that any toilet or urinal sold or installed in California on or after January 1, 2014, must not exceed flush ratings of 1.28 gallons per flush (gpf) for toilets and 0.5 gpf for urinals. These standards superseded the earlier 1991 limits of 1.6 and 1.0 gpf, respectively. In response to the Governor’s Emergency Drought Response Executive Order B-29-15, the California Energy Commission adopted new urinal standards in April 2015, reducing allowable use to 0.125 gpf—75 percent lower than the AB 715 standard.
- **California Appliance Efficiency Regulations (California Code of Regulations [CCR], Title 20, Sections 1601-1609)** set a two-tier standard for showerheads: a maximum flow rate of 2.0 gallons per minute (gpm) for models manufactured on or after July 1, 2016, and a maximum flow rate of 1.8 gpm for models manufactured on or after July 1, 2018.
- **Federal appliance water efficiency standards** for residential and commercial clothes washers and dishwashers are established by the U.S. Department of Energy under the Energy Policy and Conservation Act.
- **CALGreen Building Code** requirements apply to new construction and renovations in California. CALGreen includes prescriptive indoor standards limiting water consumption of plumbing fixtures and fittings, as well as an optional performance path requiring a 20 percent reduction in indoor water use relative to a calculated baseline using CALGreen worksheets.
- **Senate Bill (SB) 407 (2009)** mandates that all buildings constructed on or before January 1, 1994, retrofit noncompliant plumbing fixtures to meet current state efficiency

standards. The law also requires sellers of single-family homes, effective January 1, 2017, to disclose in writing whether required plumbing fixture replacements have been completed. Similar disclosure requirements for multi-family and commercial properties took effect January 1, 2019. **SB 837 (2011)** reinforced these requirements by adding corresponding disclosure elements to the statutory property transfer disclosure statement.

- **Model Water Efficient Landscape Ordinance (MWELO)** was updated by the California Water Commission in 2015. MWELO (or a locally adopted equivalent) limits water use for new and rehabilitated landscapes. Under MWELO, the maximum applied water allowance (MAWA) is set at 55 percent of reference evapotranspiration for residential landscapes and 45 percent for commercial landscapes, with exceptions for special uses such as sports fields, parks, or landscapes irrigated with recycled water.

Passive water savings adjustments were estimated using the Alliance for Water Efficiency's *Water Conservation Tracking Tool* (AWE Tracking Tool), a quantitative model widely used by water utilities to assess both active and passive water savings.¹⁰

(2) Active Savings Adjustment

Active savings refer to water savings resulting from the District's implementation of water conservation programs, customer education efforts, and the provision of financial incentives (e.g., rebates). The active savings adjustment assumes continuation of the District's current conservation programs at implementation levels consistent with conservation program funding authorized by the California Public Utilities Commission (CPUC) in California Water Service's most recent General Rate Case.

A description of the District's existing and planned conservation programs, also referred to as Demand Management Measures (DMMs), is provided in Chapter 9. Projected compliance with state urban water conservation regulations is addressed in Chapter 5.

As with passive savings, the cumulative effects of these programs on future water demand were estimated using the AWE Tracking Tool.

(3) Customer Price Response Adjustment

The AWE Tracking Tool was also used to calculate customer price response adjustments. The adjustment assumes a sustained 1.0 percent annual rate of increase above general price inflation in the marginal cost of water service.

¹⁰AWE's Tracking Tool is available at: <https://allianceforwaterefficiency.org/resource/water-conservation-tracking-tool/>

The AWE Tracking Tool's default demand elasticities were used to adjust baseline demands over the forecast period in response to the real increases in marginal water service costs. The demand elasticities estimate the expected percentage change in water use given a 1.0 percent inflation-adjusted increase in marginal water cost. For example, an elasticity of -0.1 implies that demand will decrease, on average, by 0.1 percent given a 1.0 percent increase in marginal water cost.

The default elasticities used by the tracking tool are as follows:

- Single-Family: -0.15
- Multi-Family: -0.075
- CII: -0.15
- Irrigation: -0.25

Because higher water service cost encourages conservation program participation, the AWE Tracking Tool's default elasticities are purposely conservative (i.e., small in magnitude) in order to reduce the likelihood of double counting water savings.

(4) Water Loss Standards Compliance

The water loss standards compliance adjustment is based on the difference between average real and apparent water loss, as reported in the District's most recent three water loss reports (see **Table 4-5**), and the corresponding standards. Real and apparent water use per service is reduced by these differences in 2028, the deadline for compliance with the standards, if the average loss rates exceed their standards.

(5) Summary of Demand Adjustments

Table 4-4 and **Figure 4-5** show the impact of the demand adjustments on projected water use. In total, the adjustments reduce projected 2050 water use by 5.3 percent relative to the baseline forecast. Demand reductions are shared between passive and active sources of conservation. The water service cost adjustment incorporates adjustments for increases in both household income and the price of water. The negative adjustments shown in the table indicate that for the District the increases in demand because of projected increases in household income are larger than the reductions in demand associated with the projected increases in the price of water. No adjustment for water loss standards compliance is shown because current average District loss rates for real and apparent water losses are below the state standards.

Table 4-4. Projected Baseline and Adjusted Potable Water Demand

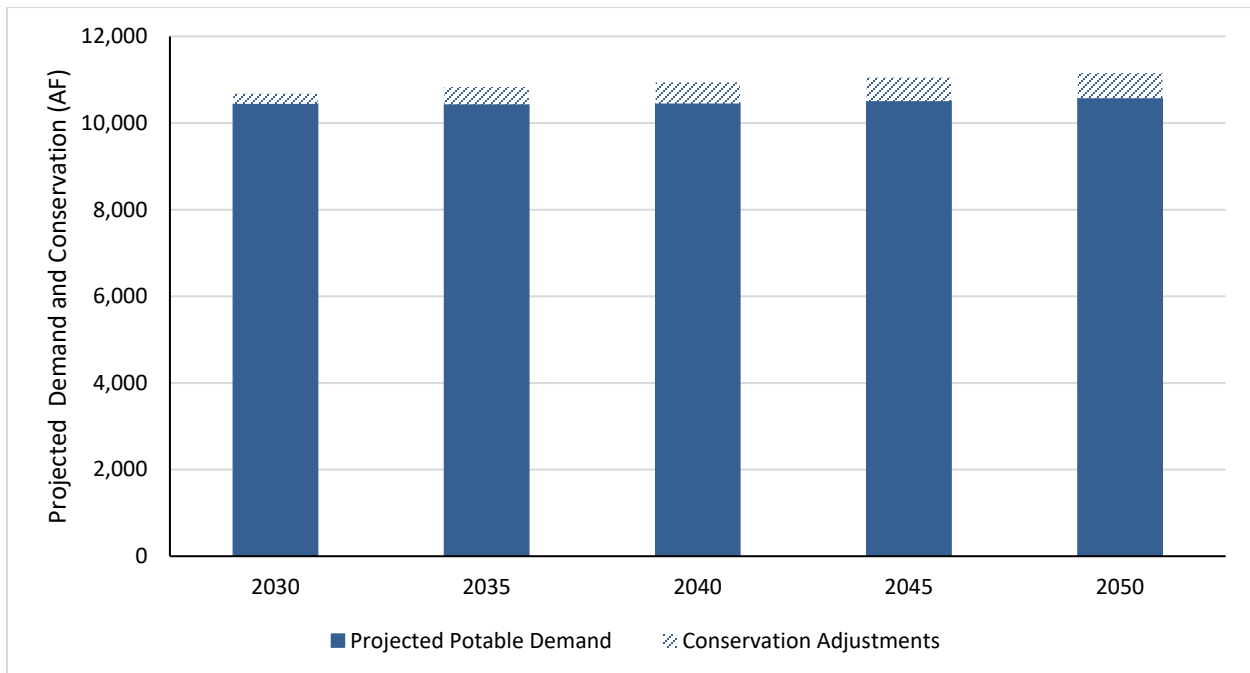
Water Conservation Type	Projected Potable Water Demand				
	2030	2035	2040	2045	2050
	(AF)	(AF)	(AF)	(AF)	(AF)
Baseline Potable Water Demand	10,676	10,833	10,940	11,048	11,158
Demand Adjustments					
Passive Conservation	123	190	226	247	265
Active Conservation	145	284	380	459	538
Water Service Cost (a)	-36	-74	-117	-165	-217
Water Loss Standards (b)	0	0	0	0	0
Subtotal Adjustments	232	400	489	541	586
Projected Potable Demand	10,444	10,433	10,451	10,507	10,572

Notes:

(a) Water cost adjustments incorporate adjustments for increases in both income and price. Negative water service cost adjustments indicate the increase in demand because of increased income is greater than the reduction in demand because of increased price of water.

(b) Compliance with loss standards by 2028 is assumed. No reported adjustment indicates current losses per connection are below the District's standards for real and apparent water loss.

Figure 4-5. Projected Potable Water Demand and Conservation



4.3 Distribution System Water Loss

CWC § 10631 (3)

(A) The distribution system water loss shall be quantified for each of the five years preceding the plan update, in accordance with rules adopted pursuant to Section 10608.34.

(B) The distribution system water loss quantification shall be reported in accordance with a worksheet approved or developed by the department through a public process. The water loss quantification worksheet shall be based on the water system balance methodology developed by the American Water Works Association.

(C) In the plan due July 1, 2021, and in each update thereafter, data shall be included to show whether the urban retail water supplier met the distribution loss standards enacted by the board pursuant to Section 10608.34.

4.3.1 Previous Five Years Distribution System Losses

Since 2016, urban retail water suppliers have been required under CWC §10608.34 and CCR §638.1 et seq to quantify distribution system water losses using the American Water Works Association (AWWA) Free Water Audit Software (referred to as “water loss audit reports”). **Table 4-5** summarizes the water loss audit reports submitted by the District to DWR since 2021.

Table 4-5. Water Loss Audit Reporting (DWR Table 4-5)

Public Water System ID # Reported in Table 2-1 R	Reporting Period	Submitted to DWR Water Loss Audit Program (yes/no)
CA4310001	2021	Yes
	2022	Yes
	2023	Yes
	2024	Yes
	2025	(see notes)
Notes:		
(a) Submitted water loss reports are available at: https://wuedata.water.ca.gov/		
(b) 2025 water loss audit reports are not due until January 1, 2027, after the July 2026 UWMP filing deadline.		

4.3.2 Progress Toward Meeting the Water Loss Performance Standard

In 2022, the State Water Resources Control Board (SWRCB) adopted new performance standards for urban retail water suppliers that would reduce water loss by nearly 35 percent. Effective starting in 2023, the SWRCB provided a volumetric standard to each urban retail water supplier that sets cost-effective levels of achievable water loss given each water system’s characteristics and budgets. Suppliers will be required to start meeting individual volumetric loss standards over

a three-year period beginning January 2028. This water loss standard is one component of the Making Conservation a California Way of Life (MCCWL) regulation.¹¹

CWC §10631 (3)(c) requires that this UWMP demonstrate whether the distribution loss standards enacted by the SWRCB pursuant to CWC §10608.34 have been met. **Table 4-6** shows that the District's current water loss rates fall below the loss standards (i.e., the District is in compliance) established by the SWRCB.

¹¹ Details on the MCCWL Regulation can be found on:

https://www.waterboards.ca.gov/conservation/regs/water_efficiency_legislation.html

Table 4-6. Progress Towards 2028 Water Loss Standards (DWR Table 4-6)

Public Water System ID #	Did the Water Board Calculate a Water Loss Standard for this Public Water System? (y/n) If no, Supplier will not complete this row.	Real Water Loss					Apparent Water Loss				
		State Water Board Standard		Most Recent AWWA Water Loss Audit			State Water Board Standard		Most Recent AWWA Water Loss Audit		
		2028 Real Water Loss Standard (a)	Units for Real Water Loss (b)	Number of Services	Volume of Real Loss (c)	Real Water Loss Per Unit per Day	2028 Apparent Water Loss Standard (a)	Units for Apparent Water Loss (b)	Number of Services	Volume of Apparent Loss (c)	Apparent Water Loss Per Unit per Day
CA4310001	Yes	25.6	GPSCD	19,278	502	23.3	13.7	GPSCD	19,278	249	11.5

Notes:
 (a) Provided by State Water Resources Control Board (SWRCB).
 (b) GPSCD = Gallons per service connection per day.
 (c) Result from most recent validated AWWA water loss report.

4.4 Climate Change Considerations

CWC §10630

It is the intention of the Legislature, in enacting this part, to permit levels of water management planning commensurate with the numbers of customers served and the volume of water supplied, while accounting for impacts from climate change.

CWC §10635(b)

(b) Every urban water supplier shall include, as part of its urban water management plan, a drought risk assessment ...(and) shall include each of the following ...

(4) Considerations of the historical drought hydrology, plausible changes on projected supplies and demands under climate change conditions, anticipated regulatory changes, and other locally applicable criteria.

As discussed in Section 3.3, the Los Altos Suburban District's climate has been warming. Changing climate can affect water demands, as extreme and higher temperatures can lead to increases in water use. At the same time, adaptive behavior by water users, such as replacing existing landscape with more drought-tolerant landscape material, may partially offset these effects. Pursuant to the CWC requirements and the 2025 UWMP Guidebook, this Plan incorporates climate change considerations into the water demand projections provided in this section.

For many years, Cal Water has focused on identifying and assessing climate-related risks and opportunities. Cal Water's initial evaluations in 2016 and 2020 formed the foundation for the Climate Change Risk Assessment and Adaptation Framework (Climate Assessment) which was completed in 2021. This Climate Assessment considered climate-related risks and opportunities over three distinct time horizons:

- The early-century horizon (2020-2049) includes near-term vulnerabilities and adaptation measures to consider for implementation.
- The mid-century horizon (2035-2064) covers longer-term investments, such as new facilities constructed after the lifespan of the current infrastructure.
- The late-century horizon (2070-2099) evaluates long-term adaptation pathways.

Climate projections for each time horizon were averaged to account for natural climate variability across shorter periods. Cal Water also followed guidance from the Task Force on Climate-related Financial Disclosures (TCFD) and the Intergovernmental Panel on Climate Change (IPCC) to leverage Representative Concentration Pathways (RCPs) for a range of possible climate futures. RCPs show trajectories of atmospheric Green House Gas (GHG) concentrations for different timeframes and emission levels. Based on the findings from our foundational work and the associated literature review, the following RCPs were selected for risk analysis:

- RCP 4.5 is an intermediate scenario that assumes an estimated global temperature rise between 2.0 degrees Celsius and 3.0 degrees Celsius from pre-industrial levels by 2100, with anthropogenic GHG emissions peaking in 2040.
- RCP 8.5 is a high-emissions scenario that assumes temperature increases of at least 4.0 degrees Celsius from pre-industrial levels by 2100, with anthropogenic GHG emissions continuing to rise over the next century.

Although RCP 2.6 is the lower bound of the RCP scenarios adopted by the IPCC, Cal Water selected RCP 4.5, since Cal Water believes it to be a more realistic potential lower bound, because achieving RCP 2.6 requires significant actions at a global scale. The California Fourth Climate Assessment also identified RCP 4.5 and RCP 8.5, which are consistent with planning models that stage agencies use.

The Climate Assessment also identifies and prioritizes climate-driven risks to future water supply availability and critical operations and assets, projects and assesses supply of and demand for water, and identifies primary risks to Cal Water's operations.

The Climate Assessment provides actionable insights and a reliable framework for future planning. Using this framework, Cal Water intends to continue implementing programs that capitalize on these adaptation strategies.

The Executive Summaries from the 2016 and 2020 foundational work, and the Climate Assessment, can be found in **Appendix F**.

4.4.1 Characteristic Five-Year Water Use

CWC § 10635(b)(3)

(b) Every urban water supplier shall include, as part of its urban water management plan, a drought risk assessment for its water service to its customers as part of information considered in developing the demand management measures and water supply projects and programs to be included in the urban water management plan. The urban water supplier may conduct an interim update or updates to this drought risk assessment within the five-year cycle of its urban water management plan update. The drought risk assessment shall include each of the following...

*(3) A comparison of the total water supply sources available to the water supplier with **the total projected water use for the drought period**. (Emphasis added).*

In accordance with CWC §10635(b)(3), UWMPs must provide a five-year Drought Risk Assessment (see Section 7.2). As a first step, DWR suggests that water suppliers estimate their unconstrained water demand for the next five years (2026-2030). Unconstrained water demand is water use in the absence of drought water use restrictions. These numbers can then be adjusted to estimate the five-years' cumulative drought effects. The Drought Risk Assessment

presented in Section 7.2 incorporates adjustments to unconstrained water demand in accordance with the District’s Water Shortage Contingency Plan (WSCP).

As part of the sales forecasting process for General Rate Cases before the CPUC, Cal Water conducts econometric modeling to evaluate the sensitivity of water sales to variations in weather conditions. These models were used to simulate differences in projected water use under normal weather conditions and under multiple dry-year scenarios. For this analysis, historical weather data from the dry periods of 1929–1934, 1987–1991, and 2013–2016 were applied.

The results indicate that the District’s annual water use under a multiple dry-year scenario would increase by approximately 7.0 percent relative to normal conditions. This relatively large increase reflects the sensitivity of District demands to climate variability, particularly in spring and autumn transitional irrigation periods.

Projected unconstrained demands for 2026-2030 for normal and multiple-dry-year scenarios are provided in **Table 4-7**.

Table 4-7. Characteristic Five-Year Water Use for Normal and Multi-Year Dry Scenarios

Water Year Type	2026	2027	2028	2029	2030
	(AF)	(AF)	(AF)	(AF)	(AF)
Normal	10,556	10,579	10,605	10,634	10,665
Multi-Year Dry	11,303	11,325	11,351	11,379	11,410

4.5 Coordinating Water Use Projections

CWC §10631

(h) An urban water supplier that relies upon a wholesale agency for a source of water shall provide the wholesale agency with water use projections from that agency for that source of water in five-year increments to 20 years or as far as data is available. The wholesale agency shall provide information to the urban water supplier for inclusion in the urban water supplier’s plan that identifies and quantifies, to the extent practicable, the existing and planned sources of water as required by subdivision (b), available from the wholesale agency to the urban water supplier over the same five-year increments, and during various water-year types in accordance with subdivision.

As described in Chapter 6, the Los Altos Suburban District currently purchases water from the Santa Clara Valley Water District (Valley Water). Valley Water was provided with the District’s 2026-2050 water demand projections as part of the preparation of this UWMP.

Chapter 5

SB X7-7 Baseline and Targets

Senate Bill (SB) X7-7 mandated a 20 percent reduction in urban per capita water use across California by 2020. To achieve this goal, SB X7-7 required each retail supplier to establish an urban water use target (2020 Target), contributing to the State’s collective efforts. Because the California Water Code (CWC) does not set an end date for reporting progress in meeting the 2020 Target, this section of the Urban Water Management Plan (UWMP or Plan) demonstrates the California Water Service (Cal Water) Los Altos Suburban District’s (also referred to herein as the “District”) compliance with SB X7-7 in 2020.

This chapter has the following sections:

5.1 Demonstration of Compliance with the 2020 Target in 2020

5.2 Nexus to State Water Board Urban Water Use Objectives

5.1 Demonstration of Compliance with the 2020 Target in 2020

CWC §10608.40

Urban water retail suppliers shall report to the department on their progress in meeting their urban water use targets as part of their urban water management plans submitted pursuant to Section 10631.

CWC §10608.12

(af) “Urban retail water supplier” means a water supplier, either publicly or privately owned, that directly provides potable municipal water to more than 3,000 end users or that supplies more than 3,000 acre-feet of potable water annually at retail for municipal purposes.

The District achieved its 2020 Target in 2020. The data used to calculate the 2020 Target and demonstrate compliance are documented in the District’s 2020 UWMP. **Table 5-1** below summarizes the District’s 2020 Target and actual 2020 gallons per capita per day (GPCD), confirming that it met the SB X7-7 compliance requirements.

Table 5-1. SB X7-7 2020 Target Progress (DWR Table 5-1)

<input type="checkbox"/>	Check the box if the Supplier was not an Urban Water Supplier during or before the 2020 UWMP reporting cycle. Proceed to the next table.					
Was Supplier part of a merger or consolidation since 2020?	Regional Alliance Target or Individual Target?	2020 Target	Actual 2020 GPCD	Did Supplier achieve targeted reduction for 2020?	Only for suppliers that did not meet the Target in 2020	
					Actual 2025 GPCD (From SB X7-7 Compliance Form)	Did Supplier meet the 2020 Target in 2025?
No	Individual Target	185	166	Yes		N/A

5.2 Nexus to State Water Board Urban Water Use Objectives

CWC § 10609.20

(a) Each urban retail water supplier shall calculate its urban water use objective no later than January 1, 2024, and by January 1 every year thereafter.

(b) The calculation shall be based on the urban retail water supplier's water use conditions for the previous calendar or fiscal year.

CWC § 10609.22

(a) An urban retail water supplier shall calculate its actual urban water use no later than January 1, 2024, and by January 1 every year thereafter.

(b) The calculation shall be based on the urban retail water supplier's water use for the previous calendar or fiscal year.

CWC § 10609.24

(a) An urban retail water supplier shall submit a report to the department no later than January 1, 2024, and by January 1 every year thereafter. The report shall include all of the following:

(1) The urban water use objective calculated pursuant to Section 10609.20 along with relevant supporting data.

(2) The actual urban water use calculated pursuant to Section 10609.22 along with relevant supporting data.

(3) Documentation of the implementation of the performance measures for CII water use.

(4) A description of the progress made towards meeting the urban water use objective.

(5) The validated water loss audit report conducted pursuant to Section 10608.34.

(b) The department shall post the reports and information on its internet website.

(c) The board may issue an information order or conservation order to, or impose civil liability on, an entity or individual for failure to submit a report required by this section.

In July 2024, California adopted the Making Conservation a California Way of Life (MCCWL) regulation, implementing SB 606 and Assembly Bill (AB) 1668 to support long-term water conservation and drought resilience. The regulation establishes annual Urban Water Use Objectives (UWUOs) for urban retail water suppliers and introduces performance measures for commercial, industrial, and institutional (CII) water uses.

The UWUO is a water budget-based framework that is specific to each urban retail water supplier. It consists of the following components: (1) a residential indoor water use standard; (2) a

residential outdoor water budget; (3) a CII landscape outdoor water use standard for landscapes served by dedicated irrigation meters; (4) a water loss standard; (5) allowable variances; and (6) a potable reuse bonus. Beginning in 2027, suppliers must annually assess whether the sum of their regulated water uses—residential indoor and outdoor use, dedicated irrigation meter use, and distribution system water loss—is at or below their UWUO. Additionally, starting in 2028, they must demonstrate that real and apparent distribution system water loss rates are less than their corresponding standards, as discussed in Section 4.3. Compliance with the water loss standards is required even if the urban retail water supplier’s total regulated water use is below its UWUO.

The state standards underlying the residential indoor, residential outdoor, and CII outdoor components of the UWUO will become increasingly stringent over time. As a result, compliance is expected to require continued reductions in water use beyond those achieved under the SB X7-7 framework.¹² Urban retail water suppliers are required to report annually to the State Water Resources Control Board on water use relative to their UWUOs. The Los Altos Suburban District submits UWUO compliance data through the Department of Water Resources’ Water Use Efficiency Data portal.¹³

Although projections of UWUO compliance are not required as part of an Urban Water Management Plan, they provide useful insight into the magnitude and timing of future conservation needs. For this reason, Cal Water has evaluated how projected regulated water use in the District compares to anticipated UWUO requirements over the planning horizon, with findings expressed as relative changes to baseline demand needed for compliance.

The assessment of future UWUO compliance for the Los Altos Suburban District is predicated on levels of conservation that are currently authorized by the California Public Utilities Commission (CPUC), together with anticipated passive conservation savings. These passive savings include continued turnover of plumbing fixtures and appliances subject to state and federal efficiency standards and customer behavioral responses to conservation-oriented rate structures. The baseline demand projections described in Chapter 4 reflect these authorized active conservation programs and anticipated passive savings.

Under this baseline demand scenario, regulated water use in the Los Altos Suburban District is projected to remain below the applicable UWUO requirements through 2050. Additionally, as discussed in Section 4.3, current water loss rates in the District fall below the water loss standards assigned by the state and are projected to remain below these levels through 2050.

¹² Under the MCCWL regulation, the SB X7-7 target serves as a backstop on the UWUO. If a supplier’s UWUO exceeds its SB X7-7 target, its UWUO becomes its SB X7-7 target.

¹³ DWR’s Water Use Efficiency Data Portal: https://wuedata.water.ca.gov/uwuo_plans

Chapter 6

Water Supply Characterization

CWC § 10631 (b) *A plan shall be adopted in accordance with this chapter that shall do all of the following:*

Identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier over the same five-year increments described in subdivision (a).

This chapter provides a description of the California Water Service (Cal Water) Los Altos Suburban District's (also referred to herein as the "District") current water supplies, including its purchased water, a discussion of the underlying groundwater basin and its management, and potential supply sources, such as surface water, stormwater, and recycled water, and an assessment of the energy intensity used to operate the District's treatment and distribution system. This chapter includes the following sections:

6.1 Purchased Water

6.2 Groundwater

6.3 Surface Water

6.4 Stormwater

6.5 Wastewater and Recycled Water

6.6 Desalinated Water Opportunities

6.7 Water Exchanges and Transfers

6.8 Future Water Projects

6.9 Summary of Existing and Planned Sources of Water

6.10 Special Conditions

6.11 Energy Intensity

6.1 Purchased Water

CWC § 10631 (h) *A plan shall be adopted in accordance with this chapter and shall do all of the following:*

An urban water supplier that relies upon a wholesale agency for a source of water shall provide the wholesale agency with water use projections from that agency for that source of water in five-year increments to 20 years or as far as data is available. The wholesale agency shall provide information to the urban water supplier for inclusion in the urban water supplier's plan that identifies and quantifies, to the extent practicable, the existing and planned sources of water as required by subdivision (b), available from the wholesale agency to the urban water supplier over the same five-year increments, and during various water-year types in accordance with subdivision (f). An urban water supplier may rely upon water supply information provided by the wholesale agency in fulfilling the plan informational requirements of subdivisions (b) and (f).

Cal Water currently purchases treated surface water from the Santa Clara Valley Water District (Valley Water). Valley Water's supplies include local surface water derived from rainfall and runoff captured in Santa Clara County's reservoirs and stream systems, which is stored, treated, and delivered to customers. In addition to these local supplies, Valley Water imports surface water to the region via the South Bay Aqueduct of the State Water Project (SWP) and the San Felipe Division of the federal Central Valley Project (CVP).

Valley Water operates three drinking water treatment plants (WTPs) (i.e., Penitencia WTP, Rinconada WTP, and Santa Teresa WTP) that treat its combined surface water supplies. Valley Water disinfects the water using a blend of chlorine and ammonia (chloramines).

Treated surface water is delivered to the Los Altos Suburban District from the Rinconada WTP through a large-diameter high pressure pipeline that runs through Cupertino and along Foothill Expressway. This pipeline is commonly referred to as the West Pipeline. The West Pipeline also has branch lines that distribute water to the Cities of Santa Clara and Mountain View ("distributaries").

The District takes treated surface water at five turnouts referred to as the "Vallco", "Granger", "Farndon", "Covington", and "Western" turnouts. The Farndon and Granger turnouts are located directly on the West Pipeline, while the Vallco turnout is located on the Santa Clara Distributary, and the Covington connection is located on the Mountain View Distributary. The Western turnout is also connected to San Jose Water Company. Each of these turnouts is equipped with pressure and flow control devices that provide a seamless hydraulic transition between the delivery main and the District's system.

When surface water supplies were plentiful in the past, Valley Water authorized the sale of "Non-Contract" water in order to facilitate conjunctive use (i.e., storage) of surplus supply in the underlying groundwater aquifers. In such year types, the District typically reduced its production of groundwater and increased its purchase of surface deliveries from Valley Water. However, the "Non-Contract" water has not been available for over 15 years. When surface water supplies are

scarce, Valley Water imposes both voluntary and mandatory reductions in the overall use of water. In addition, because surplus surface water supplies are stored underground by Valley Water (i.e., directly or through in-lieu recharge), during shortages the District increases groundwater production and reduces its purchases from Valley Water to the extent allowable by Valley Water.

Since it is unknown whether "Non-Contract" water will be available when the District's purchase water schedules are prepared, and "Non-Contract" water is only available in the non-summer months between October and April of the next year, the scheduling of District deliveries is set to maximize the delivery of purchased water in the summer and to utilize groundwater production capacity during all other periods. This scheduling pattern enables the District to take advantage of the economic incentive provided by the sale of "Non-Contract" water, in turn assisting Valley Water in accomplishing the goal of storing surplus supplies through in-lieu recharge. Valley Water also has scheduling restrictions regarding the purchase of direct deliveries (i.e., Peak Day deliveries are limited to 180 percent of the average day delivery and the maximum monthly delivery cannot exceed fifteen percent of the annual scheduled delivery).

Since the 2021–2022 drought, and in response to reduced reliability of imported water supplies, climate driven supply uncertainty, and the ongoing need for water conservation, Valley Water implemented a 23 percent planning level reduction in the treated water supply available to its retailers, including the District. This reduction was authorized under Valley Water Board Resolution No. 22 20 and implemented consistent with provisions of the treated water supply contract, which require proportional delivery reductions when conservation programs exceed a 10 percent threshold. The 23 percent reduction reflects a countywide conservation target during severe drought conditions and was applied uniformly through adjusted annual and monthly delivery schedules for retailers supplied by the Rinconada Water Treatment Plant. The District anticipates that these planning level reductions will continue and will be managed through a combination of additional groundwater pumping to the extent allowable by Valley Water and implementation of the District's WSCP (see **Appendix G**) to maintain water supply reliability.

6.2 Groundwater

CWC § 10631

(b) Identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier over the same five-year increments described in subdivision (a), providing supporting and related information, including all of the following:

(4) If groundwater is identified as an existing or planned source of water available to the supplier, all of the following information:

(A) The current version of any groundwater sustainability plan or alternative adopted pursuant to Part 2.74 (commencing with Section 10720), any groundwater management plan adopted by the urban water supplier, including plans adopted pursuant to Part 2.75 (commencing with Section 10750), or any other specific authorization for groundwater management for basins underlying the urban water supplier's service area.

(B) A description of any groundwater basin or basins from which the urban water supplier pumps groundwater. For basins that a court or the board has adjudicated the rights to pump groundwater, a copy of the order or decree adopted by the court or the board and a description of the amount of groundwater the urban water supplier has the legal right to pump under the order or decree. For a basin that has not been adjudicated, information as to whether the department has identified the basin as a high- or medium-priority basin in the most current official departmental bulletin that characterizes the condition of the groundwater basin, and a detailed description of the efforts being undertaken by the urban water supplier to coordinate with groundwater sustainability agencies or groundwater management agencies listed in subdivision (c) of Section 10723 to maintain or achieve sustainable groundwater conditions in accordance with a groundwater sustainability plan or alternative adopted pursuant to Part 2.74 (commencing with Section 10720).

(C) A detailed description and analysis of the location, amount, and sufficiency of groundwater pumped by the urban water supplier for the past five years. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

Groundwater makes up an important portion of the Los Altos Suburban District's water supply. This section includes information regarding the basin description, groundwater management, and Cal Water's coordination with the relevant Groundwater Sustainability Agency (GSA), followed by a discussion of historical pumping and supply sufficiency, which is further supported by Section 7.1.1.

6.2.1 Basin Description and Status

As shown on **Figure 6-1**, the District overlies the Santa Clara Subbasin (also referred to herein as the "Basin") of the Santa Clara Valley Basin (California Department of Water Resources [DWR] Basin No. 2-009.02). The Basin is not adjudicated, and DWR determined that the Basin is not in a condition of critical overdraft in its recent evaluation of California groundwater basins.¹⁴

¹⁴ DWR, 2019. Sustainable Groundwater Management Act 2018 Basin Prioritization, State of California, dated January 2019.

The Basin is designated as a high priority basin under DWR’s 2019 Phase 2 Basin Prioritization.¹⁵ Under this prioritization process, basins are ranked on eight components, and if a basin is assigned more than 21 total points, it is defined as “high priority.” The main factors driving the Basin’s designation include total population (5 out of 5 possible points), number of public supply wells (4 out of 5 possible points), and documented impacts including declining groundwater levels and subsidence (4 out of 5 possible points).¹⁶ The Basin was assigned a total of 24.5 priority points.

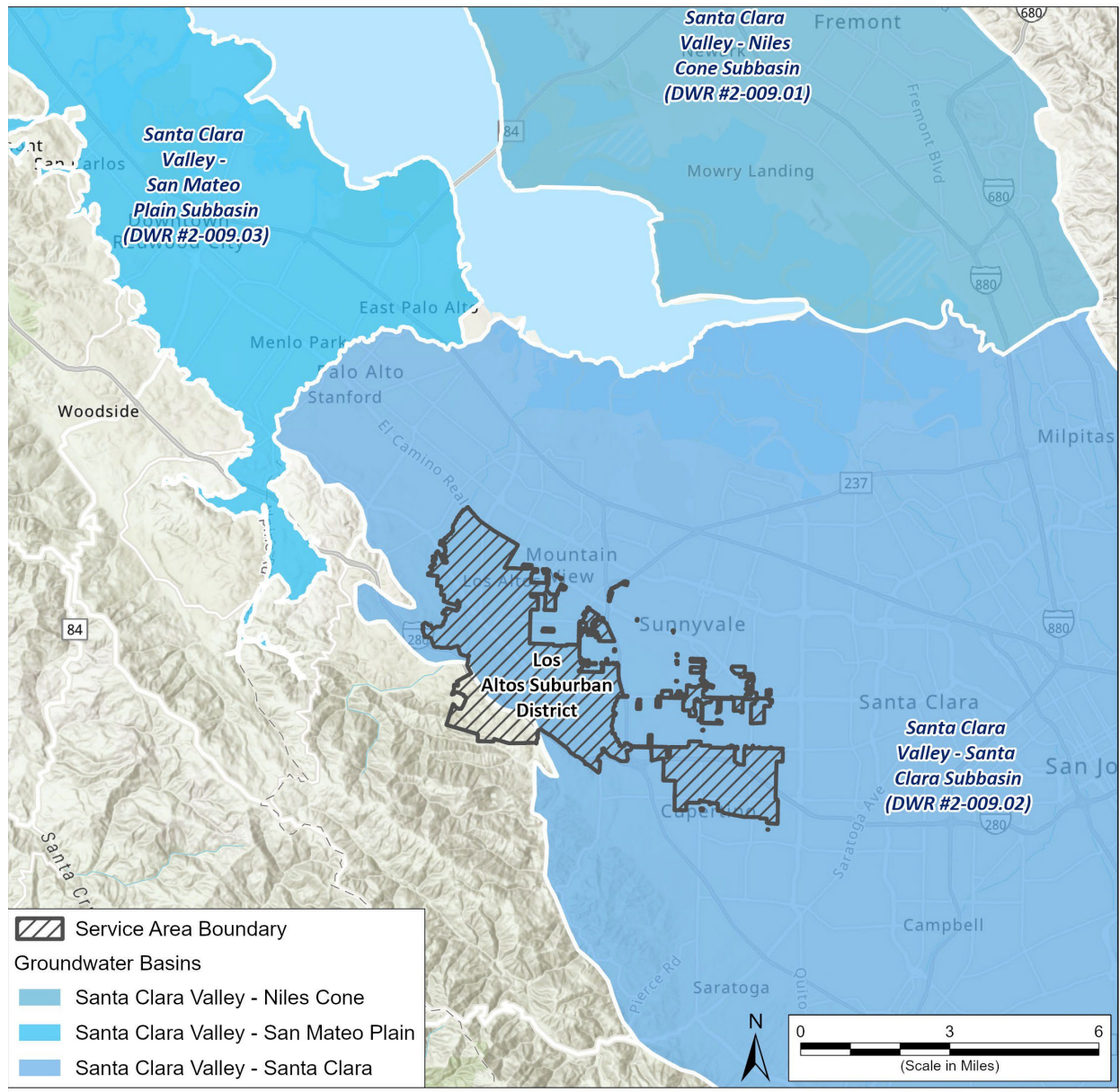
The Basin covers 190,080 acres (297 square miles) and forms a northwest-trending, elongated valley bounded by the Santa Cruz Mountains to the west and the Diablo Range to the east. The western and eastern Basin boundaries are the geologic contact between permeable to semipermeable alluvial sediments within the Santa Clara Valley and the impermeable bedrock of the adjacent mountain ranges. The Basin is bounded in the North by the San Francisco Bay. To the northwest and northeast, the Basin borders the San Mateo and Niles Cone Subbasins, respectively, at institutional boundaries formed by county boundaries. The southern boundary with the Llagas Subbasin is the Coyote Creek alluvial fan in the Morgan Hill area.¹⁷

¹⁵ Ibid.

¹⁶ DWR’s 2019 Phase 2 Basin Prioritization used the basin’s total possible ranking points assigned to each of the eight components to determine the priority. A basin is defined as High Priority if it has more than 21 total ranking points.

¹⁷ Valley Water, 2021. Groundwater Management Plan: Santa Clara and Llagas Subbasins, dated November 2021.

Figure 6-1. Groundwater Basin Underlying the Los Altos Suburban District



Additional details on the Basin are given in the DWR Groundwater Bulletin 118, as well as in the key documents described below related to groundwater management of the Basin. These documents inform groundwater management and regional water planning for the basin and are incorporated into this Urban Water Management Plan (UWMP or Plan) by reference:

- The 2016 Groundwater Management Plan for the Santa Clara and Llagas Subbasins (GWMP) was submitted to DWR as an Alternative Groundwater Sustainability Plan (Alternative GSP) on December 21, 2016 and approved by DWR in July 2019. Pursuant to

Sustainable Groundwater Management Act (SGMA) regulations, approved Alternatives must undergo a periodic evaluation at least every five years to demonstrate continued compliance with SGMA objectives and sustainability criteria. An amended GWMP was submitted to DWR in December 2021 (2021 Alternative GSP). In June 2024, DWR approved the 2021 Alternative GSP confirming that the Alternative satisfies the objectives of SGMA and complies with related regulations. The 2021 Alternative GSP includes the basin setting, current groundwater conditions, water budget, local sustainable management criteria, and projects and management actions (P/MAs) for maintaining sustainability in the Basin through 2042. The 2021 Alternative GSP is available on the DWR SGMA Portal website. The Annual Reports are submitted to DWR by April 1st of each year for the previous water year. The 2021 Alternative GSP and Annual Reports for the Basin can be accessed here:

<https://sgma.water.ca.gov/portal/alternative/print/18>

- The Bay Area Integrated Regional Water Management Plan (IRWMP), including detailed descriptions of Basin hydrogeology, groundwater conditions, and groundwater monitoring practices, is available on the Bay Area IRWMP website:

<http://bayareairwmp.org/irwm-plans/>

6.2.2 Non-SGMA Groundwater Management

Prior to the passage of SGMA, water agencies in the Basin cooperated in water supply and groundwater management efforts. The Basin was included in the Bay Area IRWMP and the Santa Clara subregion of the Bay Area IRWMP Region covers the District. The Bay Area IRWMP describes the physical, environmental, social, and demographic characteristics of the Bay Area region, the hydrologic features and overall water reliability, major water related infrastructure, and the identified subregional issues, needs, challenges and priorities.

The most recent update to the Bay Area IRWMP was adopted in October 2019. The five regional goals stated in the IRWMP include: (1) promote environmental, economic and social sustainability, (2) improve water supply reliability and quality, (3) protect and improve watershed health and function and Bay water quality, (4) improve regional flood management, and (5) create, protect, enhance, and maintain environmental resources and habitats. These regional goals were used to inform the measurable objectives and potential project proposals to accomplish the goals of the region.¹⁸

6.2.3 SGMA Groundwater Management

In 2014, the California State Legislature enacted SGMA with subsequent amendments in 2015. Among other things, SGMA requires the formation of GSAs and the development and

¹⁸ The Bay Area Integrated Regional Water Management Plan website: <http://bayareairwmp.org/>

implementation of GSPs for groundwater basins that are designated by DWR as medium or high priority. As a high priority, non-critically overdrafted and non-adjudicated basin, the Basin is subject to the requirements of SGMA.

Valley Water is the exclusive GSA within its statutory boundary, which includes all of Santa Clara County, and has assumed responsibility for sustainable groundwater management of the Basin. The District falls within the jurisdiction of the Valley Water GSA. The majority of the District falls within the jurisdiction of the 2021 Alternative GSP. A small portion of the District falls outside of the Basin, as shown on **Figure 6-1**.

As defined under SGMA, sustainable yield means “the maximum quantity of water, calculated over a base period representative of long-term conditions in a basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing undesirable results.”¹⁹ Previous analysis has estimated that annual pumping rates should not exceed 200,000 acre-feet per year (AFY) for Santa Clara Plain Management Area^{20, 21} However, the 2021 Alternative GSP also stated that “the District [Valley Water] does not manage to a particular value for sustainable yield, but instead manages groundwater to maintain sustainable conditions through annual operations and long-term water supply planning”.

The P/MAs that support achievement of the Basin’s sustainability goal under SGMA are proposed by the Valley Water GSA and documented in the 2021 Alternative GSP. The P/MAs that are relevant to the District are summarized below; however, this summary is not exhaustive.²²

- **Managed Aquifer Recharge and Conjunctive Use Programs:** Valley Water implements an extensive managed aquifer recharge program designed to optimize groundwater reliability and maintain long-term basin storage. Recharge activities include capture of local runoff, releases from local reservoirs to recharge facilities, in-lieu recharge using imported surface water supplies, and protection of natural recharge areas. On average, approximately 50,000 AFY of local runoff is recharged through existing recharge facilities. Valley Water periodically evaluates recharge system capacity, infiltration performance, and operational constraints to improve effectiveness and adapt to changing hydrologic conditions.

¹⁹ California Water Code (CWC) §10721(w)

²⁰ Valley Water, 2016. 2016 Groundwater Management Plan: Santa Clara and Llagas Subbasins, dated November 2016.

²¹ The Basin is delineated into two groundwater management areas: the Santa Clara Plain and the Coyote Valley. There is no sustainable yield estimate for the Coyote Valley management area, which is small, relatively shallow, and transmissive, with limited storage capacity.

²² Valley Water, 2021. 2021 Groundwater Management Plan: Santa Clara and Llagas Subbasins, dated December 2021.

- **Groundwater Production and Storage Management:** Groundwater production is actively managed to maintain target basin storage levels and avoid undesirable results such as chronic groundwater-level declines or land subsidence. Valley Water tracks groundwater storage using outcome measures established in the Amended Alternative GSP and implements demand-management and operational adjustments during dry periods, including coordination with water retailers and implementation of short-term water use reduction measures when storage thresholds are approached.
- **Monitoring Network Improvements and Data Management:** Valley Water maintains a comprehensive groundwater-level and water-quality monitoring network and periodically evaluates data gaps and redundancies. Recent management actions include analysis of monitoring network coverage and installation of additional monitoring wells where needed to improve representation of groundwater conditions and assess the effectiveness of management actions. Monitoring data are incorporated into annual reporting and used to inform adaptive management decisions.
- **Groundwater Quality Protection Programs:** Programs to protect groundwater quality include well ordinance implementation, domestic well testing, salt and nutrient management, and coordination with State and regional water quality programs. These actions are intended to prevent degradation of groundwater quality and support continued beneficial use of groundwater supplies.
- **Stormwater Capture and Flood-Managed Aquifer Recharge (Flood-MAR):** Valley Water implements stormwater capture and Flood-MAR projects to increase groundwater recharge during high-flow events while maintaining flood protection objectives. These projects are integrated with broader watershed and surface water management programs and are expected to play an increasing role in long-term groundwater sustainability under changing climate conditions.

As reported in the Basin’s Annual Report for Water Year (WY) 2024, the Valley Water GSA has made continued progress toward implementing P/MAs since adoption of the Alternative GSP and 2021 Alternative GSP. For example, Valley Water conducted substantial managed aquifer recharge using local and imported surface water, reduced groundwater demand through treated surface water deliveries, recycled water use, and conservation programs, and continued coordination of conjunctive use operations to maintain basin storage. Valley Water also conducted comprehensive monitoring of groundwater levels, groundwater quality, and land subsidence to support adaptive management. Additional details regarding implementation of P/MAs for the Basin are included in the Annual Report for WY 2024.²³

²³ Valley Water, 2024. *Water Year 2024 Groundwater Report for the Santa Clara and Llagas Subbasins*, dated April 2025.

6.2.4 Cal Water Coordination with Groundwater Sustainability Agencies

Cal Water's groundwater basin management philosophy is to engage collaboratively with all stakeholders in the basins where it operates, prioritizing the long-term sustainability of groundwater resources and ensuring that both burdens and benefits are distributed on an equitable basis. Cal Water recognizes and deeply supports the goals, objectives, and intended outcomes of the SGMA. Moreover, Cal Water recognizes the numerous challenges of the legislation along a variety of technical, legal, political, and financial/economic dimensions, particularly when the geographical diversity of the Cal Water's service territory is considered. None-the-less, Cal Water intends to continue to take an active role in the local and state-wide management of groundwater resources by fully supporting and participating in the principal edicts of SGMA. A number of specific steps that Cal Water has taken with respect to this position and role include (among others):

- Coordination and public comment with public agencies, and DWR, to ensure that Cal Water's presence, rights and interests, customer financial concerns, as well as historical and current resource management concerns are honored/incorporated within the GSA and Alternative GSP formulation process(es);
- Participation in Valley Water's Retailer and Subcommittee meetings;
- Coordination with applicable local and regulatory agencies to ensure that Cal Water is at full participation, while also meeting the requirements and expectations set forth by SGMA;
- Enhanced use of digital/electronic groundwater monitoring equipment and other new technology aimed at measuring withdrawal rates, pumping water levels, and key water quality parameters within the context of day-to-day operations;
- Participation in the development and implementation of GSPs and formulation of groundwater models being constructed in basins where Cal Water has an operating presence;
- Participation in individual and/or joint projects aimed at mitigating seawater intrusion and other "undesirable results" where appropriate;
- Inclusion of sound groundwater management principles and data in all applicable technical reports, studies, facility master plans, and UWMPs (including this 2025 update), particularly as these undertakings relate or pertain to water resource adequacy and reliability;
- Ensure reliable water service for historically underserved and/or vulnerable communities within Cal Water's service areas; and,

- Inclusion of sound groundwater management principles and data in all general rate case (GRC) filings and grant applications to ensure that resource management objectives remain visible and central to Cal Water’s long-term planning/budgeting efforts.

6.2.5 Historical Pumping and Supply Sufficiency

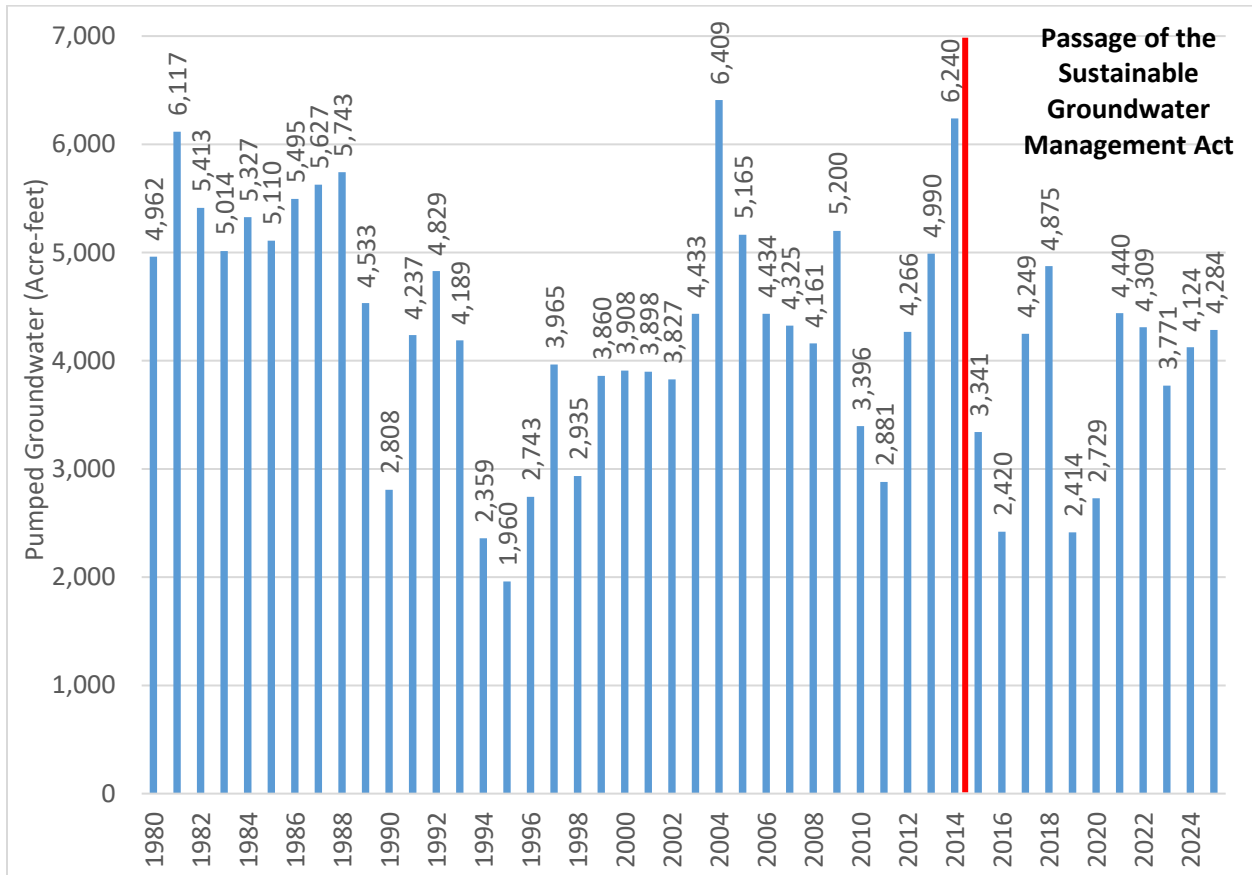
The District has a total of 20 wells located within the District service area boundaries shown in **Figure 6-1**.

There are 41 surface storage structures, enabling the groundwater wells to pump to storage during non-peak demand periods and provide peak day demand. The District has sufficient production capacity to supply all of the District’s current annual average day and maximum day demand.

As noted above, groundwater is a portion of the supply for the District. Because Valley Water replenishes the groundwater resources within its boundaries, it levies an assessment on the production of groundwater to finance this operation. During normal periods of supply, the groundwater pumping assessment is set such that the cost of pumping groundwater is essentially equal to the cost of directly purchasing water from Valley Water.

Table 6-1 lists the amount of groundwater pumped by Cal Water over the past five years. Historically, the groundwater supplies available to the District from the Basin have always been sufficient to meet District demands (in addition to its purchased and recycled water supplies), and the Cal Water supply wells have not dewatered, even during historical drought periods. Due to successful conservation efforts and response to the historic drought spanning WYs 2012-2015, groundwater demand (and thus, District groundwater pumping volumes) were approximately 14 percent lower from 2016 through 2025 (i.e., averaging 3,761 AFY) in comparison to the previous ten years (i.e., averaging 4,323 AFY from 2006 through 2015); see **Figure 6-2**.

Figure 6-2. Los Altos Suburban District Historical Pumping (1980 – 2025)



Section 7.1.1 presents an analysis of the availability of supply for the District based on historical purchased surface water and groundwater use and review of available information regarding future supply availability to the District. Based on the available information, the available supplies in normal years are expected to be sufficient to meet the projected future normal year demands of the District through 2050.

Table 6-1. Groundwater Volume Pumped (DWR Table 6-1)

<input type="checkbox"/>	Check the box if the Supplier does not pump groundwater.						
<input type="checkbox"/>	Check the box if all or part of the groundwater below is desalinated. (OPTIONAL)						
Groundwater Type	Water Type (OPTIONAL)	Location or Basin Name	2021	2022	2023	2024	2025
			(AF)	(AF)	(AF)	(AF)	(AF)
Alluvial Basin	Potable	Santa Clara Subbasin	4,441	4,310	3,771	4,124	4,284
TOTAL			4,441	4,310	3,771	4,124	4,284
Notes:							
(a) The Santa Clara Subbasin is not adjudicated and is not critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.							

6.3 Surface Water

Cal Water purchases treated surface water from Valley Water, as described above in Section 6.1.

6.4 Stormwater

There are no plans to divert stormwater for beneficial use in the Los Altos Suburban District.

6.5 Wastewater and Recycled Water

CWC § 10633

The plan shall provide, to the extent available, information on recycled water and its potential for use as a water source in the service area of the urban water supplier. The preparation of the plan shall be coordinated with local water, wastewater, groundwater, and planning agencies that operate within the supplier’s service area.

The recycling of wastewater offers several benefits to Cal Water and its customers. One of these benefits is to help maintain a sustainable groundwater water supply either through direct recharge, or by reducing potable supply needs by utilizing recycled water for appropriate uses (e.g., landscape irrigation) now being served by potable water. Cal Water is evaluating the feasibility of specific recycled water projects that could be implemented and will incorporate these findings in future water supply planning. The potential amount of recycled water that can be produced is proportional to the amount of wastewater that is locally generated and is discussed in the following sections.

6.5.1 Recycled Water Coordination

The District relies on and coordinates with City of Palo Alto, City of Los Altos, City of Mountain View, City of Cupertino, and City of Sunnyvale for relevant wastewater collection, treatment, and discharge. As discussed in Section 6.5.3 below, the District currently uses a small amount of recycled water and plans to continue this level of usage throughout the planning period.

6.5.2 Wastewater Collection, Treatment, and Disposal

CWC § 10633 (a)

A description of the wastewater collection and treatment systems in the supplier's service area, including a quantification of the amount of wastewater collected and treated and the methods of wastewater disposal.

CWC § 10633 (b)

A description of the quantity of treated wastewater that meets recycled water standards, is being discharged, and is otherwise available for use in a recycled water project.

The City of Palo Alto is the administrator of the Palo Alto Regional Water Quality Control Plant (RWQCP). The Cities of Palo Alto, Los Altos, Mountain View and their sub-partnering sewer agencies, East Palo Alto, Stanford University, and Los Altos Hills, share in the proportionate costs of upkeep for the Palo Alto RWQCP. Each city owns, operates, and maintains its own collection system.

The community served by the RWQCP is composed primarily of low-density residential housing. In addition, there are several industrial areas and commercial districts within the plant's service area. The RWQCP provides primary, secondary, and tertiary treatment. The tertiary treatment processes include fixed film reactors and dual media filters. The treatment plant has a capacity to treat 39 million gallons per day (MGD) but currently receives an average of 20 MGD from all of its customers.²⁴ The disinfected effluent is discharged to San Francisco Bay through an unnamed slough near the Palo Alto Airport.

The RWQCP generates approximately 1.0 MGD of high quality recycled water, which is used to irrigate the municipal golf courses in Palo Alto and Mountain View as well as Greer Park in Palo Alto.²⁵ The recycled water is also used by tanker trucks to provide dust control at construction sites, and for irrigation at additional sites. The RWQCP reclamation program began in the late 1980s and continues today looking for new ways to reuse water. In December 2019, the City of Palo Alto signed an agreement with Valley Water and the City of Mountain View to increase water

²⁴ City of Palo Alto website:

<https://www.paloalto.gov/Departments/Public-Works/Regional-Water-Quality-Control-Plant/About-the-Plant/>

²⁵ City of Palo Alto website:

<https://www.paloalto.gov/Departments/Public-Works/Watershed-Protection/Recycled-Water>

reuse in the Santa Clara County. As part of this agreement, the City of Palo Alto is moving forward with implementation of a local salt removal facility (also referred to as the Local Advanced Water Purification System) to be located at the RWQCP. As of the development of this UWMP, the Local Advanced Water Purification System is in construction.²⁶ Currently, the RWQCP does not provide reclaimed water to any Cal Water service areas.

The City of Sunnyvale operates and maintains its sewer system consisting of 48 inch or smaller gravity sewers and five pumping stations from residential, commercial, and some industrial customers.²⁷ The collected wastewater is discharged to trunk sewers owned and operated by the City of Sunnyvale and conveyed to the Sunnyvale Water Pollution Control Plant (WPCP) for treatment. The wastewater at the WPCP, which has a capacity of 29.5 MGD, undergoes primary, secondary, and tertiary treatment followed by chlorination and dechlorination prior to disposal into the San Francisco Bay via the Guadalupe Slough.²⁸ The WPCP currently produces an average of 0.8 MGD of recycled water for more than 100 customers within its service area.²⁹ The WPCP provides recycled water to the District.

The Cupertino Sanitary District (CuSD) operates and maintains its sewer system consisting of over 1.0 million lineal feet of sewer mains, 0.5 million lineal feet of sewer laterals, 17 pump stations, 4,000 manholes and flushing inlets, and one equipment storage facility.³⁰ The CuSD has been serving the community for over 50 years and providing service to over 23,000 residential and business units within the communities of Cupertino, portions of Saratoga, Sunnyvale, Los Altos and unincorporated areas within Santa Clara County. The CuSD conveys nearly 5.0 MGD of wastewater from its customers for treatment at the San Jose-Santa Clara Regional Wastewater Facility (RWF).

The RWF is the largest advanced wastewater treatment facility in the western United States. Using primary, secondary, and tertiary treatment, the RWF treats an average of 110 MGD of wastewater, with a capacity of up to 167 MGD.³¹ The treated wastewater is discharged into South San Francisco Bay. The RWF serves 1.5 million residents and over 17,000 businesses in eight cities and four sanitation districts.

²⁶ City of Palo Alto website, <https://www.paloalto.gov/Departments/Public-Works/Regional-Water-Quality-Control-Plant/Capital-Improvement-Projects/Local-Advanced-Water-Purification-System>

²⁷ HydroScience Engineers, 2020. 2020 Sewer System Management Plan, dated May 2020.

²⁸ City of Sunnyvale website, <https://www.sunnyvalecleanwater.com/water-pollution-control-master-plan>.

²⁹ City of Sunnyvale website, <https://www.sunnyvale.ca.gov/homes-streets-and-property/water-and-sewer/sewer/water-pollution-control-plant>

³⁰ Cupertino Sanitary District website: https://www.cupertinosanitarydistrict.org/about_us.

³¹ City of San Jose website: <https://www.sanjoseca.gov/your-government/departments-offices/environmental-services/water-utilities/regional-wastewater-facility>

Table 6-2 includes the estimated volume of wastewater collected from District customers in 2025. The estimate is calculated by annualizing 90 percent of January water use in the service area. As shown in **Table 6-3**, no wastewater is treated or disposed of within the District.

Currently, as shown in **Table 6-3**, no wastewater is treated and recycled for direct reuse within the Los Altos Suburban District service area. However, the District receives recycled water treated from the WPCP, which is located outside of the District serving area, and with plans to continue use of recycled water to meet a small portion of its demand. Projected recycled water supplies for the District through the year 2050 are shown in **Table 6-4**.

Table 6-2. Wastewater Collected Within Service Area in 2025 (DWR Table 6-2)

<input type="checkbox"/>	Check the box if there is no wastewater collection system.			
	Percentage of 2025 service area covered by wastewater collection system (OPTIONAL)			
	Percentage of 2025 service area population covered by wastewater collection system (OPTIONAL)			
Wastewater Collection			Recipient of Collected Wastewater	
Name of Wastewater Collection Agency	Wastewater Volume Metered or Estimated? (OPTIONAL)	Volume of Wastewater Collected from UWMP Service Area 2025	Name of Wastewater Treatment Plant (WWTP) and Place ID Number	Is WWTP Located Within UWMP Area?
		(AF)		
City of Los Altos, City of Mountain View, Town of Los Altos Hills	Estimated	5,129	Palo Alto Regional WQCP, Place ID 247457	No
City of Sunnyvale	Estimated	315	Sunnyvale WPCP, Place ID 259507	No
Cupertino Sanitary District	Estimated	2,055	San Jose/Santa Clara WPCP, Place ID 255333	No
Total Wastewater Collected from Service Area in 2025:		7,499		
Notes:				
(a) The volume of wastewater collected from the Los Altos Suburban District service area in 2025 is estimated by annualizing 90 percent of January water use in the District.				

Table 6-3. Wastewater and Discharge Within Service Area in 2025 (DWR Table 6-3)

☒	Check box if no wastewater is treated or disposed of within the UWMP service area.													
Wastewater Treatment Plant Name and Place ID Number	Does This Plant Treat Wastewater Generated Outside the UWMP Service Area?	2025 Volume of Wastewater Received from UWMP Service Area (AF)	Total 2025 Volume of Water Treated (AF)	2025 Outcomes of Treated Wastewater										
				Water Recycled Within UWMP Service Area		Water Recycled Outside of UWMP Service Area		Effluent Discharge that is not a Permitted Recycled Water Use		Required Discharge for Instream Flow		Delivered to Another Entity for Additional Treatment		
				Treatment Level	Volume (AF)	Treatment Level	Volume (AF)	Treatment Level	Volume (AF)	Treatment Level	Volume (AF)	Treatment Level	Volume (AF)	Name of other entity
Total														
Notes:														

6.5.3 Recycled Water System and Recycled Water Beneficial Uses

 CWC § 10633 (c-g)

(c) A description of the recycled water currently being used in the supplier's service area, including, but not limited to, the type, place, and quantity of use.

(d) A description and quantification of the potential uses of recycled water, including, but not limited to, agricultural irrigation, landscape irrigation, wildlife habitat enhancement, wetlands, industrial reuse, groundwater recharge, indirect potable reuse, and other appropriate uses, and a determination with regard to the technical and economic feasibility of serving those uses.

(e) The projected use of recycled water within the supplier's service area at the end of 5, 10, 15, and 20 years and a description of the actual use of recycled water in comparison to uses previously projected pursuant to this subdivision.

(f) A description of actions, including financial incentives, which may be taken to encourage the use of recycled water, and the projected results of these actions in terms of acre-feet of recycled water used per year.

(g) A plan for optimizing the use of recycled water in the supplier's service area, including actions to facilitate the installation of dual distribution systems, to promote recirculating uses, to facilitate the increased use of treated wastewater that meets recycled water standards, and to overcome any obstacles to achieving that increased use.

Use of recycled water reduces use of purchased water from Valley Water and groundwater pumped from the Basin. This helps to increase groundwater storage and the sustainability of both supply sources. Currently, a small amount of recycled water is used in the District. The WPCP recycled water is conveyed through the Valley Water transmission facilities to the District service area in the City of Cupertino. The recycled water transmission facilities, which commenced deliveries in 2019 and have a capacity of 1,095 AFY, serves the Apple Campus 2 site within the District. Cal Water is actively investigating additional recycled water connections to the existing recycled water transmission pipeline.

In 2012, Valley Water constructed, and currently operates, an 8.0 MGD advanced water purification plant adjacent to the RWF, which provides secondary effluent as source water. The treated water from the advanced water purification plant is currently blended with tertiary treated water to improve the quality for non-potable use by a wide variety of customers. Valley Water is working with the cities of San Jose and Santa Clara to implement a regional Advanced Water Purification Facility Pure Water Silicon Valley (PWSV) adjacent to the SVAWPC for direct potable reuse to meet its potable reuse goal of 24,000 AFY by 2035 and 32,000 AFY by 2050.³²

As shown in **Table 6-4** and **Table 6-5**, the District currently uses a small amount of recycled water for landscaping and cooling and plans to continue this level of recycled water usage throughout the planning period as part of its supplies. The extent and timing of recycled water use by other District customers is highly variable and often speculative given the uncertainty surrounding

³² Valley Water, 2026.Draft 2025 Urban Water Management Plan, dated April 2026.

planned developments. For example, the 2025 actual recycled water use is greater than the 2020 projection for 2025, as shown in **Table 6-5**. This discrepancy is attributed to additional recycled water usage by the District's current recycled water customer (i.e., since 2024 they have utilized an increased amount of recycled water due to a change in the source water that increased the water quality).

Table 6-4. Recycled Water Direct Beneficial Uses Within Service Area (DWR Table 6-4)

<input type="checkbox"/> Check box if recycled water is not used and is not planned for use within the service area of the supplier.										
Name(s) of Facility/ies Producing (Treating) the Recycled Water (OPTIONAL):				City of Sunnyvale						
Name of Supplier Operating the Recycled Water Distribution System (OPTIONAL):				Valley Water						
Supplemental Water Added in 2025 (Volume) (OPTIONAL):										
Source of 2025 Supplemental Water (OPTIONAL):										
Use Type	Water Type (after treatment if treated) (OPTIONAL)	Additional Information (as needed)	2025	2030	2035	2040	2045	2050 (opt)	Potential Recycled Water Use	
			(AF)	(AF)	(AF)	(AF)	(AF)	(AF)	Volume	Narrative Page Number (OPTIONAL)
Landscape irrigation (excludes golf courses)	Landscape and cooling	Includes distribution losses	277	221	223	225	227	230		
Total:			277	221	223	225	227	230		
Notes:										

Table 6-5. 2020 UWMP Recycled Water Use Projection Compared to 2025 Actual (DWR Table 6-5)

<input type="checkbox"/>	Check the box if recycled water was not used in 2025 nor projected for use in 2020.	
Use Type	2020 Projection for 2025	2025 Actual Use
	(AF)	(AF)
Landscape Irrigation (excludes golf courses)	100	277
Total	100	277
Notes:		
(a) Since 2024, one of the District’s customers has been utilizing an increased amount of recycled water due to a change in the source water.		

6.5.4 Actions to Encourage and Optimize Future Recycled Water Use

At this time, as shown in **Table 6-6**, Cal Water does not currently have specific projects to expand the use of recycled water within the Los Altos Suburban District. Cal Water’s supply portfolio in some districts already includes recycled water. Cal Water has also recently developed a Water Reuse Strategic Plan that evaluated potential reuse opportunities across all Cal Water Districts, including Non-Potable Reuse (NPR), Indirect Potable Reuse (IPR), and Direct Potable Reuse (DPR). It further outlined key aspects of potable reuse projects including project structure, interagency coordination, and source control. Cal Water will utilize this Strategic Plan to further evaluate the feasibility of specific opportunities and is eager to expand its water supply portfolio to utilize water reuse where feasible, and to form partnerships with other agencies and jurisdictions to accomplish this.

Table 6-6. Methods to Expand Future Recycled Water Use (DWR Table 6-6)

<input checked="" type="checkbox"/>	Check the box if the Supplier does not plan to expand recycled water use in the future.		
Section 6.5.4	Page location of narrative in UWMP		
Name of Action	Description	Planned Implementation Year	Expected Increase in Recycled Water Use
			(AF)
Total			
Notes:			

6.6 Desalinated Water Opportunities

CWC § 10631 (g) A plan shall be adopted in accordance with this chapter and shall do all of the following:

Describe the opportunities for development of desalinated water, including, but not limited to, ocean water, brackish water, and groundwater, as a long-term supply.

A desalination plant could theoretically be used to provide potable water to District and several of Cal Water’s districts located on the San Francisco Peninsula. Because the supply of both groundwater, treated surface water provided by Valley Water, and recycled water is adequate, and because the cost is not competitive with these supplies, desalinated water is unlikely to become a supply source for the District in the near future.

Valley Water is a partner in the Bay Area Regional Desalination Project (BARDP), which is evaluating purifying brackish water from Mallard Slough using Contra Costa Water District water rights. Partners include San Francisco Public Utilities Commission (SFPUC), Zone 7 Water Agency, East Bay Municipal Utility District (EBMUD), and Contra Costa Water District.³³ As a retail agency of Valley Water, the District would benefit from this alternative supply. To date, the agencies have completed a number of feasibility studies on hydrologic modeling, energy use, and potential habitat impacts of BARDP. The agencies are evaluating the water rights to determine how much water can be reliably produced by a desalination facility and approaches for conveying project water to each partner agency. There is no timeline yet determined for design, construction and permitting of the project.³⁴

In October 2023, Valley Water completed a preliminary environmental feasibility study (Feasibility Study) evaluating the potential development of a desalination project in Santa Clara County. The Feasibility Study found that desalination may be feasible; however, there were key environmental concerns to consider. As a next step, Valley Water has retained a technical consultant to develop an Engineering Feasibility Study to assess technical viability, anticipated costs, and regulatory permitting requirements.³⁵

³³ Information on the BARDP accessed from: <https://www.regionaldesal.org/>

³⁴ Ibid.

³⁵ Valley Water, Bay Area Desalination webpage: <https://www.valleywater.org/your-water/water-supply-planning/desalination>

6.7 Water Exchanges and Transfers

CWC § 10631 (c) *A plan shall be adopted in accordance with this chapter and shall do all of the following:
Describe the opportunities for exchanges or transfers of water on a short-term or long-term basis.*

6.7.1 Exchanges

Cal Water is not pursuing water exchanges involving the Los Altos Suburban District and other entities at the time.

6.7.2 Transfers

Cal Water is not pursuing water transfers involving the Los Altos Suburban District and other entities at the time.

6.7.3 Emergency Interties

The District currently has a total of eleven emergency interties, including with San Jose Water Company (one connection), City of Santa Clara (one connection), City of Sunnyvale (six connections), and Purissima Hills Water District (three connections). Cal Water is exploring options for installing additional interconnections in the near future with adjacent agencies.

6.8 Future Water Projects

CWC § 10631 *A plan shall be adopted in accordance with this chapter and shall do all of the following:*

(b) (3) For any planned sources of water supply, a description of the measures that are being undertaken to acquire and develop those water supplies.

(f) Include a description of all water supply projects and water supply programs that may be undertaken by the urban water supplier to meet the total projected water use, as established pursuant to subdivision (a) of Section 10635. The urban water supplier shall include a detailed description of expected future projects and programs that the urban water supplier may implement to increase the amount of the water supply available to the urban water supplier in normal and single-dry water years and for a period of drought lasting five consecutive water years. The description shall identify specific projects and include a description of the increase in water supply that is expected to be available from each project. The description shall include an estimate with regard to the implementation timeline for each project or program.

Cal Water has an active well maintenance program to monitor all of the wells and identify which wells need to be replaced to maintain the reliability of the system. Cal Water will maintain sufficient wells and distribution facilities to meet the anticipated increases in future demand as needed. In addition to routine well maintenance, Cal Water is currently advancing additional

supply-augmentation projects to support reliability and growth, including adding additional wells to its system.

As shown in **Table 6-7**, there are no planned future water supply projects or programs that are expected to provide a quantifiable increase to the District's water supply, beyond Cal Water's groundwater well program mentioned above.

Table 6-7. Expected Future Water Supply Projects or Programs (DWR Table 6-7)

<input checked="" type="checkbox"/>	No expected future water supply projects or programs that provide a quantifiable increase to the agency's water supply.						
<input type="checkbox"/>	Some or all of the supplier's future water supply projects or programs are not compatible with this table and are described in a narrative format.						
	Provide page location of narrative in the UWMP						
Name of Future Projects or Programs	Joint Project with Other Suppliers?		Additional Description (as needed)	Water Type (after treatment if treated) (OPTIONAL)	Planned Implementation Year	Planned for Use in Year Type	Expected Increase in Water Supply to Supplier
	Yes/No	If Yes, Supplier Name					(AF)
Notes:							

6.9 Summary of Existing and Planned Sources of Water

CWC § 10631 (b) Identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier over the same five-year increments described in subdivision (a).

CWC § 10631 (b) (2)

When multiple sources of water supply are identified, a description of the management of each supply in correlation with the other identified supplies.

CWC § 10631 (b) (4) (D) A detailed description and analysis of the amount and location of groundwater that is projected to be pumped by the urban water supplier. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

Table 6-8 summarizes the actual volumes of purchased water, groundwater, and recycled water supplies for calendar year 2025, as applicable.

Table 6-9 shows the projected supply volumes through 2050. While the exact split between the District's future use of purchased water and groundwater to meet potable demand is unknown, the sum of projected groundwater and purchased water equals the projected potable demand in each year, maintaining the historical mix of groundwater and purchased water through 2035. With anticipated completion of Valley Water's ongoing construction efforts, by 2040 the District anticipates that approximately 80 percent its potable supply will be met with water purchased from Valley Water. The projected volume of recycled water is based on the historical usage. In normal years, groundwater supply will be used to serve any remaining District potable demand that is not met with purchased water, to the extent allowable by Valley Water. Therefore, the sum of purchased water, groundwater, and recycled water supplies shown in **Table 6-9** equal the projected demand in each year (see Section 7.1.1).

It should be noted that the projected supply volumes shown in **Table 6-9** do not represent the total water supply available to the District in a given year but rather reflect the fact that the available supplies are projected to be sufficient to meet the normal year demands as needed.

Table 6-8. Water Supplies – Actual (DWR Table 6-8)

Water Supply	Additional Description (As Needed)	2025		
		Water Type (after treatment if treated) (OPTIONAL)	Actual Volume	Total Entitlement (OPTIONAL)
			(AF)	(AF)
Purchased or Imported Water	Santa Clara Valley Water District & San Jose Water Company	Potable	6,022	
Groundwater (not desalinated)	Santa Clara Subbasin	Potable	4,284	
Recycled Water	Sunnyvale WPCP	Non-Potable	277	
Subtotal Potable			10,306	
Subtotal Non-Potable			277	
Total			10,583	

Notes:

- (a) The Santa Clara Subbasin is not adjudicated and is not critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.
- (b) Since 2024, one of the District’s customers has been utilizing an increased amount of recycled water due to a change in the source water.

Table 6-9. Water Supplies – Projected (DWR Table 6-9)

Water Supply	Additional Detail on Water Supply	Water Type (OPTIONAL)	Projected Water Supply									
			2030		2035		2040		2045		2050 (opt)	
			Reasonably Available Volume	Total Entitlement (OPTIONAL)	Reasonably Available Volume	Total Entitlement (OPTIONAL)	Reasonably Available Volume	Total Entitlement (OPTIONAL)	Reasonably Available Volume	Total Entitlement (OPTIONAL)	Reasonably Available Volume	Total Entitlement (OPTIONAL)
			(AF)	(AF)	(AF)	(AF)	(AF)	(AF)	(AF)	(AF)	(AF)	(AF)
Purchased or Imported Water	Santa Clara Valley Water District	Potable	6,266		6,260		8,361		8,406		8,458	
Groundwater (not desalinated)	Santa Clara Subbasin	Potable	4,178		4,173		2,090		2,101		2,114	
Recycled Water	Sunnyvale WPCP	Non-Potable	221		223		225		227		230	
Subtotal Potable			10,444		10,433		10,451		10,507		10,572	
Subtotal Non-Potable			221		223		225		227		230	
Total			10,665		10,656		10,676		10,735		10,802	

Notes:

(a) The Santa Clara Subbasin is not adjudicated and is not critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.

6.10 Special Conditions

6.10.1 Climate Change Effects

Cal Water is committed to incorporating climate change into its ongoing water supply planning. Section 4.4 of this Plan includes a description of plausible changes to projected demands under climate change conditions, and Cal Water is currently working to consider the effects of climate change in future demand modeling. The impact of climate change on District supplies is addressed in detail in the key resources described below, which are incorporated into this Plan by reference:

- In 2016, Cal Water completed a study of climate change impacts on a representative subset of its districts to gain a better understanding of the potential impacts of climate change on the availability of its diverse supplies.³⁶ The 2016 study relied on the best available projections of changes in climate (temperature and precipitation) through the end of the century to examine how surface water flows and groundwater recharge rates may change. The executive summary of this study is included in this Plan in **Appendix F**.
- Cal Water developed a multi-phase climate change study to assess the climate-related impacts on Cal Water assets, supplies, demands, and vulnerabilities. Phase 1, which primarily consisted of a literature and tools review of previous and complementary studies, was completed in December 2020.³⁷ Phase 2 included a District-level vulnerability assessment of Cal Water’s facilities and operations, an assessment approach that evaluates climate impacts to Cal Water, identification of asset vulnerabilities, and prioritization of climate risks. Phase 2 also included an assessment of climate-driven impacts to water supply resources and demand, and was completed in December 2021. The executive summary for Phase 1 and the Summary for Decision Makers for Phase 2 of these studies are included in this Plan in **Appendix F**.
- SGMA dictates that GSPs include basin-wide water budget models under various climate change scenarios, including future conditions which account for the effects of estimated climate change. The final 2016 Groundwater Management Plan for the Santa Clara and Llagas Subbasins was submitted to DWR as the Alternative GSP. An amended Alternative GSP was submitted to DWR in December 2021 (the 2021 Alternative GSP), is available on the DWR SGMA Portal website:

<https://sgma.water.ca.gov/portal/alternative/periodiceval/preview/6>

³⁶ California Water Service, 2016. Potential Climate Change Impacts on the Water Supplies of California Water Service, prepared by Gary Fiske and Associates, Inc. and Balance Hydrologics, Inc., dated January 2016.

³⁷ ICF, 2020. California Water Service Climate Change – Water Resource Monitoring and Adaptation Plan – Phase 1, prepared by ICF, dated December 17, 2020.

6.10.2 Regulatory Conditions and Project Development

Emerging regulatory conditions (e.g., issues surrounding the Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary [Bay-Delta Plan]) may affect planned future projects and the characterization of future water supply availability and analysis. The District does not have any current plans to develop additional supply sources. If the District does move forward with any plans to develop supply projects, emerging regulatory conditions will be considered, and the associated water supply reliability impacts will be assessed in future UWMP updates.

Detailed information is provided below regarding Delta Reliance. The source for the information is the draft Valley Water 2025 UWMP Appendix H provided by Valley Water.

“Draft Valley Water 2025 UWMP Appendix H

Valley Water’s retailers rely on Valley Water to maintain sustainable water supplies, including managed groundwater recharge and in-lieu groundwater recharge (e.g., treated surface water deliveries, demand management programs, etc.) Valley Water’s retail water agencies do not control the amount of Delta watershed water they receive from Valley Water and the interconnected nature of the groundwater basins and blended use of sources in Valley Water infrastructure like reservoirs and pipelines make it infeasible to quantify imported water use at the retailer level. The system and operations are designed to integrate and work at a regional level.

Since the 1930s, Valley Water’s water supply strategy has been to maximize the conjunctive management of surface water and groundwater supplies to enhance water supply reliability and avoid land subsidence. Local groundwater resources make up the foundation of the County’s water supply but need to be augmented by Valley Water’s comprehensive water management activities to reliably meet the needs of county residents, businesses, agriculture, and the environment. These activities include managed recharge of imported and local supplies and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.

Imported water diverted from the Delta watershed is an important component of Valley Water’s current water supply portfolio, accounting for approximately 40% of its annual water supply on average. Imported supplies received from the SWP and CVP are sent to one of Valley Water’s three drinking water treatment plants, used for managed groundwater recharge, or stored in local and State reservoirs for use in subsequent years. Valley Water also stores some of its imported water in the Semitropic Groundwater Bank in the Central Valley for withdrawal during dry periods.

Water supplies that contribute to regional self-reliance are shown in Table C-3. Consistent development and funding of these supplies have resulted in reduced reliance on the percentage of water supplies imported from the Delta watershed as compared to overall water use in the County. Valley Water, with the financial support of all its retailers as reflected in its water rates, has made significant investments in demand management and developing local supplies to reduce Santa Clara County's reliance on the Delta watershed and increase regional self-reliance. These investments include³⁸:

- Conservation and demand management
- Recycled and purified water
- Dam improvements/seismic retrofits to lift storage restrictions on local reservoirs
- Regional collaborations to increase self-reliance

Valley Water used both actual data and modeling estimates to develop reduction percentages in Table C-2 and C-3. Data for 2010 and 2015 are the same as what used in the 2020 UWMP. Data for 2020 was developed using averages over the ten-year periods of 2015-2024. Data for 2025 uses average over five-year periods of 2021-2025. Annual demand and supply data were collected from Valley Water's Protection and Augmentation of Water Supplies (PAWS) reports that are published annually. Actual numbers from the relevant years were not used since supplies and demands are highly dependent on annual hydrology. Averaging values over a longer period allows sometimes extreme annual variation to be smoothed out to a value that is more indicative of conditions of that time.

All demand and supply data for 2030 through 2050 is from current 2025 UWMP and represents average, normal year conditions.

All data for water conservation comes from Valley Water's Water Savings Model, which tracks water conservation savings since 1992. The data from 2030 through 2050 is consistent with what is reported in the current plan. As indicated in Tables C-3 and C-4, based on its past and ongoing efforts to increase regionally developed water supplies, planned water supply projects including expansion of water recycling, direct potable reuse, and long-term water conservation savings, Valley Water estimates that its service area in general has reduced, and will continue to reduce, their reliance on imported water supplies diverted from the Delta watershed from the 2010 baseline year through 2050, consistent with the Delta Plan and regulation WR P1. Tables C-3 and C-4 show estimated

³⁸ Detailed description of each investment is included in Appendix H of the draft Valley Water 2025 UWMP.

changes in Valley Water’s Delta watershed supply from 2010 through 2045. Compared to the baseline, the projected percentage decrease of Delta watershed supply in Valley Water’s portfolio ranges from 4.8% (2030) to 10.9% (2045).”

6.10.3 Other Locally Applicable Criteria

Other locally applicable criteria may affect characterization and availability of an identified water supply (e.g., changes in regional water transfer rules may alter the availability of a water supply that had historically been readily available). The District does not have any current plans to develop additional supply sources. If the District does move forward ahead with any plans to develop supply projects, locally applicable criteria will be considered, and the associated water supply reliability impacts will be assessed in future UWMP updates.

6.11 Energy Intensity

CWC § 10631.2

- (a) *In addition to the requirements of Section 10631, an urban water management plan shall include any of the following information that the urban water supplier can readily obtain:*
- (1) *An estimate of the amount of energy used to extract or divert water supplies.*
 - (2) *An estimate of the amount of energy used to convey water supplies to the water treatment plants or distribution systems.*
 - (3) *An estimate of the amount of energy used to treat water supplies.*
 - (4) *An estimate of the amount of energy used to distribute water supplies through its distribution systems.*
 - (5) *An estimate of the amount of energy used for treated water supplies in comparison to the amount used for nontreated water supplies.*
 - (6) *An estimate of the amount of energy used to place water into or withdraw from storage.*
 - (7) *Any other energy-related information the urban water supplier deems appropriate.*
- (b) *The department shall include in its guidance for the preparation of urban water management plans a methodology for the voluntary calculation or estimation of the energy intensity of urban water systems. The department may consider studies and calculations conducted by the Public Utilities Commission in developing the methodology.*
- (c) *The Legislature finds and declares that energy use is only one factor in water supply planning and shall not be considered independently of other factors.*

The “Total Utility Approach” as defined by DWR in the 2025 UWMP Guidebook is used to report water-related energy-consumption data for the Los Altos Suburban District. Calendar year 2024 is selected as the one-year reporting period, and utility bills for the associated time period are used as the source for energy consumption data. Utility bills reported the following energy consumption data for the Los Altos Suburban during calendar year 2024:

Total Energy Consumed by the Los Altos District = 3,897,022 kilowatt hour (kWh)

Table 6-10 shows the energy consumed for each acre-foot (AF) of water entering the distribution system in the District, including energy associated with the pumping, treatment, conveyance, and distribution of drinking water, but not including energy associated with the treatment of wastewater. Based on this, the energy intensity is estimated to be 368 kilowatt hours per acre-foot (kWh/AF), or 1,129 kWh per million gallon consistent with the DWR 2025 UWMP Submittal Tables (see **Table 6-10**).

Table 6-10. Recommended Energy Intensity – Total Utility Approach (DWR Table O-1B)

Water Delivery Product	Retail Potable Deliveries	Only for Water Delivery Products Under the Urban Water Supplier's Operational Control		
		Sum of All Water Management Processes	Non-Consequential Hydropower	
Start Date of Reporting Period	1/1/2024			
End Date of Reporting Period	12/31/2024			
Is Upstream Embedded Energy in the Values Reported?	No			
Units of Measure for Water	(AF)	Total Utility	Hydropower	Net Utility
Volume of Water Entering Process		10,589	-	10,589
Energy Consumed (kWh)		3,897,022	-	3,897,022
Energy Intensity (kWh/vol. converted to MG)		1,129	-	1,129
Quantity of Self-Generated Renewable Energy				
N/A				
Data Quality (Estimate, Metered Data, Combination of Estimates and Metered Data)				
Metered Data				
Data Quality Narrative:				
Utility bills for the associated time period are used as the source for energy consumption data.				
Narrative:				
Total energy consumption represents the energy consumed during pumping, treatment, conveyance, and distribution.				
Notes:				

Chapter 7

Water Supply Reliability Assessment

CWC § 10620 (f)

An urban water supplier shall describe in the plan water management tools and options used by that entity that will maximize resources and minimize the need to import water from other regions.

CWC § 10630.5

Each plan shall include a simple lay description of how much water the agency has on a reliable basis, how much it needs for the foreseeable future, what the agency's strategy is for meeting its water needs, the challenges facing the agency, and any other information necessary to provide a general understanding of the agency's plan.

This chapter describes the reliability of the California Water Service (Cal Water) Los Altos Suburban District's (also referred to herein as the "District") water supplies. Assessment of water supply reliability is complex and dependent upon a number of factors, such as the number of water sources, regulatory and legal constraints, hydrological and environmental conditions, climate change, and expected growth, among others. Based on available historical information and projections of future water uses, regulatory and legal constraints, and hydrological and environmental conditions, including climate change, Cal Water has made its best determination of future water supply reliability for the District. This chapter includes the following sections:

- 7.1 Constraints on Water Sources
- 7.2 Reliability by Type of Year
- 7.3 Supply and Demand Assessment
- 7.4 Water Supply Management Tools and Options
- 7.5 Drought Risk Assessment

7.1 Constraints on Water Sources

Purchased surface water from the Santa Clara Valley Water District (Valley Water), groundwater pumped from the Santa Clara Subbasin (Basin), and recycled water from the Sunnyvale Water Pollution Control Plant (WPCP) are the supply sources for the District. Cal Water has identified several potential constraints on future purchased water and groundwater supply availability, including water quality and climate change and evolving regulations such as the Sustainable Groundwater Management Act (SGMA). These constraints, along with associated management strategies are summarized in the following sections.

7.1.1 Supply Availability

As discussed in Chapter 6 of the Urban Water Management Plan (UWMP or Plan), Cal Water expects the available supplies (i.e., purchased water, groundwater, and recycled water) to be sufficient to meet projected demands in all hydrologic conditions, except in the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of the District's Water Shortage Contingency Plan ([WSCP; see **Appendix G**). This assessment is based on the available information regarding purchased water, groundwater, and recycled water supply availability to the District and the additional information presented below.

Purchased Water

Cal Water currently purchases treated surface water from Valley Water. In addition to its local supplies, Valley Water imports surface water to the region through the South Bay Aqueduct of the State Water Project (SWP) and the San Felipe Division of the federal Central Valley Project (CVP). Detailed information is provided below regarding constraints on imported water supplies, water service reliability, and Delta Reliance. The source of the information is the draft Valley Water 2025 UWMP.

6.1.1 Existing Imported Water Supply

Valley Water holds contracts for 100,000 [acre-feet per year] AFY from the SWP and for 152,500 AFY from the CVP. The actual amount of water delivered is typically less than these contractual amounts and depends on hydrology, conveyance limitations, and environmental regulations. In certain wetter years, when conditions allow the CVP or SWP to make temporary flood flows from the Delta watershed available, Valley Water may also augment its imported supplies with additional water deliveries. In addition, supplemental imported water is sometimes acquired through transfers and exchanges if available. Figure 6-1 shows imported water delivery from the Delta from 2010 to 2024. During the height of droughts in 2014-2015 and 2021-2022, imported water delivery was quite low, while in 2023, a very wet year, the delivery was considerably higher.

The imported supplies are sent to Valley Water's three drinking water treatment plants, used for managed groundwater recharge, or stored in local, State and Federal reservoirs for use in subsequent years. Valley Water also stores some of its imported water in the Semitropic Groundwater Bank in the Central Valley for withdrawal during dry periods or as otherwise needed.

6.1.3. Constraints on Imported Water Supplies

Imported water supplies are subject to hydrologic variability. Local and out-of-county storage can help mitigate the impacts of hydrologic variability.

Valley Water's SWP and CVP water supplies are subject to a number of additional constraints including regulatory requirements to protect fisheries and water quality in the Delta, and conveyance limitations. Delta-conveyed supplies are also at risk from Delta levee failures due to seismic threats and flooding, sea level rise and climate change, declining populations of protected fish species, and water quality variations (including algal blooms). Many water quality variations are addressed by blending sources and/or switching sources to the drinking water treatment plants. Algae and disinfection byproduct precursors have been especially challenging during recent drought conditions. To address some of these constraints, Valley Water continues to evaluate the costs and benefits of participating in the [Delta Conveyance Project] DCP in addition to other water supply options such as developing additional local supplies, securing and optimizing Valley Water's existing water system, and expanding water conservation.

6.9 Summary of Existing and Projected Water Supplies

Valley Water's existing and projected average water supplies are presented in Table 6-4. To forecast average available supplies through the planning horizon, Valley Water uses its Water Evaluation and Planning (WEAP) model. The WEAP model simulates future demands and supply using historic hydrology from 1922-2021. Valley Water presents the average supply over 100-years of hydrology (1922 - 2021) for groundwater, local surface water, CVP and SWP allocations, and [San Francisco Public Utilities Commission] SFPUC supply since their availability varies greatly from year to year with hydrologic cycles and there is not a single representative year. Available recycled water supplies are summed based on retailer forecasted future use. A complete summary of data and assumptions used in the modeling for this plan is provided in Appendix D.

Per the UWMP guidebook, average supply represents reasonable available supply during normal years, therefore, those supplies did not include water stored in local and out of county storage which is typically reserved for use during droughts or other emergencies.

The future supply projections include future projects that Valley Water is currently planning and/or implementing to ensure long-term water supply reliability. Projects included in the supply projections are Anderson dam seismic retrofit (2034), Guadalupe, Calero, and Almaden dam seismic retrofits (2035); Pure Water Silicon Valley for [Direct Potable Reuse] DPR (2035), B.F. Sisk Dam Raise (2035), DCP (2045), Groundwater banking,

South County Recharge (recharge projects in the South County to increase groundwater recharge capacity), and an additional 41,000 AF of conservation by 2050.

7.3.3 Five Dry Year Supply Reliability

The greatest challenge to Valley Water’s water supply reliability is multiple dry years, such as those that occurred in 1988 through 1992 and in 2012 through 2016. The five dry-year period used in this analysis is 1988 to 1992, which was an extended and more severe drought within historic record and WEAP modeling period. Estimated supplies and demands for the period, under different demand years, are shown in Table 7-4. The analysis indicates that with existing and planned projects’ supplies, Valley Water’s diverse water supplies are sufficient to meet demands throughout the full five-year drought in demand years 2035 and 2040 without having to call for short-term water use reductions, but in demand years 2030 as well as 2045 through 2050, there will be shortages in the last two years of the drought. The shortages are less than 10% of projected demands, thus within Valley Water’s level of service goal of meeting 100% of annual water demand during non-drought years and at least 80% of annual water demand in drought years. Those shortages will be addressed through a combination of supply augmentation from transfer and exchange and water use reductions.

Valley Water’s basic water supply strategy to compensate for supply variability is to store excess wet year supplies in the groundwater basin, local reservoirs, San Luis Reservoir, and/or Semitropic Groundwater Bank, and draw on these reserve supplies during dry years to help meet demands. These reserves, along with existing and planned future projects in the WSMP, help Valley Water meet demands during a prolonged drought. Future projects and programs recommended in the WSMP 2050, including additional long-term water conservation savings, potable reuse, recharge capacity increases, and banking and storage, were developed in accordance with this policy to minimize the need to call for water use reductions greater than 20%. As part of the on-going master planning process to address future uncertainties with demands, existing supplies, and proposed projects, Valley Water conducts annual evaluation of WSMP projects to determine which projects should continue to be invested in to meet the level of service goal and potentially for other benefits such as operational flexibility, supply diversification, and resiliency to future uncertainties.”

Since the 2021–2022 drought, and in response to reduced reliability of imported water supplies, climate driven supply uncertainty, and the ongoing need for water conservation, Valley Water implemented a 23 percent planning level reduction in the treated water supply available to its retailers, including the District. This reduction was authorized under Valley Water Board Resolution No. 22 20 and implemented consistent with provisions of the treated water supply contract, which require proportional delivery reductions when conservation programs exceed a

10 percent threshold. The 23 percent reduction reflects a countywide conservation target during severe drought conditions and was applied uniformly through adjusted annual and monthly delivery schedules for retailers supplied by the Rinconada Water Treatment Plant.

Given the variety of supply reliability actions to be undertaken by Valley Water discussed above, purchased water supplies (in combination with groundwater and recycled water discussed below) are expected to be sufficient to meet projected water demands of the District except in the fourth and fifth year of a drought in 2030, 2045, and 2050. The District will make up the shortfall either with groundwater supplies, to the extent allowable by Valley Water, and/or through implementation of the District's WSCP (see **Appendix G**).

Groundwater

Historically, the groundwater supplies available to the District from the underlying Basin, together with purchased water and recycled water, have always been sufficient to meet District demands and the Cal Water supply wells have not dewatered, even during historical drought periods. As such, groundwater is expected to remain 100 percent reliable, up to allowable pumped volumes.

For over 80 years, Valley Water has managed groundwater in Santa Clara County per its statutory authority. Valley Water's comprehensive groundwater management programs and investments have resulted in sustainable groundwater conditions for many decades and will ensure groundwater resources are sustainable far into the future.³⁹ Detailed information is provided below regarding groundwater management and current groundwater conditions within the Basin. The source for the information is the draft Valley Water 2025 UWMP.

"6.2 Local Groundwater

Valley Water manages the Santa Clara and Llagas subbasins for the benefit of its groundwater customers and the county at large. Since the 1930s, Valley Water's water supply strategy has been to maximize conjunctive use of surface water and groundwater supplies to enhance water supply reliability and avoid land subsidence. Local groundwater resources make up the foundation of the county's water supply, but need to be augmented by Valley Water's comprehensive water management activities to reliably meet the needs of county residents, businesses, agriculture, and the environment. These activities include managed recharge of imported and local supplies and in-lieu groundwater recharge through the provision of treated surface water and raw water, acquisition of supplemental water supplies, and water conservation and recycling.

³⁹ Valley Water, 2021. 2021 Groundwater Management Plan: Santa Clara and Llagas Subbasins, dated December 2021.

In 2016, Valley Water became the Groundwater Sustainability Agency (GSA) for the Santa Clara and Llagas subbasins under California's 2014 Sustainable Groundwater Management Act (SGMA), but Valley Water does not directly deliver groundwater to customers. Valley Water has a DWR-approved Alternative to a Groundwater Sustainability Plan (GSP) that it uses to sustainably manage these subbasins. Valley Water is also the GSA for the small portion of the North San Benito Subbasin within Santa Clara County (most of the subbasin is in San Benito County) and supported San Benito County Water District in developing a DWR-approved GSP for the entire North San Benito Subbasin. The area of the North San Benito Subbasin within Santa Clara County is very small and not addressed further in this UWMP.

6.2.3 Current Conditions

DWR has identified both the Santa Clara and Llagas subbasins as high priority subbasins based on criteria that include overlying population, projected growth, number of wells, irrigation acreage, groundwater reliance, and groundwater impacts. Neither subbasin has been identified by DWR as being critically overdrafted.

Groundwater conditions throughout the county are sustainable. In calendar year 2025, groundwater levels were generally higher than the prior five-year average and during the two most recent droughts (2012-2016 and 2020–2022), with managed and in-lieu recharge programs maintaining adequate storage to meet annual water supply needs and provide a buffer against drought or other shortages. Although groundwater levels declined during the two recent (2012-2016 and 2020-2022) statewide droughts, groundwater levels in the Santa Clara and Llagas subbasins quickly recovered after the drought due largely to Valley Water's proactive response and comprehensive water management activities. Valley Water monitors water levels and water quality at wells throughout the county. In addition, it evaluates data from local water suppliers to assess regional groundwater quality and identify potential threats so they can be appropriately addressed. Valley Water also monitors the quality of water used for groundwater recharge to ensure groundwater resources are protected.

Most wells in Santa Clara County produce high-quality water that meets drinking water standards without the need for treatment beyond disinfection. The primary exception is nitrate, which is elevated in many South County wells (primarily domestic wells) due to historic agricultural land use and septic system use in some areas, and continues to be a groundwater quality challenge. However, Valley Water supports domestic well owners by encouraging regular testing and connecting eligible residents to free/basic testing resources and advocate for effective remediation where needed. Cleanup is ongoing at a number of sites with industrial contaminants in groundwater (primarily near industrial sites in North County), and perchlorate was detected above the [Maximum Contaminant

Level] MCL in four domestic wells adjacent to the Olin contaminant cleanup site in South County or within approximately 1 mile south of the site.⁴⁰ In April 2024, the U.S. Environmental Protection Agency (EPA) established enforceable standards for six per- and polyfluoroalkyl substances (PFAS) in drinking water. PFAS have been noted to exceed drinking water standards in several water retailer wells and a few domestic wells throughout South County. However, regional testing does not indicate widespread PFAS presence in groundwater, but one water retailer has removed ten wells from service out of an abundance of caution. In October 2025, the State Water Board updated and revised Notification and Response Levels (NLs and RLs) for some PFAS. Valley Water will continue to evaluate the threat posed by PFAS and other contaminants while continuing to coordinate with regulators, land-use agencies, and other stakeholders to address these issues and ensure groundwater quality remains high. Valley Water produces comprehensive groundwater monitoring reports that are available at <https://www.valleywater.org/your-water/where-your-water-comes-from/groundwater/groundwater-monitoring>”

Recycled Water

The District currently uses a small amount of recycled water from the Sunnyvale Water Pollution Control Plant (WPCP), which has a capacity of 29.5 million gallons per day (MGD). As discussed in Section 6.5.2, the WPCP currently produces an average of 0.8 MGD of recycled water. The recycled water is delivered through the transmission facilities, which have a capacity of 1,095 AFY. The District’s recycled water demands comprise a modest fraction of the WPCP total capacity which have historically always been met. Given that the recycled water demands have been historically met and that recycled water is considered a “drought-proof” supply, recycled water is projected to be a reliable source to the District under all hydrologic conditions.

7.1.2 Water Quality

CWC § 10634

The plan shall include information, to the extent practicable, relating to the quality of existing sources of water available to the supplier over the same five-year increments as described in subdivision (a) of Section 10631, and the manner in which water quality affects water management strategies and supply reliability.

Impaired water quality also has the potential to affect water supply reliability. Cal Water is committed to meeting all state and federal water quality regulations. All drinking water standards are set by the U.S. Environmental Protection Agency (EPA) under the authorization of the Federal Safe Drinking Water Act of 1974. In California, the State Water Resources Control Board (SWRCB),

⁴⁰ <https://www.valleywater.org/your-water/where-your-water-comes-from/groundwater/groundwater-monitoring>.

Division of Drinking Water (DDW) can either adopt the EPA standards or set more stringent standards, which are then codified in Title 22 of the California Code of Regulations. There are two general types of drinking water standards:

- **Primary Maximum Contaminant Levels (MCLs)** are health protective standards and are established using a very conservative risk-based approach for each constituent that takes into potential health effects, detectability and treatability, and costs of treatment. Public water systems may not serve water that exceeds Primary MCLs for any constituent.
- **Secondary MCLs** are based on the aesthetic qualities of the water such as taste, odor, color, and certain mineral content, and are considered limits for constituents that may affect consumer acceptance of the water.

Cal Water routinely monitors its wells and the water that is treated and served to customers to ensure that water delivered to customers meets these drinking water standards. The results of this testing are reported to the SWRCB DDW following each test and are summarized annually in Water Quality Reports (also known as “Consumer Confidence Reports”), which are provided to customers by mail and made available on Cal Water’s website:

<https://www.calwater.com/water-quality-reports/>.

Additionally, a detailed review of the water quality conditions of the underlying groundwater basin are provided in the 2021 Alternative GSP, available on the DWR SGMA Portal website:

<https://sgma.water.ca.gov/portal/alternative/all>.

Although there is the potential for some regulated constituents to be present in source water, as documented in the Water Quality Reports, the District’s monitoring, management, and treatment of its water results in high quality drinking water meeting all drinking water standards being served to customers. Cal Water tracks changes in constituent concentrations to proactively address water quality issues before they impact supply reliability.⁴¹ In the event that water quality constituents are detected in source water at concentrations requiring treatment, the District is able to take impacted source(s) offline to implement appropriate treatment. Further, as part of the siting process for all new wells, Cal Water evaluates the presence of groundwater contamination and avoids placing wells in areas of known contamination.

Cal Water is committed to proactively addressing emerging contaminants and changing MCL requirements as needed.

⁴¹ Cal Water, 2018. Direct Testimony of Director of Water Quality, 2018 CPUC Rate Case Filing.

Given Cal Water’s proactive monitoring and management of water quality in its source water supplies, water quality is not expected to impact the reliability of the District’s available supplies within the planning horizon (i.e., through 2050).

7.1.3 Climate Change

CWC § 10631 (b) (1)

...For each source of water supply, consider any information pertinent to the reliability analysis conducted pursuant to Section 10635, including changes in supply due to climate change.

Section 6.10.1 provides a summary of the assessments of climate change on supplies that Cal Water has previously performed and those planned for the near term, as well as those related to SGMA efforts for the Basin. The 2021 Alternative GSP projected water budget for the Basin incorporated climate change using spatially downscaled projections from an ensemble of general circulation models, consistent with DWR’s 2018 guidance and in alignment with Valley Water’s long-term water supply and operations planning. Valley Water’s Draft 2025 UWMP additionally incorporated climate change into its projections of available supplies. Section 4.4 of this Plan presents information on how the impacts of climate change are factored into projected demands in the District. Cal Water is actively working to further quantify and consider future climate change impacts as part of its ongoing supply and operations planning.

Impacts of climate change are discussed further in Section 4.4 and Section 6.10 of the draft Valley Water 2025 UWMP.

7.2 Reliability by Type of Year

CWC § 10631 (b)

Identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier over the same five-year increments described in subdivision (a), providing supporting and related information, including all of the following:

CWC § 10631 (b)(1)

A detailed discussion of anticipated supply availability under a normal water year, single dry year, and droughts lasting at least five years, as well as more frequent and severe periods of drought, as described in the drought risk assessment. For each source of water supply, consider any information pertinent to the reliability analysis conducted pursuant to Section 10635, including changes in supply due to climate change.

CWC § 10635 (a)

Every urban water supplier shall include, as part of its urban water management plan, an assessment of the reliability of its water service to its customers during normal, dry, and multiple dry water years. This water supply and demand assessment shall compare the total water supply sources available to the water supplier with the long-term total projected water use over the next 20 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. The water service reliability assessment shall be based upon the information compiled pursuant to Section 10631, including available data from state, regional, or local agency population projections within the service area of the urban water supplier.

Per the 2025 UWMP Guidebook , the water service reliability assessment includes three unique year types:

- A normal hydrologic year represents the water supplies available under normal conditions, this could be an averaged range of years or a single representative year;
- A single dry year represents the lowest available water supply; and,
- A five-consecutive year drought represents the driest five-year period in the historical record.

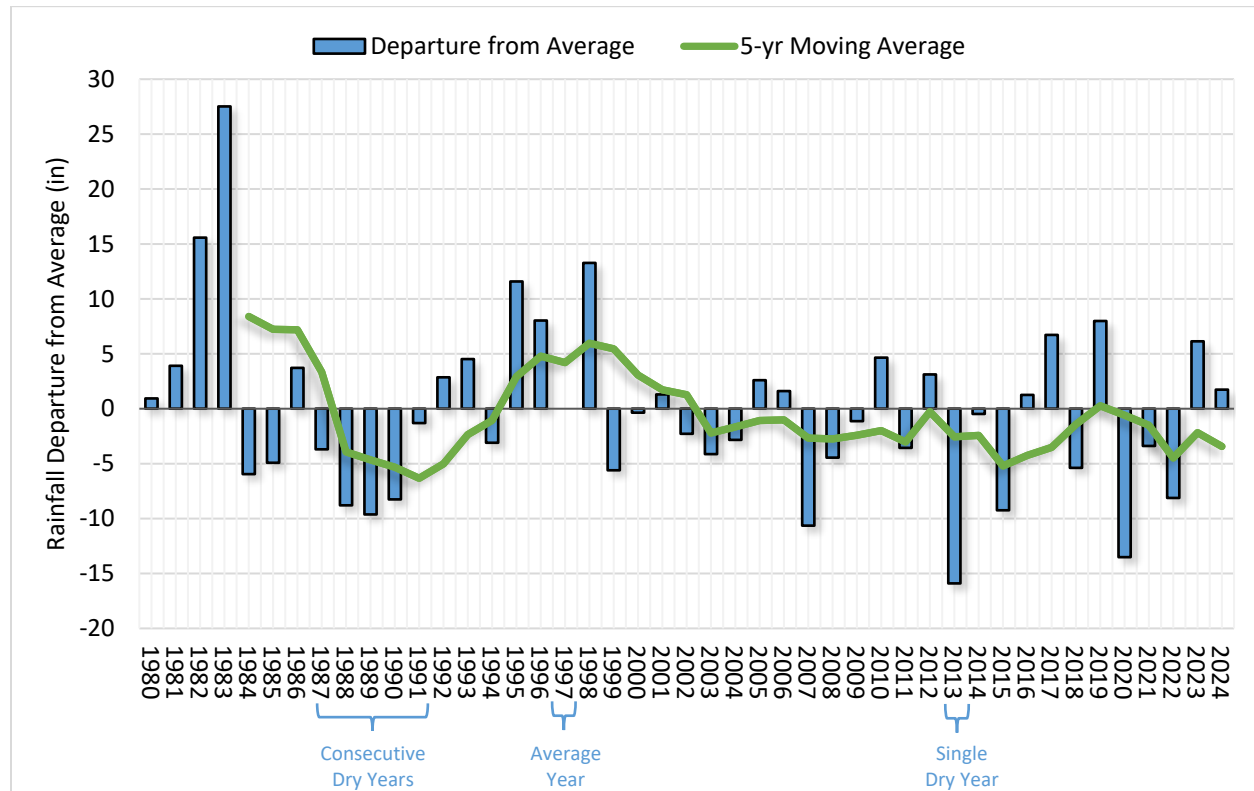
Identification of these dry year periods consistent with the 2025 UWMP Guidebook methodology is provided below.

Figure 7-1 compares annual rainfall to the historic average (19.67 inches). The designation of Base Years for drought planning shown in **Table 7-1** below comes from the data underlying this chart. The Cal Water production data record for the Los Altos Suburban District begins in the year 1980; therefore, the following year type analysis uses the historical period from 1980 to 2024.

A normal hydrologic year occurred in 1997 when precipitation was approximately 0.87 percent below the historic average for the period from 1980 to 2024. The driest year occurred in 2013 when the rainfall was approximately 80 percent below average (3.94 inches). This is taken as the

single dry year shown in **Table 7-1**. The multiple dry water years used to represent a five-consecutive year drought are 1987 through 1991. This period represents the driest five-year period on record for the historical period from 1980 to 2024, with an average precipitation of 11.08 inches per year.

Figure 7-1. Deviation of Annual Rainfall from Long-Term Average



Source: PRISM Climate Group, Oregon State University, <http://prism.oregonstate.edu>

As discussed in Section 7.1.1, the District expects the available supplies to be sufficient to meet projected demands in all hydrologic conditions, except in the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of the District’s WSCP (see **Appendix G**).

The above notwithstanding, the projected “volume available” estimates presented in **Table 7-1** are equal to the maximum demands across projected years and year types shown in **Table 7-2**, **Table 7-3**, and **Table 7-4**. For example, the assumed volume available in a representative single dry year in **Table 7-1** is equal to the projected single dry year demand for the year 2050 as shown in **Table 7-3**, not accounting for the make-up of any projected shortfalls.

Table 7-1. Basis of Water Year Data (Reliability Assessment) (DWR Table 7-1)

Year Type	Base Year	Available Supplies if Year Type Repeats	
		<input checked="" type="checkbox"/>	Quantification of available supplies is not compatible with this table and is provided elsewhere in the UWMP. Location: _____
		Quantification of available supplies is provided in this table as either volume only, percent only, or both.	
		Volume Available	% of Average Supply
(AF)			
Average Year	2016	10,802	
Single-Dry Year	2013	11,267	
Consecutive Dry Years 1st Year	1987	11,556	
Consecutive Dry Years 2nd Year	1988	11,556	
Consecutive Dry Years 3rd Year	1989	11,556	
Consecutive Dry Years 4th Year	1990	11,556	
Consecutive Dry Years 5th Year	1991	11,556	

Notes:
 (a) As discussed in Section 7.1, the projected “volume available” estimates presented in Table 7-1 are equal to the maximum demands across projected years and year types shown in **Table 7-2, Table 7-3, and Table 7-4**. For example, the assumed volume available in a representative single dry year in **Table 7-1** is equal to the projected single dry year demand for the year 2050 as shown in **Table 7-3**, not accounting for any additional groundwater pumping to make-up for any projected shortages.

7.3 Supply and Demand Assessment

Water supply and demand patterns change during normal, single dry, and multiple dry years. Cal Water has relied on the demand modeling described in Chapter 4 to forecast demands for normal, single dry and multiple dry years. As described above, Cal Water’s supply portfolio for the Los Altos Suburban District is expected to be sufficient to meet projected demands in all hydrologic conditions, excepting the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of the District’s WSCP (see **Appendix G**).

Table 7-2 shows the projected supply and demand totals for a normal year. The supply and demand totals are consistent with those in **Table 6-9** and **Table 4-2**, respectively. **Table 7-3** shows the projected supply and demand totals for the single dry year, and **Table 7-4** shows the projected supply and demand totals for multiple dry year periods extending five years.

Table 7-2. Normal Year Supply and Demand Comparison (DWR Table 7-2)

	2030	2035	2040	2045	2050 (opt)
	(AF)	(AF)	(AF)	(AF)	(AF)
Supply Totals	10,451	10,390	10,409	10,466	10,532
Use Totals	10,451	10,390	10,409	10,466	10,532
Surplus/(Shortfall)	0	0	0	0	0
Notes:					
(a) The Santa Clara Subbasin is neither adjudicated nor critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.					

Table 7-3. Single Dry Year Supply and Demand Comparison (DWR Table 7-3)

	2030	2035	2040	2045	2050 (opt)
	(AF)	(AF)	(AF)	(AF)	(AF)
Supply Totals	11,125	11,114	11,136	11,197	11,267
Use Totals	11,125	11,114	11,136	11,197	11,267
Surplus/(Shortfall)	0	0	0	0	0
Notes:					
(a) The Santa Clara Subbasin is neither adjudicated nor critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.					

Table 7-4. Multiple Dry Years Supply and Demand Comparison (DWR Table 7-4)

		2030	2035	2040	2045	2050 (Opt)
First Year	Supply Totals	11,410	11,398	11,420	11,483	11,556
	Demand Totals	11,410	11,398	11,420	11,483	11,556
	Surplus/(Shortfall)	0	0	0	0	0
Second Year	Supply Totals	11,410	11,398	11,420	11,483	11,556
	Demand Totals	11,410	11,398	11,420	11,483	11,556
	Surplus/(Shortfall)	0	0	0	0	0
Third Year	Supply Totals	11,410	11,398	11,420	11,483	11,556
	Demand Totals	11,410	11,398	11,420	11,483	11,556
	Surplus/(Shortfall)	0	0	0	0	0
Fourth Year	Supply Totals	10,311	11,398	11,420	10,501	10,567
	Demand Totals	11,410	11,398	11,420	11,483	11,556
	Surplus/(Shortfall)	(1,099)	0	0	(982)	(988)
	OPTIONAL Planned WSCP Actions					
	WSCP - supply augmentation benefit	0	0	0	0	0
	WSCP - use reduction savings benefit	1,099	0	0	982	988
	Revised Surplus/(shortfall)	0	0	0	0	0
Fifth Year	Supply Totals	10,635	11,398	11,420	10,820	10,889
	Demand Totals	11,410	11,398	11,420	11,483	11,556
	Surplus/(Shortfall)	(775)	0	0	(662)	(667)
	OPTIONAL Planned WSCP Actions					
	WSCP - supply augmentation benefit	0	0	0	0	0
	WSCP - use reduction savings benefit	775	0	0	662	667
	Revised Surplus/(shortfall)	0	0	0	0	0

Notes:

- (a) The Santa Clara Subbasin is neither adjudicated nor critically overdrafted, and the projected groundwater supply volumes are not intended to and do not determine, limit or represent Cal Water’s water rights or maximum pumping volumes. Any determination of Cal Water’s water rights, as an overlying owner, appropriator, municipal water purveyor or otherwise, is beyond the scope of this report and the UWMP statutes and regulations.
- (b) In general, the District has sufficient supplies to meet demands in all year types through the third dry year. The District may pump additional groundwater to address any shortages or WSCP actions may be required in the District during the drought periods in the fourth and fifth year of drought to the extent allowable by Valley Water. During state, regional, or extreme circumstances, the WSCP may also be implemented to reduce demand.

7.4 Water Supply Management Tools and Options

CWC § 10620 (f)

An urban water supplier shall describe in the plan water management tools and options used by that entity that will maximize resources and minimize the need to import water from other regions.

Cal Water coordinates on an ongoing basis with all relevant agencies in the region to optimize the use of regional water supplies. This includes City of Los Altos, Valley Water, and other public and private entities with which Cal Water can collaborate to protect and enhance local groundwater and surface water resources.

Cal Water developed multiple regional water supply reliability studies using integrated resource planning practices to create a long-term supply reliability strategy through 2045/2050 for Cal Water districts throughout California. The studies created long-term strategies to address a wide range of water supply challenges including climate change, new regulatory requirements (e.g., SGMA), and potential growth in demands due to new development. These water supply reliability studies were completed on a rolling basis between 2021 and 2025. The District was included in the Bay Area Region Water Supply Reliability Study.

Cal Water also has its own aggressive and comprehensive water conservation program that has and will continue to reduce per-capita usage and therefore demands on critical water sources. Cal Water is committed to helping its customers use water efficiently and has developed a range of water conservation programs to support this goal. To ensure that it is providing the right mix of programs in the most cost-effective manner possible, Cal Water routinely conducts comprehensive conservation program analysis and planning. This is done on a five-year cycle in tandem with the UWMP. Cal Water's Conservation Master Plan provides the basis for the information on the implementation of and expected water savings from Demand Management Measures (DMMs) presented in Chapter 9.

Cal Water also monitors and supports the goals of the Bay Area Integrated Regional Water Management Plan (IRWMP) and the 2021 Alternative GSP.

In summary, Cal Water has a robust planning process in place with multiple supply projects for consideration to address future supply/demand gaps and to increase supply reliability. Additional conservation, if approved by the CPUC, will also support these efforts. Projects will be developed, as needed, to balance supply reliability and affordability.

7.5 Drought Risk Assessment

CWC § 10635(b)

Every urban water supplier shall include, as part of its urban water management plan, a drought risk assessment for its water service to its customers as part of information considered in developing the demand management measures and water supply projects and programs to be included in the urban water management plan. The urban water supplier may conduct an interim update or updates to this drought risk assessment within the five-year cycle of its urban water management plan update. The drought risk assessment shall include each of the following:

(1) A description of the data, methodology, and basis for one or more supply shortage conditions that are necessary to conduct a drought risk assessment for a drought period that lasts five consecutive water years, starting from the year following when the assessment is conducted.

(2) A determination of the reliability of each source of supply under a variety of water shortage conditions. This may include a determination that a particular source of water supply is fully reliable under most, if not all, conditions.

(3) A comparison of the total water supply sources available to the water supplier with the total projected water use for the drought period.

(4) Considerations of the historical drought hydrology, plausible changes on projected supplies and demands under climate change conditions, anticipated regulatory changes, and other locally applicable criteria.

7.5.1 Data, Methods, and Basis for Water Shortage Condition

This drought risk assessment considers the effects on available water supply sources of a five-year drought commencing the year after the assessment is completed, i.e., from 2026 through 2030. This evaluation considers historical drought hydrology and plausible changes on projected supplies and demands under climate change conditions, anticipated regulatory changes, information provided by Valley Water, and other locally applicable criteria. In the District, the supply source is a combination of purchased water, groundwater, and recycled water. As such, the same data, methodology, and basis for the conclusions of the above water supply sufficiency analysis for multiple dry year periods through 2050 holds true for purposes of this drought risk assessment (i.e., supply availability through 2030). Accordingly, as shown in **Table 7-5**, the District expects the available supplies to be sufficient to meet projected demands through 2028. In the fourth (2029) and fifth year (2030), small shortages (5.0 percent and 9.0 percent respectively), are anticipated due to shortages in Valley Water supplies. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of the District's WSCP (see **Appendix G**).

7.5.2 Drought Risk Assessment Water Source Reliability

As described in Chapter 6, purchased surface water from Valley Water, groundwater pumped from the Basin, and recycled water from WPCP supplies are the sources of supply for the District. The reliability of these supplies is discussed in Section 7.1.1.

As described in Sections 4.4 and 6.10.1 of this Plan, the impacts on climate change have already been factored into the District's demand projections and the analysis of the near- and longer-term reliability of the supply sources available to the District.

Regulatory conditions that could affect future water supply availability and project development (e.g., related to the Bay-Delta Plan) are discussed in Section 6.10.3 of the Plan. However, the District does not currently have plans for projects to develop additional supply sources, and so these regulatory conditions will be assessed in future UWMP updates if or when the District moves forward with any plans to develop supply projects.

Implementation of SGMA in the Santa Clara Subbasin is a locally applicable consideration for the District. However, it is the intent of the projects and management actions planned by Valley Water within the Basin to provide for on-going sustainable management of the groundwater resource.

Table 7-5 provides a comparison of the water supply sources available to the District with the total projected water use for an assumed drought period of 2026 through 2030. This includes current climate change conditions. It should be noted that the supply values shown in the table do not represent the total supply available to the District in a given year, but rather reflect the fact that the available purchased surface water, groundwater, and recycled water supplies are sufficient to meet the projected District demands, with the exception of the fourth and fifth year of the drought where up to 9.0 percent shortfalls are projected. The District anticipates that it will address shortages through pumping additional groundwater (if allowed by Valley Water) or through implementation of its WSCP (see **Appendix G**).

The District's WSCP may also be utilized to address potential water shortage conditions resulting from other causes (e.g., impacted distribution system infrastructure, regulatory-imposed shortage restrictions, etc.) and identifies a variety of actions that Cal Water will implement to reduce demands and further ensure supply reliability at various levels of water shortage.

Table 7-5. Five-Year Drought Risk Assessment Tables (DWR Table 7-5)

2026		Total
Total Water Use	(AF)	11,303
Total Supplies	(AF)	11,303
Surplus/Shortfall w/o WSCP Action		0
OPTIONAL: Planned WSCP Actions (use reduction and supply augmentation)		
WSCP - supply augmentation benefit	(AF)	
WSCP - use reduction savings benefit	(AF)	
Revised Surplus/(shortfall)		

2027		Total
Total Water Use (AF)	(AF)	11,325
Total Supplies (AF)	(AF)	11,325
Surplus/Shortfall w/o WSCP Action		0
Planned WSCP Actions (use reduction and supply augmentation)		
WSCP - supply augmentation benefit (AF)	(AF)	
WSCP - use reduction savings benefit (AF)	(AF)	
Revised Surplus/(shortfall)		

2028		Total
Total Water Use (AF)	(AF)	11,351
Total Supplies (AF)	(AF)	11,351
Surplus/Shortfall w/o WSCP Action		0
Planned WSCP Actions (use reduction and supply augmentation)		
WSCP - supply augmentation benefit (AF)	(AF)	
WSCP - use reduction savings benefit (AF)	(AF)	
Revised Surplus/(shortfall)		

2029		Total
Total Water Use (AF)	(AF)	11,379
Total Supplies (AF)	(AF)	10,784
Surplus/Shortfall w/o WSCP Action		(595)
Planned WSCP Actions (use reduction and supply augmentation)		
WSCP - supply augmentation benefit (AF)	(AF)	
WSCP - use reduction savings benefit (AF)	(AF)	595
Revised Surplus/(shortfall)		0

2030		Total
Total Water Use (AF)	(AF)	11,410
Total Supplies (AF)	(AF)	10,361
Surplus/Shortfall w/o WSCP Action		(1,049)
Planned WSCP Actions (use reduction and supply augmentation)		
WSCP - supply augmentation benefit (AF)	(AF)	
WSCP - use reduction savings benefit (AF)	(AF)	1,049
Revised Surplus/(shortfall)		0

Notes:

(c) In general, the District has sufficient supplies to meet demands in all year types through the third dry year. The District may pump additional groundwater to address any shortages or WSCP actions may be required in the District during the drought periods in the fourth and fifth year of drought to the extent allowably by Valley Water. During state, regional, or extreme circumstances, the WSCP may also be implemented to reduce demand.

Chapter 8

Water Shortage Contingency Planning

CWC § 10640

(a) Every urban water supplier required to prepare a plan pursuant to this part shall prepare its plan pursuant to Article 2 (commencing with Section 10630). The supplier shall likewise periodically review the plan as required by Section 10621, and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

(b) Every urban water supplier required to prepare a water shortage contingency plan shall prepare a water shortage contingency plan pursuant to Section 10632. The supplier shall likewise periodically review the water shortage contingency plan as required by paragraph (10) of subdivision (a) of Section 10632 and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

The Water Shortage Contingency Plan (WSCP) for the California Water Service (Cal Water) Los Altos Suburban District (also referred to herein as “District”) is included in this Urban Water Management Plan (UWMP) as **Appendix G**. The WSCP serves as a standalone document to be engaged in the case of a water shortage event, such as a drought or supply interruption, and defines specific policies and actions that will be implemented at various Shortage Level scenarios. The primary objective of the WSCP is to ensure that the District has in place the necessary resources and management responses needed to protect health and human safety, minimize economic disruption, and preserve environmental and community assets during water supply shortages and interruptions.

Consistent with California Water Code (CWC) §10632, the WSCP includes six water Shortage Levels to address shortage conditions ranging from up to 10 percent to greater than 50 percent shortage, identifies a suite of demand mitigation measures for the District to implement at each level, and identifies procedures for the District to annually assess whether or not a water shortage is likely to occur in the coming year, among other things.

A summary of the key elements of the WSCP including water Shortage Levels and demand-reduction actions is shown in **Table 8-1**, **Table 8-2**, and **Table 8-3**. Additional details are provided in **Appendix G**.

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

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

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

<input checked="" type="checkbox"/>	Is the Supplier completing this table using the standard six levels? (yes/no)			
Shortage Level	Supply Augmentation Methods and Other Actions by Water Supplier	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)
		Volume or Percentage	Shortage Gap Reduction Value	
			AF	
See note (a)	See note (a)	See note (a)	See note (a)	See note (a)
Notes:				
(a) Cal Water evaluates water supply augmentation projects on an on-going basis. At this time, Cal Water does not have supply augmentation projects planned specifically to address water shortage conditions.				

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

X Is the Supplier completing this table using the standard six levels?					
Shortage Level	Demand Reduction Actions	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement?
		Volume or Percentage	Shortage Gap Reduction Value		
			AF		
1	Other	Percentage	10%	1. Landscape - Limit landscape irrigation to specific times. 2. Other - Customers must repair leaks, breaks, and malfunctions in a timely manner. 3. Landscape - Restrict or prohibit runoff from landscape irrigation. 4. Prohibit application of potable water to outdoor landscapes within 48 hours of measurable rainfall. (<i>Landscape - Other landscape restriction or prohibition</i>). 5. Other - Prohibit use of potable water for washing hard surfaces. 6. Other – Require automatic shut off hoses (<i>Other - Require automatic shut off hoses</i>). 7. CII - Lodging establishments must offer opt out of linen service. 8. CII - Restaurants may only serve water upon request. 9. No watering of landscape of newly constructed homes and buildings in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission, the Department of Housing and Community Development, or other State agency (<i>Landscape - Other landscape restriction or prohibition</i>). 10. Prohibit Potable Water Use for Decorative Water Features that do not Recirculate Water (<i>Water Features - Restrict water use for decorative water features, such as fountain</i>).	Yes

X Is the Supplier completing this table using the standard six levels?					
Shortage Level	Demand Reduction Actions	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement?
		Volume or Percentage	Shortage Gap Reduction Value		
			AF		
1	Other	--	--	1. Expand Public Information Campaign. 2. Water Bill Inserts (<i>Improve Customer Billing</i>). 3. Promote online water waste reporting (<i>Expand Public Information Campaign</i>). 4. Expand Rebates or Giveaways of Plumbing Fixtures and Devices. (<i>Provide Rebates on Plumbing Fixtures and Devices</i>). 5. Expand Rebates for Landscape irrigation Efficiency (<i>Provide Rebates for Landscape irrigation Efficiency</i>). 6. Expand CII Water Use Surveys (<i>Offer Water Use Surveys</i>). 7. Expand Res Water Use Surveys (<i>Offer Water Use Surveys</i>).	No
2	Other	Percentage	20%	1. Continue with Shortage Level 1 restrictions and prohibitions except where superseded by more stringent restrictions and prohibitions. 2. Landscape - Limit landscape irrigation to specific days. ^(b) 3. CII - Prohibit the use of non-recirculating systems in all new conveyer car wash and commercial laundry systems (<i>CII – Other CII restriction or prohibition</i>). 4. Prohibit the use of single pass cooling systems in new connections (<i>Other</i>).	Yes
2	Other	--	--	1. Continue with Shortage Level 1 actions except where superseded by more stringent actions. 2. Water Efficiency Workshops, Public Events (<i>Other</i>).	Yes

X Is the Supplier completing this table using the standard six levels?					
Shortage Level	Demand Reduction Actions	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement?
		Volume or Percentage	Shortage Gap Reduction Value		
			AF		
3	Other	Percentage	30%	1. Continue with Shortage Level 2 restrictions and prohibitions except where superseded by more stringent restrictions and prohibitions. 2. Other - Prohibit use of potable water for construction and dust control. 3. Prohibit use of potable water for street washing (<i>Other</i>) 4. Prohibit Filling Ornamental Lakes or Ponds (<i>Other water feature or swimming pool restriction</i>).	Yes
3	Other	--	--	1. Continue with Shortage Level 2 actions except where superseded by more stringent actions. 2. Home or Mobile Water Use Reports (<i>Expand Public Information Campaign</i>). 3. Decrease Frequency and Length of Line Flushing (<i>Decrease Line Flushing</i>). 4. Reduce System Water Loss. 5. Increase Water Waste Patrols/Enforcement (<i>Increase Water Waste Patrols</i>). 6. Implement Drought Rate Structure and Customer Water Budgets (Res)(<i>Implement or Modify Drought Rate Structure or Surcharge</i>). 7. Implement Drought Rate Structure and Customer Water Budgets (CII) (<i>Implement or Modify Drought Rate Structure or Surcharge</i>).	Yes

X Is the Supplier completing this table using the standard six levels?					
Shortage Level	Demand Reduction Actions	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement?
		Volume or Percentage	Shortage Gap Reduction Value		
			AF		
4	Other	Percentage	40%	1. Continue with Shortage Level 3 restrictions and prohibitions except where superseded by more stringent restrictions and prohibitions. 2. Prohibit vehicle washing except with recirculated water or low-volume systems (<i>Other - Prohibit vehicle washing except at facilities using recycled or recirculating water</i>). 3. Prohibit use of water for recreational purposes such as water parks and the filling of pools (<i>Other water feature or swimming pool restriction</i>).	Yes
5	Other	Percentage	50%	1. Continue with Shortage Level 4 restrictions and prohibitions except where superseded by more stringent restrictions and prohibitions. 2. Require net zero demand increase on new water service connections (<i>Moratorium or Net Zero Demand Increase on New Connections</i>). 3. Prohibit single-pass cooling systems (<i>Other</i>).	Yes
5	Other	--	--	1. Continue with Shortage Level 4 actions except where superseded by more stringent actions. 2. Require Pool Covers (<i>Pools and Spas - Require covers for pools and spas</i>).	Yes

X Is the Supplier completing this table using the standard six levels?					
Shortage Level	Demand Reduction Actions	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement?
		Volume or Percentage	Shortage Gap Reduction Value		
			AF		
	Other	Percentage	60%	1. Continue with Shortage Level 5 restrictions and prohibitions except where superseded by more stringent restrictions and prohibitions. 2. Moratorium on new water service connections (<i>Moratorium or Net Zero Demand Increase on New Connections</i>). 3. Landscape - Prohibit all landscape irrigation.	Yes
<p>Notes:</p> (a) In certain cases water use restrictions and consumption reduction actions implemented by Cal Water are not specifically called out in DWR’s provided demand reduction actions list. The most appropriate DWR provided demand reduction action is included in italics in parenthesis. (b) Watering restricted to no more than 3 days/week in Shortage Level 2 and Shortage Level 3; no more than 2 days/week in Shortage Level 4; no more than 1 day/week in Shortage Level 5. (c) Residential water budgets of up to 30% for Shortage Level 3, up to 40% for Shortage Level 4, up to 50% for Shortage Level 5, up to 60% for Shortage Level 6. (d) CII water budgets of up to 10% for Shortage Level 3, up to 20% for Shortage Level 4, up to 30% for Shortage Levels 5 and 6.					

Chapter 9

Demand Management Measures

CWC § 10631 (e)

Provide a description of the supplier's water demand management measures. This description shall include all of the following:

(1) (A) For an urban retail water supplier, as defined in Section 10608.12, a narrative description that addresses the nature and extent of each water demand management measure implemented over the past five years. The narrative shall describe the water demand management measures that the supplier plans to implement to achieve its water use targets pursuant to Section 10608.20.

(B) The narrative pursuant to this paragraph shall include descriptions of the following water demand management measures:

(i) Water waste prevention ordinances.

(ii) Metering.

(iii) Conservation pricing.

(iv) Public education and outreach.

(v) Programs to assess and manage distribution system real loss.

(vi) Water conservation program coordination and staffing support.

(vii) Other demand management measures that have a significant impact on water use as measured in gallons per capita per day, including innovative measures, if implemented.

This chapter describes the demand management measures (DMMs) implemented by California Water Service (Cal Water) in its Los Altos Suburban District (also referred to herein as the "District") to promote efficient water use and support long-term water supply reliability. These measures are organized in accordance with the categories identified in the Urban Water Management Planning Act and reflect both longstanding conservation practices and more recent programmatic developments.

Demand management plays a central role in Cal Water's resource planning strategy. As discussed in earlier chapters, historical reductions in per capita water use in the District have been driven by a combination of metering, conservation-oriented rate design, customer programs, and passive savings associated with plumbing codes and appliance efficiency standards. The measures described in this chapter build on those foundations and represent the primary tools available to manage future demand growth.

This chapter also provides important context for the State's Making Conservation a California Way of Life (MCCWL) regulation, which establishes new water use efficiency standards and performance requirements that extend beyond the SB X7-7 framework. While compliance with

MCCWL-related Urban Water Use Objectives (UWUOs) is addressed in Chapter 5, many of the actions required to support future compliance—particularly expanded conservation programs, enhanced reporting, and implementation of Commercial, Industrial, and Institutional (CII) performance measures—are described in this chapter.

For public utilities such as Cal Water that are regulated by the California Public Utilities Commission (CPUC), the scope and pace of demand management implementation are closely tied to authorization by the CPUC. Accordingly, this chapter describes both the measures currently in place and the institutional, staffing, and regulatory considerations that influence Cal Water’s ability to expand conservation activities in the District over time. This chapter has the following sections:

- 9.1 Water Waste Prevention Ordinances
- 9.2 Metering
- 9.3 Conservation Pricing
- 9.4 Customer Conservation Programs
- 9.5 Water Loss Management
- 9.6 Water Conservation Program Staffing
- 9.7 Summary and Implementation Considerations

9.1 Water Waste Prevention Ordinances

Cal Water’s authority to enforce water waste prevention measures and water use restrictions is established and overseen by the CPUC through Rule 14.1 or Schedule 14.1. In addition, local governments within Cal Water districts may adopt ordinances regulating water use. Cal Water coordinates its water waste prevention efforts with applicable local jurisdictions. For the Los Altos Suburban District, this coordination includes the City of Los Altos, City of Mountain View, City of Cupertino, City of Sunnyvale, and Town of Los Altos Hills.

CPUC Rule 14.1 defines the District’s Water Shortage Contingency Plan ([WSCP]; see **Appendix G**), including, but not limited to, permanent prohibitions on water waste and restrictions on water use. Prohibited water waste practices include, but are not limited to, the following:

- Use of potable water through a broken or defective plumbing fixture or irrigation system after Cal Water has provided written notice to repair the condition and the customer has failed to complete repairs within seven business days of receipt of the notice.

- Application of potable water to landscapes in a manner that results in runoff onto adjacent property, non-irrigated areas, sidewalks, roadways, parking lots, or structures.
- Use of a hose to wash vehicles—including cars, trucks, buses, boats, aircraft, and trailers—unless the hose is equipped with a shut-off nozzle or similar device that immediately stops water flow when not in use.

During water shortage conditions, Schedule 14.1 also authorizes Cal Water to implement additional water use restrictions and penalties, which may include the following:

- Limitations on outdoor irrigation, including restrictions on time of day and frequency of watering.
- Requirements to repair leaks, breaks, or malfunctions within five business days of written notification by Cal Water.
- Application of potable water to driveways, sidewalks, and other hardscapes.
- Use of potable water in water features unless the feature operates as a recirculating system.
- Application of potable water to outdoor landscapes during and within 48 hours following measurable rainfall.
- Serving drinking water in eating or drinking establishments unless requested by the customer.
- Irrigation of ornamental landscaping on public street medians.
- Irrigation of landscapes at newly constructed homes or buildings using potable water in a manner inconsistent with requirements established by the California Building Standards Commission or the Department of Housing and Community Development.
- Requirements for hotels and motels to provide guests with the option to decline daily laundering of towels and linens, with clear and prominent notice provided in each guest room.
- Limitations on filling ornamental lakes or ponds.
- Use of potable water for street cleaning, except for initial wash-down associated with construction activities.
- Use of potable water for construction-related purposes, such as dust control or backfill consolidation, unless no alternative water source or method is available.

These measures form a key component of the District's overall demand management strategy and support compliance with state water conservation regulations.

9.2 Metering

CWC § 526 (a)

Notwithstanding any other provision of law, an urban water supplier that, on or after January 1, 2004, receives water from the federal Central Valley Project under a water service contract or subcontract ... shall do both of the following:

(1) On or before January 1, 2013, install water meters on all service connections to residential and nonagricultural commercial buildings constructed prior to January 1, 1992, located within its service area.

(2) On and after March 1, 2013, or according to the terms of the Central Valley Project water contract in operation, charge customers for water based on the actual volume of deliveries, as measured by a water meter.

CWC § 527 (a)

(a) An urban water supplier that is not subject to Section 526 shall do both of the following:

(1) Install water meters on all municipal and industrial service connections located within its service area on or before January 1, 2025.

All services in the District are metered. Meters are read monthly and are subject to routine maintenance and calibration to ensure accuracy. Customers are billed monthly based on metered water use.

Cal Water is also piloting automatic meter reading (AMR) and advanced metering infrastructure (AMI) in several of its districts. If deployed more broadly in the future, AMI would enhance the District's ability to detect leaks and other system issues and to notify customers of potential problems. AMI would also allow the provision of more timely and detailed water use information, supporting customer engagement as well as enabling customers to more closely monitor their own water usage and take appropriate actions to improve their water use efficiency.

9.3 Conservation Pricing

The CPUC reviews and authorizes District water rates in a General Rate Case (GRC) every three years. Currently, the District uses a four-tier increasing block rate design for residential water use and a single-tier uniform rate design for non-residential use. The District provides rate assistance to lower income households through its Customer Assistance Program (CAP).

9.4 Customer Conservation Programs

Cal Water has a long-standing water-use efficiency program designed to reduce water use across residential and non-residential customer classes. The program includes landscape conversion incentives, irrigation equipment rebates, indoor device rebates, and customer education

resources. Core programs available to residential customers are summarized below. Additional programs are offered to non-residential customers, and program offerings may be adjusted over time based on district-specific needs and program performance.

9.4.1 Current Customer Conservation Programs

Cal Water currently offers residential customers a range of water-use efficiency rebates, support services, and educational resources, including the following:

Turf Replacement

- Turf replacement rebates of up to \$3 per square foot for removal of turf and conversion to California-friendly, low-water-use landscaping with efficient irrigation.

Irrigation Equipment Rebates

- Smart Landscape Tune-Up: A free, site-specific irrigation assessment that includes approved repairs to existing irrigation systems and installation of high-efficiency sprinkler nozzles and smart irrigation controllers, as appropriate.
- Smart irrigation controllers: Rebates of \$125 per controller for weather- and soil-based irrigation controllers that adjust watering schedules based on site conditions.
- High-efficiency sprinkler nozzles: Rebates of \$5 per nozzle for replacing conventional spray nozzles with high-efficiency nozzles that apply water more uniformly.

Indoor Device Rebates

- High-efficiency clothes washers: Rebates of \$150 per washer for eligible models that use substantially less water than standard washers.
- MaP Premium high-efficiency toilets: Rebates of \$50 per toilet for models using 1.1 gallons per flush or less.
- Conservation kits: Free kits containing water-saving plumbing devices, such as high-efficiency showerheads, faucet aerators, hose nozzles, leak detection tablets, and educational materials.

Online Resources

- Cal Water maintains a suite of online water-use efficiency resources to help customers understand and adopt water-saving practices.

School Education

- Cal Water’s school education program includes the Aqua Adventures, A Splash of Creativity, H2Oath, and Water Smart Grant programs. Cal Water’s Teacher Toolkit provides teachers with practical guidance and teaching rubrics for helping students learn about resource sustainability and the importance of using water wisely.

These programs are implemented through a combination of in-house staff and contracted service providers. Cal Water conducts ongoing outreach and customer engagement to promote awareness and participation. In addition, customer service representatives are trained to assist customers with high water use or billing concerns by directing them to appropriate conservation programs and educational resources.

9.4.2 Future Customer Conservation Programs

Cal Water understands that its conservation programming must be adapted to the new MCCWL regulatory requirements. For instance, meeting the rigorous outdoor water use standards will require transitioning substantial amounts of turf area to more water efficient landscaping. Therefore, outdoor conservation measures, including turf replacement incentives and support services, will need to be prioritized to drive future water savings. While targeted indoor efficiency measures have also been retained to maximize water savings, the focus remains heavily on outdoor improvements.

Achieving continued water savings in the District requires a rapid market transformation towards landscape efficiency. Typically, market transformations can span decades as they require shifting both consumer behaviors and supply chain dynamics, even with incentives. Early adopters have already made necessary adjustments, but many property owners have not yet embraced this change. Landscape transformation represents a significant departure from traditional practices, often perceived as complex and undesirable by many. Overcoming this resistance and encouraging participation will be challenging.

A crucial aspect is convincing customers that embracing landscape efficiency enhances, rather than detracts from, the value of their property. The traditional view equates lush, green lawns with success and economic status. Therefore, changing this deep-seated perception to appreciate the aesthetics and benefits of water-sustainable landscaping is essential.

Given the urgency to transform landscapes without the luxury of time, Cal Water faces several challenges that require:

- Robust customer education.
- High levels of customer motivation.

- Accessibility to landscape design and plant knowledge.
- Considerable labor investment.
- Significant financial resources.

To increase customer engagement, Cal Water's programs must offer compelling incentives, clear communication about the required processes, and substantial support to guide customers through these changes. **Table 9-1** outlines the key barriers to successful deployment of landscape transformation programs.

Table 9-1. Barriers and Customer Requirements of Landscape Transformation Programs

Landscape Transformation Barriers	Customer Requirements
<ul style="list-style-type: none"> • Customers lack motivation to reduce their water use. • Most customers are unaware of, or overwhelmed by, landscape efficiency programs. • Landscape efficiency solutions must be “customized” for each property. • Water suppliers do not currently have a deep understanding of their customers. • Agencies do not possess the resources to uniquely target and engage their customers. 	<ul style="list-style-type: none"> • Customers desire to have a beautiful landscape. • Each customer has a different vision of what comprises landscape beauty. • Most customers have considered converting their lawn, but they need help to accomplish this. • Customers confirmed that design support is the most important need. • Incentives are necessary to pull the trigger on converting their lawn. • There are a number of misperceptions that disconnect the customer from their actual water usage. They believe most water is used indoors; that they already have efficient equipment; and saving money is the main driver.

Many water users currently do not prioritize landscape water efficiency, lacking both understanding of its urgency and motivation to implement drastic changes.

Cal Water's strategy is to significantly enhance education about the need for outdoor water use reduction and how to achieve it. Fortunately, studies indicate a growing customer interest in aesthetically pleasing, water-efficient landscaping. Many property owners consider turf removal but require assistance to proceed. Time and cost are significant barriers.

To effectively encourage this shift, Cal Water must not only convince customers of the necessity of these changes but also provide them with extensive support—from design assistance to

continuous engagement and resources. Additionally, incentives must be compelling enough to convince customers of the value of investing in these changes.

Success will depend on expanding education, services, and incentives to accelerate market transformation. To support this enhanced program structure, Cal Water must accordingly increase its staff, marketing efforts, operational support, and budget to meet these elevated service demands.

In addition to turf replacement, Cal Water has identified a suite of customer conservation programs with demonstrated water-saving potential and meaningful market impact. Together, these measures represent a comprehensive portfolio that—subject to adequate staffing and funding—is intended to support compliance with the MCCWL regulations. The measures summarized in **Table 9-2** are representative of Cal Water’s current conservation approach. As program performance is evaluated and technologies evolve, Cal Water may refine this portfolio by modifying, replacing, or adding measures to ensure continued effectiveness and cost-efficient water savings.

Table 9-2. Representative Conservation Measures with Significant Savings Potential

Conservation Measure	Remaining Potential	Reasoning for Selecting
Home Water Budgets	All single-family homes	<ul style="list-style-type: none"> Identifies customers with inefficient usage, thus allowing better targeting of programs and assistance. Provides a foundational step in educating customers with powerful and personal information that identifies site-specific efficiency opportunities. As an educational tool alone, shown to reduce water use.
Outdoor Efficiency		
Turf Replacement	All properties with remaining turf	<ul style="list-style-type: none"> Required measure for meeting landscape and irrigation standards. Huge remaining opportunity. Long lifespan measure.
Sprinkler Tune-up	All properties with remaining turf	<ul style="list-style-type: none"> Nearly all irrigation systems need repair. Repairs are necessary before efficiency upgrades are made otherwise new products will not work as designed. High customer demand.
Smart Controllers	All properties with irrigation	<ul style="list-style-type: none"> High customer receptivity due to technical aspect of device.

Conservation Measure	Remaining Potential	Reasoning for Selecting
		<ul style="list-style-type: none"> Reduces overwatering by providing the appropriate amount of water based on the local weather.
Pressure Regulating Spray Heads	All properties with popup spray heads	<ul style="list-style-type: none"> Millions of non-pressure regulating spray heads. Reduces water use due to high water pressure and low head drainage.
High Efficiency Sprinkler Nozzles	All properties with popup spray heads	<ul style="list-style-type: none"> Millions of high flow nozzles are available for retrofit. Solution for customers electing to keep turf. Reduces runoff. High cost effectiveness. Generally easy retrofit.
Indoor Efficiency		
Premium Efficiency Toilets	Nearly 50% of existing fixtures are 1.6 GPF or above	<ul style="list-style-type: none"> Reliable 25-year life of water savings. Easy retrofit.
High Efficiency Clothes Washers	All single-family homes and multi-family in-unit washers	<ul style="list-style-type: none"> Customers prefer high efficiency models. Easy to administer. Washers have 10–12-year life

9.4.3 CII Performance Measures

The MCCWL regulations require urban retail water suppliers to implement a suite of actions intended to improve CII water use efficiency. These actions include converting certain mixed-use meters (MUMs) serving large landscaped areas to dedicated irrigation meters (DIMs), installing approved in-lieu technologies where DIM installation is not pursued, and implementing a broad set of CII best management practices (BMPs). The regulations also require suppliers to classify all CII accounts using a prescribed framework and to identify and catalog large, disclosable buildings.

Importantly, implementation of CII Performance Measures is required regardless of whether a supplier is otherwise projected to comply with its UWUO. As a result, compliance with these requirements will require substantial staffing, technical, and financial resources independent of UWUO compliance outcomes. The following subsections summarize the primary CII Performance Measure requirements applicable to the District.

DIM or In-Lieu Technology Installation

The MCCWL regulations require Cal Water to install DIMs or implement approved in-lieu technologies at all CII sites served by MUMs that irrigate one-half acre or more of landscaped area.

Installation of DIMs involves significant cost and logistical complexity for both Cal Water and its customers. Activities include site assessments, permitting, meter and backflow device installation, account setup, integration of additional meter reads, and ongoing maintenance and calibration. In recognition of these challenges, the regulations allow suppliers to satisfy the requirement through adoption of approved in-lieu technologies.

Approved in-lieu technologies include the following:

1. Water budget–based rate structures
2. Water budget–based management approaches not tied to rates
3. Hardware upgrades that enhance irrigation performance, including technologies that allow identification of outdoor water use, smart irrigation controllers, and pressure-regulated spray heads
4. Remote sensing technologies
5. Landscape plant palette transformation programs, including green infrastructure such as swales or rain gardens that reduce irrigation demand
6. Other efficient water use technologies, subject to demonstration of improved water use efficiency

For sites utilizing in-lieu technologies, the regulations further require Cal Water to provide education and communication services, irrigation system maintenance support (including audits and testing), and site-specific irrigation scheduling guidance. As a result, Cal Water will be required to take on an active role in supporting irrigation management at CII sites with large, landscaped areas. In addition, Cal Water must calculate landscape water budgets for these sites using prescribed methodologies by June 30, 2029.

CII Account Classification

The MCCWL regulations require Cal Water to classify all CII accounts using a regulatory classification system that includes U.S. Environmental Protection Agency’s (EPA’s) 19 ENERGY STAR Portfolio Manager property types, along with additional categories for water recreation facilities, vehicle washes, and commercial laundries. Following classification, Cal Water must identify customers whose water use falls within the 80th and 97.5th percentiles within each category to support targeted delivery of BMPs.

CII Disclosable Buildings

Under the MCCWL regulations, Cal Water is required to identify all disclosable buildings within its service area and provide water use reports upon request. Disclosable buildings are defined as non-manufacturing buildings exceeding 50,000 square feet.⁴² Identification of these buildings was required by January 1, 2025, and by January 1 every year thereafter.

Upon request by a building owner or authorized agent, Cal Water must provide water use reports compatible with the U.S. Environmental Protection Agency's (EPA's) ENERGY STAR Portfolio Manager Data Exchange Services. Reports must include detailed monthly and aggregated usage data for at least the preceding twelve months for each meter serving the building.

Compliance with this requirement will require development of new processes and reporting systems capable of integrating billing data with EPA reporting platforms. Meeting these requirements will necessitate coordinated effort across Cal Water's conservation, billing, and information technology departments.

CII BMPs

The MCCWL regulations require implementation of CII BMPs for customers in the highest water-use percentiles. Cal Water must implement one BMP from each category (five total) for customers in the 80th percentile of usage and two BMPs from each of five categories (ten total) for customers in the 97.5th percentile of usage. The categories of BMPs include outreach and education, incentives, landscape practices, collaboration and coordination, and operational practices, with a range of eligible actions specified in the regulations.

Selection and implementation of BMPs will be guided by customer characteristics, site conditions, and feasibility, and will require substantial program oversight, customer coordination, and tracking.

CII Performance Measures and UWUO Compliance

While the CII Performance Measures are an integral component of the MCCWL regulatory framework, water savings achieved through these measures do not directly contribute toward meeting the District's UWUO reduction targets. Under the regulations, CII Performance Measures contribute to UWUO compliance only through reductions in water use measured by DIMs. Cal Water does not currently utilize a DIM meter classification, and DIM water use is therefore not a component of the District's UWUO calculation. As a result, although implementation of CII Performance Measures is mandatory and expected to yield water use

⁴² For the precise definition of a disclosable building, see California Code of Regulations, title 20, section 1683.

efficiency benefits, the associated water savings will not be credited toward UWUO compliance for the Los Altos Suburban District.

9.5 Water Loss Management

Cal Water conducts annual distribution system water loss audits using the American Water Works Association (AWWA) Free Water Audit Software and reports the results to the California Department of Water Resources.⁴³

To guide ongoing water loss management, Cal Water has developed a Water Loss Control Compliance Plan and a Water Loss Control Policy. These documents provide a framework for:

- Meeting current and future CPUC and state water loss standards and regulatory requirements;
- Improving audit data quality and validation scores; and
- Identifying and implementing cost-effective water loss control actions.

Cal Water has also conducted a comprehensive assessment comparing each district's current and projected distribution system water loss to applicable water loss standards. The results show that the Los Altos Suburban District's distribution system loss rates currently fall below the state-established efficient water loss standards applicable to the District pursuant to SB 555 (see **Table 4-6**). For the District, the focus going forward will be on maintaining and replacing distribution system infrastructure as needed to ensure that distribution system losses remain below regulated levels.

9.6 Water Conservation Program Staffing

Cal Water's Conservation Department is currently staffed by nine full-time equivalent (FTE) positions. In light of mandated UWUO reductions and the extensive reporting and performance requirements associated with the MCCWL regulations, Cal Water has identified a need to expand its conservation program staffing.

While the use of consultants could provide short-term support, the ongoing and long-term nature of the regulatory requirements makes exclusive reliance on temporary staffing impractical. In particular, the data analysis, program tracking, and reporting obligations associated with the MCCWL framework require sustained institutional knowledge and continuity that are best supported through permanent staff.

⁴³ Completed water audits may be accessed at: <https://wuedata.water.ca.gov/>

Cal Water’s staffing strategy therefore emphasizes strengthening internal capacity to manage conservation programs, lead outreach and customer engagement efforts, support customers, oversee ongoing CII activities, and fulfill reporting and compliance obligations. Consultants are expected to continue to play a targeted role by providing short-term, specialized expertise as needed, allowing flexibility while maintaining a strong in-house program foundation.

Consistent with this strategy, Cal Water has proposed in its 2024 GRC an increase in Conservation Department staffing from nine to fifteen positions. The six requested positions and their primary responsibilities are summarized in **Table 9-3**. At the time this UWMP was prepared, a final decision in the 2024 GRC had not yet been issued. As a result, it remains uncertain whether the requested staffing increases necessary to support compliance with state conservation requirements will be authorized.

Table 9-3. Proposed New Conservation Staff Positions

New Position	Responsibilities
Conservation Manager	<ul style="list-style-type: none"> • Program development/implementation/management • Budgeting • Staff oversight
Regional Conservation Coordinator (2 positions)	<ul style="list-style-type: none"> • Regional program implementation • District coordination • Customer engagement
Water Resource Sustainability Analyst	<ul style="list-style-type: none"> • Program tracking/analysis • Compliance assessment/reporting • Data management
Water Resource Sustainability Assistant	<ul style="list-style-type: none"> • Data entry • Analysis support • Compliance reporting support
Conservation Assistant	<ul style="list-style-type: none"> • Program application/rebate processing • Customer assistance • Data entry/processing

9.7 Summary and Implementation Considerations

Cal Water has developed and implemented a comprehensive suite of DMMs in the Los Altos Suburban District that address each category identified in the Urban Water Management Planning Act. These measures include water waste prevention and enforcement, universal metering, conservation-oriented pricing, public education and outreach, active management of distribution system water losses, and a broad portfolio of customer conservation programs. Collectively, these actions have contributed to substantial long-term reductions in per capita water use and have positioned the District well relative to historical conservation benchmarks.

Looking ahead, demand management will play an increasingly important role in meeting the requirements of the MCCWL regulation and supporting water supply reliability. While many conservation-driven reductions are already embedded in the District’s baseline demand projections—through authorized programs, plumbing codes and appliance standards, and implementation of conservation rates—additional actions are anticipated to be needed in future years to comply with MCCWL requirements.

For Cal Water, the ability to expand conservation programs, modify rate structures, and implement additional demand management actions is contingent on CPUC authorization. Program funding levels, staffing capacity, and implementation timelines are therefore closely linked to regulatory approval processes, including General Rate Case proceedings. The measures described in this chapter represent both Cal Water’s current conservation framework and the foundation upon which expanded efforts may be built, subject to future CPUC decisions.

In this context, this chapter provides a practical and forward-looking assessment of how demand management measures support water use efficiency, regulatory compliance, and long-term resource reliability in the District, while acknowledging the institutional and regulatory factors that shape implementation over the UWMP planning horizon.

Chapter 10

Plan Adoption, Submittal, and Implementation

CWC § 10621 (b)

Every urban water supplier required to prepare a plan pursuant to this part shall, at least 60 days before the public hearing on the plan required by Section 10642, notify any city or county within which the supplier provides water supplies that the urban water supplier will be reviewing the plan and considering amendments or changes to the plan. The urban water supplier may consult with, and obtain comments from, any city or county that receives notice pursuant to this subdivision.

This chapter provides information on a public hearing, the adoption process for the Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP), the adopted UWMP and WSCP submittal process, Plan implementation, and the process for amending the adopted UWMP or WSCP. This chapter includes the following sections:

10.1 Inclusion of All 2025 Data

10.2 Notice of Public Hearing

10.3 Public Hearing and Adoption

10.4 Plan Submittal

10.5 Public Availability

10.6 Notification of Public Utilities Commission

10.7 Amending an Adopted UWMP or Water Shortage Contingency Plan

10.1 Inclusion of All 2025 Data

This UWMP includes the water use and planning data for the entire calendar year of 2025, per the California Department of Water Resources' (DWR's) 2025 UWMP Guidebook.

10.2 Notice of Public Hearing

CWC § 10642

Each urban water supplier shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of both the plan and the water shortage contingency plan. Prior to adopting either, the urban water supplier shall make both the plan and the water shortage contingency plan available for public inspection and shall hold a public hearing or hearings thereon. Prior to any of these hearings, notice of the time and place of the hearing shall be published within the jurisdiction of the publicly owned water supplier pursuant to Section 6066 of the Government Code. The urban water supplier shall provide notice of the time and place of a hearing to any city or county within which the supplier provides water supplies. Notices by a local public agency pursuant to this section shall be provided pursuant to Chapter 17.5 (commencing with Section 7290) of Division 7 of Title 1 of the Government Code. A privately owned water supplier shall provide an equivalent notice within its service area. After the hearing or hearings, the plan or water shortage contingency plan shall be adopted as prepared or as modified after the hearing or hearings.

Prior to adopting the Plan, California Water Service (Cal Water) held a formal public hearing to present information on its Los Altos Suburban District (also referred to herein as the “District”) 2025 UWMP and WSCP on June 1, 2026, 5:30 PM.

Relevant entities were notified of the UWMP and WSCP review at least 60 days prior to the public hearing, including: (1) cities, counties, and Groundwater Sustainability Agency (GSA), and (2) the public. These entities were noticed again with the specific date, time and location of the hearing at least two weeks prior to the public hearing. The notice to the public, as specified in Government Code 6066, and letters to relevant agencies can be found in **Appendix B** and **Appendix C**, respectively.

10.2.1 Notice to Cities and Counties

CWC § 10631 (a) A plan shall be adopted in accordance with this chapter that shall do all of the following:

Urban water suppliers shall coordinate with local or regional land use authorities to determine the most appropriate land use information, including, where appropriate, land use information obtained from local or regional land use authorities, as developed pursuant to Article 5 (commencing with Section 65300) of Chapter 3 of Division 1 of Title 7 of the Government Code.

Table 10-1 lists the cities, counties and agencies that were notified. Copies of these letters are provided in **Appendix B**.

Table 10-1. Notification to Cities and Counties (DWR Table 10-1)

City Name	60 Day Notice Drop Down (yes/no)	Notice of Public Hearing Drop Down (yes/no)
Add additional rows as needed		
City of Los Altos	Yes	Yes
City of Mountain View	Yes	Yes
City of Cupertino	Yes	Yes
City of Sunnyvale	Yes	Yes
Town of Los Altos Hills	Yes	Yes
County Name Drop Down List	60 Day Notice Drop Down (yes/no)	Notice of Public Hearing Drop Down (yes/no)
Add additional rows as needed		
Santa Clara County	Yes	Yes
Notes:		
(a) In addition to the Cities and Counties notified, Cal Water additionally notified the Regional Water Quality Control Plant, Santa Clara Valley Water (Valley Water) District (including the Valley Water GSA), an In addition to the Cities and Counties notified, Cal Water additionally notified the Regional Water Quality Control Plant, Santa Clara Valley Water (Valley Water) District (including the Valley Water GSA), and Sustainable Silicon Valley.		

10.2.2 Notice to the Public

Notification to the public and to cities and counties also provided instructions on how to view the 2025 UWMP and WSCP prior to the hearing, the revision schedule, and contact information of the UWMP and WSCP preparer. A copy of this notice is included in **Appendix C**.

10.3 Public Hearing and Adoption

CWC § 10608.26

(a) In complying with this part, an urban retail water supplier shall conduct at least one public hearing to accomplish all of the following:

(1) Allow community input regarding the urban retail water supplier's implementation plan for complying with this part.

(2) Consider the economic impacts of the urban retail water supplier's implementation plan for complying with this part.

(3) Adopt a method, pursuant to subdivision (b) of Section 10608.20, for determining its urban water use target.

CWC § 10621 (b)

Every urban water supplier required to prepare a plan pursuant to this part shall, at least 60 days before the public hearing on the plan required by Section 10642, notify any city or county within which the supplier provides water supplies that the urban water supplier will be reviewing the plan and considering amendments or changes to the plan. The urban water supplier may consult with, and obtain comments from, any city or county that receives notice pursuant to this subdivision.

The deadline for public comments on the UWMP and WSCP was June 4, 2026, three days after the public hearing. The final Plan was formally adopted by Cal Water's Vice President, Water Resources Planning and Sustainability on MM DD, 2026, and was submitted to DWR within 30 days of approval. **Appendix I** presents a copy of the signed Resolution of Plan Adoption. **Appendix B** contains the following:

- Letters sent to and received from various agencies regarding this Plan, and
- Correspondence between Cal Water and participating agencies.

10.4 Plan Submittal

CWC § 10621 (f)

(1) Each urban water supplier shall update and submit its 2020 plan to the department by July 1, 2021.

CWC § 10635 (c)

The urban water supplier shall provide that portion of its urban water management plan prepared pursuant to this article to any city or county within which it provides water supplies no later than 60 days after the submission of its urban water management plan.

CWC § 10644 (a)

(1) An urban water supplier shall submit to the department, the California State Library, and any city or county within which the supplier provides water supplies a copy of its plan no later than 30 days after adoption. Copies of amendments or changes to the plans shall be submitted to the department, the California State Library, and any city or county within which the supplier provides water supplies within 30 days after adoption.

(2) The plan, or amendments to the plan, submitted to the department pursuant to paragraph (1) shall be submitted electronically and shall include any standardized forms, tables, or displays specified by the department.

This UWMP and WSCP were submitted to DWR within 30 days of adoption and by the July 1, 2026 deadline. The submittal was done electronically through DWR's Water Use Efficiency Data Portal, an online submittal tool. The adopted UWMP and WSCP were also sent to the California State Library and to the cities and counties listed in **Table 10-1** no later than 30 days after adoption.

10.5 Public Availability

CWC § 10645

(a) Not later than 30 days after filing a copy of its plan with the department, the urban water supplier and the department shall make the plan available for public review during normal business hours.

(b) Not later than 30 days after filing a copy of its water shortage contingency plan with the department, the urban water supplier and the department shall make the plan available for public review during normal business hours.

On or about MM DD, 2026, an electronic version of the draft 2025 UWMP and WSCP were made available for review by visiting Cal Water's website:

<https://www.calwater.com/conservation/uwmp2025>.

10.6 Notification of Public Utilities Commission

CWC § 10621 (c)

An urban water supplier regulated by the Public Utilities Commission shall include its most recent plan and water shortage contingency plan as part of the supplier's general rate case filings.

Cal Water is an urban water supplier regulated by the California Public Utilities Commission. Cal Water will include the District's 2025 UWMP and WSCP as part of its General Rate Case Filings.

10.7 Amending an Adopted UWMP or Water Shortage Contingency Plan

CWC § 10644 (b)

If an urban water supplier revises its water shortage contingency plan, the supplier shall submit to the department a copy of its water shortage contingency plan prepared pursuant to subdivision (a) of Section 10632 no later than 30 days after adoption, in accordance with protocols for submission and using electronic reporting tools developed by the department.

If either the 2025 UWMP or WSCP are amended, each of the steps for notification, public hearing, adoption and submittal will also be followed for the amended UWMP and/or WSCP.

Appendix A: UWMP Act Checklist

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Chapter 1	10615	A plan shall describe and evaluate sources of supply, reasonable and practical efficient uses, reclamation and demand management activities.	Introduction and overview	n/a	Chapter 1 - Chapter 10
x	x	Chapter 1	10630.5	Each plan shall include a simple description of the Supplier's plan including water availability, future requirements, a strategy for meeting needs, and other pertinent information. Additionally, a Supplier may also choose to include a simple description at the beginning of each chapter.	Plan preparation	n/a	Section 1.6
x	x	Section 2.1	10620(b)	Every person that becomes a Supplier shall adopt UWMP within one year after it has become a Supplier.	Plan preparation	n/a	Section 2.4
x	n/a	Section 2.5	10644	Supplier shall report the Public Water Systems number, volume of delivered water, and number of connections that are included in this UWMP.	Plan preparation	2-1	Section 2.1 Table 2-1
x	x	Section 2.5	10644	Supplier shall report if this UWMP is an individual UWMP and whether the Supplier belongs to a regional UWMP or regional alliance.	Plan preparation	2-2	Section 2.3 Table 2-2
x	x	Section 2.5	10644	Supplier shall report whether the data is in fiscal or calendar years and the units of measure used for reporting water volumes.	Plan preparation	2-3	Section 2.4 Table 2-3

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 2.4	10642	Provide supporting documentation that the Supplier has encouraged active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the plan and contingency plan.	Plan preparation	n/a	Section 2.5.2 Section 10.2 Appendix C
x	x	Section 2.4.2	10620(d)(3)	Coordinate the preparation of its plan with other appropriate agencies in the area, including other Suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practicable.	Plan preparation	n/a	Section 2.5 Section 10.2 Appendix B
x	n/a	Section 2.4.1	10631(h)	Retail Suppliers will include documentation that they have provided their Wholesale Supplier(s)—if any—with water use projections from that source.	Plan preparation	2-4 R	Section 2.5.1 Table 2-4 Section 4.5
n/a	x	Section 2.4.1	10631(h)	Wholesale Suppliers will provide their Suppliers with identification and quantification of the existing and planned sources of water available from the Wholesale Supplier to the Supplier during various water year types.	Plan preparation	2-4 W	N/A
x	x	Chapter 3.0	10631(a)	Describe the Supplier service area.	System description	n/a	Chapter 3
x	x	Section 3.3	10631(a)	Describe the climate of the Supplier’s service area.	System description	n/a	Section 3.3 Figure 3-2

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 3.4.1	10631(a)	Provide the current and projected service area populations for 2030, 2035, 2040, 2045 and optionally 2050.	System description	3-1	Section 3.4 Table 3-1
x	x	Section 3.4.2	10631(a)	Describe other social, economic, and demographic factors affecting the Supplier's water management planning.	System description	n/a	Section 3.4 Table 3-2
x	x	Section 3.5	10631(a)	Describe the land uses within the service area... include the current and projected land uses within the existing or anticipated service area affecting the Supplier's water management planning. Describe the land uses within the service area.	System description and baselines	n/a	Section 3.5 Table 3-1
x	Optional	Sections 4.2.3 and 4.2.4	10631(d)(1)	Quantify past, current, and projected water use, identifying the uses among water use sectors.	System water use	4-1 and 4-2	Section 4.2 Table 4-1 Table 4-2
x	Optional	Section 4.3.1	10631(d)(3)(A)	Report the distribution system water loss for each of the five years preceding the plan update.	System water use	4-5	Section 4.3.1 Table 4-5
x	n/a	Section 4.3.2	10631(d)(3)(C)	Retail Suppliers shall provide data to show the distribution loss standards were met.	System water use	4-6	Section 4.3.2 Table 4-6

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	n/a	Section 4.2.5.4	10631.1(a)	Include projected water use needed for lower income housing projected in the service area of the Supplier.	System water use	4-3	Section 4.2.2 Table 4-3
x	n/a	Section 4.2.5.3	10631(d)(4)(A)	In projected water use, include estimates of water savings from adopted codes, plans, and other policies or laws.	System water use	4-3	Section 4.2.3(1) Table 4-4
x	n/a	Section 4.2.5.3	10631(d)(4)(B)	Provide citations of codes, standards, ordinances, or plans used to make water use projections.	System water use	4-3	Section 4.2.3(1) Table 4-4
x	n/a	Section 4.2.5.3	10631(d)(4)(B)(ii)	To the extent that a Supplier reports the information described in subparagraph (A), an urban water Supplier shall... Indicate the extent that the water use projections consider savings from codes, standards, ordinances, or transportation and land use plans. Water use projections that do not account for these water savings shall be noted of that fact.	System water use	4-3	Section 4.2.3(1) Table 4-4
x	x	Section 4.2.5.6	10635(b)	Demands under climate change considerations must be included as part of the drought risk assessment.	System water use	n/a	Section 4.4 Section 7.5 Table 4-7 Table 7-5
n/a	x	Section 5.1	10608.36	Wholesale Suppliers shall include an assessment of present and proposed future measures, programs, and policies to help their Retail Suppliers achieve targeted water use reductions.	Baselines and targets	n/a	N/A

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	n/a	Section 5.2	10608.4	Retail Suppliers shall report on their compliance in meeting their water use targets. Reporting requirements will vary depending on whether the Supplier: - Was considered an urban retail water supplier in 2020, - Met its 2020 target in 2020, or - Was part of a merger or consolidation since 2020. Chapter 5 Subsections 5.2.1, 5.2.2, and 5.2.3 address each of these situations.	Baselines and targets	5-1	Chapter 5 Table 5-1
x	x	Section 6.1	10631(b)(2)	When multiple sources of water supply are identified, describe the management of each supply in relationship to other identified supplies.	System supplies	n/a	Section 6.9 Table 6-9
x	x	Sections 6.1 and 6.2	10631(b)(1)	Provide a discussion of anticipated supply availability under a normal, single dry year, and a drought lasting five years, as well as more frequent and severe periods of drought, including changes in supply due to climate change.	System supplies	n/a	Chapter 7
x	x	Section 6.2.2	10631(b)(4)(C)	Indicate whether groundwater is an existing or planned source of water available to the Supplier. If groundwater is identified as an existing or planned source of water... (include) a detailed description and analysis of the location, amount and sufficiency of groundwater pumped by the Supplier for the past five years.	Water supplies and recycled water	6-1	Section 6.2 Table 6-1
x	x	Section 6.2.2	10631(b)(4)(A)	Indicate whether a groundwater sustainability plan or groundwater management plan has been adopted by the Supplier or if there is any other specific authorization for groundwater management. Include a copy of the plan or authorization.	System supplies	n/a	Section 6.2
x	x	Section 6.2.2	10631(b)(4)(B)	Describe the groundwater basin.	System supplies	n/a	Section 6.2.1

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 6.2.2	10631(b)(4)(B)	Indicate if the basin has been adjudicated and include a copy of the court order or decree and a description of the amount of water the Supplier has the legal right to pump.	System supplies	n/a	Section 6.2.1
x	x	Section 6.2.2	10631(b)(4)(B)	For unadjudicated basins... (include) information as to whether DWR has identified the basin as a high- or medium-priority basin in the most current official departmental bulletin...	Water supplies and recycled water	n/a	Section 6.2.1
x	x	Section 6.2.2	10631(b)(4)(B)	For unadjudicated basins... describe efforts by the Supplier to coordinate with sustainability or groundwater agencies to achieve sustainable groundwater conditions.	Water supplies and recycled water	n/a	Section 6.2.3
x	x	Section 6.2.2.	10631(b)(4)(C)	If groundwater is identified as an existing or planned source of water... (include) a detailed description and analysis of the location, amount and sufficiency of groundwater pumped by the Supplier for the past five years.	System supplies	n/a	Section 6.2.5 Table 6-1
x	x	Section 6.2.2	10631(b)(4)(D)	Provide a detailed description and analysis of the amount and location of groundwater that is projected to be pumped.	System supplies	6-9	Section 6.9 Table 6-9
x	x	Section 6.1	10631(b)	Identify and quantify the existing and planned sources of water available for 2025, 2030, 2035, 2040, 2045 and optionally 2050.	System supplies	6-8 and 6-9	Section 6.9 Table 6-9

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 6.2.7	10631(c)	Describe the opportunities for exchanges or transfers of water on a short-term or long-term basis.	System supplies	n/a	Section 6.7
x	n/a	Section 6.2.5	10633(a)	Describe the wastewater collection and treatment systems in the Supplier's service area with quantified amount of collection and treatment and the disposal methods.	System supplies (recycled water)	6-2	Section 6.5.2 Table 6-2
x	x	Section 6.2.5	10633(b)	Describe the quantity of treated wastewater that meets recycled water standards, is being discharged, and is otherwise available for use in a recycled water project.	System supplies (recycled water)	6-3	Section 6.5.2 Table 6-3
x	x	Section 6.2.5	10633(c)	Describe the recycled water currently being used in the Supplier's service area.	System supplies (recycled water)	6-4	Section 6.5.3 Table 6-4
x	x	Section 6.2.5	10633(d)	Describe and quantify the potential uses of recycled water and provide a determination of the technical and economic feasibility of those uses.	System supplies (recycled water)	6-4	Section 6.5.3 Table 6-4
x	x	Section 6.2.5	10633(e)	Describe the projected use of recycled water within the Supplier's service area at the end of 5, 10, 15, and 20 years, and describe the actual use of recycled water in comparison to uses previously projected.	System supplies (recycled water)	6-4 and 6-5	Section 6.5.3 Table 6-4 Table 6-5

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 6.2.5	10633(f)	Describe the actions that may be taken to encourage the use of recycled water and the projected results of these actions in terms of acre-feet of recycled water used per year.	System supplies (recycled water)	6-6	Section 6.5.4 Table 6-6
x	x	Section 6.2.5	10633(g)	Provide a plan for optimizing the use of recycled water in the Supplier's service area.	System supplies (recycled water)	n/a	Section 6.5.4 Table 6-6
x	x	Section 6.2.6	10631(g)	Describe desalinated water project opportunities for long-term supply.	System supplies	6-7	Section 6.6
x	x	Section 6.2.10	10631(f)	Describe the expected future water supply projects and programs that may be undertaken by the water Supplier to address water supply reliability in average, single-dry, and for a period of drought lasting five consecutive water years.	System supplies	6-7	Section 6.8 Table 6-7
x	x	Section 6.3 and Appendix O	10631.2(a)	The UWMP must include energy information, as stated in the code, that a Supplier can readily obtain.	System suppliers, energy intensity	O-1A, O-1B, O-1C, and O-2	Section 6.11 Table 6-10
x		Section 7.1	10634	Provide information on the quality of existing sources of water available to the Supplier and the manner in which water quality affects water management strategies and supply reliability.	Water supply reliability assessment	n/a	Section 7.1.2

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 7.2	10635(a)	Service Reliability Assessment: Assess the water supply reliability during normal, dry, and a drought lasting five consecutive water years by comparing the total water supply sources available to the Supplier with the total projected water use over the next 20 years.	Water supply reliability assessment	7-2, 7-3, and 7-4	Section 7.2 Section 7.3 Table 7-1 Table 7-2 Table 7-3 Table 7-4
x	x	Section 7.2.3	10620(f)	Describe water management tools and options to maximize resources and minimize the need to import water from other regions.	Water supply reliability assessment	n/a	Section 7.4
x	x	Section 7.3	10635(b)	Provide a drought risk assessment as part of information considered in developing the demand management measures and water supply projects.	Water supply reliability assessment	n/a	Section 7.5 Table 7-5
x	x	Section 7.3	10635(b)(1)	Include a description of the data, methodology, and basis for one or more supply shortage conditions that are necessary to conduct a drought risk assessment for a drought period that lasts five consecutive years.	Water supply reliability assessment	n/a	Section 7.5.1
x	x	Section 7.3	10635(b)(2)	Include a determination of the reliability of each source of supply under a variety of water shortage conditions.	Water supply reliability assessment	n/a	Section 7.5.2
x	x	Section 7.3	10635(b)(3)	Include a comparison of the total water supply sources available to the Supplier with the total projected water use for the drought period.	Water supply reliability assessment	7-5	Section 7.5 Table 7-5

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 7.3	10635(b)(4)	Include considerations of the historical drought hydrology, plausible changes on projected supplies and demands under climate change conditions, anticipated regulatory changes, and other locally applicable criteria.	Water supply reliability assessment	n/a	Section 7.5 Table 7-5
x	x	Chapter 8	10632(a)	Provide a water shortage contingency plan (WSCP) with specified elements below.	Water shortage contingency planning	n/a	Appendix G
x	x	Chapter 8	10632(a)(1)	Provide an analysis of water supply reliability (from Guidebook Chapter 7) in the WSCP.	Water shortage contingency planning	n/a	Appendix G (Chapter 2)
x	x	Section 8.2	10632(a)(2)(A)	Provide the written decision-making process and other methods that the Supplier will use each year to determine its water reliability.	Water shortage contingency planning	n/a	Appendix G (Chapter 3)
x	x	Section 8.2	10632(a)(2)(B)	Provide data and methodology to evaluate the Supplier's water reliability for the current year and one dry year pursuant to factors in the code.	Water shortage contingency planning	n/a	Appendix G (Chapter 3)
x	x	Section 8.3	10632(a)(3)(A)	Define six standard water shortage levels of 10%, 20%, 30%, 40%, 50% shortage, and greater than 50% shortage. These levels shall be based on supply conditions, including percent reductions in supply, changes in groundwater levels, changes in surface elevation, or other conditions. The shortage levels shall also apply to a catastrophic interruption of supply.	Water shortage contingency planning	n/a	Appendix G (Chapter 4)

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 8.3	10632(a)(3)(B)	Suppliers with an existing WSCP that uses different water shortage levels must cross reference their categories with the six standard categories.	Water shortage contingency planning	8-1	Appendix G (Chapter 4)
x	x	Section 8.4	10632(a)(4)(A)	Suppliers with WSCPs that align with the defined shortage levels must specify locally appropriate supply augmentation actions.	Water shortage contingency planning	8-2	Appendix G (Section 5.2)
x	x	Section 8.4	10632(a)(4)(B)	Specify locally appropriate demand reduction actions to adequately respond to shortages.	Water shortage contingency planning	8-3	Appendix G (Section 5.1)
x	x	Section 8.4	10632(a)(4)(C)	Specify locally appropriate operational changes.	Water shortage contingency planning	8-2	Appendix G (Section 5.3)
x	x	Section 8.4	10632(a)(4)(D)	Specify additional mandatory prohibitions against specific water use practices that are in addition to State-mandated prohibitions are appropriate to local conditions.	Water shortage contingency planning	Table 8-3	Appendix G (Section 5.4, Table 5-1)
x	x	Section 8.4	10632(a)(4)(E)	Estimate the extent to which the gap between supplies and demand will be reduced by implementation of the action.	Water shortage contingency planning	8-2 and 8-3	Appendix G (Section 5.1, Section 5.2, Section 5.7, Table 5-1)

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 8.4.6	10632.5	The UWMP shall include a seismic risk assessment and mitigation plan.	Water shortage contingency plan	n/a	Appendix G (Section 5.6)
x	x	Section 8.5	10632(a)(5)(A)	Suppliers must describe that they will inform customers, the public and others regarding any current or predicted water shortages.	Water shortage contingency planning	n/a	Appendix G (Chapter 6)
x	x	Section 8.5	10632(a)(5)(B), 10632(a)(5)(C)	Suppliers must describe that they will inform customers, the public and others regarding any shortage response actions triggered or anticipated to be triggered and other relevant communications.	Water shortage contingency planning	n/a	Appendix G (Chapter 6)
x	n/a	Section 8.6	10632(a)(6)	Retail Supplier must describe how it will ensure compliance with and enforce provisions of the WSCP.	Water shortage contingency planning	n/a	Appendix G (Chapter 7)
x	x	Section 8.7	10632(a)(7)(A)	Describe the legal authority that empowers the Supplier to enforce shortage response actions.	Water shortage contingency planning	n/a	Appendix G (Chapter 8)
x	x	Section 8.7	10632(a)(7)(B)	Provide a statement that the Supplier will declare a water shortage emergency per Water Code Chapter 3. <i>Water Shortage Emergencies</i> .	Water shortage contingency planning	n/a	Appendix G (Chapter 8)

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 8.7	10632(a)(7)(C)	Provide a statement that the Supplier will coordinate with any city or county within which it provides water for the possible proclamation of a local emergency.	Water shortage contingency planning	n/a	Appendix G (Chapter 8)
x	x	Section 8.8	10632(a)(8)(A)	Describe the potential revenue reductions and expense increases associated with activated shortage response actions.	Water shortage contingency planning	n/a	Appendix G (Chapter 9)
x	x	Section 8.8	10632(a)(8)(B)	Provide a description of mitigation actions needed to address revenue reductions and expense increases associated with activated shortage response actions.	Water shortage contingency planning	n/a	Appendix G (Chapter 9)
x	n/a	Section 8.8	10632(a)(8)(C)	Retail Suppliers must describe the cost of compliance with Water Code Chapter 3.3, <i>Excessive Residential Water Use During Drought</i> .	Water shortage contingency planning	n/a	Appendix G (Chapter 9)
x	n/a	Section 8.9	10632(a)(9)	Retail Suppliers must describe the monitoring and reporting requirements and procedures that ensure appropriate data are collected, tracked, and analyzed for purposes of monitoring customer compliance.	Water shortage contingency planning	n/a	Appendix G (Chapter 10)
x	x	Section 8.10	10632(a)(10)	Describe reevaluation and improvement procedures for monitoring and evaluation the WSCP to ensure risk tolerance is adequate and appropriate water shortage mitigation strategies are implemented.	Water shortage contingency planning	n/a	Appendix G (Chapter 11)

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	n/a	Section 8.11	10632(b)	Analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas.	Water shortage contingency planning	n/a	Appendix G (Section 5.1.1, Table 5-1)
x	x	Section 8.12	10632(c)	Make available the WSCP to customers and any city or county where it provides water within 30 days after adoption of the plan.	Water shortage contingency planning	n/a	Appendix G (Chapter 12)
x	n/a	Sections 9.1	10631(e)(1)	Retail Suppliers shall provide a description of the nature and extent of each demand management measure implemented over the past five years. The description will address specific measures listed in code.	Demand management measures	n/a	Chapter 9
n/a	x	Sections 9.2	10631(e)(2)	Wholesale Suppliers shall describe specific demand management measures listed in code, their distribution system asset management program, and Supplier assistance program.	Demand management measures	n/a	N/A
x	n/a	Chapter 10	10608.26(a)	Retail Suppliers shall conduct a public hearing to discuss adoption, implementation, and economic impact of water use targets (recommended to discuss compliance).	Plan adoption, submittal, and implementation	n/a	Section 2.5.2 Section 10.3
x	x	Section 10.2.1	10621(b)	Notify, at least 60 days prior to the public hearing, any city or county within which the Supplier provides water that the Supplier will be reviewing the UWMP and considering amendments or changes to the plan.	Plan adoption, submittal, and implementation	10-1	Section 2.5.2 Section 10.3

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Section 10.4	10621(f)	Each urban water Supplier shall update and submit its 2025 plan to DWR by July 1, 2026.	Plan adoption, submittal, and implementation	n/a	Section 2.4 Section 10.4
x	x	Sections 10.2.2, 10.3, and 10.5	10642	Provide supporting documentation that the Supplier made the UWMP and WSCP available for public inspection, published notice of the public hearing, and held a public hearing about the UWMP and WSCP.	Plan adoption, submittal, and implementation	n/a	Chapter 10 Appendix C
x	x	Section 10.2.2	10642	The Supplier is to provide the time and place of the hearing to any city or county within which the Supplier provides water.	Plan adoption, submittal, and implementation	10-1	Section 10.2.1 Table 10-1 Appendix B
x	x	Section 10.3.2	10642	Provide supporting documentation that the UWMP and WSCP has been adopted as prepared or modified.	Plan adoption, submittal, and implementation	n/a	Section 10.3 Appendix I
x	x	Section 10.4	10644(a)	Provide supporting documentation that the Supplier has submitted their UWMP to the California State Library.	Plan adoption, submittal, and implementation	n/a	Section 10.4
x	x	Section 10.4	10644(a)(1)	Provide supporting documentation that the Supplier has submitted their UWMP to any city or county within which the Supplier provides water no later than 30 days after adoption.	Plan adoption, submittal, and implementation	n/a	Section 10.4

Retail (x = required)	Wholesale (x = required)	2025 Guidebook Location	Water Code Section	Summary as Applies to UWMP	Subject	Relevant Submittal Table	2025 UWMP Location
x	x	Sections 10.4.1 and 10.4.2	10644(a)(2)	The UWMP, or amendments to the UWMP, submitted to DWR shall be submitted electronically.	Plan adoption, submittal, and implementation	n/a	Section 10.4
x	x	Section 10.7.2	10644(b)	If revised, submit a copy of the WSCP to DWR within 30 days of adoption.	Plan adoption, submittal, and implementation	n/a	Section 10.7
x	x	Section 10.5	10645(a)	Provide supporting documentation that, not later than 30 days after filing a copy of its UWMP with DWR, the Supplier has or will make the plan available for public review during normal business hours.	Plan adoption, submittal, and implementation	n/a	Section 10.5
x	x	Section 10.5	10645(b)	Provide supporting documentation that, not later than 30 days after filing a copy of its WSCP with DWR, the Supplier has or will make the plan available for public review during normal business hours.	Plan adoption, submittal, and implementation	n/a	Section 10.5
x	x	Section 10.6	10621(c)	If Supplier is regulated by the Public Utilities Commission, include its plan and contingency plan as part of its general rate case filings.	Plan adoption, submittal, and implementation	n/a	Section 10.6

Appendix B: Correspondence

- UWMP and WSCP Notice of Preparation
- District Mailing List
- UWMP and WSCP Public Draft Comments



The Cal Water Difference

Dear XXXX,

We hope that this note finds you well. California Water Service (Cal Water) is beginning the process of updating our Urban Water Management Plans (UWMP) and Water Shortage Contingency Plans (WSCP) and wanted to ensure you had the pertinent information to participate in the process, which is included in the following notification.

These plans are a critical component of the steps we are taking to meet the current and future water supply needs of our customers, and to elevate our urban water use efficiency.

To develop well-rounded plans, **we are requesting data from the partners that serve our customers** to ensure the plans are representative of the communities we serve. The specific data points we are seeking can be found below the following notice.

At your earliest convenience, **please confirm you have received this Notice of Preparation**. If you have any questions, need any additional information, or would like to find time to meet virtually with our team to discuss this further, please reach out at your convenience.

Notice of Preparation of Urban Water Management Plan and Water Shortage Contingency Plan – 2025 Update

The Urban Water Management Planning Act (California Water Code §10608–10656) requires that California Water Service Company (Cal Water) update its Urban Water Management Plan (UWMP) and associated Water Shortage Contingency Plan (WSCP) every 5 years. The updated UWMP and WSCP are due by July 1, 2026.

Cal Water is currently reviewing its existing UWMP and associated WSCP, which were updated in 2021, and considering revisions to the documents. Coordination with water suppliers, cities, counties, and community organizations in the region is an important part of the preparation of Cal Water's UWMP and WSCP. We invite your agency's participation in this revision process. We are available to discuss the assumptions used in the development of the plans including available water supply, water demands, land use, as well as other aspects of the plans.

A draft of the 2025 UWMP and WSCP will be made available for public review and a public hearing will be scheduled in 2026. In the meantime, if you would like more information regarding Cal Water's 2020 UWMP and WSCP and the schedule for updating these documents, or if you would like to participate in the preparation of the 2025 UWMP and WSCP, please contact Jake Lam at:

Jake Lam

Associate Engineer
California Water Service
jlam@calwater.com

DATA REQUEST – Help Develop Our UWMP and WSCP

We're seeking to coordinate with community partners to ensure we develop a UWMP and associated WSCP that are reflective of our communities. We'd like to begin this partnership today and ask that you provide the following information to Jake Lam (jlam@calwater.com):

- Description of current land use
- GIS files for land use and zoning
- Population growth projections
- Most recent General Plans

We are looking to gather this information by XXXX XX, XXXX.

Once again, we thank you for your continued partnership. If you have any questions, need any additional information, or would like to find time to meet virtually with our team to discuss this further, please reach out at your convenience.

Sincerely,

Kevin McCusker

Director of Government & Community Affairs

About Cal Water

California Water Service provides safe, clean, and affordable water utility service to more than 2 million people statewide. What sets Cal Water apart is its commitment to enhancing the quality of life for its customers and communities. Guided daily by their promise to provide quality, service, and value, the utility's employees lead the way in working to protect the planet, care for people, and operate with the utmost integrity. Integral to Cal Water's strategy is investing responsibly in infrastructure, sustainability initiatives, and community well-being. The utility has been named one of "America's Most Responsible Companies" and the "World's Most Trustworthy Companies" by *Newsweek* and a Great Place to Work®. More information is available at

<https://link.edgepilot.com/s/4069251c/CvANuC690u9ITiwQCmjDg?u=http://www.calwaterdifference.com/>.

Quality. Service. Value.®



California Water Service
1720 North 1st Street - San Jose, CA 95112
[Unsubscribe](#)

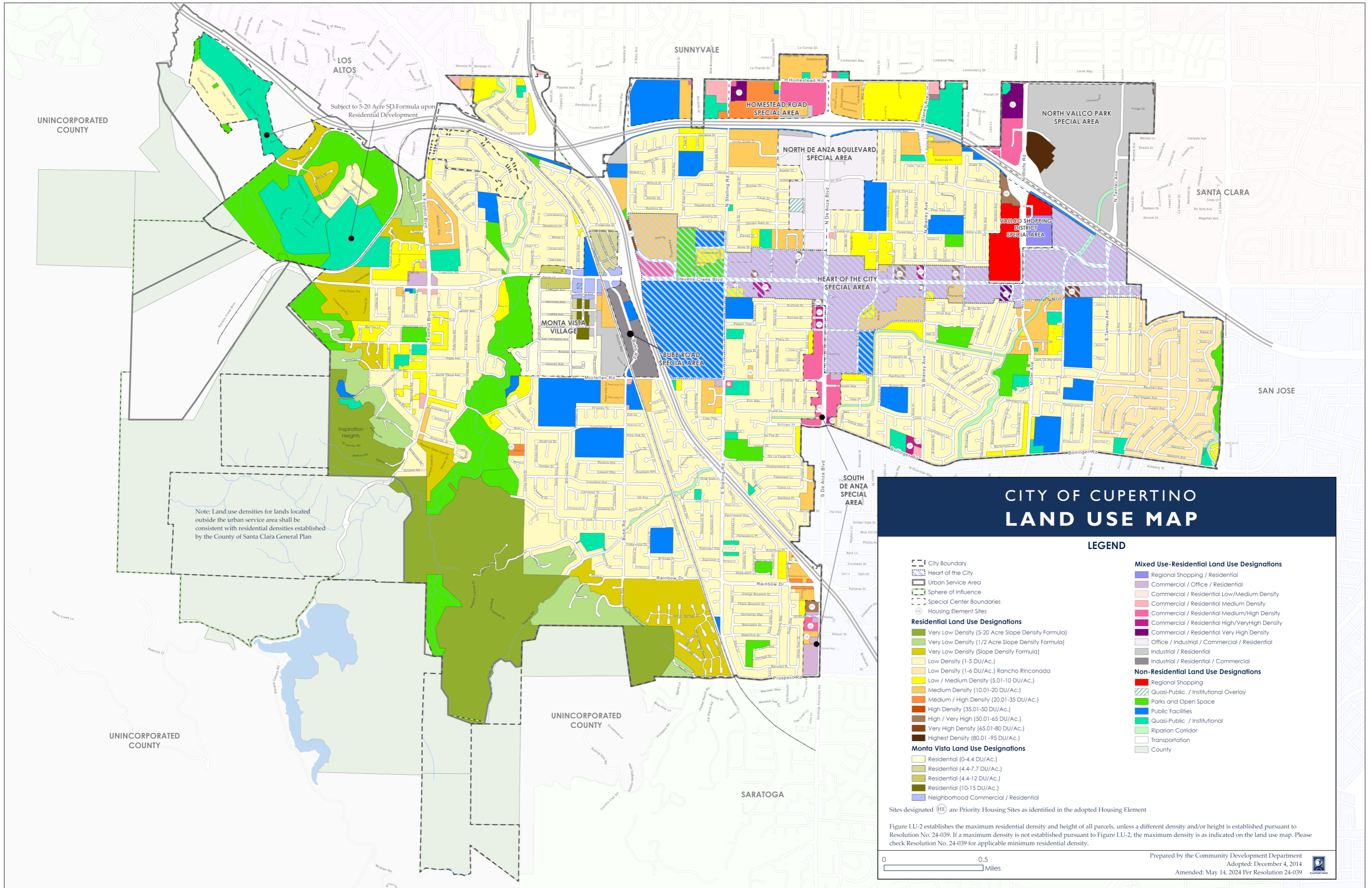
Name	Position (if known)	Agency	Other Agency Affiliation (if applicable)
Ms. Leslee Guardino	Principal	Canyon Snow Consulting	
Liang-Fang Chao	Vice Mayor	City of Cupertino	
Kirsten Squarcia	Interim Deputy City Manager	City of Cupertino	
Kitty Moore	Mayor	City of Cupertino	
Humza Javed	Public Works Director/District Engineer	City of East Palo Alto	
Matthew Vining	Utility Manager	City of East Palo Alto	
Elaine Marshall	Deputy Public Works Director	City of Milpitas	
Milpitas Public Works	Public Works Department	City of Milpitas	
Ms. Dawn Cameron	Public Works Director	City of Mountain View	
Kimbra McCarthy	City Manager	City of Mountain View	
Lisa Au	Assistant Public Works Director	City of Mountain View	
Elizabeth Flegel	Water Resources Manager	City of Mountainview	
Ed Shikada	City Manager	City of Palo Alto	
Kiely Nose	Assistant City Manager	City of Palo Alto	
Adriana Artola	Senior Resources Planner	City of Palo Alto	
Lisa Bilir	Assistant Director of Utilities	City of Palo Alto	
Kaylee Burton	Administrative Assistant	City of Palo Alto	
Rekha Ippagunta	Assistant Director of Engineering and Operations - Water, Gas, Wastewater	City of Palo Alto	
Jeff Provenzano	Director of Environmental Services	City of San Jose	
Nicole Harvie	Principle Engineer	City of San Jose	
John Ramirez	Director of Water & Sewer Utilities	City of Santa Clara	
Lawrence Tam	Utility Operations Engineer	City of Santa Clara	
Russ Melton	District 4 Councilmember	City of Sunnyvale	
Mr. Chip Taylor	Department Director	City of Sunnyvale	
Alysa Cisneros	Councilmember	City of Sunnyvale	
David Carnahan	City Clerk	City of Sunnyvale	
Larry Klein	Mayor	City of Sunnyvale	
Ramana Chinnakotla	Department Director	City of Sunnyvale	
Winola Cheong	Deputy Director of Water and Sewer	City of Sunnyvale	
Cory Burkett	Water Resources Specialist/Finance	Purissima Hills Water District	
Tammy Rudock	Interim General Manager	Purissima Hills Water District	
Mr. Rob Eastwood	Planning Manager	Santa Clara County	
Otto Lee	District 3 Supervisor	Santa Clara County	
Susan Ellenberg	District 4 Supervisor	Santa Clara County	
Margaret Abe-Koga	District 5 Supervisor	Santa Clara County	
Cindy Chavez	District 2 Supervisor	Santa Clara County	
Joe Simitian	District 5 Supervisor	Santa Clara County	
Vanessa Marcadejas	Watershed Protection and Integrated Waste Management Service	Santa Clara County Consumer and Environmental Protection Agency	
Jacqueline Onciano	Planning Director	Santa Clara County Department of Planning and Development	
Leza Mikhail	Deputy Director of Planning and Development	Santa Clara County Department of Planning and Development	
Ms. Samantha Greene	Senior Water Resources Specialist	Santa Clara Valley Water District	
Mr. Rick Callender	CEO	Santa Clara Valley Water District	
Vincent Gin	Deputy Operating Officer Water Supply Division	Santa Clara Valley Water District	
Kirsten Struve	Assistant Officer for Water Supply Division	Santa Clara Valley Water District	
Jing Wu	Sr. Water Resources Specialist	Santa Clara Valley Water District	
Desiree Sausele	Assistant Water Resources Specialist	Santa Clara Valley Water District	
Aaron Baker	Chief Operating Officer, Water Utility	Santa Clara Valley Water District	
Jason Gurdak	Hydrologist	Santa Clara Valley Water District	Santa Clara Valley Water District GSA - Santa Clara
Sam Bogale	Deputy Operating Officer of Treated Water	Santa Clara Valley Water District	
Mr. Dennis Murphy	Director of Water & Sustainable Life	Sustainable Silicon Valley	
Mr. Zachary Dahl	Interim Public Works Director	Town of Los Altos Hills	
Stanley Mok	Council Member	Town of Los Altos Hills	
Kavita Tankha	Environmental Design & Protection Committee Liaison	Town of Los Altos Hills	
George Tyson	Vice Mayor	Town of Los Altos Hills	
Linda Swan	Council Member	Town of Los Altos Hills	
Sally Meadows	Mayor	Town of Los Altos Hills	
Jonathan Weinberg	Council Member	Town of Los Altos Hills	
Neysa Fligor	First Vice President	Town of Los Altos Hills	

Appendix C: Public Meeting Notice

- Public Meeting Notice of Intent
- Proof of Publication
- Public Meeting Presentation

Appendix D: General Plan Land Use Maps

- City of Cupertino Land Use Map
- Town of Los Altos Hills Land Use Map
- City of Los Altos Land Use Map
- City of Mountain View Land Use Map
- City of Sunnyvale Land Use Map



UNINCORPORATED COUNTY

Subject to 5-20 Acre SD Formula upon Residential Development

Note: Land use densities for lands located outside the urban service area shall be consistent with residential densities established by the County of Santa Clara General Plan

UNINCORPORATED COUNTY

UNINCORPORATED COUNTY

SARATOGA

SUNNYVALE

SANTA CLARA

SAN JOSE

CITY OF CUPERTINO LAND USE MAP

LEGEND

- City Boundary
 - Heart of the City
 - Urban Service Area
 - Sphere of Influence
 - Special Center Boundaries
 - Housing Element Sites
- Residential Land Use Designations**
- Very Low Density (5-20 Acre Slope Density Formula)
 - Very Low Density (1/2 Acre Slope Density Formula)
 - Very Low Density (Slope Density Formula)
 - Low Density (1-5 DU/Ac.)
 - Low Density (1-6 DU/Ac.) Rancho Rinconada
 - Low / Medium Density (5.01-10 DU/Ac.)
 - Medium Density (10.01-20 DU/Ac.)
 - Medium / High Density (20.01-35 DU/Ac.)
 - High Density (35.01-50 DU/Ac.)
 - High / Very High (50.01-65 DU/Ac.)
 - Very High Density (65.01-80 DU/Ac.)
 - Highest Density (80.01 -95 DU/Ac.)
- Monta Vista Land Use Designations**
- Residential (0-4.4 DU/Ac.)
 - Residential (4.4-7.7 DU/Ac.)
 - Residential (4.4-12 DU/Ac.)
 - Residential (10-15 DU/Ac.)
 - Neighborhood Commercial / Residential
- Mixed Use-Residential Land Use Designations**
- Regional Shopping / Residential
 - Commercial / Office / Residential
 - Commercial / Residential Low/Medium Density
 - Commercial / Residential Medium Density
 - Commercial / Residential Medium/High Density
 - Commercial / Residential High/VeryHigh Density
 - Commercial / Residential Very High Density
 - Office / Industrial / Commercial / Residential
 - Industrial / Residential
 - Industrial / Residential / Commercial
- Non-Residential Land Use Designations**
- Regional Shopping
 - Quasi-Public / Institutional Overlay
 - Parks and Open Space
 - Public Facilities
 - Quasi-Public / Institutional
 - Riparian Corridor
 - Transportation
 - County

Sites designated (HE) are Priority Housing Sites as identified in the adopted Housing Element

Figure LU-2 establishes the maximum residential density and height of all parcels, unless a different density and/or height is established pursuant to Resolution No. 24-039. If a maximum density is not established pursuant to Figure LU-2, the maximum density is as indicated on the land use map. Please check Resolution No. 24-039 for applicable minimum residential density.



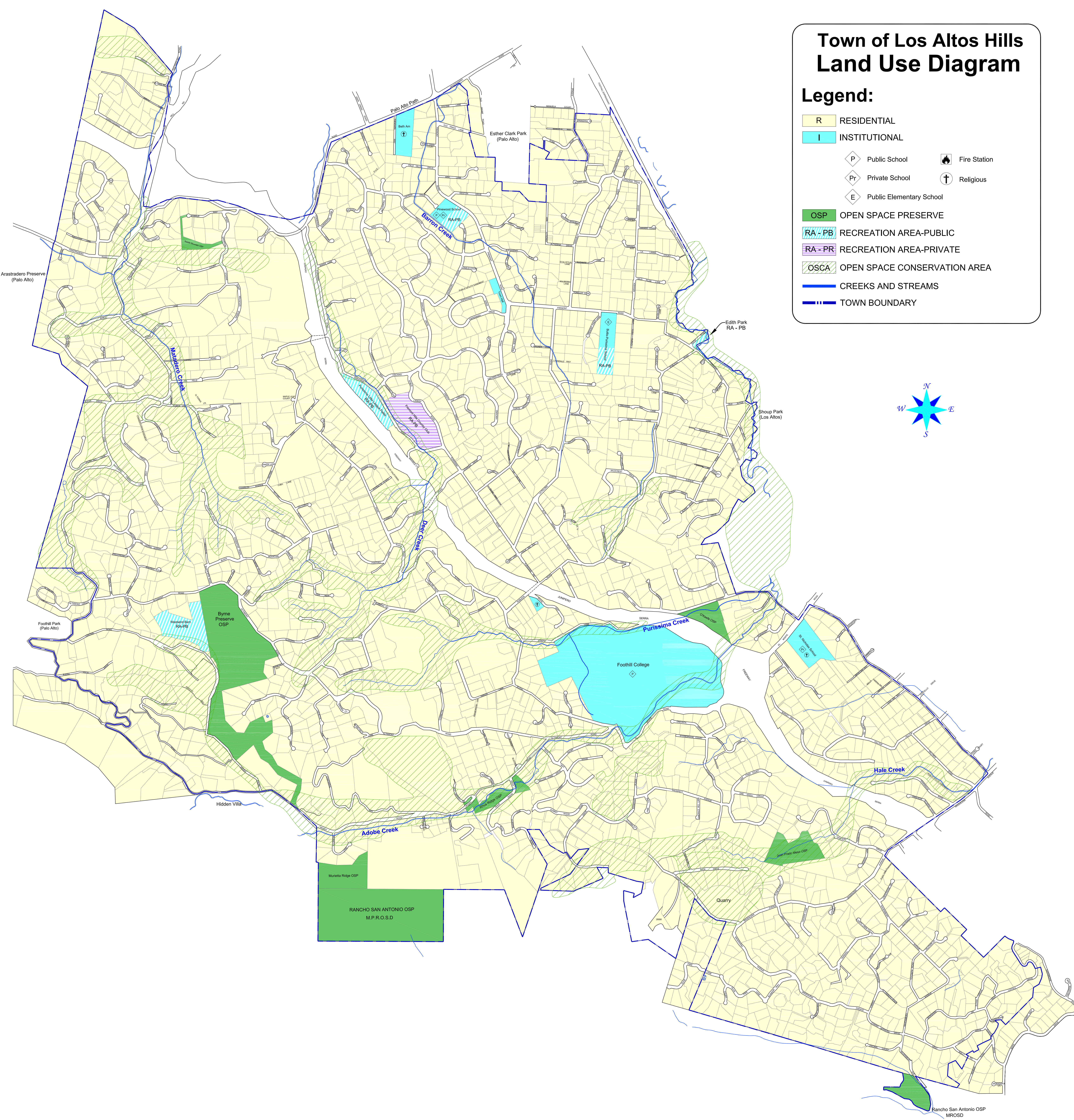
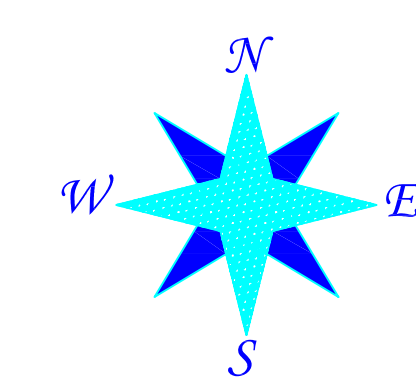
Prepared by the Community Development Department
Adopted: December 4, 2014
Amended: May 14, 2024 Per Resolution 24-039



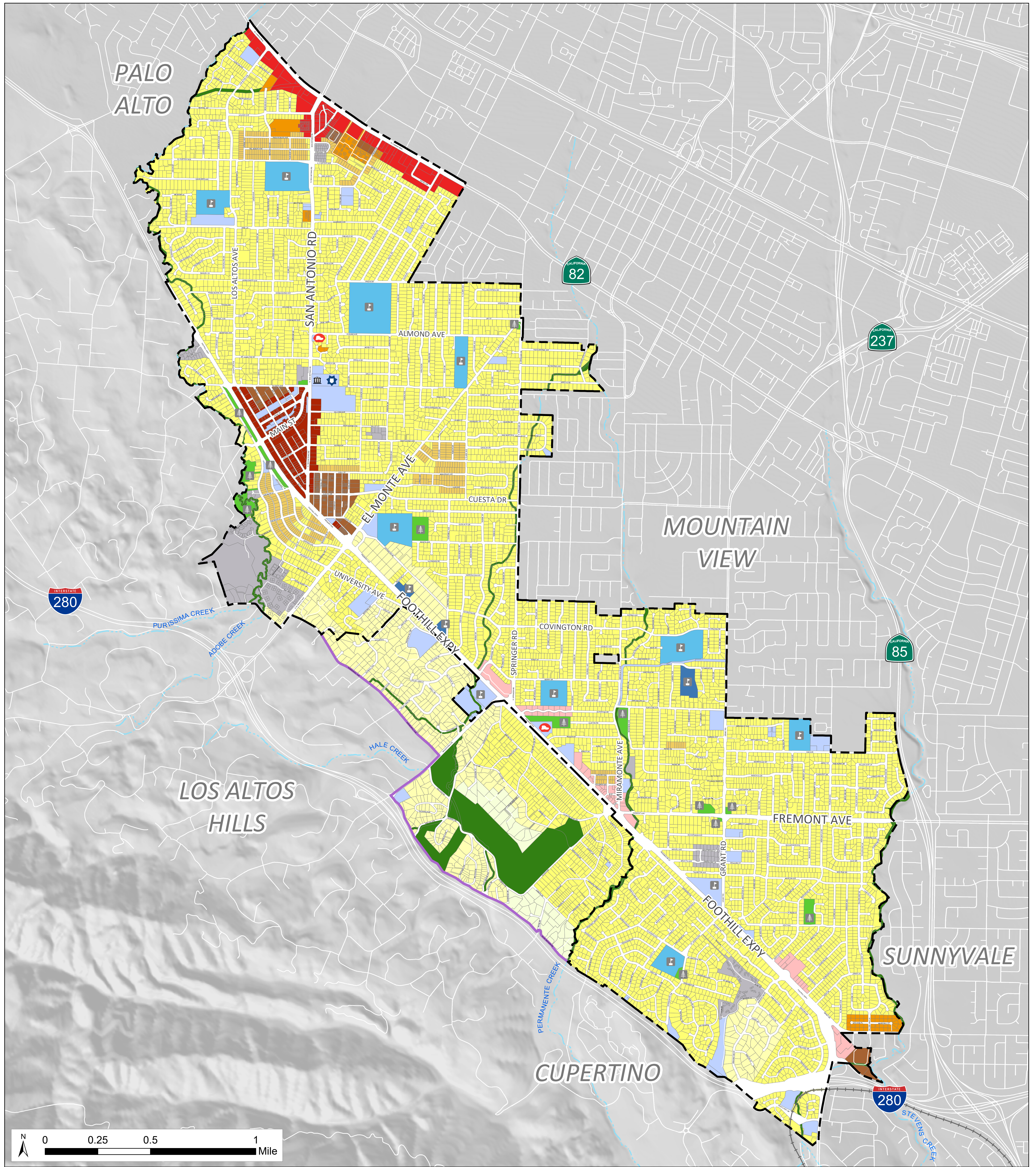
Town of Los Altos Hills Land Use Diagram

Legend:

- RESIDENTIAL
- INSTITUTIONAL
- P Public School
- Pr Private School
- E Public Elementary School
- OSP OPEN SPACE PRESERVE
- RA - PB RECREATION AREA-PUBLIC
- RA - PR RECREATION AREA-PRIVATE
- OSCA OPEN SPACE CONSERVATION AREA
- CREEKS AND STREAMS
- TOWN BOUNDARY
- 🔥 Fire Station
- ⛪ Religious



CITY OF LOS ALTOS LAND USE MAP



LAND USE DESIGNATIONS

Residential

- Single-Family One-Acre (SF-1)
- Single-Family Large Lot (SF-2)
- Single-Family Medium Lot (SF-4)
- Single-Family Small Lot (SF-10)
- Low Density Multi-Family (LDMF)
- Senior Housing (SH)
- Medium Density Multi-Family (MDMF)

Commercial

- Neighborhood Commercial (NC)
- Thoroughfare Commercial (TC)
- Downtown Commercial (DC)

Public/Quasi Public

- Public & Institutional (PI)
- Public School (PS)
- Private School (S)

Open Space

- Parks (P)
- Other Open Space (OS)

Planned Community

- Planned Community (PC)

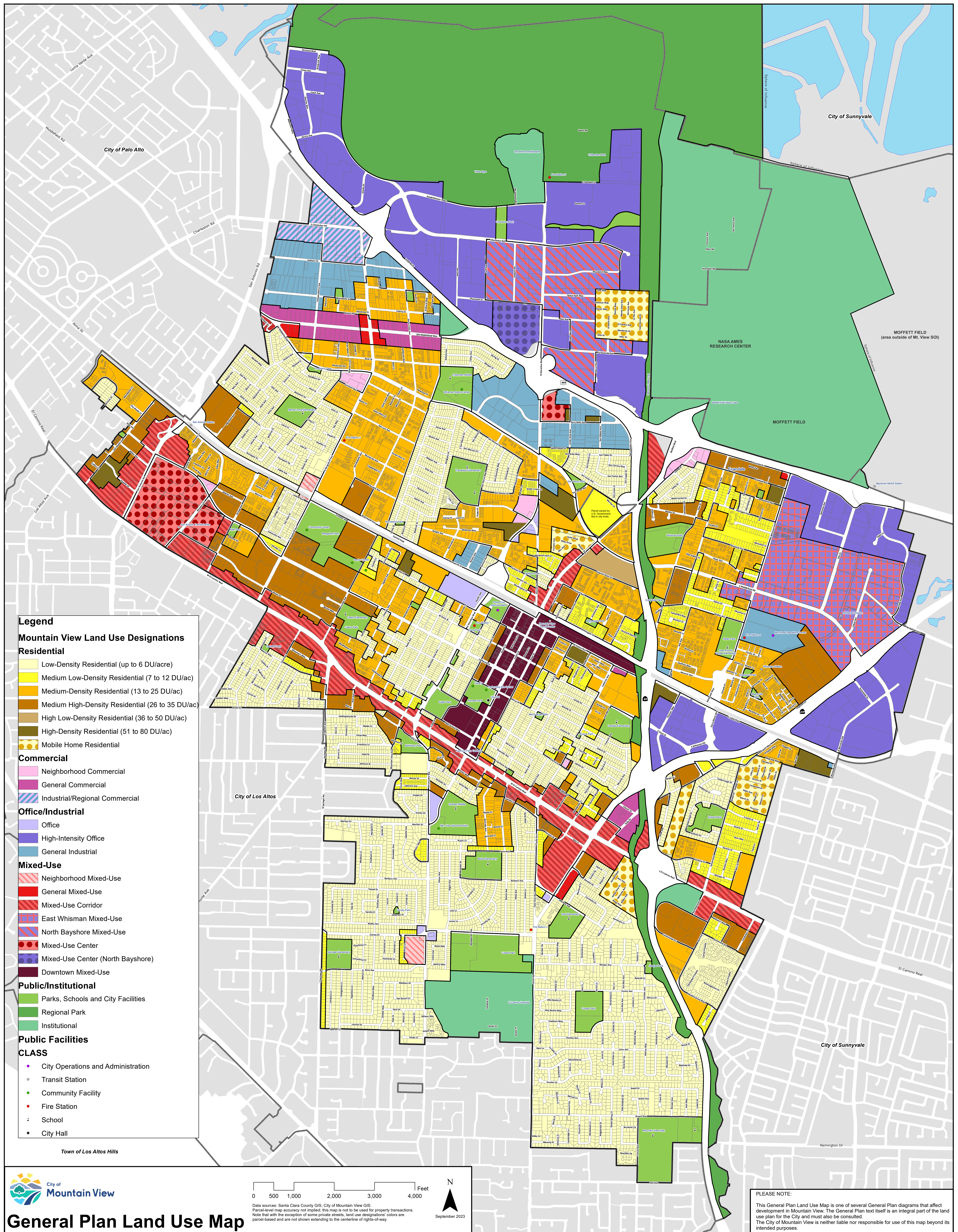
Map Features

- City Boundary
- Sphere of Influence
- Railroad
- Creek

Public Facilities

- School
- Park
- Fire Station
- Police Station
- City Hall

* Creek corridors and Montclair Park shown as approximate.

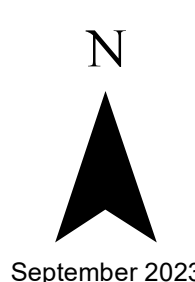
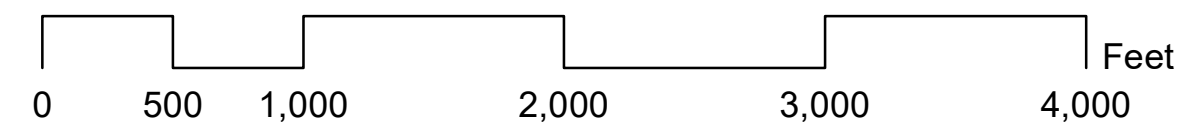


Legend

Mountain View Land Use Designations

- Residential**
- Low-Density Residential (up to 6 DU/acre)
 - Medium Low-Density Residential (7 to 12 DU/acre)
 - Medium-Density Residential (13 to 25 DU/acre)
 - Medium High-Density Residential (26 to 35 DU/acre)
 - High Low-Density Residential (36 to 50 DU/acre)
 - High-Density Residential (51 to 80 DU/acre)
 - Mobile Home Residential
- Commercial**
- Neighborhood Commercial
 - General Commercial
 - Industrial/Regional Commercial
- Office/Industrial**
- Office
 - High-Intensity Office
 - General Industrial
- Mixed-Use**
- Neighborhood Mixed-Use
 - General Mixed-Use
 - Mixed-Use Corridor
 - East Whisman Mixed-Use
 - North Bayshore Mixed-Use
 - Mixed-Use Center
 - Mixed-Use Center (North Bayshore)
 - Downtown Mixed-Use
- Public/Institutional**
- Parks, Schools and City Facilities
 - Regional Park
 - Institutional
- Public Facilities**
- CLASS**
- City Operations and Administration
 - Transit Station
 - Community Facility
 - Fire Station
 - School
 - City Hall

Town of Los Altos Hills



Data sources: Santa Clara County GIS, City of Mountain View GIS.
Parcel-level map accuracy not implied; this map is not to be used for property transactions.
Note that with the exception of some private streets, land use designations' colors are parcel-based and are not shown extending to the centerline of rights-of-way.

September 2023

PLEASE NOTE:

This General Plan Land Use Map is one of several General Plan diagrams that affect development in Mountain View. The General Plan text itself is an integral part of the land use plan for the City and must also be consulted. The City of Mountain View is neither liable nor responsible for use of this map beyond its intended purposes.

General Plan Land Use Map

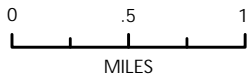
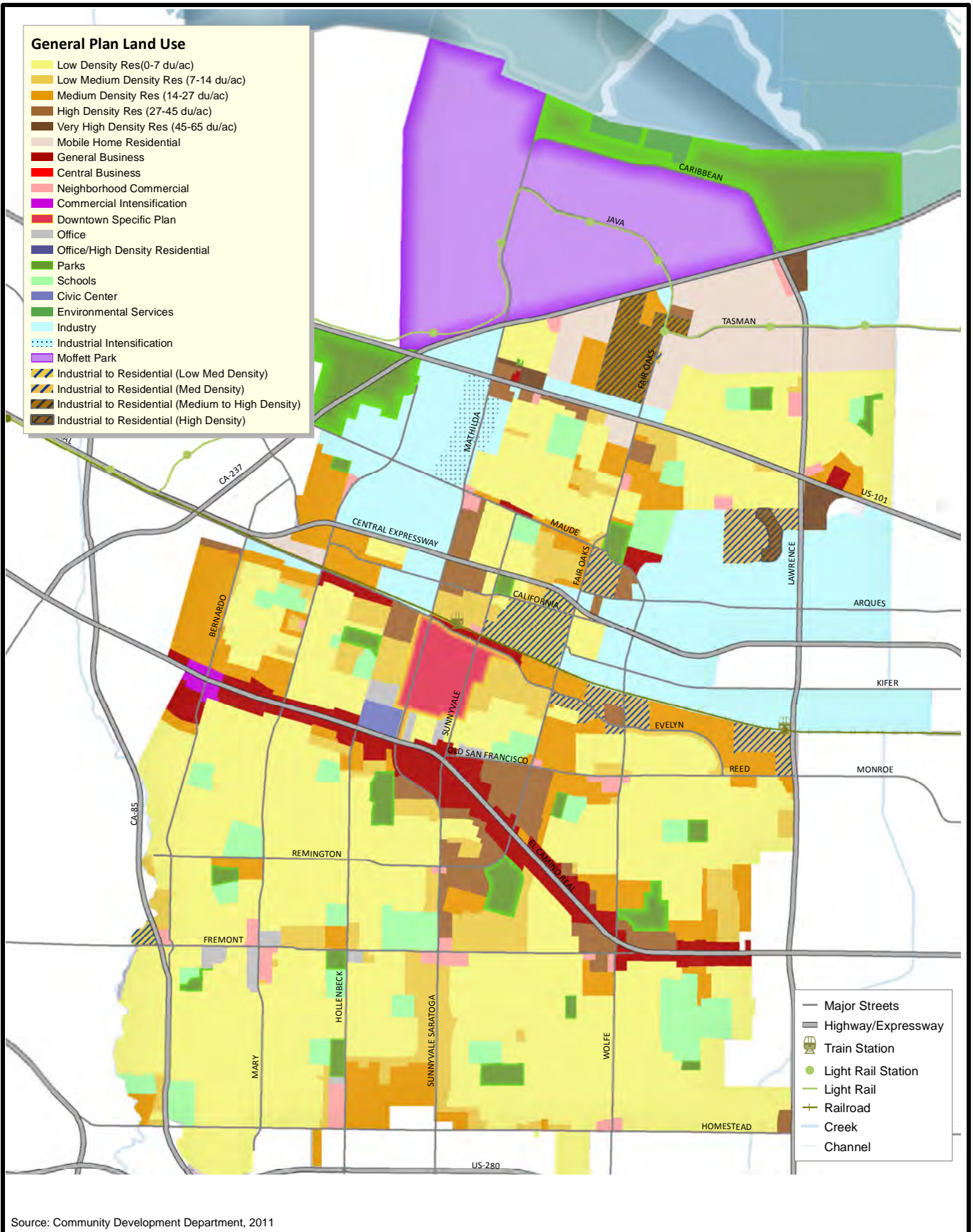


FIGURE 3.1-1
Existing General Plan Land Uses

Appendix E: Historical and Projected Service Area Population, Services, Sales, and Production

California Water Service

Los Altos Suburban District

Water Supply/Demand Analysis Projections Summary



June 2026

California Water Service - Los Altos Suburban District
 Water Supply/Demand Analysis and Projections Summary

Table 1. Historical & Projected Population

YEAR	TYPE	HOUSEHOLD	GROUP	
			QUARTERS	TOTAL
2000	Historical	51,480	457	51,937
2001	Historical	52,312	472	52,784
2002	Historical	53,143	487	53,631
2003	Historical	53,975	503	54,478
2004	Historical	54,807	518	55,325
2005	Historical	55,639	533	56,172
2006	Historical	56,470	548	57,018
2007	Historical	57,302	563	57,865
2008	Historical	58,134	579	58,712
2009	Historical	58,965	594	59,559
2010	Historical	59,797	609	60,406
2011	Historical	60,107	612	60,718
2012	Historical	60,416	614	61,030
2013	Historical	60,726	617	61,342
2014	Historical	61,035	619	61,654
2015	Historical	61,345	622	61,967
2016	Historical	61,655	624	62,279
2017	Historical	61,964	627	62,591
2018	Historical	62,274	629	62,903
2019	Historical	62,583	632	63,215
2020	Historical	62,893	634	63,527
2021	Historical	62,908	634	63,542
2022	Historical	62,907	634	63,541
2023	Historical	62,892	634	63,526
2024	Historical	62,768	634	63,402
2025	Historical	62,925	634	63,559
2030	Projected	65,344	640	65,985
2035	Projected	66,411	647	67,058
2040	Projected	67,035	653	67,688
2045	Projected	67,665	659	68,324
2050	Projected	68,301	666	68,967
2025 to 2050				
Compound Annual Growth Rate (CAGR)				0.3%

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 2. Historical & Projected Services

YEAR	TYPE	SFR-M	SFR-F	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	16,575	0	119	1,068	7	200	0	15	0	17,984
2001	Historical	16,607	0	119	1,065	7	203	0	18	0	18,018
2002	Historical	16,618	0	119	1,074	7	203	0	21	0	18,042
2003	Historical	16,493	0	119	1,079	7	206	0	19	0	17,923
2004	Historical	16,671	0	119	1,086	7	209	0	19	0	18,110
2005	Historical	16,711	0	119	1,092	7	211	0	13	0	18,153
2006	Historical	16,751	0	119	1,098	7	213	1	16	0	18,204
2007	Historical	16,776	0	119	1,106	7	174	0	14	0	18,196
2008	Historical	16,734	0	136	1,136	5	187	0	14	0	18,212
2009	Historical	16,754	0	150	1,158	5	195	0	17	0	18,279
2010	Historical	16,784	0	149	1,151	5	198	0	19	0	18,306
2011	Historical	16,829	0	151	1,150	4	201	0	21	0	18,356
2012	Historical	16,831	0	156	1,159	4	203	0	21	0	18,375
2013	Historical	16,841	0	159	1,156	4	203	0	29	0	18,392
2014	Historical	16,903	0	159	1,152	4	203	0	35	0	18,458
2015	Historical	16,915	0	162	1,161	4	203	0	35	0	18,479
2016	Historical	16,931	0	171	1,193	4	202	0	34	0	18,535
2017	Historical	16,943	0	171	1,185	3	204	0	40	0	18,546
2018	Historical	16,961	0	171	1,182	3	209	0	23	0	18,549
2019	Historical	16,980	0	171	1,182	3	207	0	18	1	18,561
2020	Historical	16,985	0	171	1,173	3	208	0	20	1	18,560
2021	Historical	16,990	0	171	1,162	3	205	0	22	1	18,554
2022	Historical	16,990	0	171	1,154	2	202	0	21	1	18,541
2023	Historical	16,989	0	171	1,149	3	201	0	20	1	18,534
2024	Historical	16,971	0	170	1,154	3	199	0	21	1	18,520
2025	Historical	17,006	0	171	1,152	3	198	0	25	1	18,556
2030	Projected	17,174	0	196	1,249	3	199	0	25	1	18,848
2035	Projected	17,344	0	207	1,278	3	201	0	25	1	19,059
2040	Projected	17,515	0	212	1,285	3	202	0	26	1	19,244
2045	Projected	17,688	0	217	1,292	3	203	0	26	1	19,431
2050	Projected	17,863	0	223	1,299	3	204	0	26	1	19,620

2025 to 2050

Compound Annual Growth Rate (CAGR)

0.2%

SFR-M = Single-Family Metered

SFR-F = Single-Family Unmetered (Flat Service)

MFR = Multi-Family

COM = Commercial

IND = Industrial

GOV = Government

IRR = Irrigation

OTH = Other/Miscellaneous

REC = Recycled

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 3. Historical & Projected Service Shares

YEAR	TYPE	SFR-M	SFR-F	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	92.2%	0.0%	0.7%	5.9%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2001	Historical	92.2%	0.0%	0.7%	5.9%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2002	Historical	92.1%	0.0%	0.7%	6.0%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2003	Historical	92.0%	0.0%	0.7%	6.0%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2004	Historical	92.1%	0.0%	0.7%	6.0%	0.0%	1.2%	0.0%	0.1%	0.0%	100.0%
2005	Historical	92.1%	0.0%	0.7%	6.0%	0.0%	1.2%	0.0%	0.1%	0.0%	100.0%
2006	Historical	92.0%	0.0%	0.7%	6.0%	0.0%	1.2%	0.0%	0.1%	0.0%	100.0%
2007	Historical	92.2%	0.0%	0.7%	6.1%	0.0%	1.0%	0.0%	0.1%	0.0%	100.0%
2008	Historical	91.9%	0.0%	0.7%	6.2%	0.0%	1.0%	0.0%	0.1%	0.0%	100.0%
2009	Historical	91.7%	0.0%	0.8%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2010	Historical	91.7%	0.0%	0.8%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2011	Historical	91.7%	0.0%	0.8%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2012	Historical	91.6%	0.0%	0.9%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2013	Historical	91.6%	0.0%	0.9%	6.3%	0.0%	1.1%	0.0%	0.2%	0.0%	100.0%
2014	Historical	91.6%	0.0%	0.9%	6.2%	0.0%	1.1%	0.0%	0.2%	0.0%	100.0%
2015	Historical	91.5%	0.0%	0.9%	6.3%	0.0%	1.1%	0.0%	0.2%	0.0%	100.0%
2016	Historical	91.3%	0.0%	0.9%	6.4%	0.0%	1.1%	0.0%	0.2%	0.0%	100.0%
2017	Historical	91.4%	0.0%	0.9%	6.4%	0.0%	1.1%	0.0%	0.2%	0.0%	100.0%
2018	Historical	91.4%	0.0%	0.9%	6.4%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2019	Historical	91.5%	0.0%	0.9%	6.4%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2020	Historical	91.5%	0.0%	0.9%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2021	Historical	91.6%	0.0%	0.9%	6.3%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2022	Historical	91.6%	0.0%	0.9%	6.2%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2023	Historical	91.7%	0.0%	0.9%	6.2%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2024	Historical	91.6%	0.0%	0.9%	6.2%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2025	Historical	91.7%	0.0%	0.9%	6.2%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2030	Projected	91.1%	0.0%	1.0%	6.6%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2035	Projected	91.0%	0.0%	1.1%	6.7%	0.0%	1.1%	0.0%	0.1%	0.0%	100.0%
2040	Projected	91.0%	0.0%	1.1%	6.7%	0.0%	1.0%	0.0%	0.1%	0.0%	100.0%
2045	Projected	91.0%	0.0%	1.1%	6.7%	0.0%	1.0%	0.0%	0.1%	0.0%	100.0%
2050	Projected	91.0%	0.0%	1.1%	6.6%	0.0%	1.0%	0.0%	0.1%	0.0%	100.0%

SFR-M = Single-Family Metered

SFR-F = Single-Family Unmetered (Flat Service)

MFR = Multi-Family

COM = Commercial

IND = Industrial

GOV = Government

IRR = Irrigation

OTH = Other/Miscellaneous

REC = Recycled

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 4. Historical & Projected Sales in Acre-Feet

YEAR	TYPE	SFR-M	SFR-F ¹	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	10,405	0	736	2,600	49	634	0	10	0	14,433
2001	Historical	10,500	0	714	2,447	43	753	0	12	0	14,469
2002	Historical	10,645	0	708	2,407	32	667	0	15	0	14,474
2003	Historical	10,097	0	708	2,490	40	592	0	8	0	13,934
2004	Historical	10,643	0	728	2,489	31	627	0	14	0	14,533
2005	Historical	9,958	0	723	2,376	35	632	0	12	0	13,737
2006	Historical	10,024	0	741	2,475	40	616	3	12	0	13,910
2007	Historical	10,824	0	729	2,544	36	705	0	16	0	14,853
2008	Historical	10,602	0	748	2,547	33	729	0	15	0	14,675
2009	Historical	9,509	0	704	2,385	29	617	0	14	0	13,258
2010	Historical	8,797	0	656	2,318	22	499	0	10	0	12,302
2011	Historical	8,899	0	681	2,329	20	509	0	10	0	12,449
2012	Historical	9,640	0	698	2,457	17	517	0	14	0	13,343
2013	Historical	10,144	0	753	2,475	15	565	0	23	0	13,974
2014	Historical	8,756	0	682	2,267	18	525	0	97	0	12,344
2015	Historical	6,615	0	595	1,930	11	436	0	16	0	9,603
2016	Historical	6,441	0	615	1,840	10	462	0	22	0	9,389
2017	Historical	7,331	0	651	2,198	4	487	0	54	0	10,726
2018	Historical	7,927	0	662	2,553	5	532	0	11	0	11,690
2019	Historical	7,615	0	649	2,436	4	512	0	17	40	11,272
2020	Historical	8,646	0	685	2,335	5	496	0	11	51	12,229
2021	Historical	7,967	0	641	2,090	3	470	0	8	127	11,307
2022	Historical	7,012	0	600	2,085	2	419	0	6	121	10,245
2023	Historical	6,502	0	596	1,980	3	438	0	2	128	9,648
2024	Historical	6,726	0	612	2,008	3	459	0	3	251	10,063
2025	Historical	6,608	0	583	1,969	2	455	0	17	277	9,912
2030	Projected	6,510	0	634	2,127	3	443	0	8	221	9,946
2035	Projected	6,458	0	646	2,151	3	440	0	8	223	9,929
2040	Projected	6,475	0	657	2,137	3	438	0	8	225	9,943
2045	Projected	6,523	0	671	2,125	3	435	0	8	227	9,994
2050	Projected	6,578	0	685	2,116	3	434	0	8	230	10,054

2025 to 2050

Compound Annual Growth Rate (CAGR)

0.1%

SFR-M = Single-Family Metered

COM = Commercial

IRR = Irrigation

SFR-F = Single-Family Unmetered (Flat Service)

IND = Industrial

OTH = Other/Miscellaneous

MFR = Multi-Family

GOV = Government

REC = Recycled

¹ SFR-F sales is an estimate.

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**

Table 5. Historical & Projected Sales Shares

YEAR	TYPE	SFR-M	SFR-F ¹	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	72%	0%	5%	18%	0%	4%	0%	0%	0%	100%
2001	Historical	73%	0%	5%	17%	0%	5%	0%	0%	0%	100%
2002	Historical	74%	0%	5%	17%	0%	5%	0%	0%	0%	100%
2003	Historical	72%	0%	5%	18%	0%	4%	0%	0%	0%	100%
2004	Historical	73%	0%	5%	17%	0%	4%	0%	0%	0%	100%
2005	Historical	72%	0%	5%	17%	0%	5%	0%	0%	0%	100%
2006	Historical	72%	0%	5%	18%	0%	4%	0%	0%	0%	100%
2007	Historical	73%	0%	5%	17%	0%	5%	0%	0%	0%	100%
2008	Historical	72%	0%	5%	17%	0%	5%	0%	0%	0%	100%
2009	Historical	72%	0%	5%	18%	0%	5%	0%	0%	0%	100%
2010	Historical	72%	0%	5%	19%	0%	4%	0%	0%	0%	100%
2011	Historical	71%	0%	5%	19%	0%	4%	0%	0%	0%	100%
2012	Historical	72%	0%	5%	18%	0%	4%	0%	0%	0%	100%
2013	Historical	73%	0%	5%	18%	0%	4%	0%	0%	0%	100%
2014	Historical	71%	0%	6%	18%	0%	4%	0%	1%	0%	100%
2015	Historical	69%	0%	6%	20%	0%	5%	0%	0%	0%	100%
2016	Historical	69%	0%	7%	20%	0%	5%	0%	0%	0%	100%
2017	Historical	68%	0%	6%	20%	0%	5%	0%	1%	0%	100%
2018	Historical	68%	0%	6%	22%	0%	5%	0%	0%	0%	100%
2019	Historical	68%	0%	6%	22%	0%	5%	0%	0%	0%	100%
2020	Historical	71%	0%	6%	19%	0%	4%	0%	0%	0%	100%
2021	Historical	70%	0%	6%	18%	0%	4%	0%	0%	1%	100%
2022	Historical	68%	0%	6%	20%	0%	4%	0%	0%	1%	100%
2023	Historical	67%	0%	6%	21%	0%	5%	0%	0%	1%	100%
2024	Historical	67%	0%	6%	20%	0%	5%	0%	0%	2%	100%
2025	Historical	67%	0%	6%	20%	0%	5%	0%	0%	3%	100%
2030	Projected	65%	0%	6%	21%	0%	4%	0%	0%	2%	100%
2035	Projected	65%	0%	7%	22%	0%	4%	0%	0%	2%	100%
2040	Projected	65%	0%	7%	21%	0%	4%	0%	0%	2%	100%
2045	Projected	65%	0%	7%	21%	0%	4%	0%	0%	2%	100%
2050	Projected	65%	0%	7%	21%	0%	4%	0%	0%	2%	100%

SFR-M = Single-Family Metered

COM = Commercial

IRR = Irrigation

SFR-F = Single-Family Unmetered (Flat Service)

IND = Industrial

OTH = Other/Miscellaneous

MFR = Multi-Family

GOV = Government

REC = Recycled

¹ SFR-F sales is an estimate.

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 6. Historical & Projected Sales Per Service in Gallons/Service/Day

YEAR	TYPE	SFR-M	SFR-F ¹	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	560	0	5,519	2,173	6,298	2,833	0	607	0	716
2001	Historical	564	0	5,361	2,052	5,423	3,318	0	610	0	717
2002	Historical	572	0	5,313	2,000	4,063	2,928	0	646	0	716
2003	Historical	547	0	5,309	2,061	5,160	2,568	0	362	0	694
2004	Historical	570	0	5,459	2,047	3,994	2,686	0	644	0	716
2005	Historical	532	0	5,427	1,944	4,438	2,675	0	841	0	676
2006	Historical	534	0	5,556	2,013	5,105	2,583	3,492	681	0	682
2007	Historical	576	0	5,466	2,053	4,737	3,613	0	1,014	0	729
2008	Historical	566	0	4,918	2,002	5,752	3,481	0	957	0	719
2009	Historical	507	0	4,185	1,838	5,113	2,830	0	751	0	648
2010	Historical	468	0	3,921	1,798	3,882	2,254	0	485	0	600
2011	Historical	472	0	4,034	1,808	4,048	2,262	0	454	0	605
2012	Historical	511	0	3,985	1,893	3,904	2,274	0	579	0	648
2013	Historical	538	0	4,230	1,912	3,272	2,480	0	698	0	678
2014	Historical	462	0	3,828	1,756	4,013	2,302	0	2,435	0	597
2015	Historical	349	0	3,278	1,485	2,427	1,923	0	405	0	464
2016	Historical	340	0	3,219	1,376	2,251	2,041	0	573	0	452
2017	Historical	386	0	3,406	1,656	1,195	2,128	0	1,214	0	516
2018	Historical	417	0	3,456	1,928	1,581	2,273	0	428	0	563
2019	Historical	400	0	3,391	1,840	1,176	2,205	0	834	53,011	542
2020	Historical	454	0	3,574	1,778	1,646	2,135	0	490	45,533	588
2021	Historical	419	0	3,348	1,606	1,069	2,046	0	306	113,507	544
2022	Historical	368	0	3,135	1,613	1,024	1,848	0	270	107,990	493
2023	Historical	342	0	3,115	1,538	1,047	1,942	0	95	114,325	465
2024	Historical	354	0	3,215	1,554	995	2,058	0	142	223,763	485
2025	Historical	347	0	3,050	1,526	616	2,048	0	620	247,650	477
2030	Projected	338	0	2,881	1,521	886	1,985	0	286	195,246	471
2035	Projected	332	0	2,794	1,502	886	1,959	0	286	195,246	465
2040	Projected	330	0	2,769	1,484	886	1,936	0	286	195,246	461
2045	Projected	329	0	2,757	1,468	886	1,915	0	286	195,246	459
2050	Projected	329	0	2,746	1,454	886	1,896	0	286	195,246	457

2025 to 2050

Compound Annual Growth Rate (CAGR) -0.2%

SFR-M = Single-Family Metered

COM = Commercial

IRR = Irrigation

SFR-F = Single-Family Unmetered (Flat Service)

IND = Industrial

OTH = Other/Miscellaneous

MFR = Multi-Family

GOV = Government

REC = Recycled

¹ SFR-F sales is an estimate.

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 7. Historical & Projected Per Capita Water Use in Gallons/Person/Day

YEAR	TYPE	SFR-M	SFR-F ¹	MFR	COM	IND	GOV	IRR	OTH	REC	TOTAL
2000	Historical	179	0	13	45	1	11	0	0	0	248
2001	Historical	178	0	12	41	1	13	0	0	0	245
2002	Historical	177	0	12	40	1	11	0	0	0	241
2003	Historical	165	0	12	41	1	10	0	0	0	228
2004	Historical	172	0	12	40	1	10	0	0	0	235
2005	Historical	158	0	11	38	1	10	0	0	0	218
2006	Historical	157	0	12	39	1	10	0	0	0	218
2007	Historical	167	0	11	39	1	11	0	0	0	229
2008	Historical	161	0	11	39	1	11	0	0	0	223
2009	Historical	143	0	11	36	0	9	0	0	0	199
2010	Historical	130	0	10	34	0	7	0	0	0	182
2011	Historical	131	0	10	34	0	7	0	0	0	183
2012	Historical	141	0	10	36	0	8	0	0	0	195
2013	Historical	148	0	11	36	0	8	0	0	0	203
2014	Historical	127	0	10	33	0	8	0	1	0	179
2015	Historical	95	0	9	28	0	6	0	0	0	138
2016	Historical	92	0	9	26	0	7	0	0	0	135
2017	Historical	105	0	9	31	0	7	0	1	0	153
2018	Historical	113	0	9	36	0	8	0	0	0	166
2019	Historical	108	0	9	34	0	7	0	0	1	159
2020	Historical	121	0	10	33	0	7	0	0	1	172
2021	Historical	112	0	9	29	0	7	0	0	2	159
2022	Historical	99	0	8	29	0	6	0	0	2	144
2023	Historical	91	0	8	28	0	6	0	0	2	136
2024	Historical	95	0	9	28	0	6	0	0	4	142
2025	Historical	93	0	8	28	0	6	0	0	4	139
2030	Projected	88	0	9	29	0	6	0	0	3	135
2035	Projected	86	0	9	29	0	6	0	0	3	132
2040	Projected	85	0	9	28	0	6	0	0	3	131
2045	Projected	85	0	9	28	0	6	0	0	3	131
2050	Projected	85	0	9	27	0	6	0	0	3	130

2025 to 2050

Compound Annual Growth Rate (CAGR) -0.3%

SFR-M = Single-Family Metered

COM = Commercial

IRR = Irrigation

SFR-F = Single-Family Unmetered (Flat Service)

IND = Industrial

OTH = Other/Miscellaneous

MFR = Multi-Family

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REC = Recycled

¹ SFR-F sales is an estimate.

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**

Table 8. Historical & Projected Non-Revenue Water (NRW) in Acre-Feet¹

YEAR	TYPE	AUTHORIZED UNBILLED USE	APPARENT LOSS	REAL LOSS	RECYCLED LOSS	TOTAL
2000	Historical					678
2001	Historical					726
2002	Historical					630
2003	Historical					805
2004	Historical					1,365
2005	Historical					1,021
2006	Historical					608
2007	Historical					598
2008	Historical					815
2009	Historical					834
2010	Historical					0
2011	Historical					0
2012	Historical					0
2013	Historical					1,218
2014	Historical					768
2015	Historical					585
2016	Historical	25	241	539	0	805
2017	Historical	29	275	626	0	930
2018	Historical	31	299	418	0	748
2019	Historical	30	287	431	0	749
2020	Historical	35	312	711	0	1,058
2021	Historical	33	286	372	0	691
2022	Historical	27	257	351	0	636
2023	Historical	24	242	443	0	709
2024	Historical	25	249	502	0	776
2025	Historical	25	250	433	0	708
2030	Projected	26	254	439	0	719
2035	Projected	26	257	444	0	727
2040	Projected	26	259	449	0	734
2045	Projected	26	262	453	0	741
2050	Projected	27	264	457	0	748

¹Total non-revenue water estimates are available prior to 2016, calculated as total water production less metered sales and estimated unmetered customer water use. Starting in 2016, non-revenue water estimates come from the Water Loss Report for the District that is filed annually with the Department of Water Resources.

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**

Table 9. Historical & Projected Non-Revenue Water in GCD^{1, 2}

YEAR	TYPE	SERVICES	AUTHORIZED UNBILLED USE	APPARENT LOSS	REAL LOSS	RECYCLED LOSS	TOTAL
2000	Historical	18,662					32
2001	Historical	18,697					35
2002	Historical	18,722					30
2003	Historical	18,598					39
2004	Historical	18,793					65
2005	Historical	18,837					48
2006	Historical	18,890					29
2007	Historical	18,882					28
2008	Historical	18,898					39
2009	Historical	18,968					39
2010	Historical	18,996					0
2011	Historical	19,047					0
2012	Historical	19,067					0
2013	Historical	19,085					57
2014	Historical	19,153					36
2015	Historical	19,176					27
2016	Historical	19,396	1	11	25	0	37
2017	Historical	19,136	1	13	29	0	43
2018	Historical	19,177	1	14	19	0	35
2019	Historical	18,719	1	14	21	0	36
2020	Historical	19,174	2	15	33	0	49
2021	Historical	19,188	2	13	17	0	32
2022	Historical	19,201	1	12	16	0	30
2023	Historical	19,211	1	11	21	0	33
2024	Historical	19,278	1	12	23	0	36
2025	Historical	19,255	1	12	20	0	33
2030	Projected	19,554	1	12	20	0	33
2035	Projected	19,772	1	12	20	0	33
2040	Projected	19,964	1	12	20	0	33
2045	Projected	20,158	1	12	20	0	33
2050	Projected	20,354	1	12	20	0	33

¹GCD = gallons/connection/day, calculated with total connections (active + inactive)

²Total non-revenue water estimates are available prior to 2016, calculated as total water production less metered sales and estimated unmetered customer water use. Starting in 2016, non-revenue water estimates come from the District's Water Loss Report filed annually with the Department of Water Resources.

California Water Service - Los Altos Suburban District
 Water Supply/Demand Analysis and Projections Summary

Table 10. Projected Baseline and Adjusted Potable Demand in Acre-Feet					
	2030	2035	2040	2045	2050
Baseline Potable Water Demand	10,676	10,833	10,940	11,048	11,158
Demand Adjustments					
Passive Conservation	-123	-190	-226	-247	-265
Active Conservation	-145	-284	-380	-459	-538
Water Service Cost Growth	-62	-122	-180	-238	-294
Household Income Growth	98	196	297	402	511
Water Loss Management	0	0	0	0	0
Total Adjustments	-232	-400	-489	-541	-586
Adjusted Potable Water Demand	10,444	10,433	10,451	10,507	10,572

Table 11. Projected Single-Dry-Year and Multi-Dry-Year Demand in Acre-Feet					
	2030	2035	2040	2045	2050
Normal Year	10,665	10,656	10,676	10,735	10,802
Single-Dry-Year	11,125	11,114	11,136	11,197	11,267
Multi-Dry-Year	11,410	11,398	11,420	11,483	11,556

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 12. Historical & Projected Demand in Acre-Feet

YEAR	TYPE	SALES	NRW ¹	DEMAND ²	GPCD ³
2000	Historical	14,433	678	15,111	260
2001	Historical	14,469	726	15,196	257
2002	Historical	14,474	630	15,104	251
2003	Historical	13,934	805	14,738	242
2004	Historical	14,533	1,365	15,898	257
2005	Historical	13,737	1,021	14,758	235
2006	Historical	13,910	608	14,518	227
2007	Historical	14,853	598	15,451	238
2008	Historical	14,675	815	15,490	236
2009	Historical	13,258	834	14,092	211
2010	Historical	12,302	0	12,302	182
2011	Historical	12,449	0	12,449	183
2012	Historical	13,343	0	13,343	195
2013	Historical	13,974	1,218	15,192	221
2014	Historical	12,344	768	13,112	190
2015	Historical	9,603	585	10,189	147
2016	Historical	9,389	805	10,195	146
2017	Historical	10,726	930	11,656	166
2018	Historical	11,690	748	12,438	177
2019	Historical	11,272	749	12,021	170
2020	Historical	12,229	1,058	13,287	187
2021	Historical	11,307	691	11,998	169
2022	Historical	10,245	636	10,881	153
2023	Historical	9,648	709	10,357	146
2024	Historical	10,063	776	10,839	153
2025	Historical	9,912	708	10,619	149
2030	Projected	9,946	719	10,665	144
2035	Projected	9,929	727	10,656	142
2040	Projected	9,943	734	10,676	141
2045	Projected	9,994	741	10,735	140
2050	Projected	10,054	748	10,802	140
2025 to 2050					
Compound Annual Growth Rate (CAGR)				0.1%	-0.3%

¹Non-Revenue Water (NRW)

²Demand is equal to the sum of water sales and non-revenue water.

³Gallons per capita per day.

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Table 13. Historical Water Production in Acre-Feet

YEAR	TYPE	WELLS	SURFACE	PURCHASED	RECYCLED ¹	OTHER ²	TOTAL
2000	Historical	3,908	0	11,203	0	0	15,111
2001	Historical	3,898	0	11,298	0	0	15,196
2002	Historical	3,827	0	11,277	0	0	15,104
2003	Historical	4,433	0	10,305	0	0	14,738
2004	Historical	6,409	0	9,489	0	0	15,898
2005	Historical	5,165	0	9,593	0	0	14,758
2006	Historical	4,434	0	10,084	0	0	14,518
2007	Historical	4,325	0	11,126	0	0	15,451
2008	Historical	4,161	0	11,329	0	0	15,490
2009	Historical	5,200	0	8,892	0	0	14,092
2010	Historical	3,396	0	8,252	0	0	11,648
2011	Historical	2,881	0	8,478	0	0	11,358
2012	Historical	4,266	0	8,513	0	0	12,779
2013	Historical	4,990	0	10,203	0	0	15,192
2014	Historical	6,240	0	6,872	0	0	13,112
2015	Historical	3,341	0	6,848	0	0	10,189
2016	Historical	2,420	0	7,774	0	0	10,194
2017	Historical	4,249	0	7,407	0	0	11,656
2018	Historical	4,875	0	7,563	0	0	12,438
2019	Historical	2,414	0	9,569	40	0	12,022
2020	Historical	2,729	0	10,294	51	0	13,074
2021	Historical	4,440	0	7,062	127	0	11,629
2022	Historical	4,309	0	6,449	121	0	10,879
2023	Historical	3,771	0	6,460	128	-2	10,358
2024	Historical	4,124	0	6,465	251	-1	10,839
2025	Historical	4,284	0	6,022	277	-1	10,582

¹Includes water from recycling and desalter supply sources.

²Other water may include leased and wheeled water, as well as backwash and wastewater from treatment plant operation. Negative volumes represent production that has not entered the distribution system.

California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

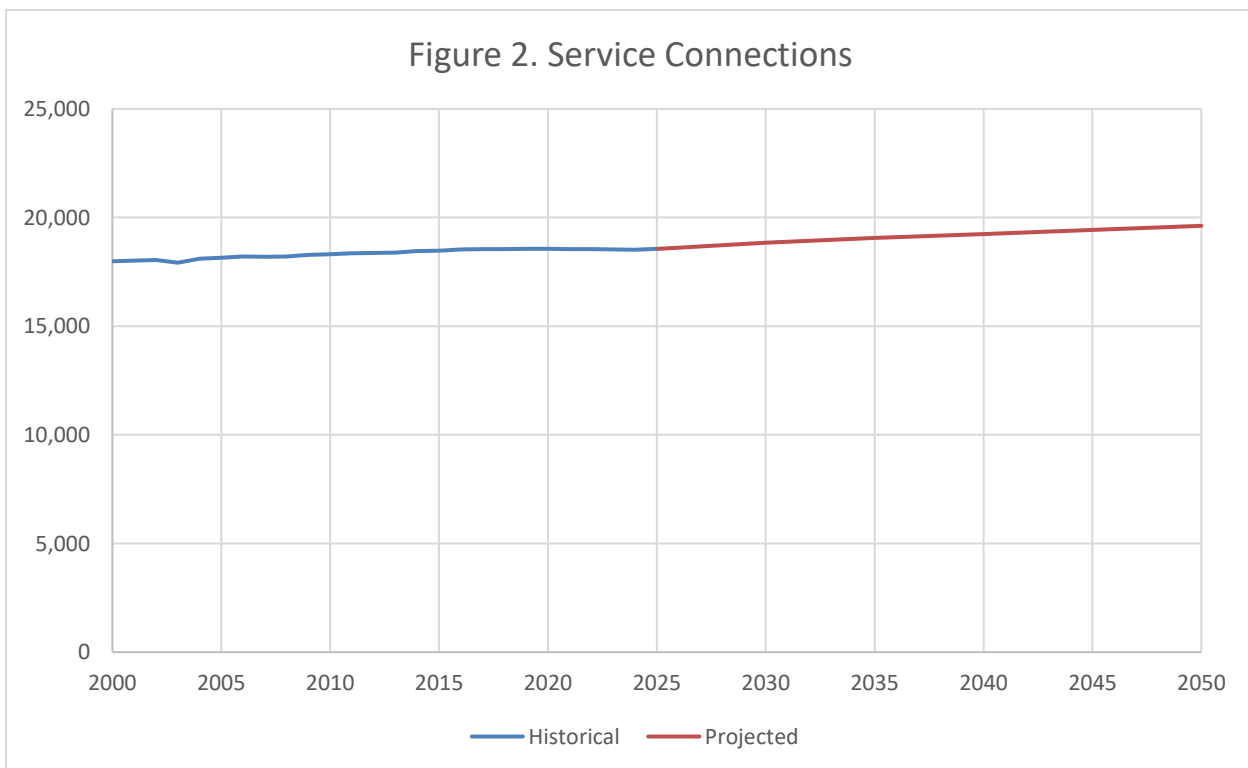
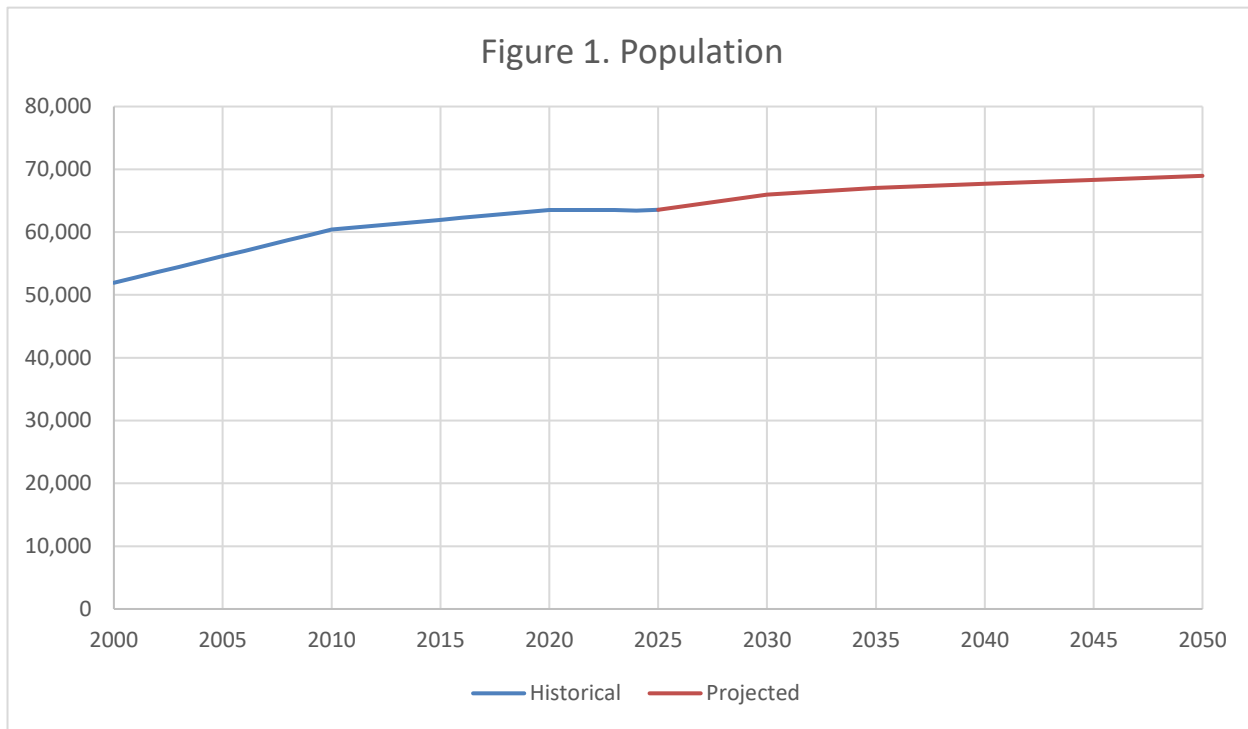
Table 14. Historical Water Production Shares

YEAR	TYPE	WELLS	SURFACE	PURCHASED	RECYCLED¹	OTHER²	TOTAL
2000	Historical	26%	0%	74%	0%	0%	100%
2001	Historical	26%	0%	74%	0%	0%	100%
2002	Historical	25%	0%	75%	0%	0%	100%
2003	Historical	30%	0%	70%	0%	0%	100%
2004	Historical	40%	0%	60%	0%	0%	100%
2005	Historical	35%	0%	65%	0%	0%	100%
2006	Historical	31%	0%	69%	0%	0%	100%
2007	Historical	28%	0%	72%	0%	0%	100%
2008	Historical	27%	0%	73%	0%	0%	100%
2009	Historical	37%	0%	63%	0%	0%	100%
2010	Historical	29%	0%	71%	0%	0%	100%
2011	Historical	25%	0%	75%	0%	0%	100%
2012	Historical	33%	0%	67%	0%	0%	100%
2013	Historical	33%	0%	67%	0%	0%	100%
2014	Historical	48%	0%	52%	0%	0%	100%
2015	Historical	33%	0%	67%	0%	0%	100%
2016	Historical	24%	0%	76%	0%	0%	100%
2017	Historical	36%	0%	64%	0%	0%	100%
2018	Historical	39%	0%	61%	0%	0%	100%
2019	Historical	20%	0%	80%	0%	0%	100%
2020	Historical	21%	0%	79%	0%	0%	100%
2021	Historical	38%	0%	61%	1%	0%	100%
2022	Historical	40%	0%	59%	1%	0%	100%
2023	Historical	36%	0%	62%	1%	0%	100%
2024	Historical	38%	0%	60%	2%	0%	100%
2025	Historical	40%	0%	57%	3%	0%	100%

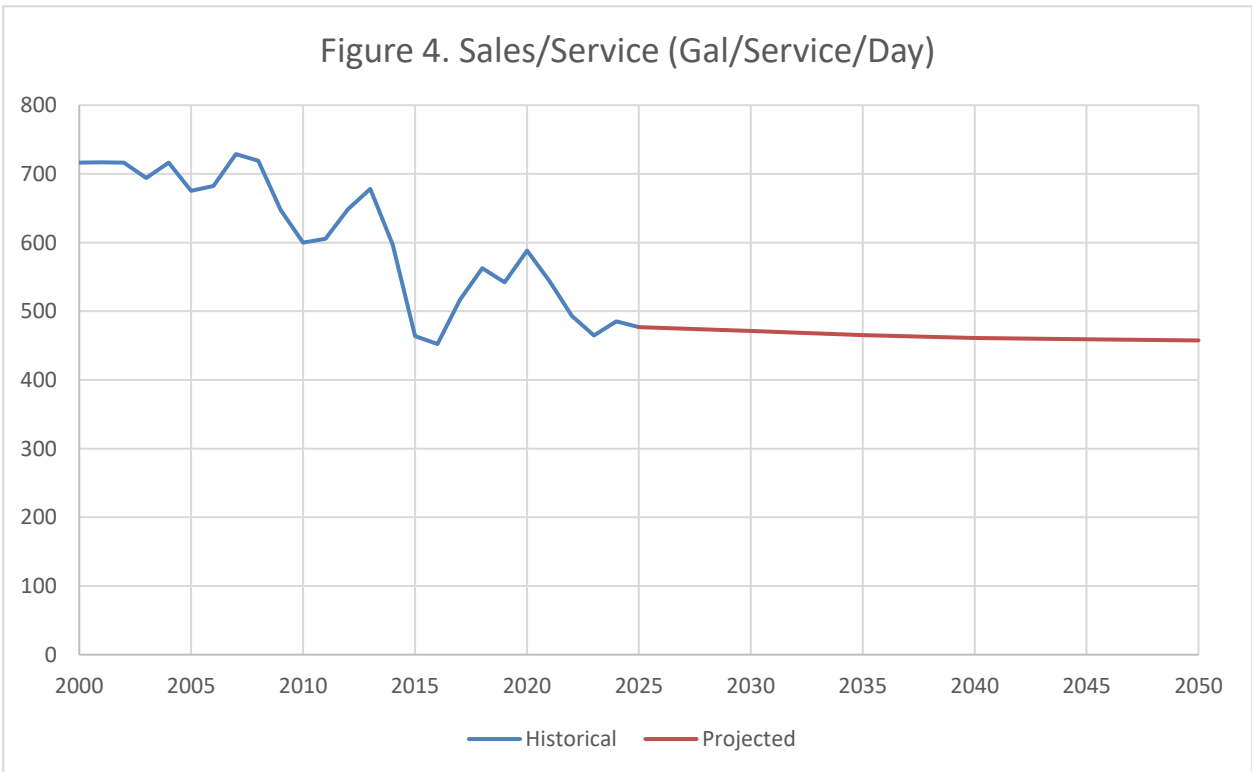
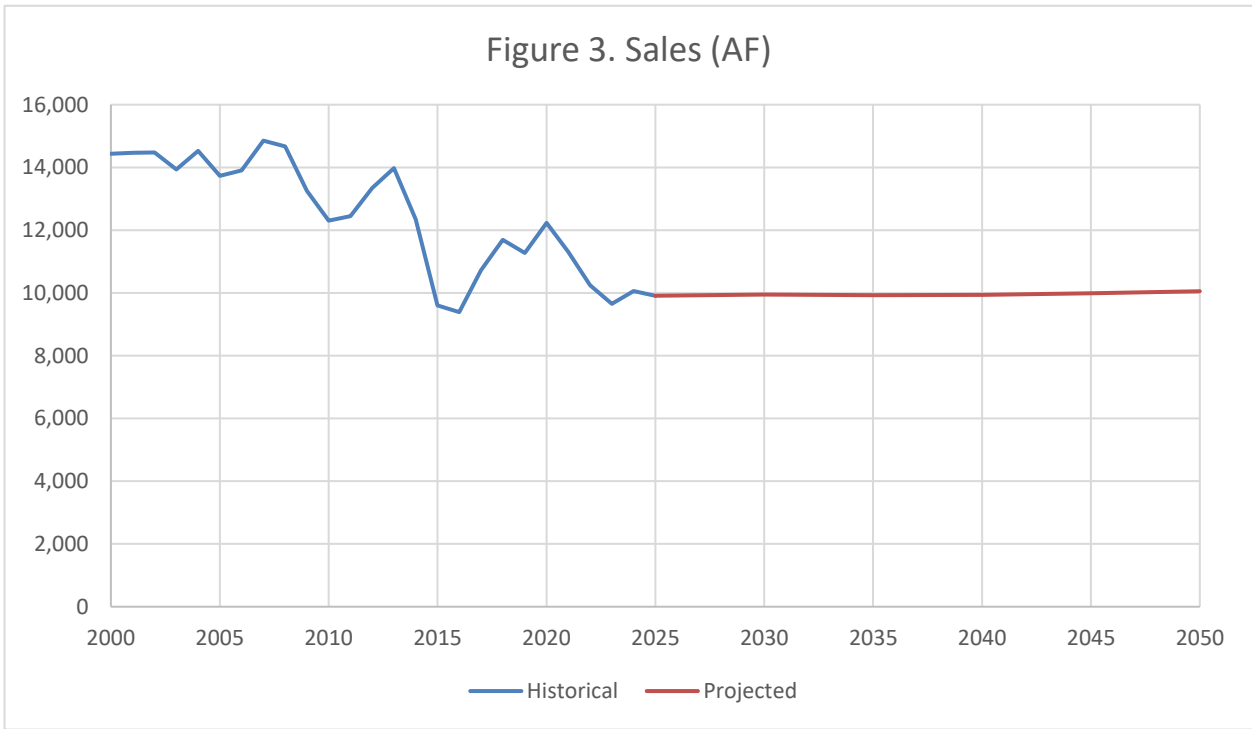
¹Includes water from recycling and desalter supply sources.

²Other water may include leased and wheeled water, as well as backwash and wastewater from treatment plant operation. Negative volumes represent production that has not entered the distribution system.

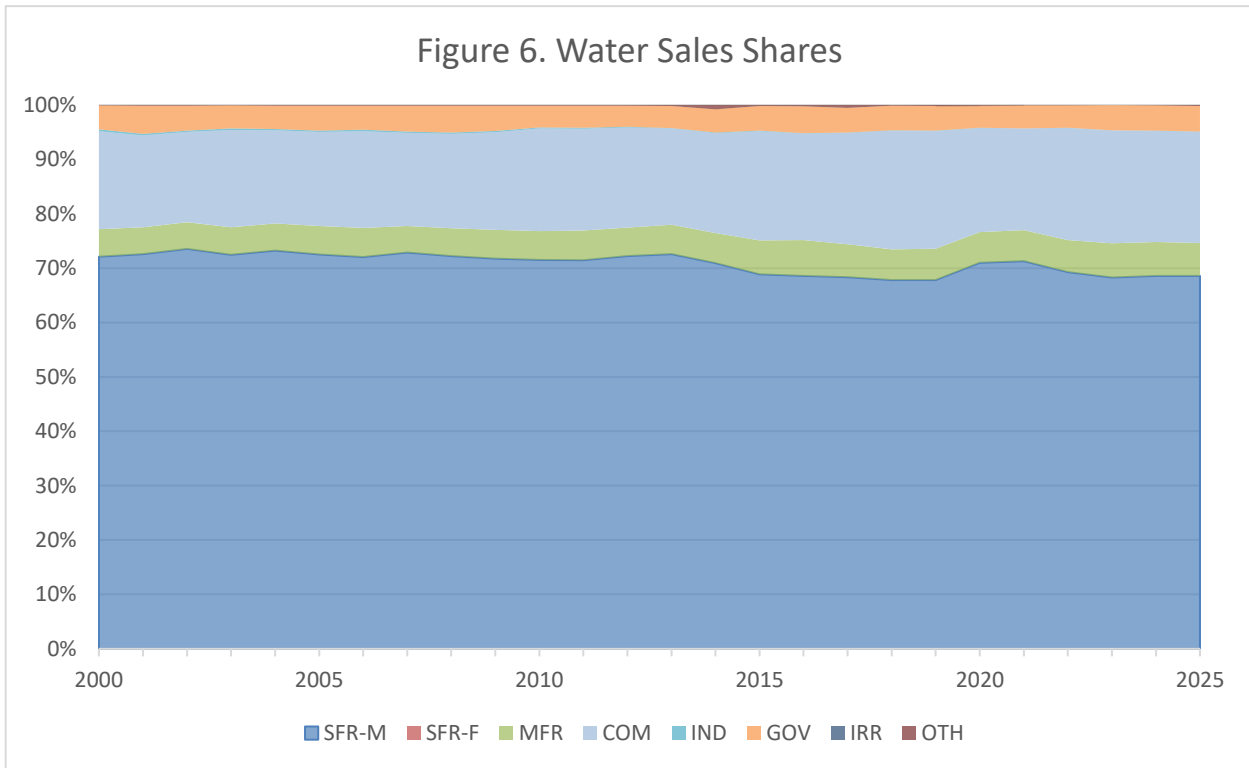
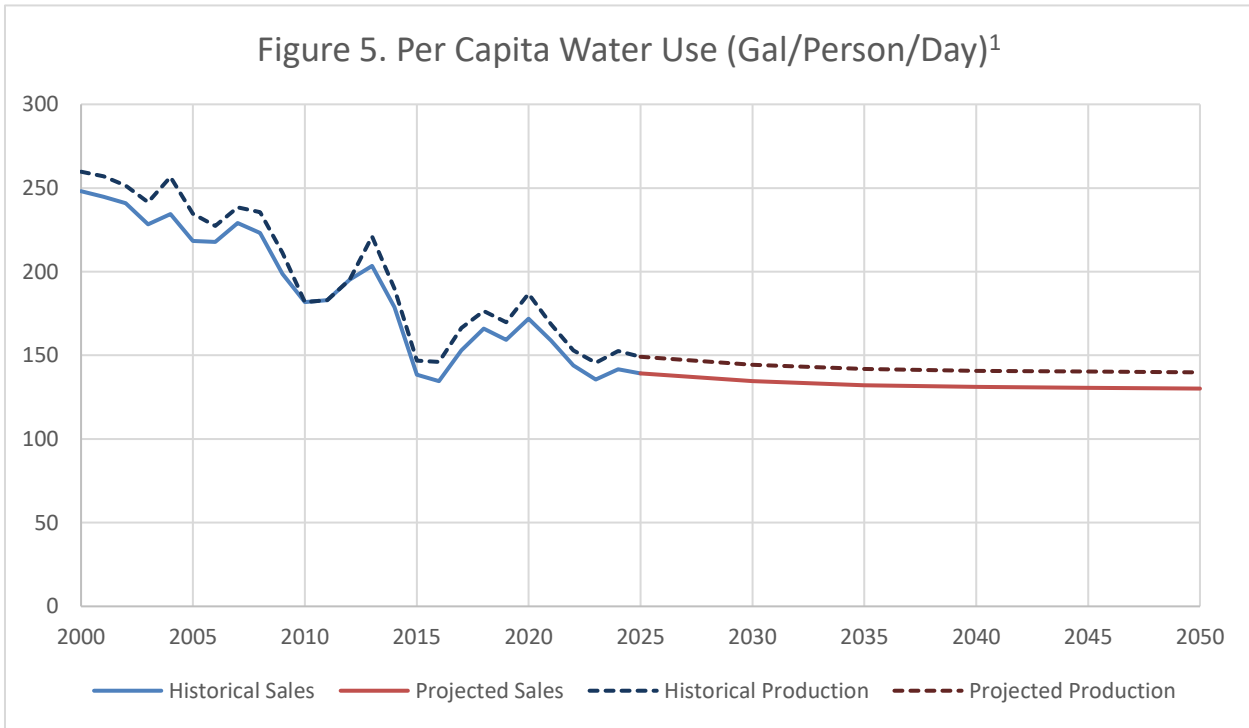
**California Water Service - Los Altos Suburban District
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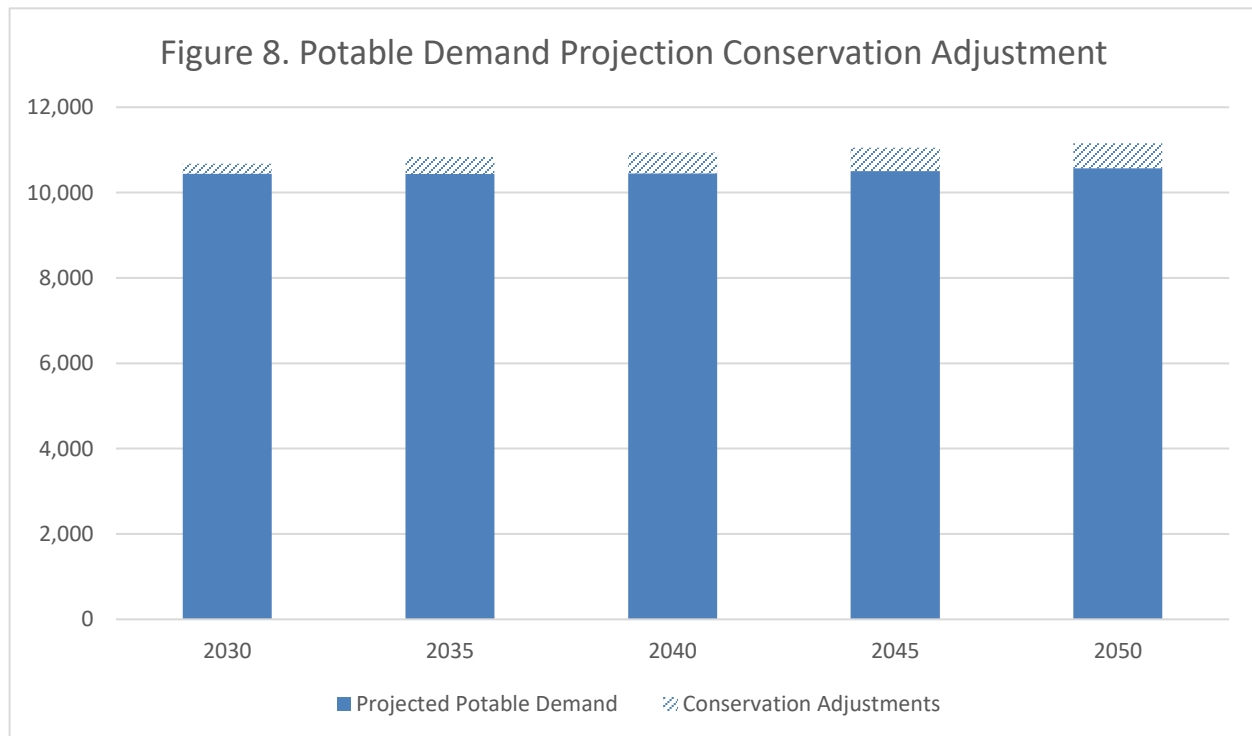
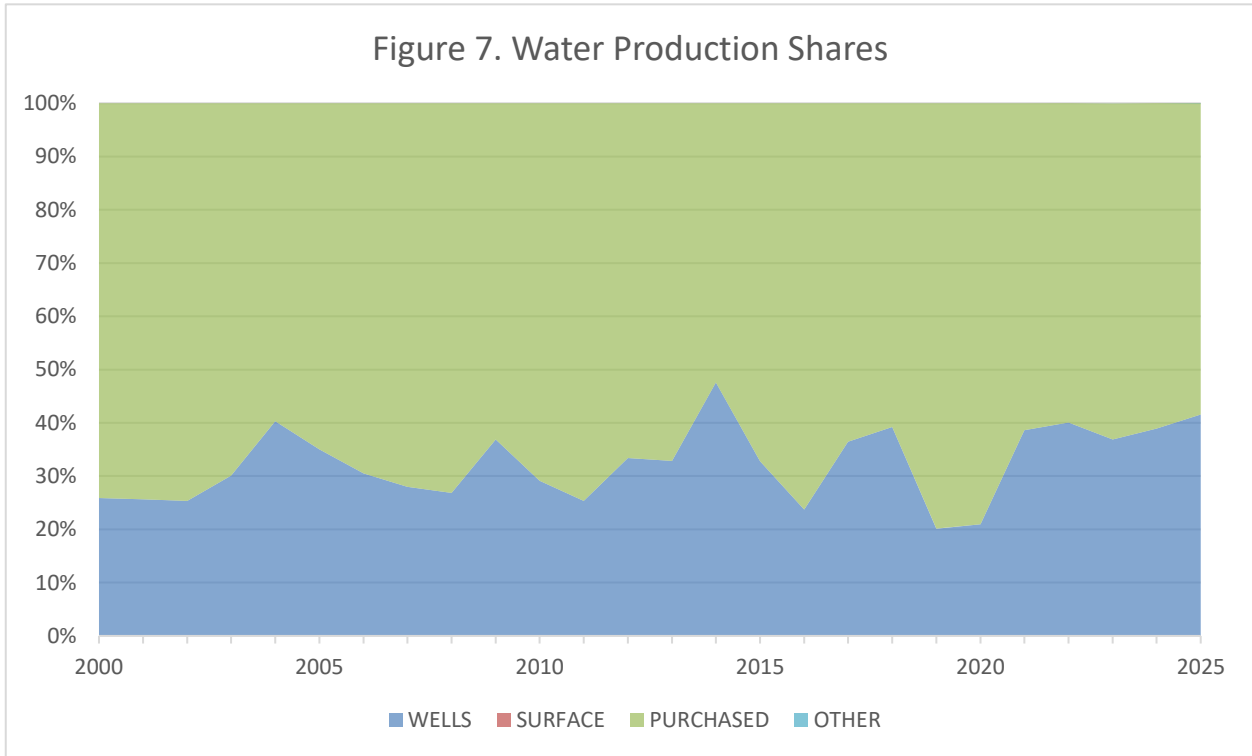
**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**



SFR-M = Single-Family Metered	COM = Commercial	IRR = Irrigation
SFR-F = Single-Family Unmetered (Flat Service)	IND = Industrial	OTH = Other/Miscellaneous
MFR = Multi-Family	GOV = Government	REC = Recycled

¹Difference between the production and sales data series in Figure 5 is non-revenue water.

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**



California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary

Water Supply Assessment (WSA) Information

Table 15. WSA Demand Treated as Additive to Regional Growth Projections

WSA	% of WSA Demand Added to Projection¹
Vallco Area Specific Plan	100%

¹Percent of WSA demand considered to be additive to regional growth forecast.

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**

Compound Annual Growth Rates (CAGR)

Table 16. Historical Service Growth

Class	2020 to 2025	2015 to 2025	2010 to 2025	2005 to 2025
SFR ¹	0.0%	0.1%	0.1%	0.1%
MFR	0.0%	0.5%	0.9%	1.8%
COM	-0.4%	-0.1%	0.0%	0.3%
IND	1.1%	-2.8%	-3.3%	-4.1%
GOV	-0.9%	-0.2%	0.0%	-0.3%
IRR	0.0%	0.0%	0.0%	-100.0%
OTH	4.3%	-3.3%	1.7%	3.4%
REC	0.0%	0.0%	0.0%	0.0%

¹Total metered and unmetered single-family services

Table 17. Historical Growth between Decennial Censuses

Series	2010 to 2020	2000 to 2020	1990 to 2020
Population	0.51%	1.01%	0.95%
Total Housing Units	0.28%	0.80%	0.74%
Occupied Housing Units	0.17%	0.65%	0.65%

Table 18. Regional Growth Forecasts from Land Use Planning Entities

Source: ABAG PBA50 TAZ Forecasts

Range: 2015-2050

Series	CAGR
Population	0.20%
Housing	0.58%
Employment	0.12%

**California Water Service - Los Altos Suburban District
Water Supply/Demand Analysis and Projections Summary**

Compound Annual Growth Rates (CAGR) Used in Demand Projections

Table 19. Historical Service Growth

Time Series	Basis	Projection CAGR	Override CAGR¹
Population	Land Use Entity Regional Population Forecast CAGR	0.20%	
Services			
SFR	Land Use Entity Regional Population Forecast CAGR	0.20%	
MFR	Land Use Entity Regional Housing Forecast CAGR	0.58%	
COM	Land Use Entity Regional Employment Forecast CAGR	0.12%	
IND	Land Use Entity Regional Employment Forecast CAGR	0.12%	
GOV	Land Use Entity Regional Employment Forecast CAGR	0.12%	
IRR	Land Use Entity Regional Employment Forecast CAGR	0.12%	
OTH	Land Use Entity Regional Population Forecast CAGR	0.20%	
REC	Land Use Entity Regional Population Forecast CAGR	0.20%	
SFR = Single-Family		IND = Industrial	OTH = Other/Miscellaneous
MFR = Multi-Family		GOV = Government	REC = Recycled
COM = Commercial		IRR = Irrigation	

¹If value is present, then the demand model uses this value instead of the Basis value.

Appendix F: Climate Change Studies – Executive Summaries

- Potential Climate Change Impacts on the Water Supplies of California Water Service
- Climate Change – Water Resource Monitoring and Adaptation Plan – Phase 1 and Phase 2

Potential Climate Change Impacts on the Water Supplies of California Water Service

Prepared by

Gary Fiske and Associates, Inc.
Balance Hydrologics, Inc.

January 2016



Executive Summary

Introduction

California Water Service Company (Cal Water) provides water service to roughly 478,000 customers – about 1.7 million people – located in 83 state-wide communities in 24 service districts. Cal Water’s districts rely on a variety of supply sources, including local groundwater, local surface water, and imported supplies. It is critical for Cal Water to gain a better understanding of the potential impacts of climate change on the availability of those supplies. Impacts are inherently uncertain, but Cal Water believes that the only responsible course is to carefully incorporate climate change into its ongoing water supply planning.

The present project and report represent a first step in that path. In order for Cal Water to determine how its long-term water supply planning should reflect climate change impacts, it must first have an understanding of what the impacts of climate change on its supply sources might be. That is the purpose of this study.

The work reported on here focuses on the sample of Cal Water districts highlighted in Figure ES-1. These districts account for 85% of Cal Water’s total 2014 production and reflect the diversity of all Cal Water districts, including geographic, hydrologic, and climatic conditions and primary and secondary supply sources.

Changes in climate can affect the availability of local groundwater and surface water supplies, as well as purchased imported supplies. This study separately addresses the impacts on each of these for each sample district. It relies on the best available projections of changes in climate (temperature and precipitation) through the end of the century. It then uses the climate projections to examine how surface water flows and groundwater recharge rates may change.

For imported supplies, this study relies on studies already completed by wholesale providers where possible. Where no such studies have been done or where the data from such studies was unavailable, other approaches were developed to estimate climate change impacts on these supplies.

The results reported here provide an integrated view of how projected climate changes may affect water supply availability for Cal Water’s service districts. The results also represent a first step in integrating potential future climate change impacts into Cal Water’s ongoing supply planning. Because of the inherent uncertainties, a nuanced risk assessment may be needed to guide the incorporation of these results into long-range planning. Beyond the Company’s supply/infrastructure planning, the results also can affect the Company’s triennial General Rate Cases; they may also have potential operational implications.

Figure ES- 1. Cal Water Service Districts with Sample Districts Highlighted



Estimating Changes in Climate

Climate change is primarily driven by increased concentrations of greenhouse gases (GHGs) in the atmosphere. The trajectory of future climate change is a function of the rate at which those concentrations are projected to increase and the manner in which the atmosphere and oceans respond to increased concentrations. Both are difficult to model. Thus, while the scientific community overwhelmingly agrees that climate change will occur (and indeed may already have begun), the trajectory of those changes is very uncertain.

The projections of temperature and precipitation that underlie this study are based on 40 of the latest Global Circulation Models (GCMs) run as part of the Coupled Model Intercomparison Project Phase 5 (CMIP5). Generally speaking, this type of approach is termed an ensemble analysis, for which the downscaled climate projections for any particular Cal Water Service District were based on the median of the 40 downscaled GCM datasets. The GCMs used by the analysis are driven by two GHG emission pathways that bound the possible trajectories of GHG concentrations.

Impacts of Climate Change on Water Supplies

The supplies for each district consist of a mix of local surface water, local groundwater, and/or purchased imports. Climate change impacts were estimated for each of these components. The approaches used for each are described below. Based on the breakdown of district production among the supply sources, Table ES-1 shows the ranges of projected overall climate change impacts on available supply, relative to the historic average.¹ Table ES-2 groups this vulnerability into 4 categories of expected change, and Figure ES-2 maps the end-of-century vulnerability.

¹ The historical averages used here, and elsewhere in this report, are based on the entire range of historical data available for the district-specific analyses. These ranges vary across districts, and are specified within the district-specific technical memoranda.

Table ES- 1. Projected Changes in Available Supply due to Climate Change

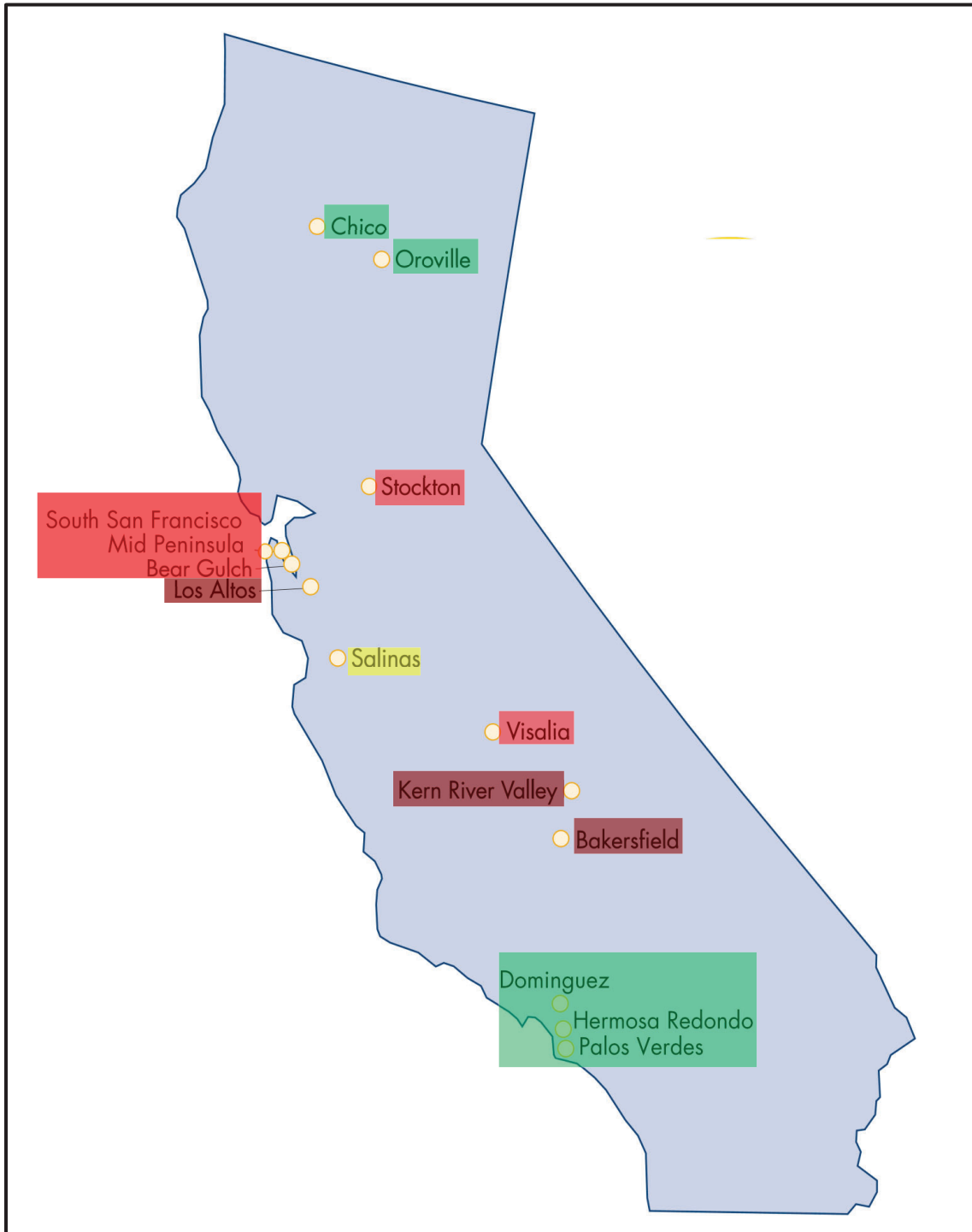
District		Percentage Change in Supply		
		2020	2050	2100
BK	Minimum	-10%	-10%	-12%
	Maximum	-12%	-16%	-20%
VIS	Minimum	-7%	-8%	-8%
	Maximum	-9%	-10%	-14%
KRV	Minimum	-13%	-16%	-19%
	Maximum	-16%	-21%	-31%
MPS/SSF/BG	Minimum	0%	-2%	-6%
	Maximum	0%	-7%	-15%
LAS	Minimum	-3%	-3%	-10%
	Maximum	-4%	-18%	-28%
CH	Minimum	2%	2%	0%
	Maximum	3%	1%	-3%
ORO	Minimum	0%	8%	5%
	Maximum	0%	-8%	-7%
DOM/HR/PV	Minimum	0%	0%	-1%
	Maximum	0%	-2%	-3%
STK	Minimum	0%	0%	-8%
	Maximum	0%	-14%	-17%
SLN	Minimum	-6%	-6%	-6%
	Maximum	-7%	-7%	-7%

Table ES- 2. Categories of Projected Supply Vulnerability

District	Supply Vulnerability		
	2020	2050	2100
KRV	3	4	4
BK	3	3	4
LAS	1	3	4
VIS	2	2	3
STK	1	2	3
SLN	2	2	2
MPS/SSF/BG	1	1	3
DOM/HR/PV	1	1	1
ORO	1	1	1
CH	1	1	1

Districts in Category 1 expect <5% reduction in supply. Category 2 indicates a reduction of 5-10%. Category 3 indicates an expected reduction of 10-15%. Category 4 reductions exceed 15%.

Figure ES- 2. Cal Water 2100 Vulnerability to Climate Change



Vulnerability levels:
Green = Low
Yellow = Moderate
Light Red = High
Dark Red = Very High

Estimating Climate Change Impacts on Local Surface Supplies

For those Cal Water districts that obtain a portion of their water supplies from local surface water, projected average annual precipitation in each of three forecast years (2020, 2050, 2100) were compared to historical precipitation to estimate the projected average annual discharge for that forecast year. Table ES-3 shows the estimated percent changes in surface water availability compared to historical averages.

Table ES- 3. Estimated Impacts on Local Surface Supply Availability

District		Percent Change in Runoff		
		2020	2050	2100
BK	Minimum Impact	-17%	-18%	-19%
	Maximum Impact	-18%	-19%	-23%
KRV	Minimum Impact	-17%	-18%	-19%
	Maximum Impact	-18%	-19%	-23%
MPS/SSF/BG	Minimum Impact	+3%	+6%	+12%
	Maximum Impact	+3%	+5%	+6%

Of the three districts, the two in the southern San Joaquin Valley are projected to experience significant reductions in their local surface supplies. In contrast, the Bear Gulch district surface supply is forecast to increase.

Estimating Climate Change Impacts on Local Groundwater Supplies

Climate change impacts on Cal Water’s local groundwater supplies result from changes in projected groundwater recharge. The three groundwater recharge components include:

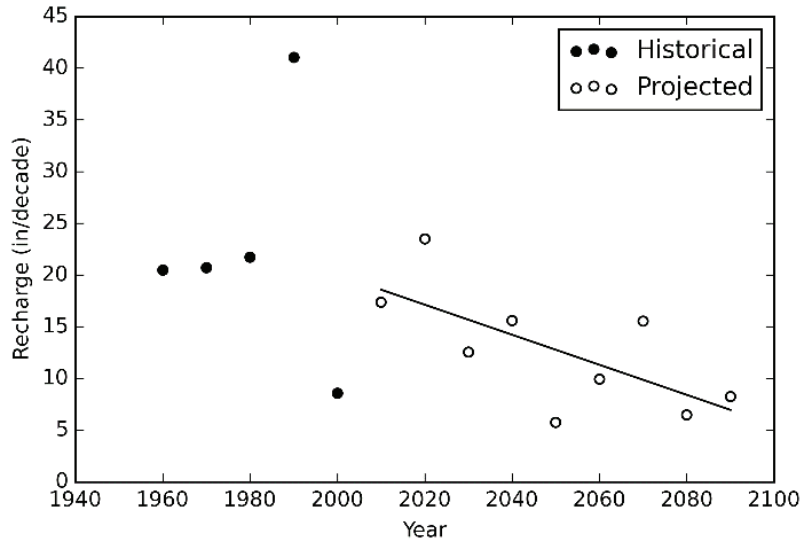
- Local river sources;
- Direct recharge from precipitation on the groundwater basin; and
- Recharge from agricultural and urban deep percolation.

The analysis first estimated the split of local recharge among these three components using geographic and geologic data, geochemical markers, and previously published reports and other supporting information. The climate change impacts on each component were then estimated, consolidated into overall projections of recharge impacts, and compared to estimated historical recharge rates.

Estimates of impacts on river recharge used the methodology for local surface supply described above. For the purposes of this phase of work, it was assumed that the change in recharge from the river is proportional to the change in total annual discharge. The estimated amount of water that will recharge directly into a groundwater basin from rain (or snow) is based on a balance of evapotranspiration (ET), precipitation rates, and soil

water capacity. Recharge is estimated using both historical and projected precipitation and temperature data. Decadal averages in projected recharge are then used to calculate long-term trends. This is illustrated in Figure ES-3 for Kern River Valley.

Figure ES- 3. Historic and Projected Decadal Direct-Precipitation Recharge for Kern River Valley



A quantitative projection of recharge from deep percolation beneath irrigated fields and urban areas is beyond the scope of this phase. Instead, districts for which a significant proportion of recharge is from agricultural and urban water are identified and expected trends under climate change of this water source for those districts are estimated. At-risk service areas with decreasing agricultural and urban water sources can be explored further in future work.

The estimated percentage impacts on each of the recharge components are multiplied by the expected fractions that each component is of total recharge to calculate the range of expected recharge reductions. Table ES-4 shows those results for each district, excluding the impacts of urban/agricultural applied water percolation.

Actual impacts on Cal Water’s ability to pump groundwater may be less than these recharge reductions because the storage volumes in different basins have differing degrees of responsiveness to changes in recharge. The degree to which changes in recharge volumes translate into available groundwater supply is a function of the hydrogeologic attributes of the basin. A detailed understanding of those characteristics would require a level of modeling that is well beyond the scope of this phase of work. Instead, the estimates of basin responsiveness were based on the historical record of how the basin’s water level has varied with recent climate variability. For some districts, the basin appears to be highly responsive, while for others changes in climate do not have much impact.

Table ES- 4. Projected Changes in Average Annual Groundwater Recharge

District		Percentage Change in Recharge		
		2020	2050	2100
BK	Minimum	-14%	-15%	-15%
	Maximum	-14%	-15%	-18%
VIS	Minimum	-9%	-10%	-11%
	Maximum	-9%	-10%	-14%
KRV	Minimum	-13.4%	-19%	-23%
	Maximum	-15%	-22%	-35%
MPS/SSF/BG	Minimum	-2%	-4%	-6%
	Maximum	-2%	-6%	-12%
LAS	Minimum	-7%	-8%	-13%
	Maximum	-8%	-18%	-25%
CH	Minimum	6%	4%	1%
	Maximum	6%	2%	-4%
ORO	Minimum	0%	0%	0%
	Maximum	0%	0%	0%
DOM/HR/PV	Minimum	0%	0%	0%
	Maximum	0%	0%	0%
STK	Minimum	-2%	-3%	-6%
	Maximum	-2%	-4%	-7%
SLN	Minimum	-7%	-7%	-7%
	Maximum	-7%	-7%	-7%

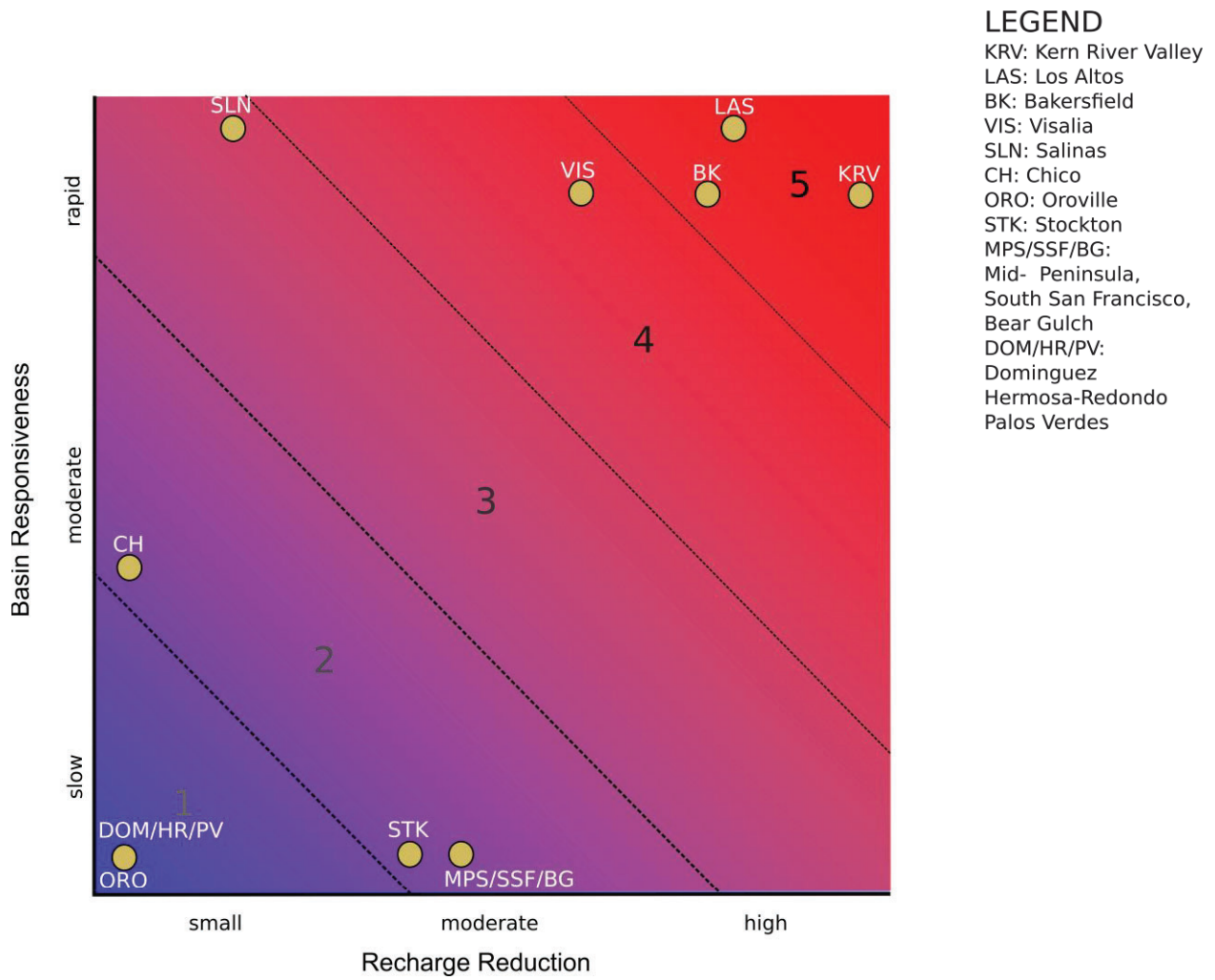
The overall risk to Cal Water’s groundwater supplies for each district is based on the expected recharge reductions and the expected responsiveness of basin water level to those reductions. Table ES-5 rates each district’s groundwater supply risk on a 1-5 scale, with 1 indicating little or no risk and 5 indicating high risk. Figure ES-4 is a visual depiction of these ratings.

Generally speaking, the groundwater supply impacts are large for the districts in the southern San Joaquin Valley. The Los Altos District also shows a high impact, largely because a significant portion of its recharge is from imported supplies, which are forecast to decrease significantly. Further north in the Central Valley, groundwater supplies are less affected. The Bay Area and Los Angeles Basin districts also show relatively smaller impacts.

Table ES- 5. District Groundwater Risk Ratings

District	Rating
BK	5
KRV	5
LAS	5
VIS	4
SLN	3
CH	2
MPS/SSF/BG	2
STK	2
ORO	1
DOM/HR/PV	1

Figure ES- 4. Groundwater Risk Ratings



Impacts of Climate Change on Imported Water Supplies

About half of Cal Water’s supply is imported water that is purchased from wholesale suppliers. The supply and delivery systems of these suppliers are generally very complex and it is impossible within the confines of this project to independently model the impacts of climate change on those systems. The analysis therefore relied on available data, including the results of any climate change modeling that these suppliers themselves have done and other indicators of climate change impacts.

As a result, the climate change scenarios on which the estimates of impacts on different wholesale supplies are based will differ from one another and from the approach described above for the analysis of local supply impacts. The time frames of the results also differ. However, despite those limitations, important information about potential future climate change impacts on wholesale water supply availability was developed. Table ES-6 compares summary measures of central tendency for the potential district-specific climate change impacts on the availability of imported supplies.

Table ES- 6. Projected Climate Change Impacts on Imported Supplies

District	Source	Mid-Century	Late-Century
BK	SWP	-7%	-17%
LAS	SWP, CVP	-9%	-21%
ORO	SWP	-1%	-3%
MPS/SSF/BG	SFPUC	-10%	-20%
DOM/HR/PV	MWD	-1% to -2%	-2% to -5%
STK	USBR	-5%	-10%

Conclusions and Next Steps

The study results indicate significant risks for some districts. This points to the need for Cal Water to account for these risks in its future water supply planning if it is to minimize the adverse effects on its customers. The sole focus of this effort was to assess the potential climate change impacts on Cal Water’s supplies. That is an important first step in integrating climate change into supply planning, but this study was not designed to:

- Analyze the impacts of these future supply limitations on Cal Water’s ability to serve future customer demands. This is a function of such factors as water rights and contractual arrangements, how future demands are forecast to grow, how water conservation programming will affect those demands, and how Cal Water might modify the manner in which it operates its system.

- Develop mitigation plan to evaluate how potential supply and infrastructure investments and/or acquisition of new supplies might address any adverse impacts on water supply reliability.
- Formally assess alternative approaches to incorporating climate change in Cal Water's supply planning.

Possible next steps for Cal Water include:

- Methodological enhancements to reduce some of the uncertainties in the results reported herein;
- Development and acquisition of better and more complete data;
- Extending this study to other Cal Water districts;
- Developing a plan to mitigate anticipated climate change impacts on supply; and
- Integrating climate change into the Company's ongoing water supply planning.

Despite the study's limitations and uncertainties, three critical messages emerge:

- Cal Water supplies in the 21st century are likely to be adversely affected by climate change.
- These impacts will vary considerably across districts, depending on geography and source mix. For some districts, the impacts can be significant; for others, little or no impacts are projected.
- The impacts will generally increase over time. Anticipated late-century impacts are forecast to be significantly higher in some districts than impacts at mid-century. Moreover, during the period that climate change is forecast to increasingly constrain supplies, demands are also generally forecast to increase, further exacerbating the adverse impacts on water supply reliability.



Climate Change- Water Resource Monitoring and Adaptation Plan – Phase 1

December 17, 2020

California Water Service
1720 North First Street
San Jose, CA 95112

Submitted by:
ICF
555 W 5th St
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Executive Summary

Shifts in the frequency and severity of natural hazards resulting from climate change, often referred to as climate hazards, increasingly threaten water resources in California. These relevant climate hazards include reductions to snowpack, greater concentrations of precipitation in both a shorter rain season and isolated atmospheric river events, and more volatility between wet and dry water years.

To identify and prepare for impacts from these hazards, California Water Service (Cal Water) is seeking to identify climate change vulnerabilities to water supplies, operations and facilities, and to develop adaptation strategies to address those vulnerabilities through a Climate Change Water Resources Monitoring and Adaptation Plan. This body of work is intended to provide Cal Water with information to inform decisions on water system/asset management and resource planning to better prepare for and respond to current and projected changes to climate. This work represents a forward-looking approach in addressing climate risks for California utilities, as the large majority of water wholesaler and utilities have not completed climate vulnerability and adaptation plans.

In the first phase of this effort, the ICF team collaborated with Cal Water to conduct a literature and tools review as the foundation for subsequent phases of work. In Phase 2 of this project, the ICF team and Cal Water will undertake a vulnerability assessment of Cal Water's facilities and operations by developing an assessment approach that evaluates climate impacts to Cal Water, identifies asset vulnerabilities, and prioritizes climate risks. Phase 3 will focus on an assessment of climate-driven impacts to water supply resources and demand. This first phase of research and assessment will provide Cal Water with a clear "lay of the land" in understanding available methodologies and lessons learned in conducting vulnerability assessments and developing adaptation plans in the water sector. This work can provide key insights for Cal Water, industry practitioners, and Cal Water customers on best practices and needs in climate vulnerability and adaptation efforts.

This first phase will also act as a foundation for Cal Water to build on in subsequent phases of work. ICF and Cal Water will build on research and findings developed in Phase 1 to define the scope of Phases 2 and 3.

In Phase 1, the ICF team undertook three areas of review:

- 1) Literature and tools related to adaptation planning by water suppliers and other relevant organizations
- 2) Methods and data in Cal Water's 2016 Vulnerability Study "Potential Climate Change Impacts on the Water Supplies of California Water Service"
- 3) Climate change impact assessments and adaptation plans beyond Cal Water (wholesalers, state agencies) that could affect Cal Water's vulnerability or adaptive capacity

In the first part of our assessment, the studies we reviewed conclude that there is high certainty of climate-driven reductions to snowpack, wetter winter months, and more volatility between wet and dry water years. While California water systems are designed to operate under a wide

range of hydrologic conditions, they are not designed to absorb and adapt to the projected levels of change, which could have impacts on historical supplies from reservoir systems and groundwater systems. These studies also revealed a suite of potential approaches to vulnerability assessment and risk assessment that are applicable to Phases 2 and 3.

Key studies that the ICF team referenced include Brown and Caldwell's "Impacts of Climate Change on Honolulu Water Supplies and Planning Strategies for Mitigation", the Water Research Foundation's (WRF)'s "Mapping Climate Exposure and Climate Information Needs to Water Utility Business Functions", the Metropolitan Water District's (MWD)'s "2015 Integrated Water Resources Plan" and "2015 Urban Water Management Plan", and the U.S. Environmental Protection Agency's (EPA's) Climate Resilience Evaluation and Awareness Toolkit (CREAT).

In the second part of our review, we found that Cal Water's 2016 Climate Change Vulnerability Study undertook a high-level investigation of impacts of climate change on water supply, including surface water, groundwater, and imported water throughout Cal Water service areas. However, the study did not use uniform metrics across water suppliers, was unable to apply the currently available downscaled climate projections, and did not consider the full suite of potential climate impacts to Cal Water's systems, including impacts of compounding climate hazards and impacts on Cal Water facilities and operations.

In the third part of this work, the ICF team researched and assessed existing climate vulnerability assessments and adaptation efforts that have an impact on Cal Water's ability to mitigate impacts from climate change. This included efforts by water supply wholesalers connected to Cal Water's system, and state agencies that regulate Cal Water's supplies, operations, and planning efforts. This will allow Cal Water to build on existing actions and avoid recreating adaptation efforts that are planned or have been implemented.

Cal Water has undertaken key steps toward adaptation planning since the 2016 Vulnerability Study, such as this work to provide additional vulnerability analysis, working locally to identify and prepare to meet Sustainable Groundwater Management Act (SGMA) requirements, and coordinating with wholesalers on their identified climate-driven vulnerabilities. Phases 2 and 3 of this work will further frame system vulnerabilities within an adaptation planning context for a flexible and anticipatory response.

The ICF team's literature review focused on identifying approaches for assessing water utility vulnerabilities of assets and water resources, and adaptation planning needs (summarized in Table 1). To identify these priority approaches, the team reviewed a list of publications with input from Cal Water on key sources. We reviewed and analyzed the relevant literature for applicability to Cal Water, the advantages and fit within a robust plan for assessment, and the potential disadvantages. We highlighted those approaches in the sections on key takeaways and the applicability of approaches to Cal Water. Table 1 provides important considerations raised by the ICF team during this process.

Table 1: Advantages and disadvantages of identified approaches

Identified Approach	Advantages	Disadvantages
<p>Integrated resource-level (i.e., top-down) and asset-level (i.e., bottom-up) approaches to vulnerability assessment</p>	<ul style="list-style-type: none"> • Allows for matching available information with appropriate methodologies • Supports evaluation of vulnerabilities in both water supply resources and physical systems: an integrated approach can help to address gaps in either area 	<ul style="list-style-type: none"> • Bottom-up approaches can require extensive historical data and asset-level data • Integration of climate projections into hydrological models can be challenging. For example, data inputs for hydrological models and the outputs from climate projections may be incompatible or require additional data processing
<p>Robust Decision-Making</p>	<ul style="list-style-type: none"> • Supports identification of decisions for response under a range of potential climate futures • Supports alignment between climate impacts and operating units/business functions • Ensures the scope focuses on critical services, assets, and resources • Supports the development of adaptation pathways and measures • Provides a framework for information that can signal the need for critical decisions on adaptation 	<ul style="list-style-type: none"> • Involves significant investment of time to identify performance metrics, business functions, and key variables • Even with significant time invested on the front end, scope can change and require rescoping later in the effort • Requires a strong understanding of utility decision-making
<p>Applying climate projections to hydrologic modeling, future demand and planning scenarios</p>	<ul style="list-style-type: none"> • Generates better understanding of impacts of extreme scenarios, snowpack loss, drought, increased temperatures, precipitation whiplash, and other hydrologic changes in water supply resources and downstream demands • Allows for modeling of a range of climate scenarios to better account for uncertainties in resource management and climate outcomes • Integrates climate projections with scaled historical time series data 	<ul style="list-style-type: none"> • Can require substantial data, and may introduce bias (due to selected climate scenarios) • It is necessary to identify performance metrics and thresholds related to available climate variables; these can be difficult to identify and thresholds may not exist • Relies on necessary simplifying assumptions to model complex hydrologic systems
<p>Stress testing and scenarios</p>	<ul style="list-style-type: none"> • Supports management of uncertainty, especially in the absence of data • Allows for understanding of climate impacts on system performance within a risk framework 	<ul style="list-style-type: none"> • Can require refined climate information (e.g. hydrological variables) and detailed asset information • Can require the integration of climate information into hydrological models, which may require

Identified Approach	Advantages	Disadvantages
	<ul style="list-style-type: none"> • Supports identification of major performance metrics and their potential for failure • Helps in understanding how the severity of impacts varies for facilities, operations, and water supplies under different climate change conditions. 	<p>significant data processing to be compatible with one another</p> <ul style="list-style-type: none"> • Can result in qualitative or directional findings that don't provide straightforward adaptation responses
<p>Engaging staff in climate change vulnerability assessments and adaptation plans</p>	<ul style="list-style-type: none"> • Provides perspective for setting study parameters • Provides targeted input and data into assessment • Identifies existing data gaps and actions to address gaps • Supports development of institutional capacity for monitoring impacts, adaptation planning, and implementation 	<ul style="list-style-type: none"> • Can be time-consuming for team members attending workshops and interviews; requires a targeted approach to ensure efficiency and that the right data is captured • Requires cross-team coordination that may be outside of "normal" communication pathways, e.g. between engineers and policy specialists
<p>Evaluating costs of inaction</p>	<ul style="list-style-type: none"> • Helps to prioritize adaptation planning needs • Creates a better understanding of the risks to Cal Water 	<ul style="list-style-type: none"> • Requires scaling information on past costs without clear data on future impacts, creating uncertainties in estimates
<p>Use of Flexible Adaptation Pathways</p>	<ul style="list-style-type: none"> • Helps to select appropriate timing (including lead time from planning to implementation) and application of adaptation measures • Considers and compares multiple strategies in adaptation planning • Includes triggers that signal when decision-makers should decide on switching to another pathway • Allows for adaptive decisions under uncertainty by integrating points for re-assessing pathway and actions • Considers alternative external developments over time 	<ul style="list-style-type: none"> • Does not provide a fixed timeline for actions • This approach is relatively new and may require coordination with budget cycles and external policy updates, since actions evolve over time • May push decision burden onto future decision-makers who did not develop original pathway

Our team synthesized these identified methodologies, findings, and insights into an overarching approach for characterizing climate vulnerabilities and planning for adaptation at both an asset level and water supply planning level to suit Cal Water's needs in addressing climate change impacts, shown in Figure 1.

Figure 1: Climate Assessment Framework

1 Set Objectives and Define Scope

Ask key questions, set objectives, scope and organize, select and characterize relevant assets, operations, and resources.

2 Compile Data

Identify appropriate climate projections for assessment and collect data on potentially impacted facilities, assets and operations, water supply resources, and water demand.

3 Assess Vulnerability

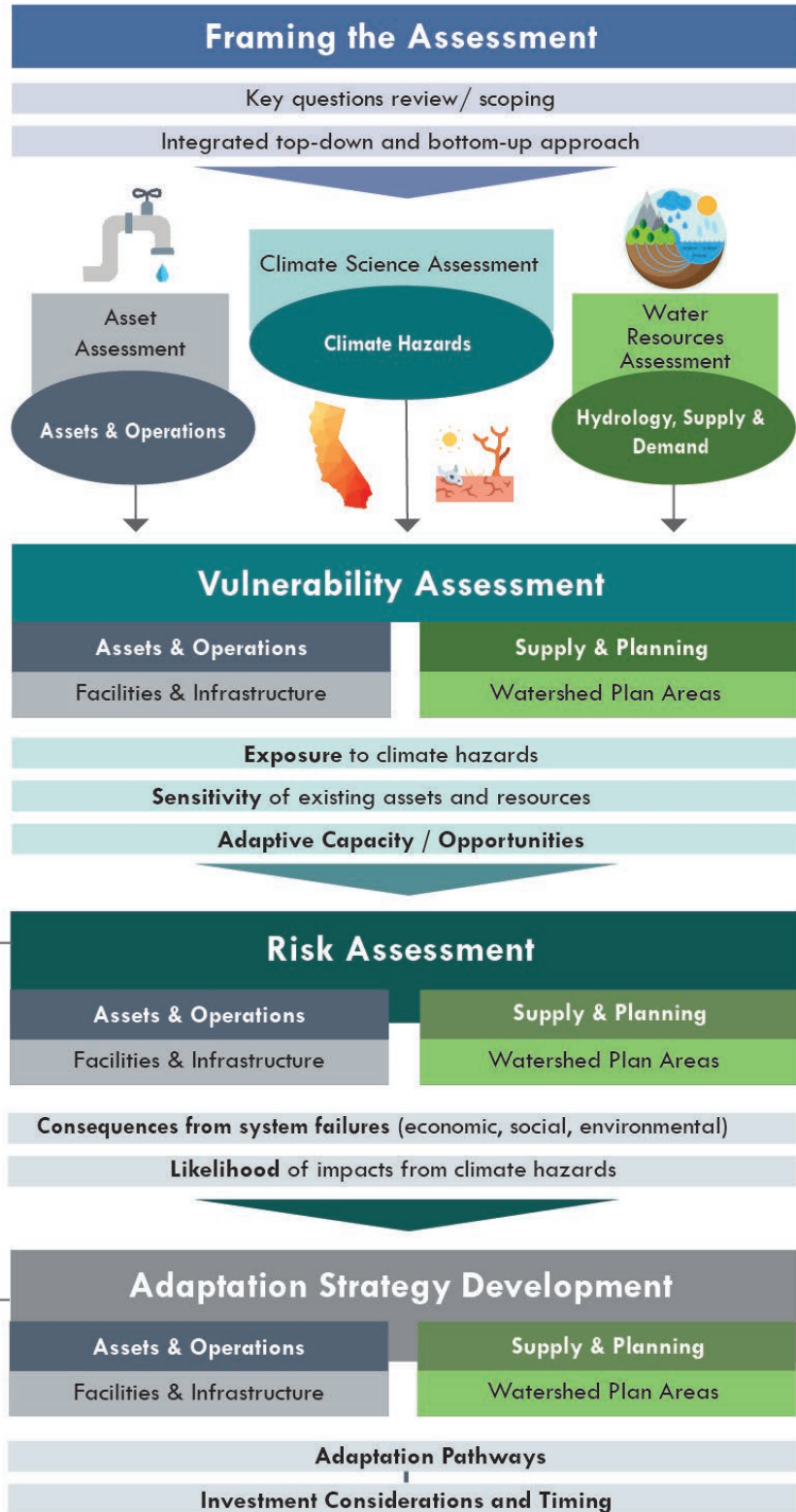
Understand and define system vulnerabilities, based on exposure, sensitivity and adaptive capacity of the system.

4 Assess Risks
Understand and define risks - consequences from system failures and uncertainty, i.e. likelihood.

Prioritization
based on consequences and likelihood.

5 Develop Adaptation Strategies

Develop and plan adaptation strategies, prioritizing strategies based on adaptation pathways and investment considerations.




Source: Silvestrum Climate Associates, October 2020

Based on this review, the ICF team is making the following key recommendations for guiding Cal Water’s efforts in identifying climate vulnerabilities and planning for adaptation:

- **Apply a standard conceptual framework to vulnerability assessment which integrates both top-down analysis and bottom-up analysis (see Figure 1).** The standard conceptual framework for assessing climate vulnerabilities and risks includes understanding exposure, sensitivity, and adaptive capacity, and potential impacts as components of vulnerability, and consequence and likelihood as components of risk. Top-down analysis would begin by applying downscaled Global Climate Model (GCM) projections to assess impacts on water supply resources and the bottom-up analysis would begin by identifying system sensitivities to climate hazards. These analyses are complementary.
- **Use a robust decision making (RDM) framework for vulnerability assessment and adaptation planning** by seeking to identify decisions for response under a range of potential climate futures, mapping impacts on operating units/business functions, and ensuring that the scope focuses on critical services, assets, and resources. A robust decision-making framing will support the development of adaptation pathways and measures by monitoring information that signals the need for critical decisions on adaptation.
- **Engage staff and key stakeholders in the planning process** to gain a holistic planning perspective for setting study parameters, providing targeted input into assessment and plan development, and supporting institutional capacity for adaptation.
- **Build off of the 2016 Cal Water Climate Change Impact study by applying updated climate models and projections for additional hydrologic variables** to hydrologic modeling, future demand and planning scenarios, and scaled historical time series data to better understand impacts of extremes, precipitation whiplash, and other hydrologic changes in water supply resources. We recommend presentation of this with uniform metrics for more actionable findings.
- **Assess climate impact consequence by stress-testing key water system performance metrics.** This includes developing a range of impact scenarios to understand how the severity of impacts varies for facilities, operations, and water supplies under different climate change conditions.
- **Evaluating the order of magnitude cost of inaction.** We recommend communicating consequences in terms of direct costs to Cal Water and customers without adaptation actions to prioritize adaptation response.
- **Follow a step-by-step, iterative process to adaptive management which fully aligns with potential exposure to climate hazards and vulnerabilities,** including:
 - Utilizing Flexible Adaptation Pathways in planning for selecting appropriate timing and application of adaptation measures
 - Planning for monitoring and evaluation
 - Evaluating adaptation investment decisions

During Phases 2 and 3 in which Cal Water and the ICF team will further assess vulnerability, we will frame the study outputs within a decision-making context for compatibility with adaptation planning concepts and eventual investment in adaptation measures.

A scenic landscape photograph of a mountain valley. In the foreground, a calm lake reflects the sky and the surrounding mountains. The shoreline is lined with large, smooth, grey rocks. The middle ground shows a valley with sparse vegetation and some trees with yellow autumn foliage. In the background, rugged, rocky mountains rise, with the right-hand side of the range illuminated by warm, golden light, suggesting a sunset or sunrise. The sky is a clear, pale blue. A dark blue rectangular box is overlaid on the upper portion of the image, containing white text.

California Water Service
CLIMATE CHANGE RISK
ASSESSMENT &
ADAPTATION FRAMEWORK

December 2021

Summary for Decision Makers

Study Purpose

California Water Service already faces climate risks — wildfire, increasing temperatures, sea level rise, flooding, and drought — and seeks to address these risks by identifying them and taking action. This Study works to (1) identify and prioritize climate-driven risks to Cal Water’s supply reliability, operations, and assets and (2) project and assess changes to the supply of and demand for Cal Water resources. This Study is intended to assist in understanding climate change risk across all Cal Water’s districts, spanning its future supply and demand as well as its key operations and assets. The report identifies primary risks to Cal Water across the districts as well as top risks to individual districts.

Using this study and the proposed adaptation framework, Cal Water can continuously monitor and address the following types of risks:

- Immediate risks given near-term threat and low risk tolerance
- Actions to take when a trigger is reached (e.g., when information becomes available or there is external opportunity for an adaptation strategy)
- District-specific risks requiring targeted management attention
- Risks to disadvantaged and vulnerable communities

Policy Context for Climate Risk Assessment and Adaptation Planning

Various state agencies are expected to develop requirements on water utilities for incorporating climate change adaptation into their planning and operations including conducting vulnerability assessments as a starting point. These policy frameworks and requirements include:

1. The California Public Utilities Commission (CPUC) [Order Instituting Rulemaking \(OIR\) R.18-04-019 to Consider Strategies and Guidance for Climate Change Adaptation \(2020\)](#). The statutory deadline for finalizing requirements for Phase II, expected to apply to water utilities, has been extended to December 2022.
2. The California Coastal Commission (CCC) Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California’s Coastal Zone (Draft, November 2021).
3. The California Natural Resources Agency (CNRA) 2021 Climate Adaptation Strategy (Draft, October 2021).
4. The 2020 Water Resilience Portfolio in response to Governor’s Executive Order N-10-19.
5. The State Water Resources Control Board’s 2017 Comprehensive Response to Climate Change.

6. The [Task Force on Climate-Related Financial Disclosures \(TCFD\)](#) from the Financial Stability Board recommend that organizations to describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term. Furthermore, it recommends that asset managers describe how climate-related risks and opportunities are factored into relevant products or investment strategies.

Summary of Findings of Climate Change Risks

All districts face climate change risks, and all districts face at least 6 of the top identified risks to Cal Water. Factors that affect district vulnerability include groundwater dependency, State Water Project (SWP) dependency, limited supply diversity, and location in coastal or wildfire-prone areas.

Risks to Supply Reliability

Without action, Cal Water may face significant water supply reliability and operational impacts that will challenge its ability to meet the water needs of its customers by mid-century due to changes to State Water Project deliveries, decreasing groundwater recharge, increasing duration, intensity, and frequency of droughts, and increasing outdoor demands.

Annual State Water Project (SWP) deliveries are likely to decrease in average years and the driest years may result in no deliveries. Average climate models project a decrease of 15% while the driest models project an average annual decrease of up to 36%. The Antelope Valley and Livermore districts are at particularly high risk.

Groundwater recharge is expected to decrease in some basins. Up to 20% decrease in average annual groundwater recharge is expected due to decreases in average precipitation, streamflow, and/or water available for managed recharge. Decreased recharge could limit sustainable yield from groundwater basins and lead to supply shortages. The King City and Visalia districts show the greatest average groundwater recharge decline.

Decreased surface water supply availability is expected due to longer, more severe, and more frequent droughts. The driest climate scenarios include megadroughts of 10 to 20+ years in duration, with districts in Southern California more at risk than districts in Northern California. The driest climate models project dry year precipitation decreases of 45 to 70%, with the Antelope Valley, Los Altos, and Livermore districts at the highest risk of large supply availability decreases during the driest years. Central tendency models project that dry year frequency may increase up to 10%. Decreased local and imported surface water supplies could lead to supply shortages.

Outdoor demands will increase due to increased evapotranspiration (ET) and longer, more frequent, and more severe droughts. Increased demands could lead to shortages and/or

challenges to operations. The Antelope Valley, Bear Gulch, Chico-Hamilton, and Visalia districts are at particularly high risk of increased demands.

Risks to Operations

Without action, major risks to operations include surface water quality from increasing temperatures and wildfire could further limit the ability to deliver water to customers and significantly increase treatment costs. Wildfire will also continue to threaten Cal Water workforce and operations throughout the century, including disruption of operations due to smoke.

Water quality will decrease due to high temperatures and low rainfall. A 24–36% increase in number of hot days with no precipitation could increase algal blooms, cyanotoxins, sediments, and eutrophication. This may increase water treatment costs and potentially impact supply availability. Multiple districts are at high risk. By mid-century Antelope Valley, Redwood Valley, and Stockton, could experience high impacts.

Water quality will also decrease due to increased wildfire risk and frequency of intense rainfall. Based on downscaled wildfire projections, districts may see an increase of 4–122% over historical averages of annual area burned by wildfire. An increase of 10–12% in extreme precipitation events could alter vegetation cover and infiltration rates, resulting in greater quantities of debris and pollutants that enter waterways after fire events. Post-fire debris flows may also disrupt operations, increase water treatment costs, and reduce water available for distribution. Multiple districts are at particularly high risk. Some districts, such as Oroville, may face higher consequences due to limited supply alternatives.

Worker health and safety will be endangered due to wildfire. A 4–122% increase in wildfire risk could increase the amount of smoke, threatening the safety of outdoor workers. All districts are likely to experience an increase in wildfire risk and are highly vulnerable to experiencing impacts to worker health and safety, including from wildfire smoke.

Natural snowpack storage may decrease due to declining snowpack due to temperature increases. A 17–57% decrease in April 1st snowpack is projected for the watersheds that provide surface water supplies for Cal Water’s districts. This decrease in snowpack storage could lead to overall reduced supply and force Cal Water (or reservoir managers) to adjust reservoir storage facilities and operations to adapt to decreased surface flows. All districts are at high risk except those with supply not influenced by snowpack.

Risks to Assets

Without action, riverine and urban flooding poses a serious threat to Cal Water’s assets, including pumps and treatment facilities. Rising groundwater and sea level rise present a risk to coastal assets, especially pressurized mains. Wildfire will continue to threaten assets, with an increase in areas burned in some districts and surrounding areas.

More frequent and severe riverine and urban flooding can result in service disruption and infrastructure damage due to loss of access to assets, damage to electrical components, long recovery time from disruption, and difficulty in moving or replacing fixed assets. Flooding could also occur from urban stormwater runoff. The most vulnerable assets are pumps, intakes, valves, wells, treatment facilities and radio sites. About half of all districts are vulnerable, particularly Chico-Hamilton.

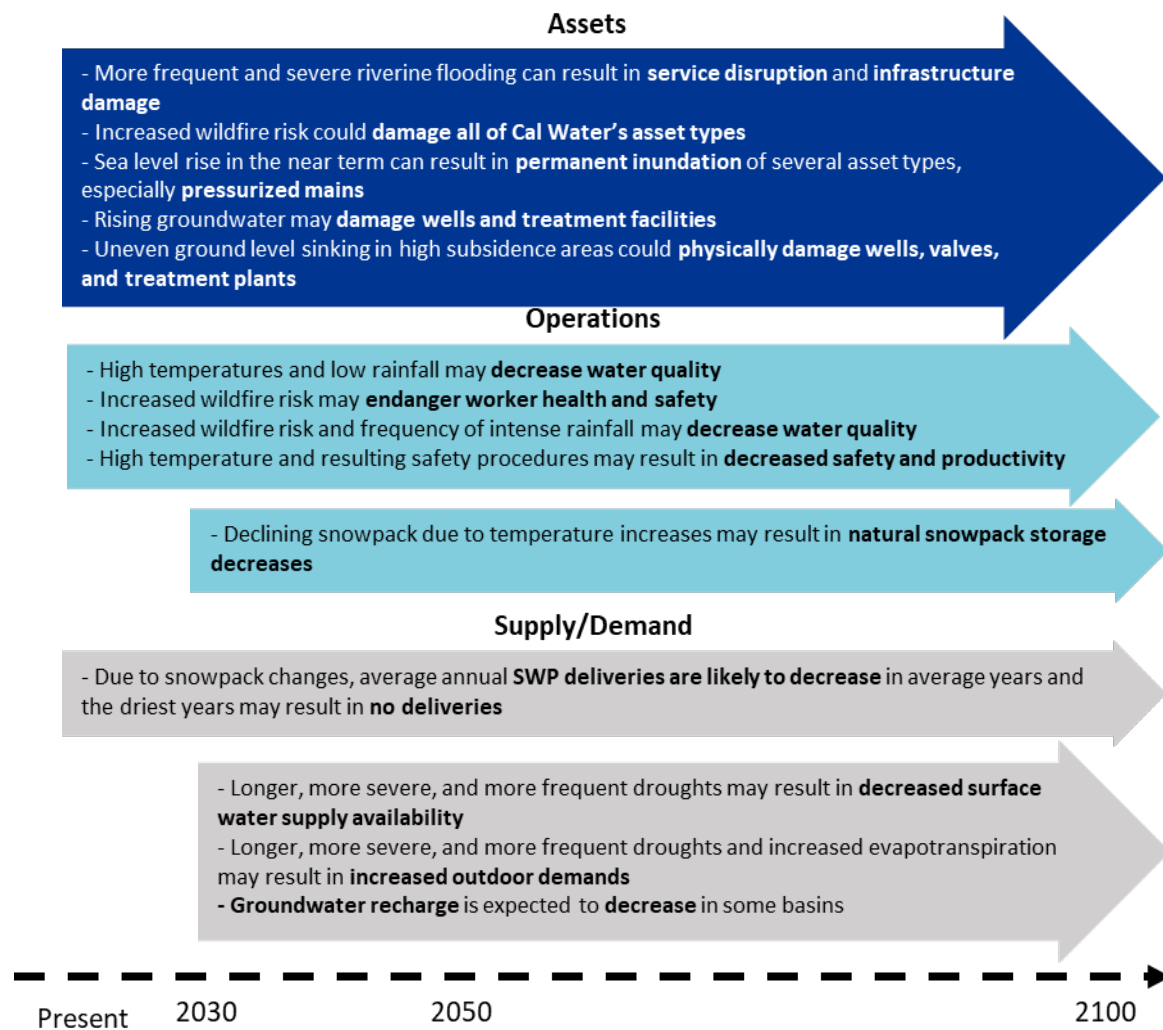
Sea level rise can result in permanent inundation of several asset types, especially pressurized mains. Assets located along low-lying coastal shorelines are most vulnerable to sea level rise. South San Francisco and Hermosa Redondo districts are at particularly high risk.

Rising groundwater due to sea level rise may affect wells and treatment facilities. Sea level rise can flood wells and treatment facilities or cause saltwater intrusion in wells, affecting operations, water quality, or preventing access to facilities. Portions of Redwood Valley, Salinas, South San Francisco, Hermosa Redondo, and Dominguez districts are at particularly high risk.

Increased wildfire risk could affect all of Cal Water's asset types. Cal Water's most vulnerable assets include pressurized mains, radio sites, and treatment facilities, which may see elevated impacts. All districts have assets in CALFIRE threat areas of High and above.

Figure 1 below summarizes climate-related risks over the short, medium, and long term. Across all Cal Water districts, many of these risks are already present, though severity of the risk will differ district by district. District profiles accompanying this report identify those risks by district.

Figure 1: Summary of climate-related risks to Cal Water over the short, medium, and long term. Timing of risks will differ by district.

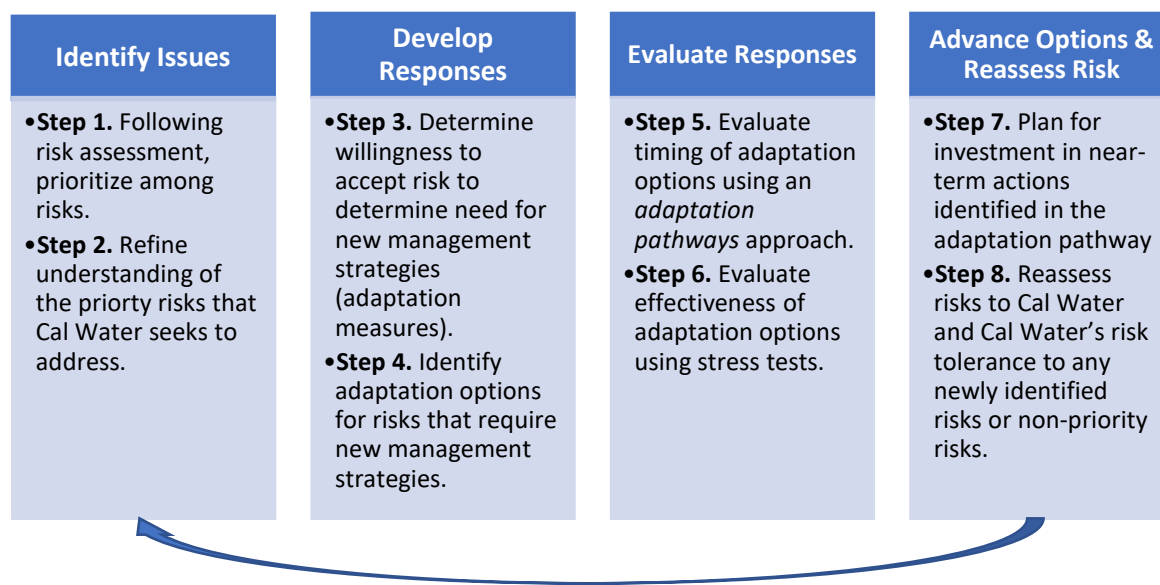


Addressing Priority Risks

An adaptation framework is provided to assist Cal Water in incorporating the outcomes of this study into further analysis of investment decision making over time.

The primary steps of the adaptation framework are summarized below in Figure 2.

Figure 2: The Adaptation Framework follows 8 steps and is an iterative process for adaptation planning



The departments primarily affected by climate risks include Water Resource Sustainability; Water Quality; Operations; and Engineering. District Management will be affected by vulnerabilities in those districts (see Climate District Profiles available for each district).

Cal Water will need to address vulnerabilities exacerbated by climate change to prepare its systems for continued operation and to continue to meet established level of service goals. Changing climate conditions may change the historical balance between supply and demand and increase management requirements of assets and operations. Adaptation options should be developed and evaluated for major identified risks. Given that supply availability is dictated by many factors outside of Cal Water’s control, it may be important for Cal Water to seek adaptation measures in collaboration with wholesalers and local and federal water management agencies.

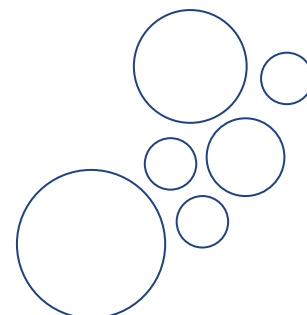
Appendix G: Water Shortage Contingency Plan



PUBLIC REVIEW DRAFT

Water Shortage Contingency Plan 2025

Los Altos Suburban District
April 2026



Chapter 1 Introduction

CWC § 10640

(a) Every urban water supplier required to prepare a plan pursuant to this part shall prepare its plan pursuant to Article 2 (commencing with Section 10630). The supplier shall likewise periodically review the plan as required by Section 10621, and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

(b) Every urban water supplier required to prepare a water shortage contingency plan shall prepare a water shortage contingency plan pursuant to Section 10632. The supplier shall likewise periodically review the water shortage contingency plan as required by paragraph (10) of subdivision (a) of Section 10632 and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

CWC § 10632.3

It is the intent of the Legislature that, upon proclamation by the Governor of a state of emergency under the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2 of the Government Code) based on drought conditions, the board defer to implementation of locally adopted water shortage contingency plans to the extent practicable.

This document describes the Water Shortage Contingency Plan (WSCP) for the California Water Service (Cal Water) Los Altos Suburban District (also referred to herein as “the Los Altos Suburban District” or “District”). The WSCP includes the levels of response to a water shortage caused by drought or by supply interruptions caused by infrastructure failure, regulatory mandate, or catastrophic human-caused or natural events. The primary objective of the WSCP is to ensure that the District has in place the necessary resources and management responses needed to protect health and human safety, minimize economic disruption, and preserve environmental and community assets during water supply shortages and interruptions.

Specifically, this WSCP includes the following chapters:

Chapter 1 - Introduction

Chapter 2 - Water Supply Reliability Analysis

Chapter 3 - Annual Water Supply and Demand Assessment Procedures

Chapter 4 - Water Shortage Levels

Chapter 5 - Shortage Response Actions

Chapter 6 - Communication Protocols

Chapter 7 - Compliance and Enforcement

Chapter 8 - Legal Authorities

Chapter 9 - Financial Consequences of WSCP

Chapter 10 - Monitoring and Reporting

Chapter 11 - WSCP Refinement Procedures

Chapter 12 - Plan Adoption, Submittal, and Availability

Chapter 2

Water Supply Reliability Analysis

CWC § 10632 (a) (1) *The analysis of water supply reliability conducted pursuant to Section 10635.*

As described in Chapter 6 of the Los Altos Suburban District’s 2025 Urban Water Management Plan (UWMP), the District currently purchases water from the Santa Clara Valley Water District (Valley Water). In addition, the District overlies the Santa Clara Subbasin (also referred to herein as the “Basin”) of the Santa Clara Valley Groundwater Basin (California Department of Water Resources [DWR] Basin No. 2-009.02). The Basin is not adjudicated, and DWR determined that the Basin is not in a condition of critical overdraft in its recent evaluation of California groundwater basins.¹ The District also receives a small amount of recycled water from the Sunnyvale Water Pollution Control Plant (WPCP).

Since the 2021–2022 drought, and in response to reduced reliability of imported water supplies, climate driven supply uncertainty, and the ongoing need for water conservation, Valley Water implemented a 23 percent planning level reduction in the treated water supply available to its retailers, including the District. This reduction was authorized under Valley Water Board Resolution No. 22 20 and implemented consistent with provisions of the treated water supply contract, which require proportional delivery reductions when conservation programs exceed a 10 percent threshold. The 23 percent reduction reflects a countywide conservation target during severe drought conditions and was applied uniformly through adjusted annual and monthly delivery schedules for retailers supplied by the Rinconada Water Treatment Plant. The District anticipates that these planning level reductions will continue and will be managed through a combination of additional groundwater pumping to the extent allowable by Valley Water and implementation of this WSCP.

Additionally, based on the analysis in Chapter 7 of the District’s 2025 UWMP, the District expects the available supplies to be sufficient to meet projected demands in all hydrologic conditions, except in the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of this WSCP. This WSCP also addresses potential water shortage conditions resulting from any other cause (e.g., droughts, impacted distribution system infrastructure, regulatory-imposed shortage restrictions, catastrophic events, etc.).

Under the Sustainable Groundwater Management Act (SGMA), Groundwater Sustainability Agencies (GSAs) have the authority to implement projects and management actions (P/MAs) that

¹ DWR, 2019. Sustainable Groundwater Management Act 2018 Basin Prioritization, State of California, dated January 2019.

help basins reach their sustainability goal. As described in Chapter 6 of the District's 2025 UWMP, Valley Water is the exclusive GSA within its statutory boundary, which includes all of Santa Clara County, and has assumed responsibility for sustainable groundwater management of the Basin. The District falls within the jurisdiction of the Valley Water GSA. Valley Water adopted the 2016 Groundwater Management Plan (GWMP) for the Santa Clara and Llagas Subbasins as the Alternative GSP in November 2016. The Alternative GSP was submitted to DWR in December 2016 and approved by DWR in July 2019. An amended GWMP was submitted to DWR in December 2021 (2021 Alternative GSP). In June 2024, DWR approved the 2021 Alternative GSP. The P/MAs to support achievement of the Basin's sustainability goal under SGMA are proposed by the Valley Water GSA and documented in the 2021 Alternative GSP, but are not expected to impact the District's supply reliability.

Chapter 3

Annual Water Supply and Demand Assessment Procedures

CWC § 10632 (a) (2)

The procedures used in conducting an annual water supply and demand assessment that include, at a minimum, both of the following:

(A) The written decision-making process that an urban water supplier will use each year to determine its water supply reliability.

(B) The key data inputs and assessment methodology used to evaluate the urban water supplier's water supply reliability for the current year and one dry year, including all of the following:

(i) Current year unconstrained demand, considering weather, growth, and other influencing factors, such as policies to manage current supplies to meet demand objectives in future years, as applicable.

(ii) Current year available supply, considering hydrological and regulatory conditions in the current year and one dry year. The annual supply and demand assessment may consider more than one dry year solely at the discretion of the urban water supplier.

(iii) Existing infrastructure capabilities and plausible constraints.

(iv) A defined set of locally applicable evaluation criteria that are consistently relied upon for each annual water supply and demand assessment.

(v) A description and quantification of each source of water supply.

CWC § 10632.1

An urban water supplier shall conduct an annual water supply and demand assessment pursuant to subdivision (a) of Section 10632 and, on or before July 1 of each year, submit an annual water shortage assessment report to the department with information for anticipated shortage, triggered shortage response actions, compliance and enforcement actions, and communication actions consistent with the supplier's water shortage contingency plan. An urban water supplier that relies on imported water from the State Water Project or the Bureau of Reclamation shall submit its annual water supply and demand assessment within 14 days of receiving its final allocations, or by July 1 of each year, whichever is later.

CWC § 10632.2

An urban water supplier shall follow, where feasible and appropriate, the prescribed procedures and implement determined shortage response actions in its water shortage contingency plan, as identified in subdivision (a) of Section 10632, or reasonable alternative actions, provided that descriptions of the alternative actions are submitted with the annual water shortage assessment report pursuant to Section 10632.1. Nothing in this section prohibits an urban water supplier from taking actions not specified in its water shortage contingency plan, if needed, without having to formally amend its urban water management plan or water shortage contingency plan.

On an annual basis, the District will conduct an Annual Water Supply and Demand Assessment (AWSDA) to identify whether there is likely to be a water shortage condition in the coming year, assuming it is dry. Each element of the AWSDA is described below.

1. Evaluation Criteria

The Evaluation Criteria that will be used to identify whether the District is likely to experience a water shortage in the coming year include:

- a. **Purchased Water Available Supply** - Because the District purchases potable water from Valley Water, the evaluation of District supplies for a particular year will be based largely on information provided by Valley Water.
 - i. Should the District not receive information from Valley Water by June 1st of each year, the District will assume supply availability in line with prior recent drought year availability.
- b. **Supply Well Operational Constraints** - A comparison of groundwater level elevations to well operational depths to identify the need to: (1) lower pump depths or (2) site and drill additional supply wells.
- c. **Recycled Water Availability** - Because the District receives recycled water from the Sunnyvale WPCP, the District will base its evaluation of available supplies for a particular year based on current recycled water supply and demand within the District in coordination with the City of Sunnyvale.
- d. **Treatment and Distribution System Constraints** - An assessment of the probabilities of facility and infrastructure outages and the degree to which they could limit Cal Water's ability to access, convey, or treat adequate supplies, including any planned maintenance or capital improvements over the next year that could affect its ability to provide sufficient supply to meet demands.
- e. **Local Regulatory Conditions** - Evaluation of: (1) any new GSA policies (e.g., pumping allocations) or sustainability criteria that could trigger a change in groundwater volume available for pumping, or (2) any new limitations on well permitting that could limit the ability to deepen existing supply wells or drill new supply wells.
- f. **State Regulatory Conditions** - Evaluation of any state-mandated drought or water use restrictions.

In the Spring prior to the submittal date, these Evaluation Criteria will be assessed by Cal Water staff, including District staff with detailed knowledge of District operations, well conditions, and Valley Water activities. The data used to support the AWSDA may include, but are not limited to, supply capacity, supply and pump capacity, firm capacities, tank storage capacity, groundwater level measurements, water quality, system demand, and zone demand.

2. Water Supply

The District obtains its supplies from purchases (Valley Water), pumped groundwater from the Basin, and recycled water from the Sunnyvale WPCP. As discussed in Chapter 7

of the District's 2025 UWMP, in all hydrologic conditions, except in the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. Operational limitations and/or potential local regulatory conditions identified in the Evaluation Criteria above may also constrain water supply. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of this WSCP.

3. Unconstrained Customer Demand

The demand forecast described in Chapter 4 of the District's 2025 UWMP yields the anticipated annual unconstrained water demand, (i.e., the expected water use in the absence of shortage-caused reductions in water use) to support the AWSDA. During a drought cycle, unconstrained demand typically increases due to higher-than-normal air temperatures and lower-than-normal precipitation. The supply reliability analysis and Drought Risk Assessment presented in Chapter 7 of the District's 2025 UWMP accounts for this anticipated shift in unconstrained water demand. As discussed above, with these increases in demand, the available supply (i.e., purchased water, groundwater, and recycled water) is expected to be sufficient to meet these demands through 2028. In the fourth (2029) and fifth year (2030), small shortages (5.0 percent and 9.0 percent respectively), are anticipated due to shortages in Valley Water supplies. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of this WSCP.

4. Planned Water Use for Current Year Considering Dry Subsequent Year

Cal Water will evaluate the anticipated supplies for the current year, assuming that the following year will be dry, as defined above, using the identified Evaluation Criteria. Barring changes in supply availability per the Evaluation Criteria, the assumed dry subsequent year is not expected to affect the manner in which the District will utilize its available supplies in the current year, and the planned water use for the current year will equal the unconstrained demand, with the exception of a fourth and fifth year drought. The District anticipates that projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of this WSCP.

5. Infrastructure Considerations

As part of its triennial General Rate Case applications to the California Public Utilities Commission (CPUC), Cal Water prepares a Supply-Demand Analysis (CPUC SD Analysis) for each of its districts. The CPUC SD Analysis is an inventory of water production and pump assets that provide direct and indirect sources of supply to meet customer

demands in accordance with CPUC General Order 103-A and California Code of Regulations (CCR) Title 22 Waterworks Standards. This CPUC SD Analysis is based on a combination of regulatory requirements, professional consultant recommendations, and industry standard practices, including those from the American Water Works Association (AWWA) and American Society of Civil Engineers (ASCE). It identifies specific vulnerabilities in different pressure zones within the system and evaluates the system against performance criteria that meet regulatory requirements and ensure operationally adequate levels of service.

This analysis will guide Cal Water's evaluation of operational treatment/distribution constraints that could potentially limit the availability of supplies. This evaluation of supply well operational constraints and treatment and distribution constraints will assess potential impacts on supply availability or related factors (e.g., mandated demand reductions). If such constraints are identified, Cal Water will develop a plan to address these constraints, mitigate potential effects, and implement the appropriate water Shortage Level of action per Chapter 5, below.

6. Other Factors

As identified under the Evaluation Criteria above, local regulatory conditions could potentially limit the availability of supplies. Therefore, Cal Water will evaluate the development of new regulatory constraints in the spring of each year and assess their potential impacts on supply availability or related factors (e.g., mandated demand reductions). If such constraints are identified, Cal Water will develop a plan to address these constraints and mitigate potential effects and implement the appropriate water Shortage Level of action per Chapter 5, below.

Consistent with California Water Code (CWC) § 10632.1, Cal Water will complete and submit an AWSDA to DWR by July 1st of each year.

Chapter 4 Water Shortage Levels

CWC § 10632

(a)(3)(A) Six standard water shortage levels corresponding to progressive ranges of up to 10, 20, 30, 40, and 50 percent shortages and greater than 50 percent shortage. Urban water suppliers shall define these shortage levels based on the suppliers' water supply conditions, including percentage reductions in water supply, changes in groundwater levels, changes in surface elevation or level of subsidence, or other changes in hydrological or other local conditions indicative of the water supply available for use. Shortage levels shall also apply to catastrophic interruption of water supplies, including, but not limited to, a regional power outage, an earthquake, and other potential emergency events.

(B) An urban water supplier with an existing water shortage contingency plan that uses different water shortage levels may comply with the requirement in subparagraph (A) by developing and including a cross-reference relating its existing categories to the six standard water shortage levels.

Consistent with the requirements of CWC § 10632(a)(3), the WSCP is based on the six water Shortage Levels shown in **Table 4-1**. These Shortage Levels are intended to address shortage caused by any condition, including the catastrophic interruption of water supplies.

Table 4-1. Water Shortage Contingency Plan Levels (DWR Table 8-1)

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

Shortage response actions for each of these Shortage Levels are identified and discussed in Chapter 5.

Chapter 5

Shortage Response Actions

CWC § 10632 (a) (4)

Shortage response actions that align with the defined shortage levels and include, at a minimum, all of the following:

(A) Locally appropriate supply augmentation actions.

(B) Locally appropriate demand reduction actions to adequately respond to shortages.

(C) Locally appropriate operational changes.

(D) Additional, mandatory prohibitions against specific water use practices that are in addition to state-mandated prohibitions and appropriate to the local conditions.

(E) For each action, an estimate of the extent to which the gap between supplies and demand will be reduced by implementation of the action.

CWC § 10632

(b) For purposes of developing the water shortage contingency plan pursuant to subdivision (a), an urban water supplier shall analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas, as defined in subdivision (a) of Section 115921 of the Health and Safety Code.

This chapter describes the response actions Cal Water will take to deal with the shortages associated with each of the six Shortage Levels enumerated in Chapter 4. As discussed above, the District expects the available supplies to be sufficient to meet projected demands in all hydrologic conditions, except in the fourth and fifth years of a drought in 2030, 2045, and 2050, due to shortfalls (each less than 10 percent) projected by Valley Water. The District anticipates that these projected shortfalls can be managed through additional groundwater pumping to the extent allowable by Valley Water or through implementation of this WSCP. This WSCP also addresses potential water shortage conditions resulting from any other cause (e.g., droughts, impacted distribution system infrastructure, regulatory-imposed shortage restrictions, catastrophic events, etc.). Given the projected shortfalls and the potential need in the future to comply with state mandates, local regulatory changes, or respond to catastrophic events, it is important to carefully identify and describe the anticipated necessary response actions.

5.1 Demand Reduction

The combinations of demand-reduction actions required to resolve the shortages associated with each of the six Shortage Levels are based on Cal Water's experience in dealing with past drought-related shortages and also include other actions deemed appropriate to achieve the required demand reductions. In order to evaluate and ensure that the right actions would be implemented with the proper level of intensity, Cal Water employed the Drought Response Tool (DRT), an Excel spreadsheet model developed by EKI Environment and Water, Inc. (EKI).

The DRT provides a quantitative framework that allows Cal Water to systematically estimate the monthly and cumulative annual demand reductions expected to result from particular combinations of drought response actions and associated implementation rates. Data inputs to the DRT include total production, sector-specific water use, population, and assumptions regarding the split between indoor and outdoor water use for each customer sector (class).

For each drought response action, the user specifies:

- The customer class(es) and end use(s) that are affected;
- The percent savings for those end use(s) for each account that implements the action based on evaluations reported in the literature, or where such studies are not available, on best estimates based on Cal Water experience; and
- The percentage of accounts assumed to implement the action, which is presumed to be the result of the intensity level of Cal Water program implementation, including but not limited to marketing and enforcement activities.

Based on the foregoing inputs, the DRT calculates the resulting monthly savings. Cal Water adjusted the combination of actions and implementation levels to achieve the targeted savings levels at each of the six Shortage Levels.

In order to evaluate the robustness of the DRT, Cal Water modeled the actions implemented during the height of the last drought for a subset of its districts and found that the modeled water shortage reductions were generally consistent with the observed responses. In short, the DRT is a robust, transparent tool that can be used to tie a particular set of shortage-response actions to an expected reduction in demand.

For each of the Shortage Levels, the modeling targeted the maximum demand reduction, ergo:

- 10% for Shortage Level 1,
- 20% for Shortage Level 2,
- 30% for Shortage Level 3,
- 40% for Shortage Level 4,
- 50% for Shortage Level 5, and
- 60% for Shortage Level 6.

The key DRT inputs and outputs for each of the Shortage Levels are reproduced in **Attachment A**.

Table 5-1 shows the water shortage reduction actions, savings assumptions, and implementation rates that are required for the District to achieve the targeted annual demand reductions for each of the Shortage Levels. At each Shortage Level, there are two types of demand-reduction actions identified:

- Restrictions on customer water usage; and,
- Consumption reduction actions by Cal Water to encourage decreased water usage.

The total demand reductions are governed by a set of user-specified constraints to ensure that usage levels do not endanger health and safety or result in unacceptable economic impacts. The DRT will not permit estimated usage reductions to violate these constraints, regardless of the demand reduction actions selected. For most districts, including the Los Altos Suburban District, the following default constraints are used:

- A minimum residential indoor per capita daily usage of 25 gallons,
- A maximum residential outdoor usage reduction of 100%,
- A maximum Commercial, industrial, and institutional (CII) indoor usage reduction of 30%, and
- A maximum CII outdoor usage reduction of 100%.

Many actions are implemented across a number of Shortage Levels, some at increasing implementation levels. Therefore, the actions are listed as a row under the first Shortage Level at which they are implemented, and the implementation rate is shown under each Shortage Level column heading at the right. The unit savings represent a percentage savings of the end uses indicated in the table.

Because of the DRT logic described above, the format of **Table 5-1** differs from that of the default DWR table.

5.1.1 Defining Water Features

CWC § 10632 (b)

For purposes of developing the water shortage contingency plan pursuant to subdivision (a), an urban water supplier shall analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas, as defined in subdivision (a) of Section 115921 of the Health and Safety Code.

As required by CWC §10632, Cal Water distinguishes between “decorative water features” such as ponds, lakes, and fountains that are artificially supplied with water and “recreational water features” such as swimming pools and spas. Prohibitions on water use for decorative water features are listed separately from those for recreational water features (see **Table 5-1**).

Table 5-1. Demand Reduction Actions to Achieve Required Savings (DWR Table 8-3)

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?
			1	2	3	4	5	6	
Shortage Level 1: Minimal Shortage									
Water Use Restriction (a)									
Landscape - Limit landscape irrigation to specific times	Irrigation	10%	75%	N/A	N/A	N/A	N/A	N/A	Yes
Other - Customers must repair leaks, breaks, and malfunctions in a timely manner	Leaks	100%	25%	60%	60%	60%	70%	75%	Yes
Landscape - Restrict or prohibit runoff from landscape irrigation	Irrigation	3%	15%	50%	50%	50%	50%	50%	Yes
Prohibit application of potable water to outdoor landscapes within 48 hours of measurable rainfall <i>(Landscape - Other landscape restriction or prohibition)</i>	Irrigation	20%	15%	60%	70%	80%	100%	N/A	Yes
Other - Prohibit use of potable water for washing hard surfaces	Misc. Outdoor	17%	15%	50%	50%	50%	50%	50%	Yes
Other - Require automatic shut-off hoses <i>(Other - Require automatic shut of hoses)</i>	Misc. Outdoor	17%	50%	50%	50%	50%	50%	50%	Yes
CII - Lodging establishments must offer opt out of linen service	Fixtures & Appliances	0.5%	50%	50%	50%	50%	50%	50%	Yes
CII - Restaurants may only serve water upon request	Fixtures & Appliances	0.5%	50%	50%	50%	50%	50%	50%	Yes

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?	
			1	2	3	4	5	6		
No watering of landscape of newly constructed homes and buildings in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission, the Department of Housing and Community Development, or other State agency <i>(Landscape - Other landscape restriction or prohibition)</i>	Irrigation	50%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	N/A	Yes
Prohibit Potable Water Use for Decorative Water Features that do not Recirculate Water <i>(Water Features - Restrict water use for decorative water features, such as fountains)</i>	Misc. Outdoor	50%	50%	50%	50%	50%	50%	50%	50%	Yes
Consumption Reduction										
Expand Public Information Campaign	All	0.5%	100%	100%	100%	100%	100%	100%	100%	No
Water Bill Inserts <i>(Improve Customer Billing)</i>	All	0.5%	0.1%	0.2%	0.2%	0.3%	0.4%	0.5%		No
Promote online water waste reporting <i>(Expand Public Information Campaign)</i>	All	10%	1%	1%	2%	3%	4%	5%		No
Expand Rebates or Giveaways of Plumbing Fixtures and Devices <i>(Provide Rebates or Giveaways of Plumbing Fixtures and Devices)</i>	All	10%	1%	1%	2%	3%	5%	5%		No
Expand Rebates for Landscape Irrigation Efficiency <i>(Provide Rebates for Landscape Irrigation Efficiency)</i>	All	10%	1%	1%	1%	2%	2%	3%		No

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?
			1	2	3	4	5	6	
Offer CII Water Use Surveys <i>(Offer Water Use Surveys)</i>	All CII uses	5%	1%	1%	1%	2%	2%	3%	No
Offer Res Water Use Surveys <i>(Offer Water Use Surveys)</i>	All Residential Uses	5%	0.1%	0.2%	0.2%	0.3%	0.4%	0.5%	No
Shortage Level 2: Moderate Shortage									
Restrictions									
Landscape - Limit landscape irrigation to specific days	Irrigation	15%-79% ^(b)		75%	75%	35%	30%		Yes
Prohibit the use of non-recirculating systems in all new conveyer car wash and commercial laundry systems <i>(Other)</i>	Fixtures & Appliances	50%		See note (c)	See note (c)	See note (c)	See note (c)	See note (c)	Yes
Consumption Reduction									
Water Efficiency Workshops, Public Events <i>(Other)</i>	All Residential Uses	5%		25%	25%	50%	50%	75%	No
Shortage Level 3: Severe Shortage									
Restrictions									
Other - Prohibit use of potable water for construction and dust control	Misc. Outdoor	100%			1%	1%	1%	1%	Yes
Prohibit use of potable water for street washing <i>(Other - Prohibit use of potable water for washing hard surfaces)</i>	Misc. Outdoor	100%			1%	1%	1%	1%	Yes

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?
			1	2	3	4	5	6	
Prohibit Filling Ornamental Lakes or Ponds <i>(Water Features - Restrict water use for decorative water features, such as fountains)</i> <i>(Other water feature or swimming pool restriction)</i>	Misc. Outdoor	100%			1%	1%	1%	1%	Yes
Consumption Reduction									
Home or Mobile Water Use Reports <i>(Expand Public Information Campaign)</i>	All	5%			15%	25%	25%	50%	No
Decrease Frequency and Length of Line Flushing <i>(Decrease Line Flushing)</i>	Non Revenue Water	25%			50%	50%	50%	50%	No
Reduce System Water Loss	Non Revenue Water	100%			10%	10%	10%	20%	No
Increase Water Waste Patrols/Enforcement <i>(Increase Water Waste Patrols)</i>	All	10%			1%	2%	4%	5%	No
Implement Drought Rate Structure and Customer Water Budgets (Res) <i>(Implement or Modify Drought Rate Structure or Surcharge)</i>	All Residential Uses	30%-60% ^(c)			30%	40%	40%	30%	Yes
Implement Drought Rate Structure and Customer Water Budgets (CII) <i>(Implement or Modify Drought Rate Structure or Surcharge)</i>	All CII uses	10%-30% ^(d)			30%	40%	40%	30%	Yes

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?
			1	2	3	4	5	6	
Shortage Level 4: Critical Shortage									
Water Use Restrictions									
Prohibit vehicle washing except with recirculated water or low-volume systems <i>(Other - Prohibit vehicle washing except at facilities using recycled or recirculating water)</i>	Misc. Outdoor	10%				50%	50%	50%	Yes
Prohibit use of water for recreational purposes such as water parks and the filling of pools <i>(Other water feature or swimming pool restriction)</i>	Misc. Outdoor	100%				1%	1%	1%	Yes
Shortage Level 5: Emergency Shortage									
Water Use Restrictions									
Require net zero demand increase on new water service connections <i>(Moratorium or Net Zero Demand Increase on New Connections)</i>	All	100%					0.2%	0.2%	Yes
Prohibit single-pass cooling systems <i>(Other)</i>	Cooling	50%					20%	20%	Yes
Consumption Reduction Actions									
Require Pool Covers <i>(Pools and Spas - Require covers for pools and spas)</i>	Misc. Outdoor	28%					10%	10%	Yes

Water Shortage Response Action	End Use(s)	End Use Savings	Implementation by Shortage Level						Penalty, Charge, or Other Enforcement?
			1	2	3	4	5	6	
Shortage Level 6: Extreme Shortage									
Water Use Restrictions									
Moratorium on new water service connections <i>(Moratorium or Net Zero Demand Increase on New Connections)</i>	All	100%					0.2%	Yes	
Landscape - Prohibit all landscape irrigation	Irrigation	100%					45%	Yes	
Cumulative Annual Savings			10%	20%	30%	40%	50%	60%	
<p>Notes:</p> <p>(a) In certain cases water use restrictions and consumption reduction actions implemented by Cal Water are not specifically called out in DWR’s provided demand reduction actions list. The appropriate DWR provided demand reduction action is included in italics in parenthesis.</p> <p>(b) Watering restricted to no more than 3 days/week in Shortage Level 2 and Shortage Level 3; no more than 2 days/week in Shortage Level 4; no more than 1 day/week in Shortage Level 5.</p> <p>(c) Implementation rates are not currently well understood and are therefore not presented. These rates will be evaluated through additional study of this water use restriction.</p> <p>(d) Residential water budgets of up to 30% for Shortage Level 3, up to 40% for Shortage Level 4, up to 50% for Shortage Level 5, up to 60% for Shortage Level 6.</p> <p>(e) CII water budgets of up to 10% for Shortage Level 3, up to 20% for Shortage Level 4, up to 30% for Shortage Levels 5 and 6.</p>									

5.2 Supply Augmentation

As indicated in **Table 5-2**, Cal Water has not identified any specific supply augmentation actions to assist in resolving future District water shortages but are currently assessing potential options. As identified in Chapter 3, Cal Water may consider drilling new wells if necessary due to declining groundwater levels or requesting additional water from Valley Water. However, Cal Water considers these actions to be operational changes (described in Section 5.3), rather than accessing a new supply source.

Table 5-2. Supply Augmentation and Other Actions (DWR Table 8-3)

☒	Is the Supplier completing this table using the standard six levels? (yes/no)			
Shortage Level	Supply Augmentation Methods and Other Actions by Water Supplier	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)
		Volume or Percentage	Shortage Gap Reduction Value	
See note (a)	See note (a)	See note (a)	See note (a)	See note (a)
<p>Notes: (a) Cal Water evaluates water supply augmentation projects on an on-going basis. At this time, Cal Water does not have supply augmentation projects planned specifically to address water shortage conditions.</p>				

5.3 Operational Changes

As discussed above in Chapter 3, the primary operational change that Cal Water will consider in the District is extracting groundwater from new wells following identification of this need as part of the AWSDA or related processes or requesting additional purchased water from Valley Water. As identified in **Table 5-1**, the District will also decrease the frequency and length of line flushing under Shortage Level 3 and beyond. The District will also evaluate the potential benefits of altering other maintenance cycles and expediting infrastructure repairs to improve system efficiency, to the extent feasible.

In addition, Cal Water is actively participating in the implementation of the Alternative GSP for the Basin and will make operational changes as necessary to support SGMA compliance.

5.4 Mandatory Restrictions

The water shortage response actions included in **Table 5-1** include a variety of mandatory customer water use restrictions that will be necessary to achieve the targeted demand

reductions for the different Shortage Levels. The types of restrictions and the manner and degree of enforcement for these restrictions vary by Shortage Level and are discussed in Chapter 7.

5.5 Emergency Response Plan

Cal Water has an Emergency Response Plan (ERP) in place that coordinates the overall response to a disaster within the District.

The ERP addresses Cal Water's responsibilities in emergencies associated with natural disaster, human-caused emergencies, and technological incidents. The ERP provides a framework for coordination of response and recovery efforts within Cal Water in cooperation with local, state, and federal agencies, as well as other public and private organizations. The ERP establishes an emergency organization to direct and control operations during a period of emergency by assigning responsibilities to specific personnel.

The ERP does the following:

- It conforms to the State mandated Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS), and it effectively structures emergency response at all levels in compliance with the Incident Command System (ICS).
- It establishes response policies and procedures, while providing Cal Water clear guidance related to emergency planning.
- It describes and details procedural steps necessary to protect lives and property.
- It outlines coordination requirements.
- It provides a basis for unified training and response exercises to ensure compliance.

The District has installed backup power generators at many of its well sites, booster sites, and pump storage sites that can be operated in the event of a system wide power outage. A complete loss of power has never been experienced, but the generators have been used in the past to overcome localized outages.

The District currently has a total of eleven emergency interties, including with San Jose Water Company (one connection), City of Santa Clara (one connection), City of Sunnyvale (six connections), and Purissima Hills Water District (three connections), as described in Section 6.7.3 of the District's 2025 UWMP. Cal Water is also exploring options for installing additional interconnections in the near future with adjacent agencies.

5.6 Seismic Risk Assessment and Mitigation Plan

CWC § 10632.5

(a) In addition to the requirements of paragraph (3) of subdivision (a) of Section 10632, beginning January 1, 2020, the plan shall include a seismic risk assessment and mitigation plan to assess the vulnerability of each of the various facilities of a water system and mitigate those vulnerabilities.

(b) An urban water supplier shall update the seismic risk assessment and mitigation plan when updating its urban water management plan as required by Section 10621.

(c) An urban water supplier may comply with this section by submitting, pursuant to Section 10644, a copy of the most recent adopted local hazard mitigation plan or multihazard mitigation plan under the federal Disaster Mitigation Act of 2000 (Public Law 106-390) if the local hazard mitigation plan or multihazard mitigation plan addresses seismic risk.

Cal Water's ERP includes information on various hazards and a related fault map overlying the District. The Santa Clara County Emergency Operations Plan, which includes additional discussion of area earthquake risk and mitigation, can be found at:

<https://emergencymanagement.sccgov.org/partners>.

5.7 Shortage Response Action Effectiveness

Table 5-1 above shows the effectiveness of the specific demand-reduction actions and implementation levels necessary for the District to achieve the targeted savings for each water Shortage Level. The bottom row indicates the total annual cumulative savings expected to be reached at each Shortage Level. Additional details, including anticipated savings on a month-by-month basis are provided in the DRT inputs and outputs included in **Attachment A**.

Chapter 6

Communication Protocols

CWC § 10632 (a) (5)

Communication protocols and procedures to inform customers, the public, interested parties, and local, regional, and state governments, regarding, at a minimum, all of the following:

(A) Any current or predicted shortages as determined by the annual water supply and demand assessment described pursuant to Section 10632.1.

(B) Any shortage response actions triggered or anticipated to be triggered by the annual water supply and demand assessment described pursuant to Section 10632.1.

(C) Any other relevant communications.

Cal Water intends to escalate communication to customers and stakeholders, as needed, throughout any water shortage situation to help ensure they are aware of current conditions, any water use restrictions that are in effect, and the many ways Cal Water can help them reduce their water use. Cal Water's outreach efforts may include multiple channels, including bill messages, bill inserts, direct mail, email, letters, social media, print, radio, music streaming services, TV, over-the-top media, movie theatre advertising, and group presentations.

These efforts will expand on current Cal Water outreach efforts and will be customized to the needs at the time of the shortage to ensure a proper channel mix so that the maximum audience is reached as efficiently as possible.

Chapter 7

Compliance and Enforcement

☑ **CWC § 10632 (a) (6)** For an urban retail water supplier, customer compliance, enforcement, appeal, and exemption procedures for triggered shortage response actions as determined pursuant to Section 10632.2.

Schedule 14.1 includes specific Enforcement provisions that take effect upon activation. When Schedule 14.1 is activated, its Enforcement section supersedes the Enforcement provisions in Rule 14.1, and enforcement of the applicable requirements will be administered in accordance with the enforcement procedures described in Schedule 14.1 for the period it remains in effect.

7.1 Water Use Restrictions

In accordance with Rule 14.1, Cal Water is currently authorized to take the following actions to enforce the water use restrictions:

First Violation: Cal Water shall provide the customer with a written notice of violation. In addition, Cal Water is authorized to take the following actions:

- a) If the customer currently receives service through a metered connection, install a real-time water measurement device on the customer's service line and provide the customer with access to information from the device. The cost of the device, including installation and on-going operating costs, may be billed to the customer, and nonpayment may result in discontinuation of service.
- b) If the customer does not currently receive service through a metered connection, install a water meter on the customer's service line, charge the customer for water use pursuant to Cal Water's metered service tariffs and rules, and install a real-time water measurement device on the customer's service line and provide the customer with access to information from the device. The cost of the device, including installation and ongoing operating costs, may be billed to the customer, and nonpayment may result in discontinuance of service.

Second Violation: If Cal Water verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the first violation, Cal Water shall provide the customer with a second written notice of violation and is authorized to install a flow-restricting device on the customer's service line. Cal Water shall not be held liable for any injuries, damages, and/or consequences arising from the installation of a flow-restricting device.

In June 2021, Cal Water submitted to the CPUC an update to Rule 14.1 and Schedule 14.1 for approval, to align with the restrictions identified in this WSCP. Rule 14.1 and Schedule 14.1 were approved by the CPUC in July 2021. Rule 14.1 and Schedule 14.1 are discussed in more detail in Chapter 8. The current versions of Rule 14.1 and Schedule 14.1 can be found on the Cal Water website.

The passage of Assembly Bill 1572 includes both regulatory responsibilities and customer-facing obligations relating to the prohibition of potable water for irrigating non-functional turf. Cal Water plans to submit a revised Rule 14.1 and Schedule 14.1 to the CPUC for approval prior to January 1, 2027, to be in compliance with the regulatory requirements and is developing communication materials and an outreach plan to be in compliance with the customer-facing obligations.

7.2 Non-Essential, Wasteful Uses

In the event that more stringent measures are needed, implementation of Schedule 14.1 would be requested from the CPUC. If implemented, Cal Water is currently authorized to take the following actions when its personnel verify a customer is using potable water for non-essential, wasteful uses.

First Violation: Cal Water shall provide the customer with a written notice of violation. In addition, Cal Water is authorized to take the following actions:

- A. If the customer currently receives service through a metered connection, install a real-time water measurement device on the customer's service line and provide the customer with access to information from the device. The cost of the device, including installation and ongoing operating costs, may be billed to the customer, and nonpayment may result in discontinuance of service.
- B. If the customer does not currently receive service through a metered connection, install a water meter on the customer's service line, charge the customer for water use pursuant to Cal Water's metered service tariffs and rules, and install a real-time water measurement device on the customer's service line and provide the customer with access to information from the device. The cost of the device, including installation and ongoing operating costs, may be billed to the customer, and nonpayment may result in discontinuance of service.

Second Violation: If Cal Water verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the first violation, Cal Water shall provide the customer with a second written notice of violation. In addition to the actions prescribed under the first violation above, Cal Water is authorized to take the following actions:

-
- A. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule or other Cal Water tariffs.
- i. If Shortage Level 1 is in effect, \$25
 - ii. If Shortage Level 2 is in effect, \$50
 - iii. If Shortage Level 3 is in effect, \$100
 - iv. If Shortage Level 4 is in effect, \$200
 - v. If Shortage Level 5 is in effect, \$400
 - vi. If Shortage Level 6 is in effect, \$800
- B. At its sole discretion, waive the waste of water penalty if the customer participates in a water use evaluation provided by Cal Water and/or provides documentation to Cal Water proving that a drip irrigation system, micro spray irrigation system, high-efficiency sprinkler system, or properly programmed smart irrigation controller has been installed, after a notice of violation was delivered, and is in use at the customer's service address.

Third Violation: If Cal Water verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the second violation, Cal Water shall provide the first and second violations above, Cal Water is authorized to take the following actions:

- A. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule or other Cal Water tariffs.
- i. If Shortage Level 1 is in effect, \$50
 - ii. If Shortage Level 2 is in effect, \$100
 - iii. If Shortage Level 3 is in effect, \$200
 - iv. If Shortage Level 4 is in effect, \$400
 - v. If Shortage Level 5 is in effect, \$800
 - vi. If Shortage Level 6 is in effect, \$1,600
- B. At its sole discretion, waive the waste of water surcharge if the customer participates in a water use evaluation provided by Cal Water and/or provides documentation to Cal Water proving that a drip irrigation system, micro spray irrigation system, high- efficiency sprinkler system, or properly programmed smart irrigation controller has been installed, after notice of violations have been delivered, and is in use at the customer's service address.

Fourth Violation: If Cal Water verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the third violation, Cal Water shall provide the customer with a fourth written notice of violation. In addition to actions set forth in previous violations prescribed above, Cal Water is authorized to install a flow-restricting device on the customer's service line.

Egregious Violations: Notwithstanding the foregoing framework for penalties, customers who Cal Water has verified are egregiously using potable water for non-essential, wasteful uses are subject to having a flow-restricting device installed on their service line. After providing the customer with one notice of egregious violation, either by direct mail or door hanger, which documents the egregious use of potable water for non-essential, wasteful uses and explains that failure to correct the violation may result in the installation of a flow-restricting device on the customer's service line, Cal Water is authorized to install a flow-restricting device on the customer's service line.

7.3 Drought Surcharges

Water budgets and associated drought surcharges are included as actions in **Table 5-1**. Cal Water may implement such actions through the implementation of Schedule 14.1.

Chapter 8

Legal Authorities

CWC § 10632 (a) (7)

(A) A description of the legal authorities that empower the urban water supplier to implement and enforce its shortage response actions specified in paragraph (4) that may include, but are not limited to, statutory authorities, ordinances, resolutions, and contract provisions.

(B) A statement that an urban water supplier shall declare a water shortage emergency in accordance with Chapter 3 (commencing with Section 350) of Division 1.

(C) A statement that an urban water supplier shall coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency, as defined in Section 8558 of the Government Code.

Cal Water is a public water utility that is regulated by the CPUC. As such, it does not have the authority to adopt resolutions or ordinances. Rule 14.1, as filed with the CPUC, serves as Cal Water's restrictions on non-essential, wasteful uses of potable water. In the event that more stringent measures are required, Cal Water may request the addition of Schedule 14.1 which serves as Cal Water's WSCP and includes leveled mandatory reductions and drought surcharges. Cal Water shall coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency as defined in Section 8558 of the Government Code and to ensure consistency with local resolutions and ordinances.

On June 14, 2021, Cal Water filed its current Schedule 14.1 with the CPUC which became effective on July 14, 2021.² The Schedule lays out the leveled mandatory reductions and drought surcharges associated with Cal Water's WSCP. The current Schedule 14.1 was approved by the CPUC in July 2021. This filing is consistent with Resolution W-5034, adopted by the Commission on April 9, 2015, ordering compliance with requirements of the State Water Resources Control Board (SWRCB).

Schedule 14.1 is an extension of Rule 14.1. The compliance and enforcement information presented in Chapter 7 is based on the current versions of both Rule 14.1 and Schedule 14.1.

In the event of a determination of a water shortage, Cal Water shall declare a water shortage emergency in accordance with the Water Code Chapter 3 (commencing with Section 350) of Division 1 and implement the WSCP at the appropriate Shortage Level.

² For reference, the current versions of Rule 14.1 and Schedule 14.1 are included as **Attachment B**.

Chapter 9

Financial Consequences of WSCP

CWC § 10632 (a) (8)

A description of the financial consequences of, and responses for, drought conditions, including, but not limited to, all of the following:

(A) A description of potential revenue reductions and expense increases associated with activated shortage response actions described in paragraph (4).

(B) A description of mitigation actions needed to address revenue reductions and expense increases associated with activated shortage response actions described in paragraph (4).

(C) A description of the cost of compliance with Chapter 3.3 (commencing with Section 365) of Division 1.

In 2008, the CPUC approved the creation of a Water Revenue Adjustment Mechanism (WRAM) and Modified Cost Balancing Accounts (MCBA). The goals of the WRAM and MCBA are to sever the relationship between sales and revenue to remove the disincentive to reduce water use. The WRAM and MCBA are designed to be revenue neutral in order to ensure that both the utility and ratepayers are neither harmed nor benefitted.

In 2020, the CPUC ordered that regulated water utilities may not include the continuation of the WRAM and MCBA in their next general rate case filing but may propose the use of a Monterey-Style Revenue Adjustment Mechanism and Incremental Cost Balancing Account. As such, as of 2023 the WRAM and MCBA are no longer in place for Cal Water.

During a water shortage, Cal Water will file for a Drought Memorandum Account, or similar, to track incremental shortage-related expenses to be reviewed by the CPUC for future recovery in rates. Cal Water will also file for a Drought Lost Revenue Memorandum Account, or similar, to track reduced sales to be reviewed by the CPUC for future recovery in rates.

Both the Drought Memorandum Account and Drought Lost Revenue Memorandum Account are mechanisms that have been approved by the CPUC in previous droughts.

Chapter 10

Monitoring and Reporting

CWC § 10632 (a) (9) For an urban retail water supplier, monitoring and reporting requirements and procedures that ensure appropriate data is collected, tracked, and analyzed for purposes of monitoring customer compliance and to meet state reporting requirements.

During the period 2014-16, in order to effectively respond to the drought, Cal Water realigned its organizational structure to ensure sufficient resources were available to implement its WSCP. The day-to-day implementation was overseen by the Director of Drought Management & Conservation, with the assistance of the Drought Response Project Manager. The Director of Drought Management & Conservation reported to a team of Cal Water's Officers (Steering Committee), including the President & CEO, the Vice President of Corporate Communications & Community Affairs, the Vice President of Customer Service & Information Technology, the Vice President of Operations, and the Vice President of Continuous Improvement.

Reporting to the Director of Drought Management & Conservation was a team of functional leads, each responsible for managing individual portions of Cal Water's Plan. This team included the Director of Customer Service, the Water Conservation Manager, the Manager of Corporate Communications, the Water Supply Manager, and the Government & Community Relations Manager.

Cal Water will implement a similar structure to effectively manage future water shortages which will be overseen by the Vice President, Water Resources Planning and Sustainability.

This structure includes regular meetings with reporting on items such as:

- Aggregate customer demands,
- Customer compliance with water use restrictions,
- Current and projected water supply conditions,
- Customer outreach activities,
- Customer service inquiries, and
- Operations activities (e.g., water flushing activities, leak repairs, etc.).

Chapter 11

WSCP Refinement Procedures

CWC § 10632 (a) (10) *Reevaluation and improvement procedures for systematically monitoring and evaluating the functionality of the water shortage contingency plan in order to ensure shortage risk tolerance is adequate and appropriate water shortage mitigation strategies are implemented as needed.*

Cal Water’s Drought Steering Committee utilizes an adaptive management process to regularly assess and determine adjustments and changes to the implementation of the WSCP. These refinements are overseen by the Vice President, Water Resources Planning and Sustainability through the team of functional leads.

Chapter 12

Plan Adoption, Submittal, and Availability

CWC § 10632 (c) *The urban water supplier shall make available the water shortage contingency plan prepared pursuant to this article to its customers and any city or county within which it provides water supplies no later than 30 days after adoption of the water shortage contingency plan.*

The deadline for public comments on the WSCP was June 4, 2026, three days after the public hearing. The final WSCP was formally adopted by Cal Water’s Vice President Water Resources Planning and Sustainability on MM DD, 2026. The District’s 2025 UWMP includes a copy of the signed Resolution of Plan Adoption and contains the following:

- Letters sent to and received from various agencies regarding the UWMP and WSCP
- Correspondence between Cal Water and participating agencies.

The District’s UWMP and WSCP were submitted to DWR within 30 days of adoption and by the July 1, 2026 deadline. The submittal was done electronically through Water Use Efficiency Data Portal, an online submittal tool. The adopted WSCP was also sent to the California State Library and to the cities and counties listed in Table 10-1 of the District’s 2025 UWMP.

On MM DD, 2026, electronic versions of the draft 2025 UWMP and WSCP were made available for review on Cal Water’s website:

<https://www.calwater.com/conservation/uwmp2025>.

Attachment A

Key Drought Response Tool Tables and Charts



Drought Response Tool

Home Input Baseline Year Water Use Baseline Year Water Use Profile Drought Response Actions Estimated Water Savings Drought Response Tracking

1 - Home

California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	10%
Drought Shortage Level	Shortage Level 1
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.



Drought Response Tool

Home

Input Baseline
Year Water Use

Baseline Year
Water Use
Profile

Drought
Response
Actions

Estimated
Water Savings

Drought
Response
Tracking

1 - Home

California Water Service - Los Altos Suburban

For questions about this tool or for additional information, contact:

Anona Dutton, P.G., C.Hg.
adutton@ekiconsult.com
(650) 292-9100



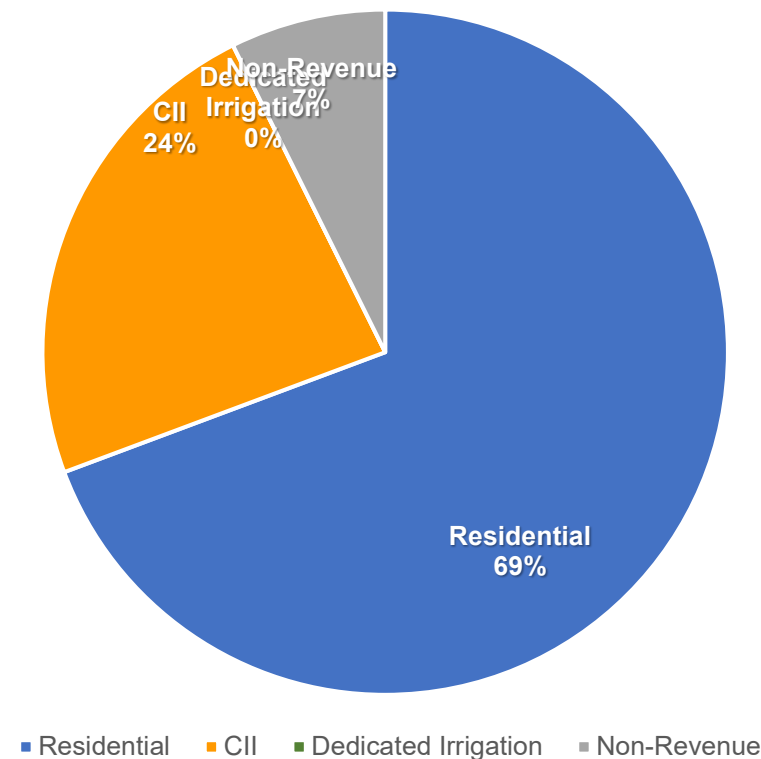
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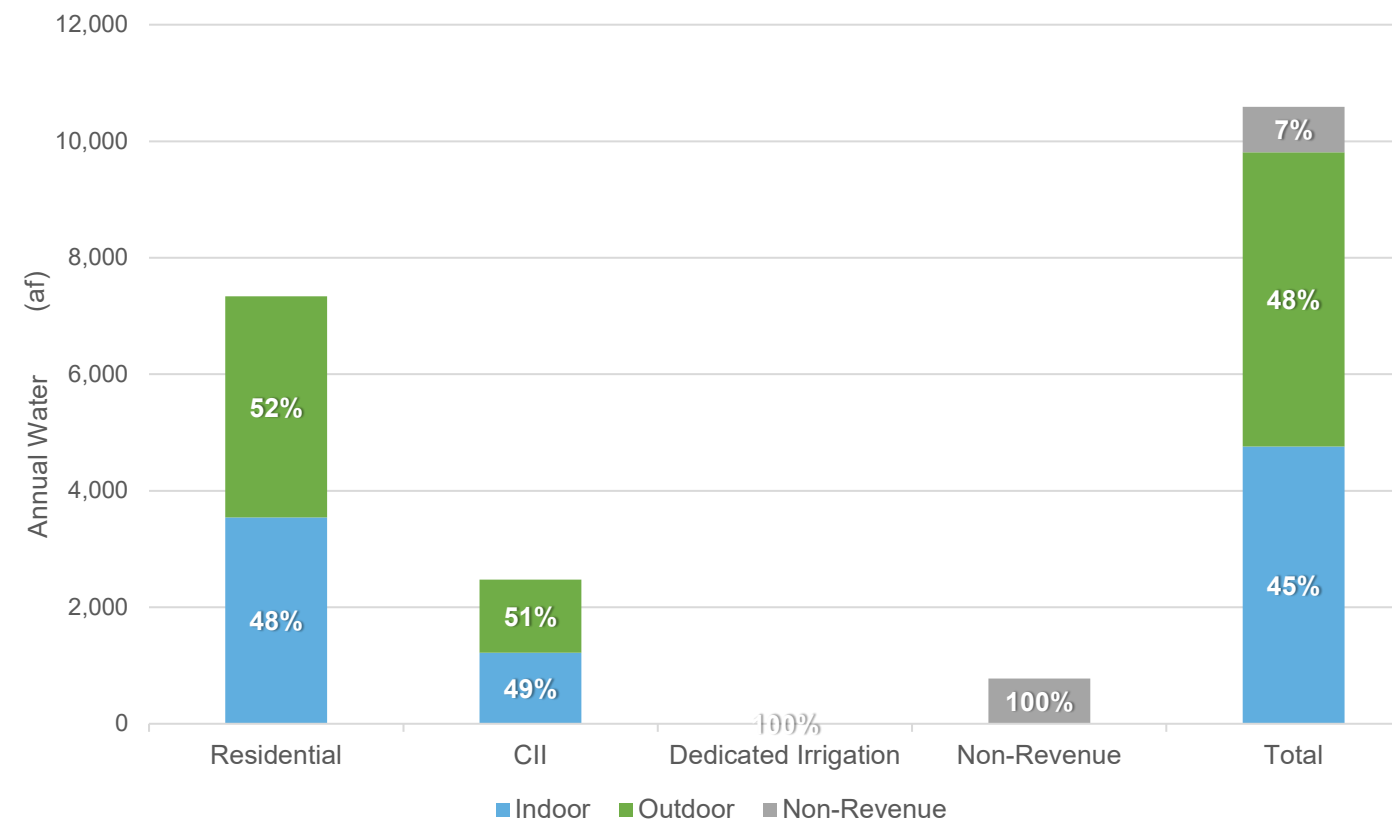
3 - Baseline Year (2024) Water Use Profile Los Altos Suburban

Baseline Year (2024) Annual Water Use Summary						
Units: <input type="text" value="(af)"/>						
A summary of your Baseline Year water use by sector and major end use category is shown below. Select the units in which your production and use data are displayed.						
Water Use	Total Production (af)	Water Use (af)				Comments
		Residential	CII	Dedicated Irrigation	Non-Revenue	
Total	10,588	7,338	2,474	0	776	
Total Indoor	4,761	3,541	1,220	--	--	
Total Outdoor	5,052	3,798	1,254	0	--	
Total Non-Revenue	776	--	--	--	776	
Total Indoor %	45%	48%	49%	0%	--	
Total Outdoor %	48%	52%	51%	100%	--	
Total Non-Revenue %	7%	--	--	--	100%	

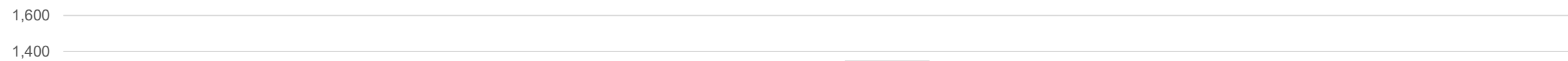
Baseline Year (2024) Percent Annual Water Use by Sector



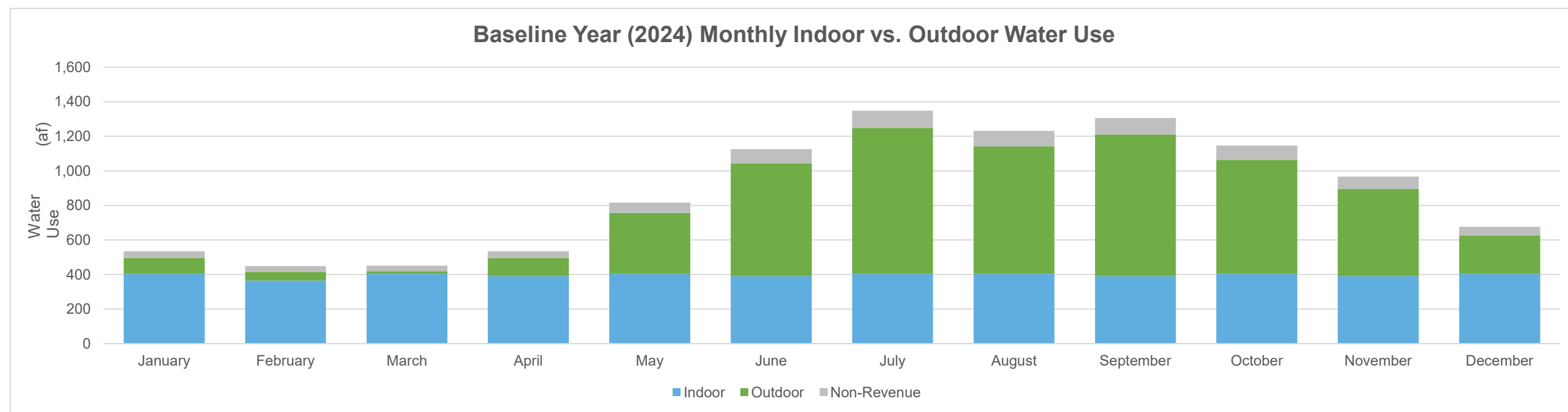
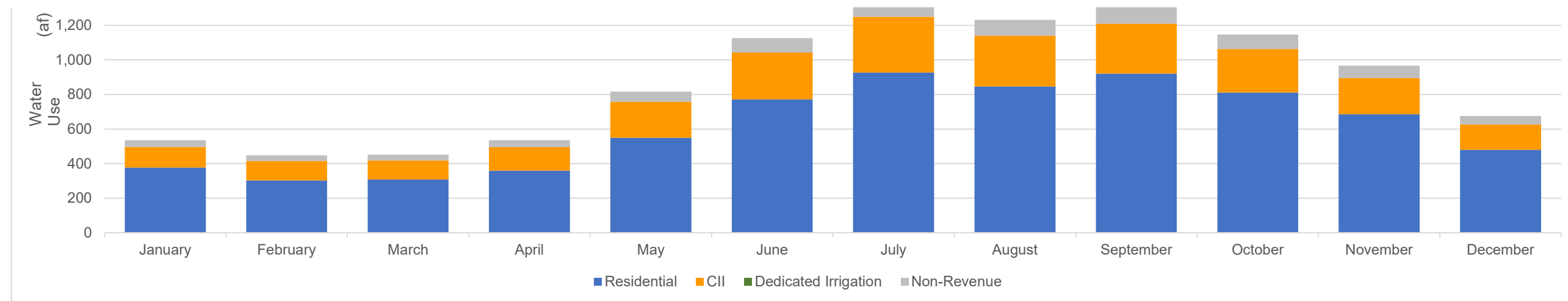
Baseline Year (2024) Annual Water Use by Sector and End Use



Baseline Year (2024) Monthly Total Water Use by Sector

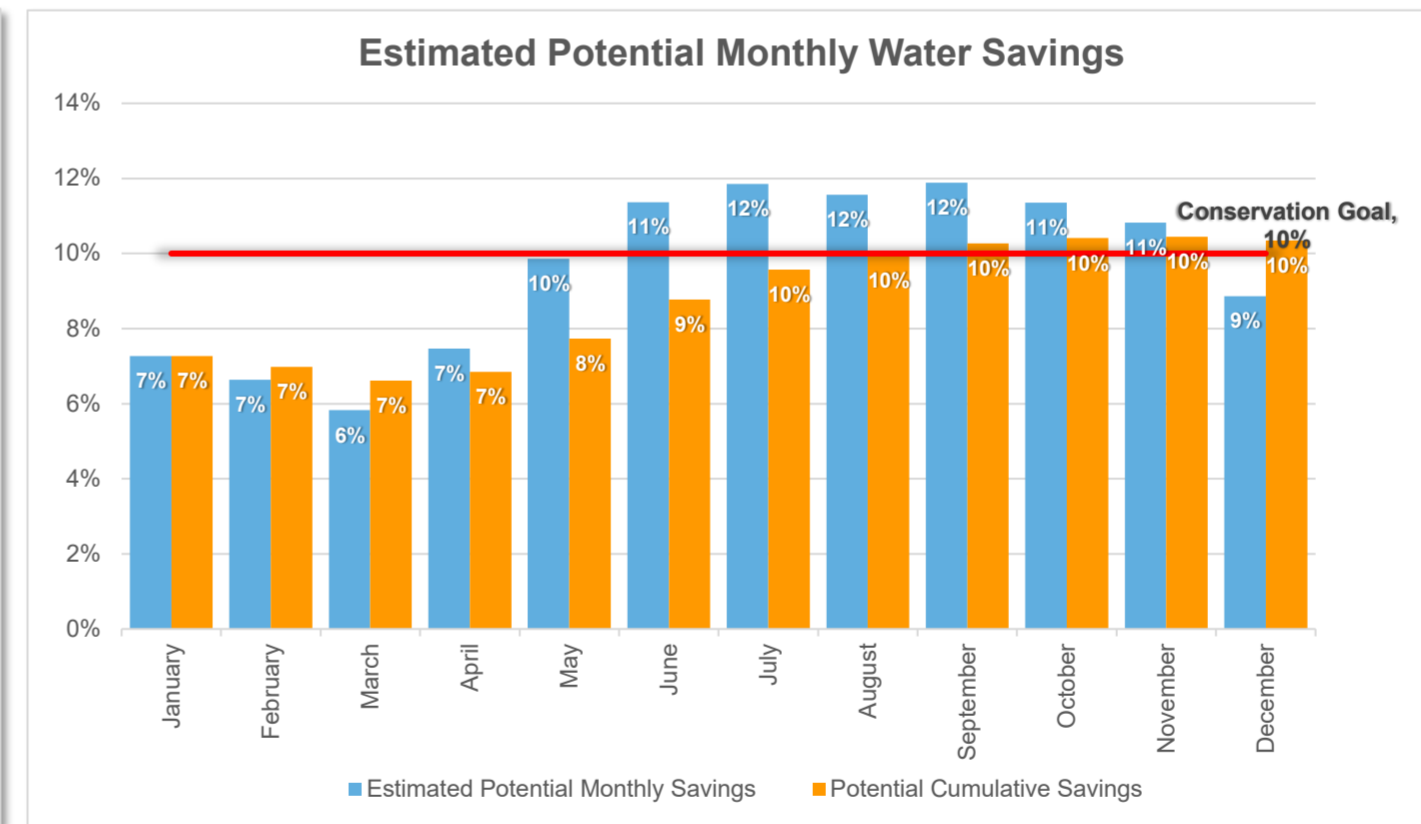
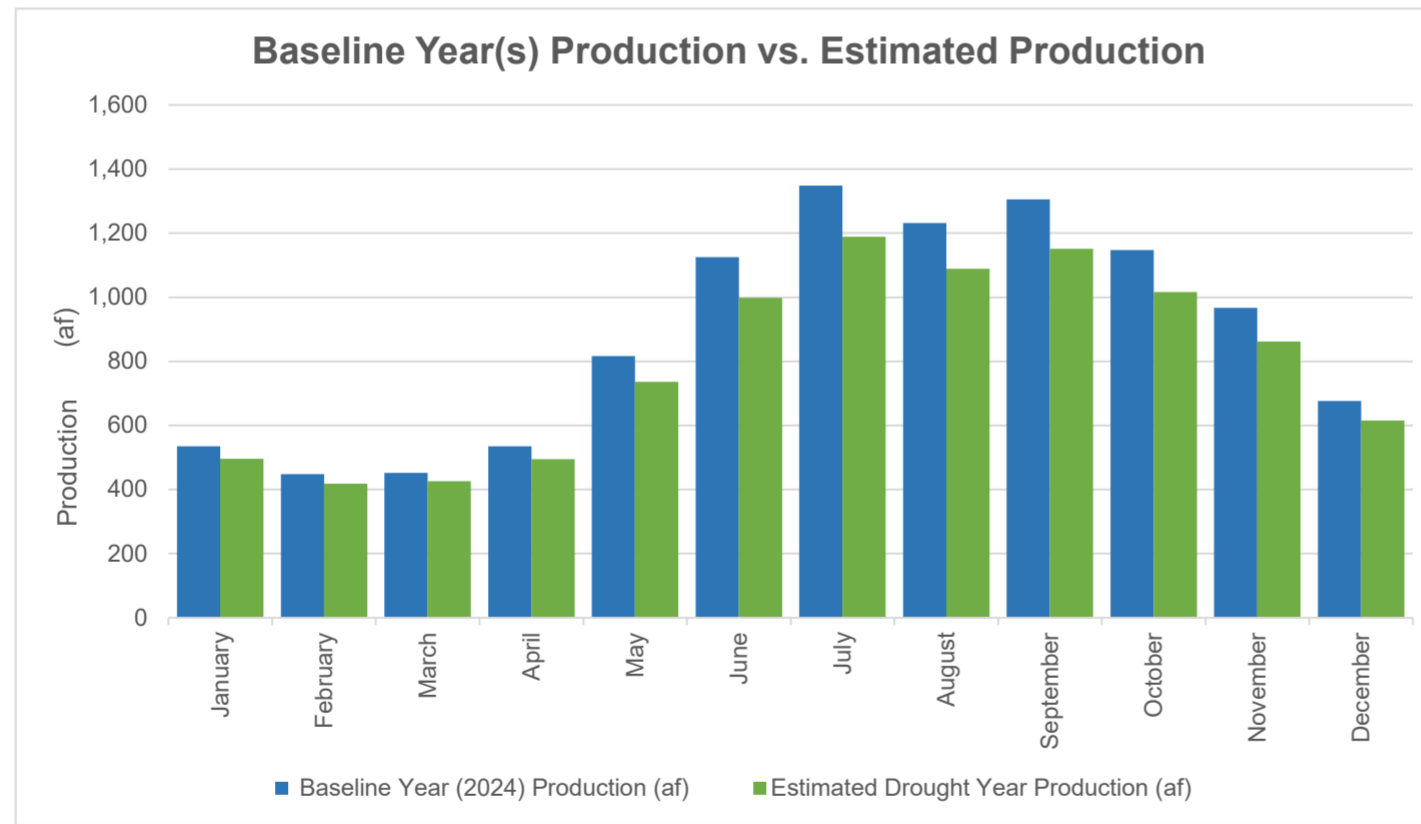


3 - Baseline Year (2024) Water Use Profile Los Altos Suburban



5 - Estimated Water Savings - Shortage Level 1 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	497	7%	7%	10%	
February	449	419	7%	7%	10%	
March	452	426	6%	7%	10%	
April	535	495	7%	7%	10%	
May	817	736	10%	8%	10%	
June	1,126	998	11%	9%	10%	
July	1,348	1,188	12%	10%	10%	
August	1,231	1,089	12%	10%	10%	
September	1,306	1,151	12%	10%	10%	
October	1,147	1,017	11%	10%	10%	
November	966	862	11%	10%	10%	
December	676	616	9%	10%	10%	





Drought Response Tool

Home Input Baseline Year Water Use Baseline Year Water Use Profile Drought Response Actions Estimated Water Savings Drought Response Tracking

1 - Home

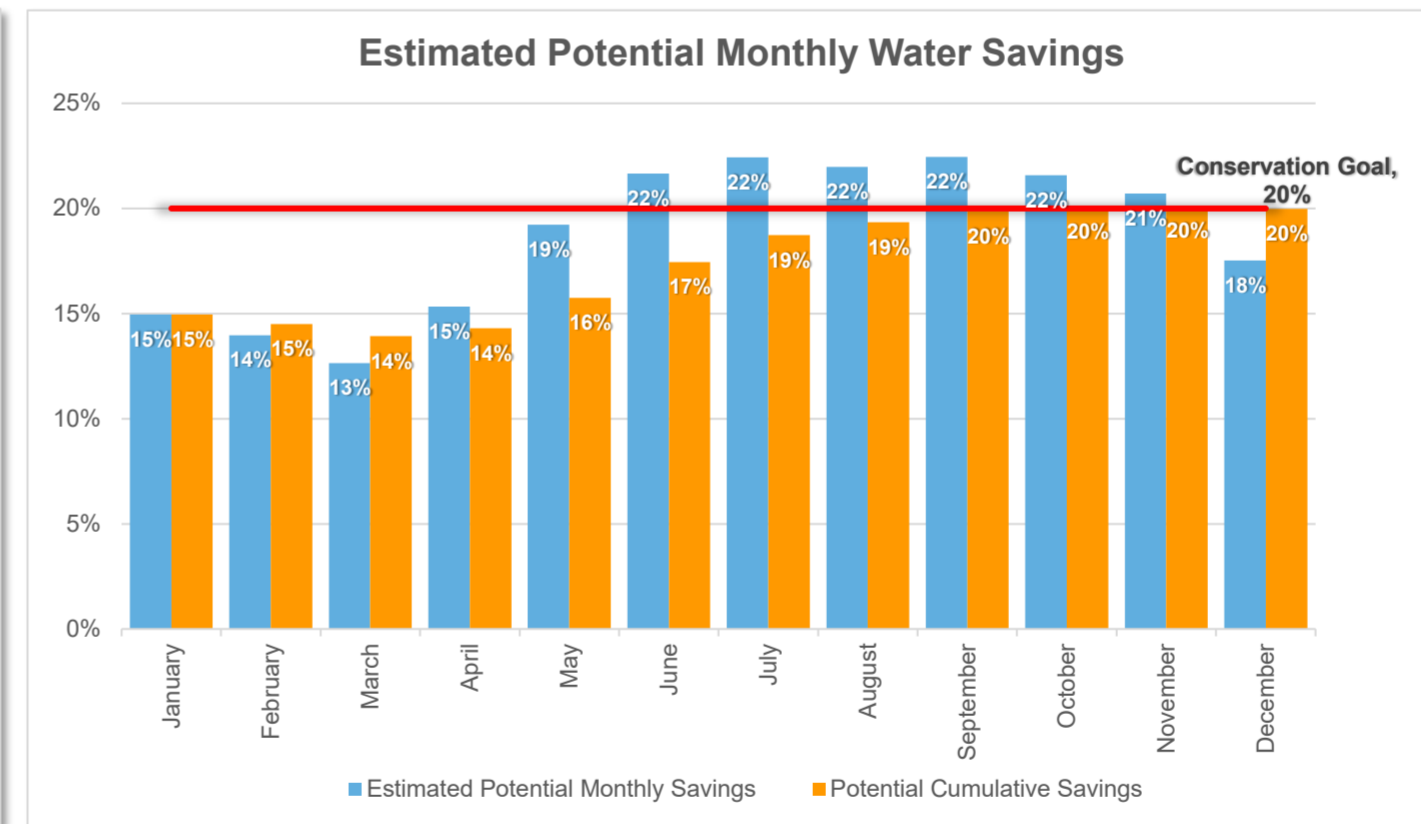
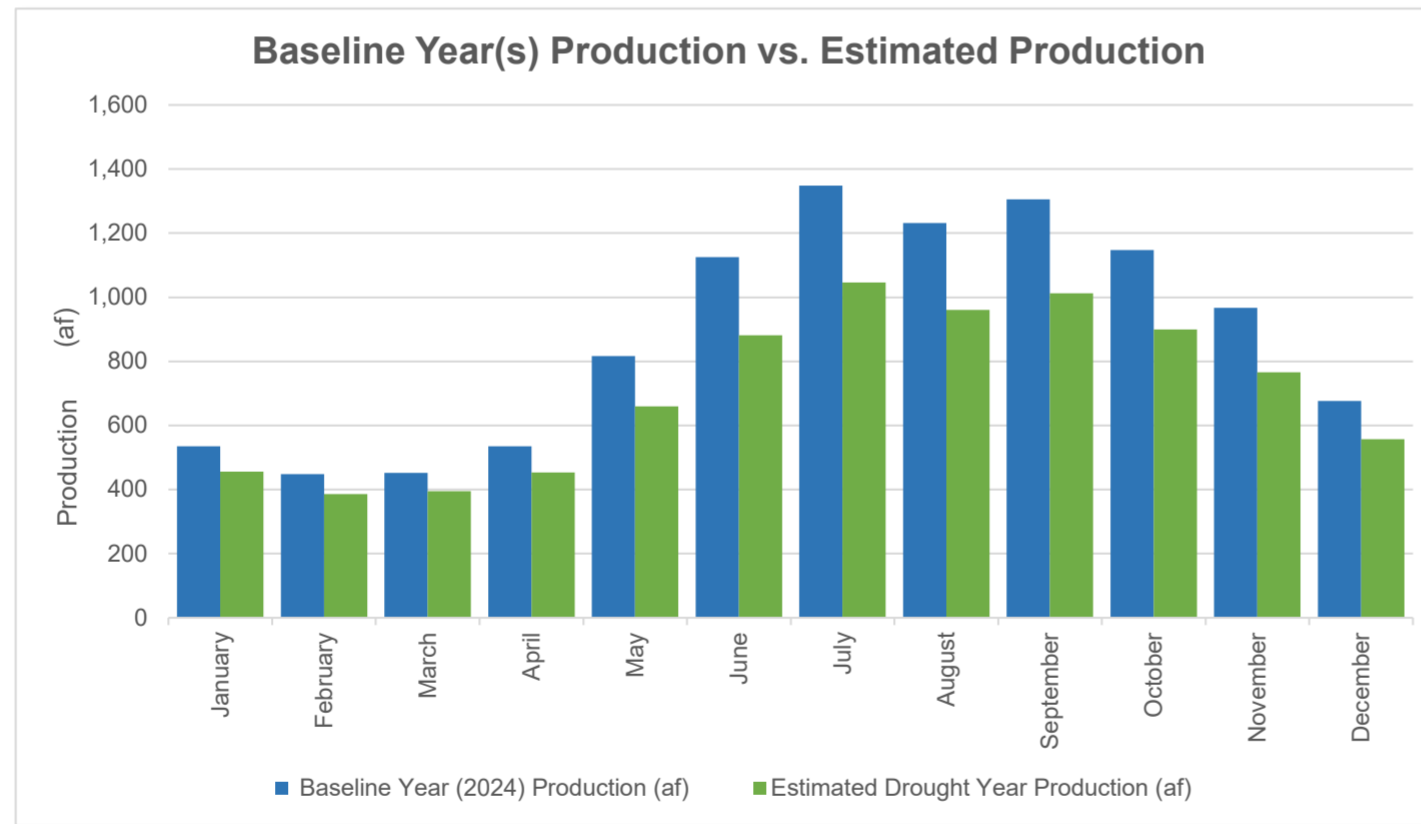
California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	20%
Drought Shortage Level	Shortage Level 2
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.

5 - Estimated Water Savings - Shortage Level 2 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	455	15%	15%	20%	
February	449	386	14%	15%	20%	
March	452	395	13%	14%	20%	
April	535	453	15%	14%	20%	
May	817	660	19%	16%	20%	
June	1,126	882	22%	17%	20%	
July	1,348	1,046	22%	19%	20%	
August	1,231	961	22%	19%	20%	
September	1,306	1,013	22%	20%	20%	
October	1,147	900	22%	20%	20%	
November	966	766	21%	20%	20%	
December	676	557	18%	20%	20%	





Drought Response Tool

Home Input Baseline Year Water Use Baseline Year Water Use Profile Drought Response Actions Estimated Water Savings Drought Response Tracking

1 - Home

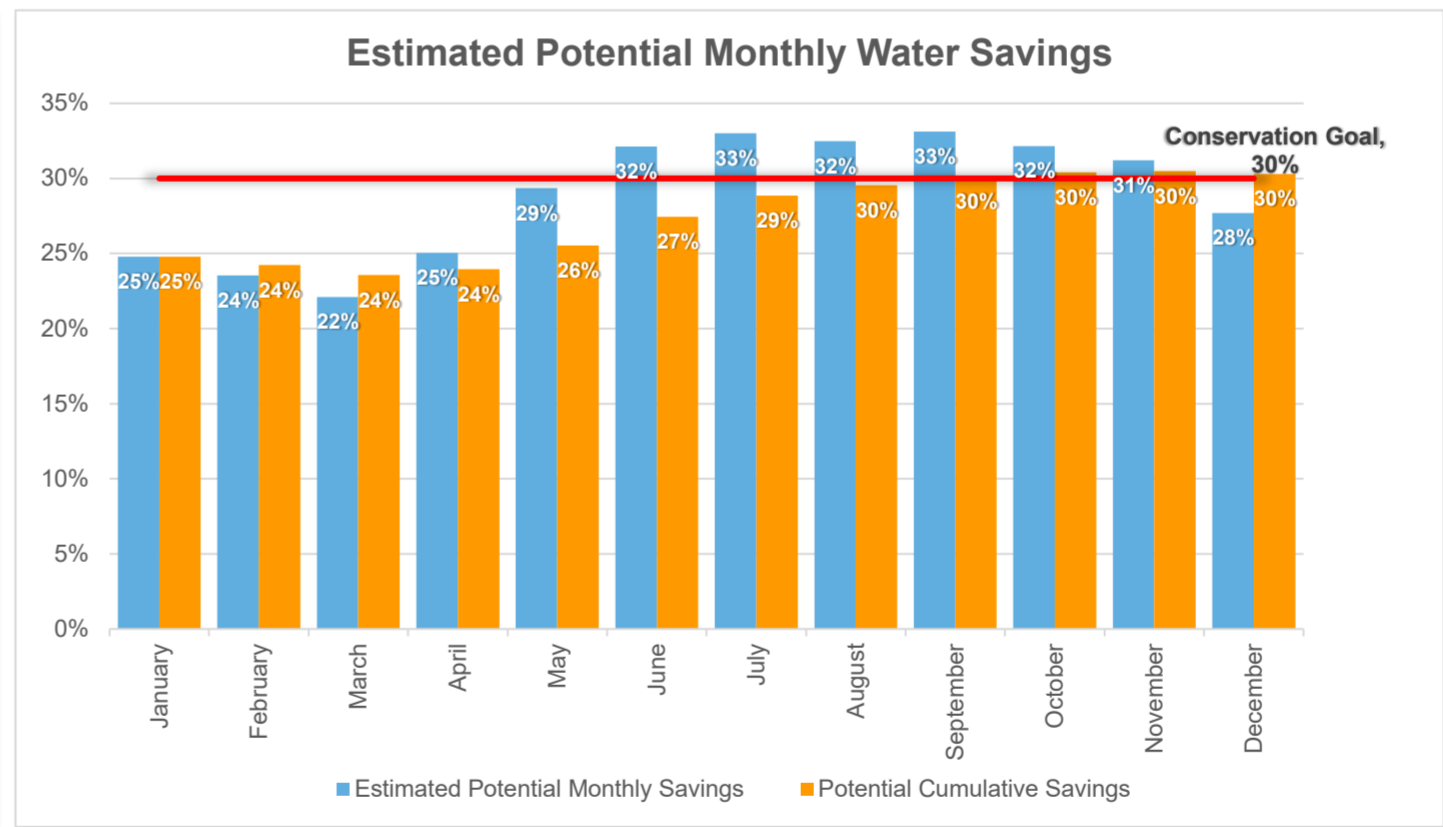
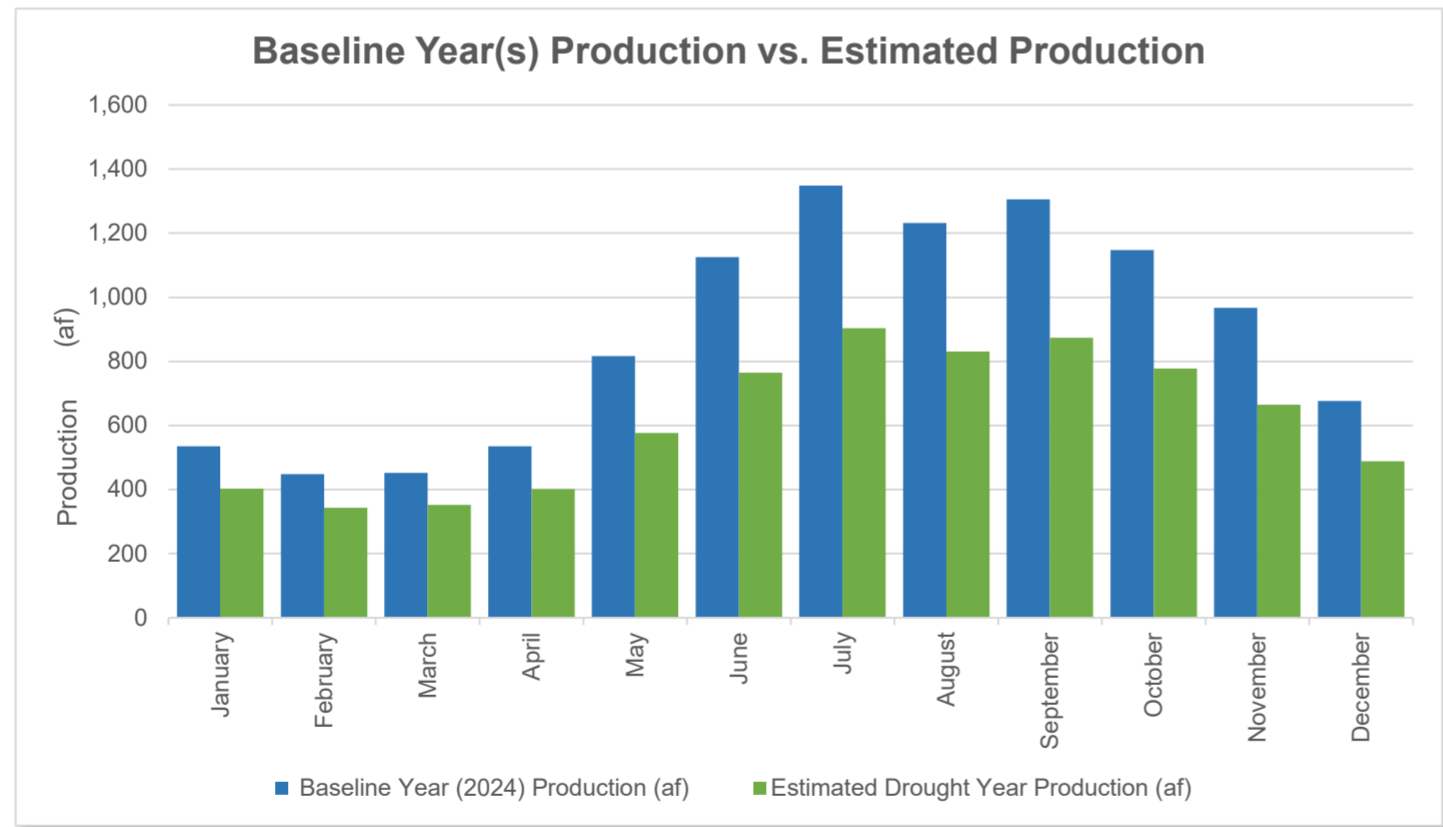
California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	30%
Drought Shortage Level	Shortage Level 3
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.

5 - Estimated Water Savings - Shortage Level 3 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	403	25%	25%	30%	
February	449	343	24%	24%	30%	
March	452	352	22%	24%	30%	
April	535	401	25%	24%	30%	
May	817	577	29%	26%	30%	
June	1,126	764	32%	27%	30%	
July	1,348	903	33%	29%	30%	
August	1,231	831	32%	30%	30%	
September	1,306	873	33%	30%	30%	
October	1,147	778	32%	30%	30%	
November	966	665	31%	30%	30%	
December	676	489	28%	30%	30%	





Drought Response Tool

- Home
- Input Baseline Year Water Use
- Baseline Year Water Use Profile
- Drought Response Actions
- Estimated Water Savings
- Drought Response Tracking

1 - Home

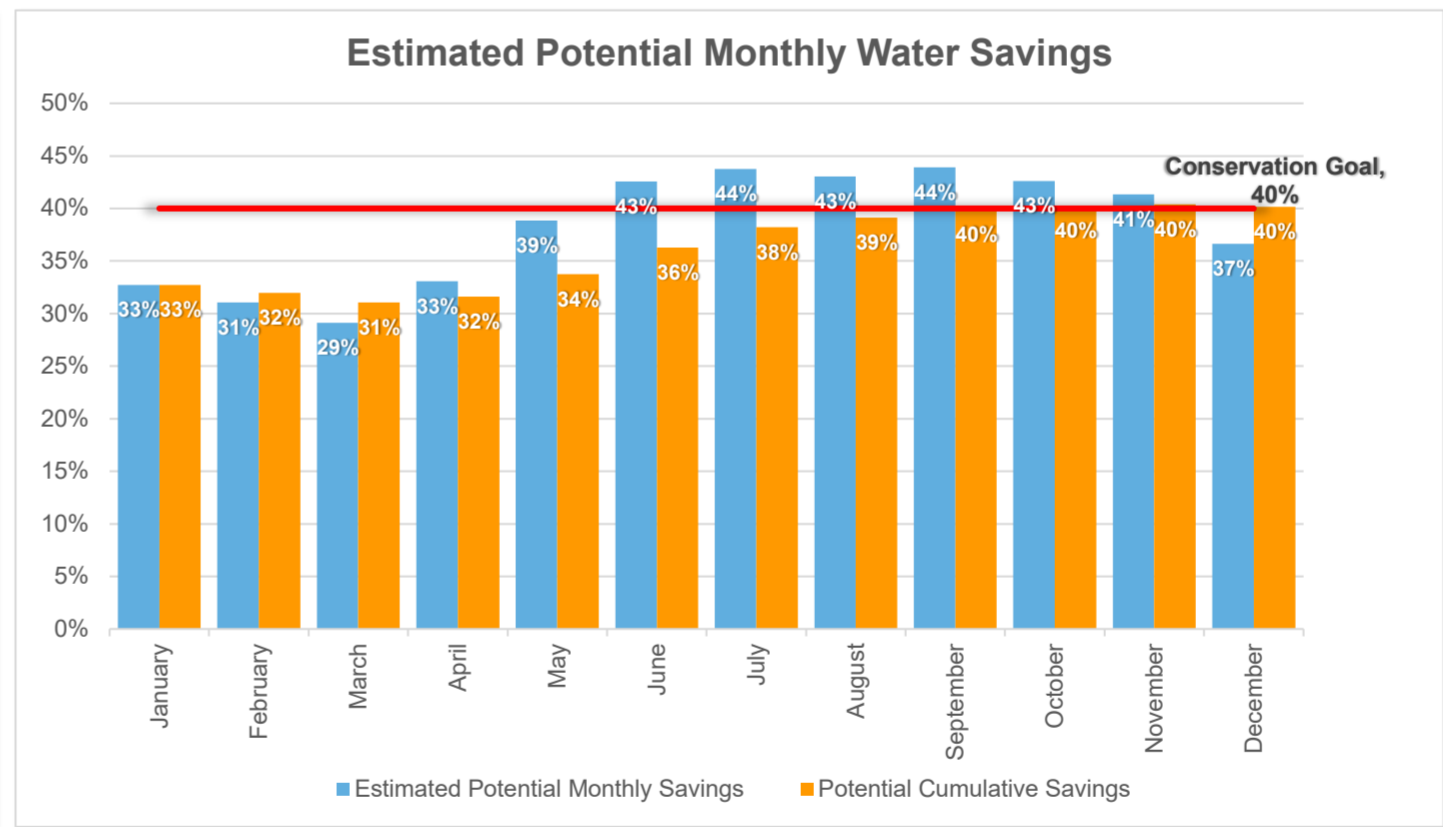
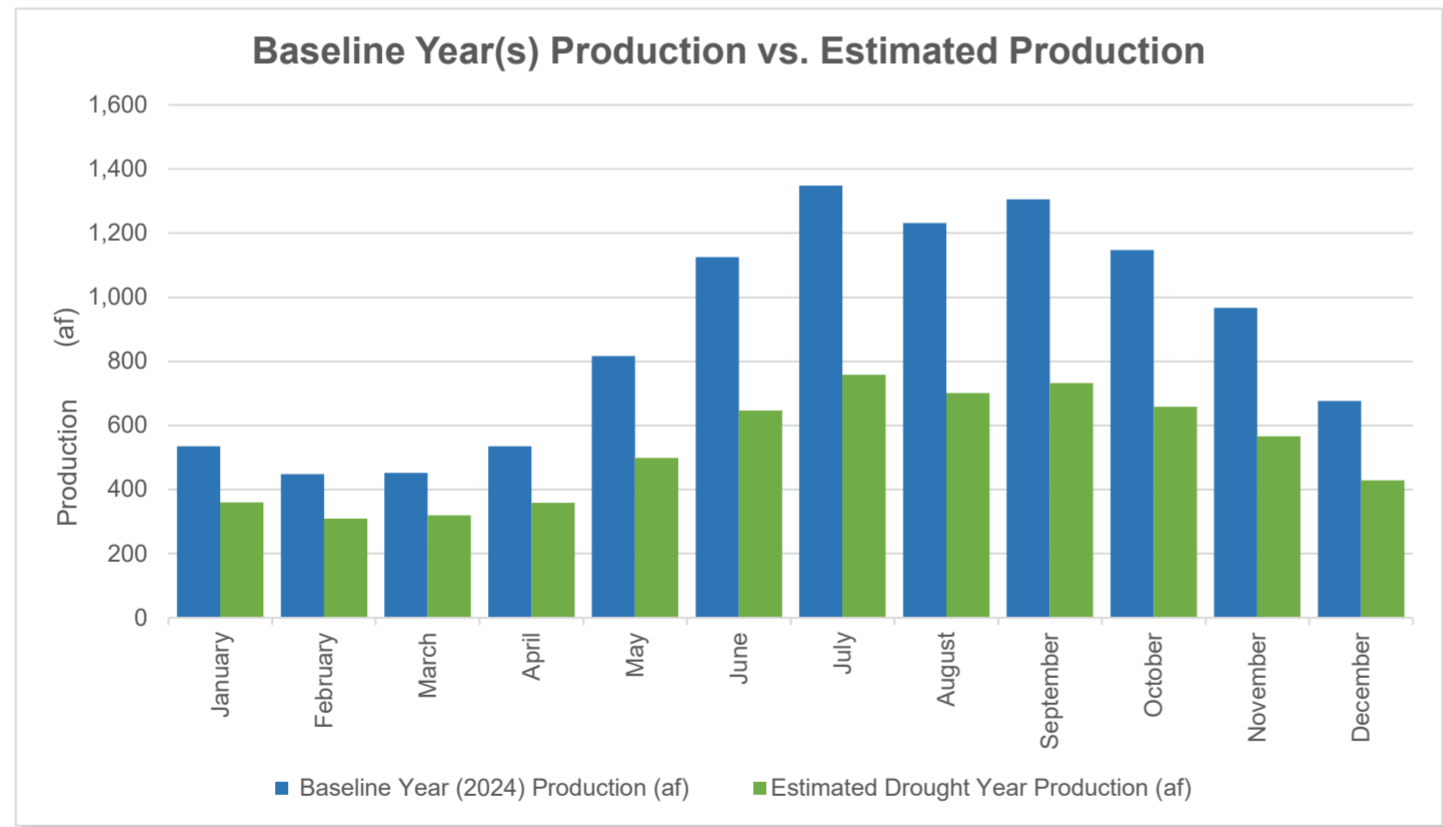
California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	40%
Drought Shortage Level	Shortage Level 4
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.

5 - Estimated Water Savings - Shortage Level 4 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	360	33%	33%	40%	
February	449	309	31%	32%	40%	
March	452	320	29%	31%	40%	
April	535	358	33%	32%	40%	
May	817	499	39%	34%	40%	
June	1,126	646	43%	36%	40%	
July	1,348	758	44%	38%	40%	
August	1,231	701	43%	39%	40%	
September	1,306	733	44%	40%	40%	
October	1,147	658	43%	40%	40%	
November	966	567	41%	40%	40%	
December	676	428	37%	40%	40%	





Drought Response Tool

Home Input Baseline Year Water Use Baseline Year Water Use Profile Drought Response Actions Estimated Water Savings Drought Response Tracking

1 - Home

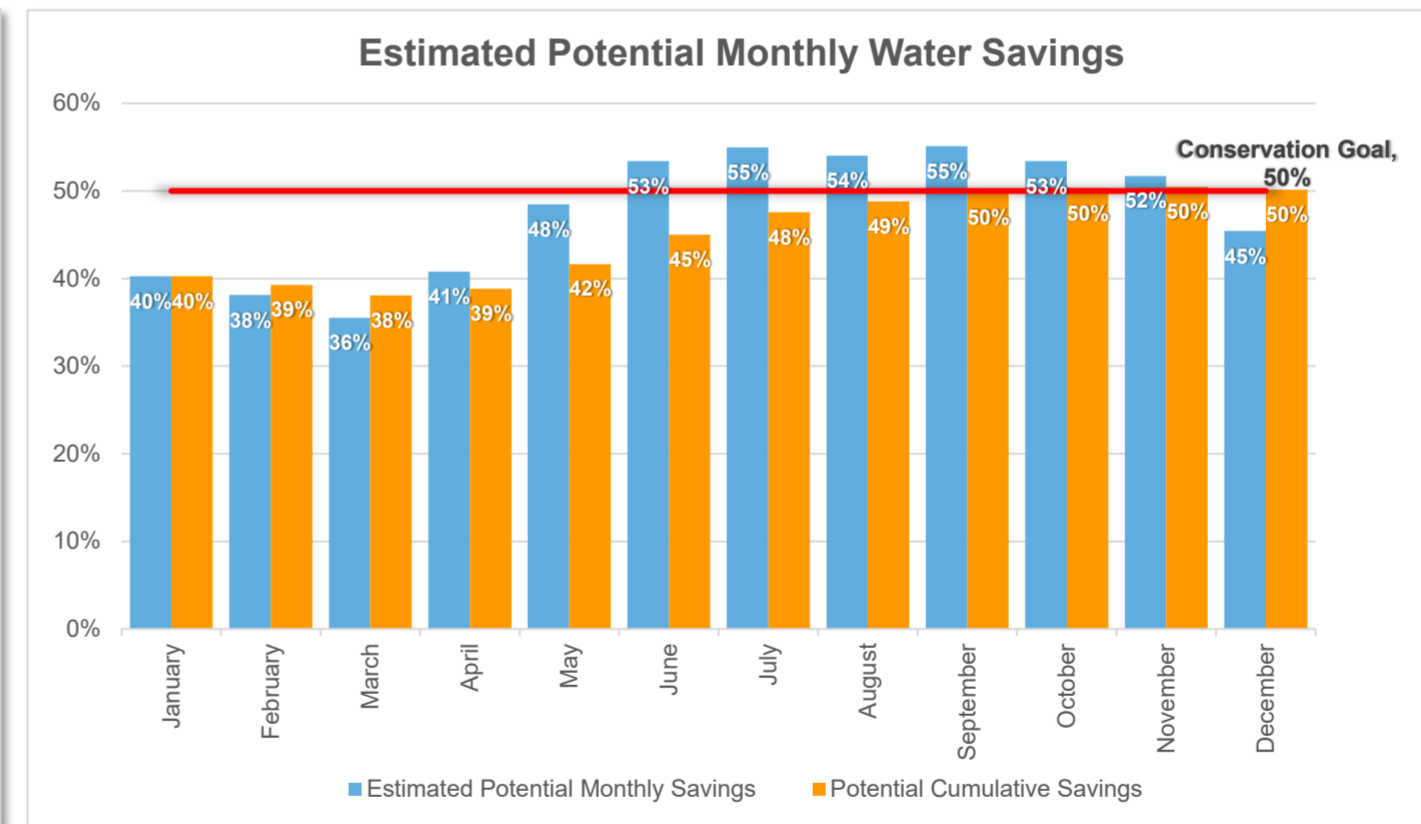
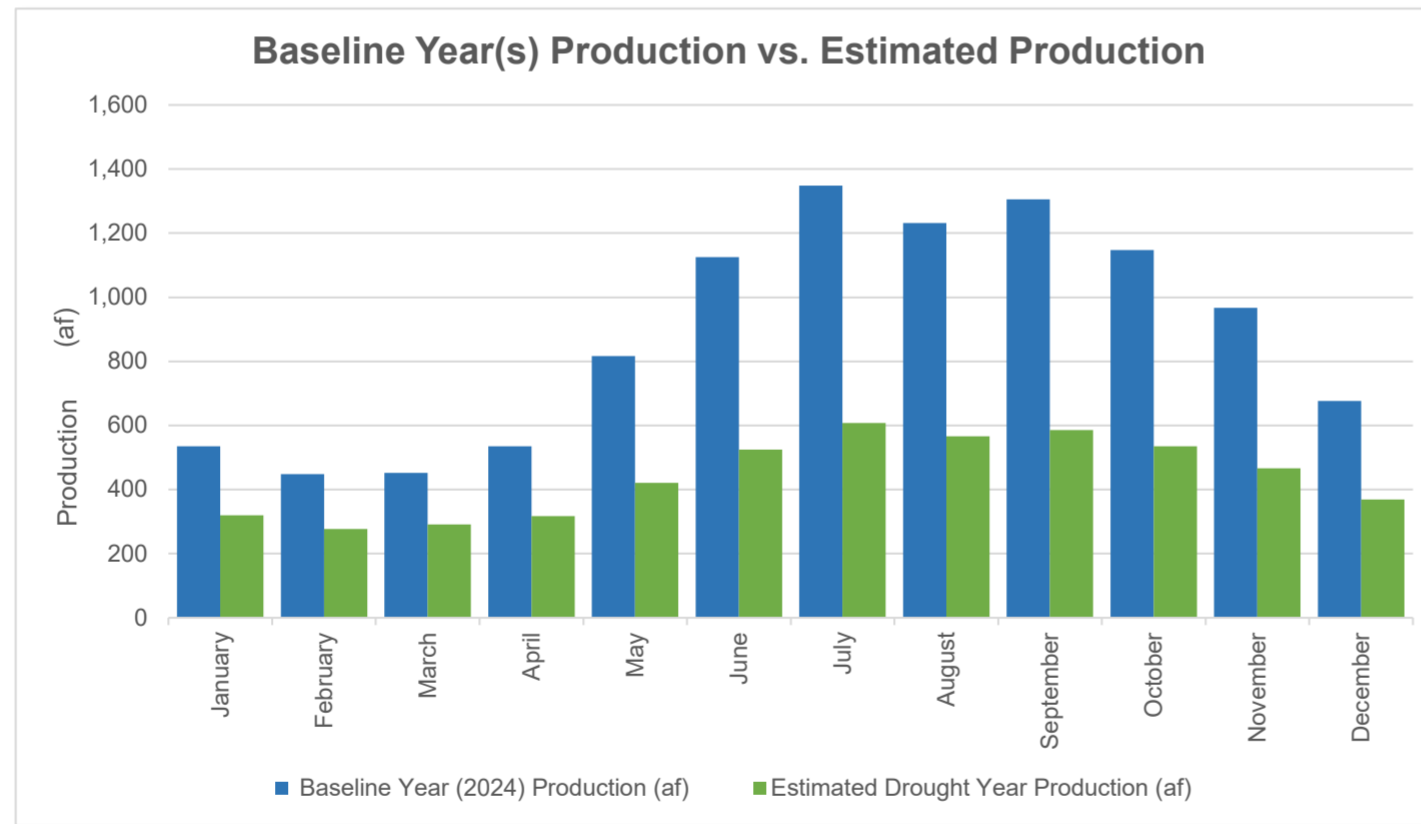
California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	50%
Drought Shortage Level	Shortage Level 5
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.

5 - Estimated Water Savings - Shortage Level 5 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	320	40%	40%	50%	
February	449	278	38%	39%	50%	
March	452	291	36%	38%	50%	
April	535	317	41%	39%	50%	
May	817	421	48%	42%	50%	
June	1,126	525	53%	45%	50%	
July	1,348	607	55%	48%	50%	
August	1,231	566	54%	49%	50%	
September	1,306	586	55%	50%	50%	
October	1,147	535	53%	50%	50%	
November	966	467	52%	50%	50%	
December	676	369	45%	50%	50%	





Drought Response Tool

Home Input Baseline Year Water Use Baseline Year Water Use Profile Drought Response Actions Estimated Water Savings Drought Response Tracking

1 - Home

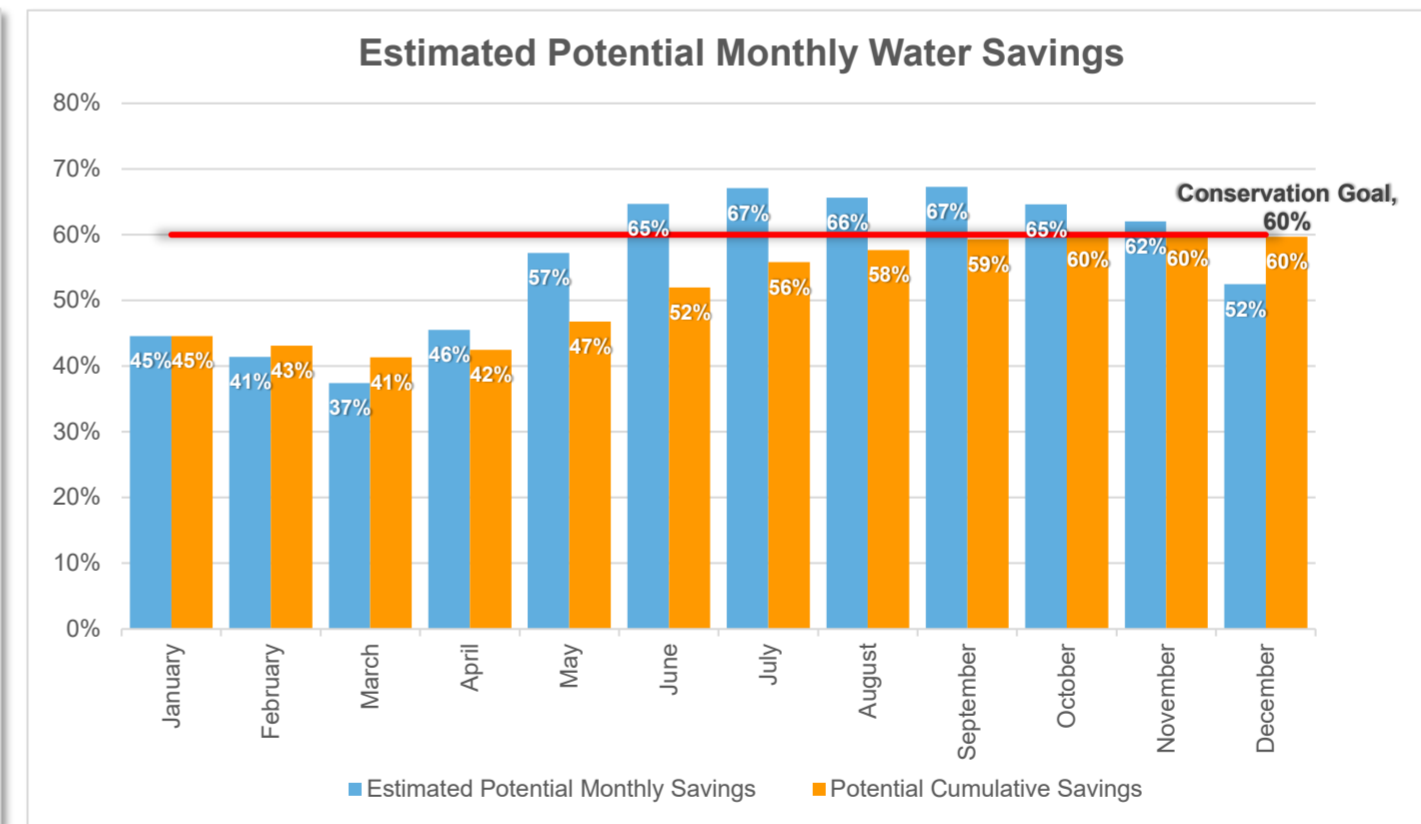
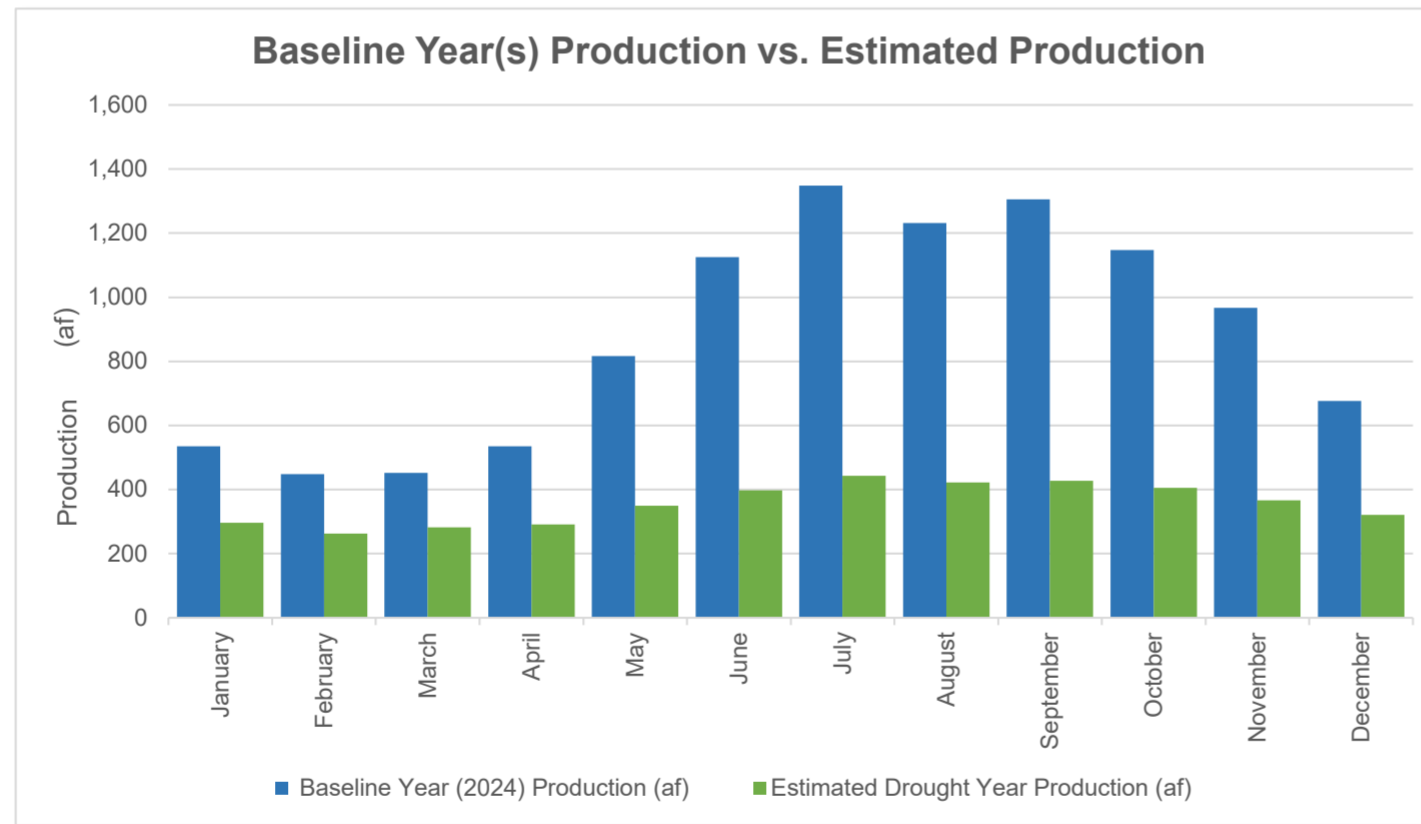
California Water Service - Los Altos Suburban

Enter Agency Information	
Agency Name	Los Altos Suburban
Total Population Served	64,029
Conservation Goal (%)	60%
Drought Shortage Level	Shortage Level 6
Number of Residential Accounts	17,141
Number of Commercial, Industrial, and Institutional (CII) Accounts	1,377
Number of Dedicated Irrigation Accounts	0
Baseline Year(s)	2024
Percentage of Residential Indoor Use During Minimum Month (%)	98%
Percentage of CII Indoor Use During Minimum Month (%)	93%
Comments	

Navigation	
USER'S GUIDE	Download and read the guide before using this Tool
1 - HOME	Enter agency information
2 - INPUT BASELINE YEAR WATER USE	Enter Baseline Year production and use
3 - BASELINE YEAR WATER USE	Review and confirm entered information
4 - DROUGHT RESPONSE ACTIONS	Select Drought Response Actions and input estimated water savings and implementation rates.
5 - ESTIMATED WATER SAVINGS	Review estimated water production and compare estimated savings to conservation target.
6 - DROUGHT RESPONSE TRACKING	Track production and water savings against the conservation target.

5 - Estimated Water Savings - Shortage Level 6 Los Altos Suburban

Estimated Monthly Water Use and Savings Summary						
Units: <input type="text" value="(af)"/>						
<i>This provides a summary of the estimated production relative to Baseline Year production and potential water savings, assuming implementation of selected actions at the water savings and implementation rates indicated in the Drought Response Actions worksheet. Select the units that your production data are displayed in.</i>						
Month	Baseline Year (2024) Production (af)	Estimated Drought Year Production (af)	Estimated Potential Monthly Savings	Potential Cumulative Savings	Conservation Goal	Comments
January	535	297	45%	45%	60%	
February	449	263	41%	43%	60%	
March	452	283	37%	41%	60%	
April	535	292	46%	42%	60%	
May	817	349	57%	47%	60%	
June	1,126	397	65%	52%	60%	
July	1,348	444	67%	56%	60%	
August	1,231	423	66%	58%	60%	
September	1,306	428	67%	59%	60%	
October	1,147	406	65%	60%	60%	
November	966	367	62%	60%	60%	
December	676	321	52%	60%	60%	



Attachment B
CPUC Rule and Schedule 14.1

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

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A) APPLICABILITY

- 1. This rule applies to all of California Water Service’s regulated ratemaking areas in California, as well as Grand Oaks Water.

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B) GENERAL INFORMATION

- 1. All expenses incurred by California Water Service to implement Rule 14.1, and Schedule 14.1, that have not been considered in a General Rate Case or other proceeding shall be accumulated by Cal Water in a separate memorandum account, authorized by the Commission, for disposition as directed or authorized from time to time by the Commission.

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C) DEFINITIONS

For the purposes of this Rule, the following terms have the meanings set forth in this section.

- 1. “Commercial nursery” means the use of land, buildings or structures for the growing and/or storing of flowers, fruit, trees, ornamental trees, vegetable plants, shrubs, trees and similar vegetation for the purpose of transplanting, for use as stock or grafting, and includes the retail sale or wholesale distribution of such items directly from the premises/lot.
- 2. “Drip irrigation system” means a non-spray, low-pressure, and low volume irrigation system utilizing emission devices with a precipitation or flow rate measured in gallons per hour (GPH), designed to slowly apply small volumes of water at or near the root zone of plants or other landscaping.
- 3. “Flow rate” means the rate at which water flows through pipes, valves, and emission devices, measured in gallons per minute (GPM), gallons per hour (GPH), inches per hour (IPH), hundred cubic feet (Ccf), or cubic feet per second (CFS).
- 4. “Flow-restricting device” means valves, orifices, or other devices that reduce the flow of potable water through a service line, which are capable of providing the premise with a minimum flow rate of 0.5 gallons per minute.
- 5. “High-efficiency sprinkler systems” means an irrigation system with emission devices, such as sprinkler heads or nozzles, with a precipitation or flow rate no greater than on IPH.
- 6. “Irrigation” means the application of potable water by artificial means to landscape.

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(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2412</u>	<u>Greg A. Milleman</u>	Date Filed <u>06/14/2021</u>
Decision	<u>Vice President</u>	Effective <u>07/14/2021</u>
		Resolution _____

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

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C) DEFINITIONS (continued)

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- 7. "Irrigation system" means the components of a system meant to apply water to an area for the purpose of irrigation, including, but not limited to, piping, fittings, sprinkler heads or nozzles, drip tubing, valves, and control wiring.
- 8. "Landscape" means all of the outdoor planting areas, turf areas, and water features at a particular location.
- 9. "Measurable rainfall" means any amount of precipitation of more than one-quarter of an inch (0.25").
- 10. "Micro spray irrigation system" means a low-pressure, low-volume irrigation system utilizing emission devices that spray, mist, sprinkle, or drip with a precipitation or flow rate measured in GPH, designed to slowly apply small volumes of water to a specific area.
- 11. "Ornamental landscape" means shrubs, bushes, flowers, ground cover, turf, lawns, and grass planted for the purpose of improving the aesthetic appearance of property, but does not include crops or other agricultural products or special landscape areas.
- 12. "Ornamental turf" means a ground cover surface of grass that can be mowed and is planted for the purpose of improving the aesthetic appearance of the property, but does not include crops or other agricultural products or special landscape areas.
- 13. "Plumbing fixture" means a receptacle or device that is connected to a water supply system, including, but not limited to, pipes, toilets, urinals, showerheads, faucets, washing machines, water heaters, tubs, and dishwashers.
- 14. "Potable water" means water supplied by Cal Water which conforms to the federal and state standards for human consumption.
- 15. "Properly programmed" means a smart irrigation controller that has been programmed according to the manufacturer's instructions and site-specific conditions.
- 16. "Real-time water measurement device" means a device or system that provides regularly updated electronic information regarding the customer's water use.
- 17. "Runoff" means water which is not absorbed by the soil or landscape to which it is applied and flows from the landscape onto other areas.
- 18. "Smart irrigation controller" means an automatic device used to remotely control valves that operate an irrigation that has been tested by an American National Standards Institute accredited third-party certifying body or laboratory in accordance with the Environmental Protection Agency's WaterSense program (or an analogous successor program), and certified by such body or laboratory as meeting the performance and efficiency requirements of such program, or the more stringent performance and efficiency requirements of another similar program.

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		Resolution _____

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

C) DEFINITIONS (continued)

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- 19. "Special landscape area" means an area of landscape dedicated solely to edible plants and areas dedicated to active play such as parks, sports fields, golf courses, and where turf provides a playing surface.
- 20. "Turf" means a ground cover surface of grass that can be mowed.
- 21. "Water feature" means a design element where open, artificially supplied water performs an aesthetic or recreation feature, including, but not limited to, ponds, lakes, waterfalls, fountains, and streams.
- 22. "Water use evaluation" means an evaluation of the efficiency of indoor water-using devices, including, but not limited to, measurement of flow rates for all existing showerheads, faucets, and toilets, inspection for leaks, and providing written recommendations to improve the efficiency of the indoor water-using fixtures and devices and/or an evaluation of the performance of an irrigation system, including, but not limited to, inspection for leaks, reporting of overspray or runoff, and providing written recommendations to improve the performance of the irrigation system.

D) ENFORCEMENT

This Rule establishes certain restrictions on the use of potable water. Violating the restrictions set forth is declared a non-essential, wasteful use of potable water. Cal Water is authorized to take the following actions when its personnel verify a customer is using potable water for non-essential, wasteful uses. No person shall have any right or claim in law or in equity against Cal Water because of, or as a result of, any matter or thing done or threatened to be done pursuant to the restrictions on using potable water for non-essential, wasteful uses.

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1. FIRST VIOLATION

Cal Water shall provide the customer with a written notice of violation. In addition, Cal Water is authorized to take the following actions:

- a) If the customer currently receives service through a metered connection, install a real-time water measurement device on the customer's service line and provide the customer with access to information from the device. The cost of the device, including installation and on-going operating costs, may be billed to the customer, and nonpayment may result in discontinuation of service.
- b)

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Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

D) ENFORCEMENT (continued)

(L)

1. FIRST VIOLATION (continued)

- b) If the customer does not currently receive service through a metered connection, install a water meter on the customer’s service line, charge the customer for water use pursuant to Cal Water’s metered service tariffs and rules, and install a real-time water measurement device on the customer’s service line and provide the customer with access to information from the device. The cost of the device, including installation and ongoing operating costs, may be billed to the customer, and nonpayment may result in discontinuance of service.

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2. SECOND VIOLATION

If Cal Water verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the first violation, Cal Water shall provide the customer with a second written notice of violation and is authorized to install a flow-restricting device on the customer’s service line. Cal Water shall not be held liable for any injuries, damages, and/or consequences arising from the installation of a flow-restricting device.

3. NOTICES OF VIOLATION:

- a) Unless otherwise specified, written notices of violation provided to customers pursuant to this Rule shall document the verified violation and alert the customer to the fact that future violations of the restricted uses of potable water may result in a real-time water measurement device being installed on the customer’s service line at the customers expense, the installation of a flow-restricting device on the customer’s service line, or the discontinuation of the customer’s service.
- b) If Cal Water elects to install a flow-restricting device on a customer’s service line, the written notice shall document the steps the customer must take in order for the flow-restricting device to be removed, and shall explain that after the flow-restricting device is removed, it may be reinstalled, without further notice, if the customer is again verified by Cal Water to be using potable water for non-essential, wasteful uses.

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4. FLOW RESTRICTING DEVICE CONDITIONS

The installation of a flow-restricting device on a customer’s service line is subject to the following conditions:

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Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

D) ENFORCEMENT (continued)

(L)

4. FLOW RESTRICTING DEVICE CONDITIONS (continued)

- a) The device shall be capable of providing the premise with a minimum flow rate of 0.5 gallons per minute. (C)
- b) The device may only be removed by Cal Water, and only after a minimum three-day period has elapsed. (C)
- c) Any tampering with the device may result in the discontinuation of the customer’s water service and the customer being charged for any damage to Cal Water’s equipment or facilities and any required service visits.
- d) After the removal of the device, if Cal Water’s personnel verify that the customer is using potable water for non-essential, wasteful uses, Cal Water may install another flow-restricting device without prior notice. This device shall remain in place until water supply conditions warrant its removal. If, despite the installation of the device, Cal Water’s personnel verifies that the customer is using potable water for non-essential, wasteful uses, then Cal Water may discontinue the customer’s water service, as provided in its Rule No. 11. (T)

5. FLOW RESTRICTING DEVICE REMOVAL CHARGES

The charge to customers for removal of a flow-restricting device installed pursuant to this Rule is \$100 during normal business hours, and \$150 for the device to be removed outside of normal business hours.

E) WASTEFUL USES OF WATER

Except where necessary to address an immediate health or safety need or to comply with a term or condition in a permit issued by a state or federal agency, customers are prohibited, at all times, from using potable water for the following actions, as each is declared a non-essential, wasteful use of water:

- a) Outdoor Irrigation Restrictions (C)
 - (i) Irrigating ornamental landscape with potable water is prohibited during the hours between 8:00 a.m. and 6:00 p.m.
 - (ii) The foregoing irrigation restriction does not apply to:
 - (1) Landscape irrigation zones that exclusively use drip irrigation systems and/or micro spray irrigation systems;

(L) (C)

(Continued)

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Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

E) WASTEFUL USES OF WATER (continued)

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a) Outdoor Irrigation Restrictions (continued)

(ii) The foregoing irrigation restriction does not apply to: (continued)

...

(2) Irrigating ornamental landscapes with the use of a hand-held bucket or similar container, with a continuously monitored hose which is fitted with an automatic shut-off nozzle or device attached to it that causes it to cease dispensing water immediately when not in use or monitored, or for the express purpose of adjusting or repairing an irrigation system.

(C)

b) Obligation to Fix Leaks, Breaks, or Malfunctions: All leaks, breaks, or other malfunctions in the customer's plumbing fixtures and/or irrigation system must be repaired within five (5) business days of written notification by Cal Water, unless other arrangements are made with Cal Water.

c) Prohibited Uses of Water: Customers are prohibited from using potable water for the following actions:

(i) The application of potable water to landscapes in a manner that causes runoff such that water flows onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures;

(ii) The use of a hose that dispenses potable water to wash vehicles, including cars, trucks, buses, boats, aircraft, and trailers, whether motorized or not, except where the hose is fitted with a shut-off nozzle or device attached to it that causes it to cease dispensing water immediately when not in use;

(iii) The application of potable water to driveways and sidewalks;

(iv) The use of potable water in a water feature, except where the water is part of a recirculating system;

(v) The application of potable water to outdoor landscapes during and within forty-eight (48) hours after measurable rainfall (see Definitions);

(vi) Irrigation outside of newly constructed homes and buildings with potable water in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission, the Department of Housing and Community Development, or other state agency.

(vii) The serving or drinking water other than upon request in eating and drinking establishments, including but not limited to restaurants, hotels, cafes, cafeterias, bars, or other public places where food or drink are served and/or purchased;

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(To be inserted by utility)
Advice Letter 2412
Decision

Issued By
Greg A. Milleman
Vice President

(To be inserted by CPUC)
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Effective 07/14/2021
Resolution _____

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

E) WASTEFUL USES OF WATER (continued)

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- d) Operators of hotels and motels shall provide guests with the option of choosing not to have towels and linens laundered daily. The hotel or motel shall prominently display notice of this option in each guest room using clear and easily understood language.
- e) Other duly adopted restrictions on the use of potable water as prescribed from time to time by the Commission or other authorized government agencies are incorporated herein by reference.

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F) ADOPTION OF SCHEDULE NO. 14.1 - STAGED MANDATORY REDUCTIONS AND DROUGHT SURCHARGES

1. Addition of Schedule No. 14.1

If, in the opinion of Cal Water, more stringent water conservation measures are required due to supply conditions or government directive, Cal Water may request the addition of Schedule No. 14.1 – Staged Mandatory Reductions and Drought Surcharges, via a Tier 2 advice letter.

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- a) Cal Water may not activate Schedule No. 14.1 until it has been authorized to do so by the California Public Utilities Commission, as delegated to its Division of Water and Audits.
- b) A Schedule No. 14.1 that has been authorized by the California Public Utilities Commission shall remain dormant until triggered by specific conditions detailed in the Schedule No. 14.1 tariff and Cal Water has requested and received authorization for activating a stage by the California Public Utilities Commission.
- c) Notice of the Tier 2 advice letter and associated public participation hearing, if required, shall be provided to customers through a bill insert or a direct mailing, as set forth in Subsection 5 (Public Notice) below.
- d) Cal Water shall comply with all requirements of Sections 350-358 of the California Water Code.
- e) The Tier 2 advice letter requesting the addition of a Schedule No. 14.1 shall include, but not be limited to:
 - (i) A proposed Schedule No. 14.1 tariff, which shall include but not be limited to:
 - (1) Applicability;
 - (2) Territory applicable to;

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(Continued)

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Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

F) ADOPTION OF SCHEDULE NO. 14.1 - STAGED MANDATORY REDUCTIONS AND DROUGHT SURCHARGES (continued)

(L)

1. Addition of Schedule No. 14.1 (continued)

e) The Tier 2 advice letter requesting the addition of a Schedule No. 14.1 shall include, but not be limited to: (continued)

(i) A proposed Schedule No. 14.1 tariff, which shall include but not be limited to: (continued)

...

(3) A detailed description of each stage (the number of stages requested for a ratemaking area may vary depending on the specifics of the water shortage event);

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(4) A detailed description of the trigger(s) that activates each stage;

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(5) A detailed description of each water use restriction for each stage of water budgets;

(6) Water use violation levels, written warning levels, associated penalties, if applicable, and exception procedures;

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(7) Conditions for the installation of a flow-restricting device;

(T)

(8) Charges for the removal of a flow-restricting device; and

(T)

(9) Special conditions.

(ii) Justification for, and documentation and calculations in support of the water budgets.

2. Conditions for Activating Schedule No. 14.1

Cal Water may file a Tier 1 advice letter to request activation of a particular stage of Schedule No. 14.1 tariff if:

a) Cal Water, the California Public Utilities Commission, wholesale water supplier, or other government agency declares an emergency requiring mandatory water budgets, mandatory water rationing, or mandatory water allocations; or

b) A government agency declares a state of emergency in response to severe drought conditions, earthquake or other catastrophic event that severely reduces Cal Water's water supply; or

c) Water supplies are projected to be insufficient to meet normal customer demand by Cal Water; or

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d) A water supply shortage or threatened shortage exists; or

e) Cal Water is unable to achieve water conservation targets set by itself or a governing agency; or

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(Continued)

(To be inserted by utility)

Issued By

(To be inserted by CPUC)

Advice Letter 2412

Greg A. Milleman

Date Filed 06/14/2021

Decision

Vice President

Effective 07/14/2021

Resolution _____

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

F) ADOPTION OF SCHEDULE NO. 14.1 - STAGED MANDATORY REDUCTIONS AND DROUGHT SURCHARGES (continued)

(L)

2. Conditions for Activating Schedule No. 14.1 (continued)

...

- f) Water conservation targets set by itself or a governing agency are insufficient; or
- g) Cal Water chooses to subsequently activate a different stage of the Schedule No. 14.1 tariff.

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3. Activating Schedule No. 14.1

The Tier 1 advice letter requesting activation of a stage of the Schedule No. 14.1 tariff shall:

- a) Include, but not be limited to, a justification for activating the particular stage of Staged Mandatory Reductions and Drought Surcharges, as well as the period during which the particular stage will be in effect.
- b) Be accompanied by the customer notification measures detailed in sub-section 5 (Public Notice) below.

(C)

4. De-Activating Schedule No. 14.1

When Schedule No. 14.1 is activated and Cal Water determines that water supplies are again sufficient to meet normal demands, and mandatory water use reductions are no longer necessary, Cal Water shall seek the approval of the California Public Utilities Commission, via a Tier 1 advice letter, to de-activate the particular stage of mandatory water use reductions that had been authorized.

5. Public Notice

- a) When Cal Water requests the addition of Schedule No. 14.1 via a Tier 2 advice letter, it shall provide notice of the Tier 2 advice letter and associated public hearing to customers through bill inserts or direct mailing, and it shall comply with all requirements of Sections 350-358 of the California Water Code (CWC), including but not limited to the following:
 - (i) In order to be in compliance with both General Order 96-B and CWC, notice shall be provided via both newspaper and bill insert or direct mailing;
 - (ii) One notice shall be provided for each advice letter filed that includes both notice of the filing of the Tier 2 advice letter as well as the details of the public hearing (date, time, place, etc.);

(T)

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(Continued)

(To be inserted by utility)	Issued By	(To be inserted by CPUC)
Advice Letter <u>2412</u>	<u>Greg A. Milleman</u>	Date Filed <u>06/14/2021</u>
Decision	<u>Vice President</u>	Effective <u>07/14/2021</u>
		Resolution _____

Rule No. 14.1

NON-ESSENTIAL, WASTEFUL USES OF POTABLE WATER

(C)

F) ADOPTION OF SCHEDULE NO. 14.1 - STAGED MANDATORY REDUCTIONS AND DROUGHT SURCHARGES (continued)

(L)

5. Public Notice (continued)

a) When Cal Water requests the addition of Schedule No. 14.1 via a Tier 2 advice letter, it shall provide notice of the Tier 2 advice letter and associated public hearing to customers through bill inserts or direct mailing, and it shall comply with all requirements of Sections 350-358 of the California Water Code (CWC), including but not limited to the following: (continued)

...

(iii) The public meeting shall be held after the Tier 2 advice letter is filed, and before the Commission authorizes the addition of Schedule No. 14.1 to the tariff, except in cases of emergency water shortages approved by the Commission;

(C)

(iv) Cal Water shall consult with Division of Water and Audits staff prior to filing advice letter, in order to determine details of the public meeting.

b) In the event that Schedule No. 14.1 is triggered, and Cal Water requests activation through the filing of a Tier 1 advice letter, Cal Water shall notify its customers and provide each customer with a summary of Schedule No. 14.1 by means of bill insert or direct mailing. Notification shall take place prior to imposing any penalties associated with this plan. If activation of Schedule No. 14.1 occurs one year or more since the public hearing associated with adding Schedule No. 14.1 to its tariffs, then Cal Water shall conduct a public hearing pursuant to California Water Code Section 351 prior to activating a stage of the tariff.

(T)

(T)

c) During the period that a stage of Schedule No. 14.1 is activated, Cal Water shall provide customers with updates in at least every other bill regarding its water supply status and the results of customers' conservation efforts.

(L)

Appendix H: Conservation Master Plan

CONSERVATION MASTER PLAN 2026 – 2030



April 2026

Los Altos Suburban District

California Water Service

Prepared by M.Cubed



Executive Summary

This Conservation Master Plan presents California Water Service’s (Cal Water’s) strategy for managing water demand in the Los Altos Suburban District over the 2026–2030 planning period. The plan describes historical conservation performance, emerging regulatory and resource drivers, the District’s conservation program framework, and the funding needed to support expanded conservation efforts.

Historical Progress

The Los Altos Suburban District has achieved substantial and sustained reductions in water use over the past two decades. Per capita water use has declined significantly, enabling the District to comply with the Water Conservation Act of 2009 (SB X7-7) and consistently exceed the California Public Utilities Commission (CPUC) conservation goals for Class A water utilities. These reductions reflect the combined effects of universal metering, conservation-oriented pricing, customer conservation programs, and state and federal plumbing and appliance efficiency standards.

Need for Expanded Conservation

Looking ahead, the primary regulatory driver is the State’s Making Conservation a California Way of Life (MCCWL) framework, which establishes increasingly stringent efficiency standards and reporting requirements beginning in 2027 and extending through 2035 and beyond. Under currently authorized programs and anticipated passive efficiency gains, the District is projected to remain below its Urban Water Use Objective (UWUO) and in compliance with the State’s distribution system water loss performance standard throughout the planning horizon. Maintaining that position will nonetheless require sustained implementation, performance monitoring, and periodic refinement of conservation strategies as standards tighten over time.

At the same time, the District relies on imported supplies from the State Water Project. SWP deliveries are inherently variable and are influenced by hydrologic conditions in Northern California, Delta regulatory constraints, and allocation decisions that can fluctuate significantly from year to year. Extended drought conditions, evolving environmental requirements, and long-term climate variability introduce both supply and cost uncertainty. These factors underscore the value of continued demand management as a means of strengthening reliability and moderating exposure to wholesale cost volatility.

Conservation Program Strategy

Cal Water’s conservation strategy integrates multiple demand-management tools within a centrally administered program framework designed to maximize consistency, cost-effectiveness, and regulatory compliance. Key elements include:

- Residential and non-residential conservation programs

Los Altos Suburban District Conservation Master Plan: 2026-2030

- Increased emphasis on outdoor landscape efficiency and high-water-use customers
- Universal metering and conservation-oriented rate design
- Proactive water loss management
- Water waste prevention under CPUC Rule 14.1
- Ongoing program tracking, empirical savings evaluations, and regulatory reporting

Together, these components position conservation as a long-term resource strategy that supports compliance with state efficiency standards, water supply sustainability objectives, and cost-effective service delivery.

Budget and Implementation

Cal Water is proposing an increase of approximately 28 percent in the Los Altos Suburban District's conservation budget in the 2024 General Rate Case. The requested budget reflects both an expansion and a reprioritization of resources, with a larger share directed toward direct customer program implementation. Although the District is projected to remain below its Urban Water Use Objective under baseline conditions, the expanded funding strengthens demand management, enhances reliability of supplies delivered through the State Water Project, and reduces exposure to imported water cost volatility.

Conclusion

Conservation is a core resource management function rather than a supplementary program. Continued investment in conservation will help the Los Altos Suburban District meet evolving state requirements, support water supply reliability, and manage the cost of service for customers. This plan establishes the framework for achieving these objectives during the 2026–2030 period and provides the foundation for future program adjustments as regulatory requirements and water use conditions continue to evolve.

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List of Acronyms

AB	Assembly Bill
AF	Acre-feet (one AF equals 325,851 gallons)
AMI	Advanced metering infrastructure
AMR	Automatic meter reading
AWE	Alliance for Water Efficiency
BCR	Benefit Cost Ratio
BMP	Best Management Practice
CalWEP	California Water Efficiency Partnership
CII	Commercial, industrial, and institutional
CPUC	California Public Utilities Commission
CUWCC	California Urban Water Conservation Council
EO	Executive Order
GPCD	Gallons per capita per day
GPF	Gallons per flush
GPM	Gallons per minute
GRC	General Rate Case
HET	High efficiency toilet
HEU	High efficiency urinal
HEW	High efficiency clothes washer
IOU	Investor-owned utility
MaP	Maximum performance toilet testing program
MCCWL	Making Conservation a California Way of Life
MGD	Million gallons per day
MOU	Memorandum of Understanding Regarding Urban Water Conservation in California
SB	Senate Bill
SB X7-7	Senate Bill X7-7 Water Conservation Act of 2009
ULFT	Ultra low flow toilet
UWMP	Urban Water Management Plan
WF	Water Factor
WSCP	Water Shortage Contingency Plan

1 Introduction

1.1 Master Plan Scope and Objectives

Cal Water is committed to helping its customers use water efficiently and has developed a broad portfolio of water conservation programs to support this objective. To ensure that these programs represent an appropriate and cost-effective mix, Cal Water routinely conducts comprehensive conservation program analysis and planning. This planning is undertaken on a five-year cycle in coordination with the Urban Water Management Plan (UWMP). The results of this planning effort for the Los Altos Suburban District are summarized in this report, which covers the period from 2026 through 2030.

New State regulations, rising water supply costs, and increasing competition for limited water supplies are driving the need for expanded conservation programs. Although Cal Water and its customers have made substantial progress in improving water-use efficiency and managing demand over the past two decades, additional conservation will be required going forward.

The recently adopted *Making Conservation a California Way of Life* (MCCWL) regulations establish a new set of conservation requirements and performance targets for urban water suppliers. At the same time, rising water supply costs in many parts of the State are making conservation an increasingly cost-effective means of narrowing the gap between water supply and demand.

Together, these regulatory and economic factors underscore the need to expand conservation programming in the Los Altos Suburban District.

The primary purposes of this Conservation Master Plan are to:

- Serve as a high-level guidance document to inform annual conservation activities, including program implementation levels, staffing requirements, and budget needs, for both internal planning and stakeholder coordination.
- Summarize the portfolio of conservation measures that Cal Water plans to implement, including estimated water savings, program costs, and anticipated effects on water demand.
- Describe the evaluation process and criteria used to assess and select conservation measures.

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- Provide an update to the 2016–2020 Conservation Master Plan as part of Cal Water’s five-year review cycle, including an assessment of program performance and identification of any needed adjustments.
- Ensure that Cal Water districts are positioned to comply with the State’s *Making Conservation a California Way of Life* (MCCWL) regulations.

1.2 Relationship to GRC and UWMP

Cal Water’s operations are regulated by the California Public Utilities Commission (CPUC), which approves district-level budgets and rates through a triennial General Rate Case (GRC) proceeding. Conservation programs and associated expenditures are reviewed and authorized as part of each GRC.

The most recent completed GRC was initiated in 2021 and covered the three-year period from 2023 through 2025 (the 2021 GRC). Conservation programs and budgets reflected in this plan are those authorized under the 2021 GRC.

A subsequent GRC covering the period from 2026 through 2028 was initiated in 2024 (the 2024 GRC). In that proceeding, Cal Water has requested authorization for increased conservation program expenditures in the Los Altos Suburban District to support compliance with state conservation regulations and supply reliability and cost issues. At the time this plan was prepared, a final decision in the 2024 GRC had not yet been issued. As a result, it remains uncertain whether the requested level of conservation program funding needed to support compliance with state conservation requirements will be approved.

This plan updates the Conservation Master Plan completed by Cal Water in 2021, which covered the 2021–2025 planning period. It serves as the primary source of information on the historical and planned implementation of conservation programs reported in the Los Altos Suburban District’s 2025 Urban Water Management Plan (UWMP). A copy of this Conservation Master Plan is included as an appendix to the UWMP.

1.3 Relationship to Water Shortage Contingency Plan

The Water Conservation Master Plan is distinct from Cal Water’s Water Shortage Contingency Plan (WSCP), which is also included as part of each district’s UWMP. The primary purpose of the WSCP is to provide a framework for responding to water shortage emergencies, such as those caused by drought or other events that temporarily disrupt water supplies.

In contrast, the purpose of the Water Conservation Master Plan is to establish a long-term framework for education, assistance, and incentive programs designed to help customers use water efficiently on an ongoing basis. Regardless of drought

conditions, water in California is an increasingly scarce resource, and investments in water use efficiency have consistently been shown to be a cost-effective means of ensuring reliable water supplies over the long term.

While conservation programs become especially important during periods of water shortage, their primary objective is to support Cal Water's ability to reliably meet customer water needs well into the future.

1.4 Plan Organization

This Conservation Master Plan is organized to describe the context for conservation in the Los Altos Suburban District, assess regulatory and resource drivers, outline the District's conservation strategy, and present the funding and implementation framework for the 2026–2030 planning period.

- **Section 2** describes the Los Altos Suburban District service area, including population, customer characteristics, and historical water use trends.
- **Section 3** explains the need for expanded conservation, including new state efficiency requirements, supply reliability considerations, and the role of conservation in managing long-term cost of service.
- **Section 4** summarizes the District's performance relative to past and emerging conservation goals and regulatory targets, including SB X7-7, CPUC conservation goals, and Urban Water Use Objective (UWUO) requirements.
- **Section 5** presents the District's water conservation program strategy, including program administration, water waste prevention, metering and conservation pricing, water loss management, customer conservation programs, staffing, and program monitoring and reporting.
- **Section 6** describes the current and requested conservation budget, including budget components, proposed adjustments, and comparisons of authorized and requested funding levels.
- **Section 7** provides conclusions regarding the District's conservation progress, future needs, and the role of conservation as a long-term resource management strategy.

Together, these sections provide a comprehensive framework for understanding how conservation supports regulatory compliance, water supply reliability, and cost-effective water service in the Los Altos Suburban District.

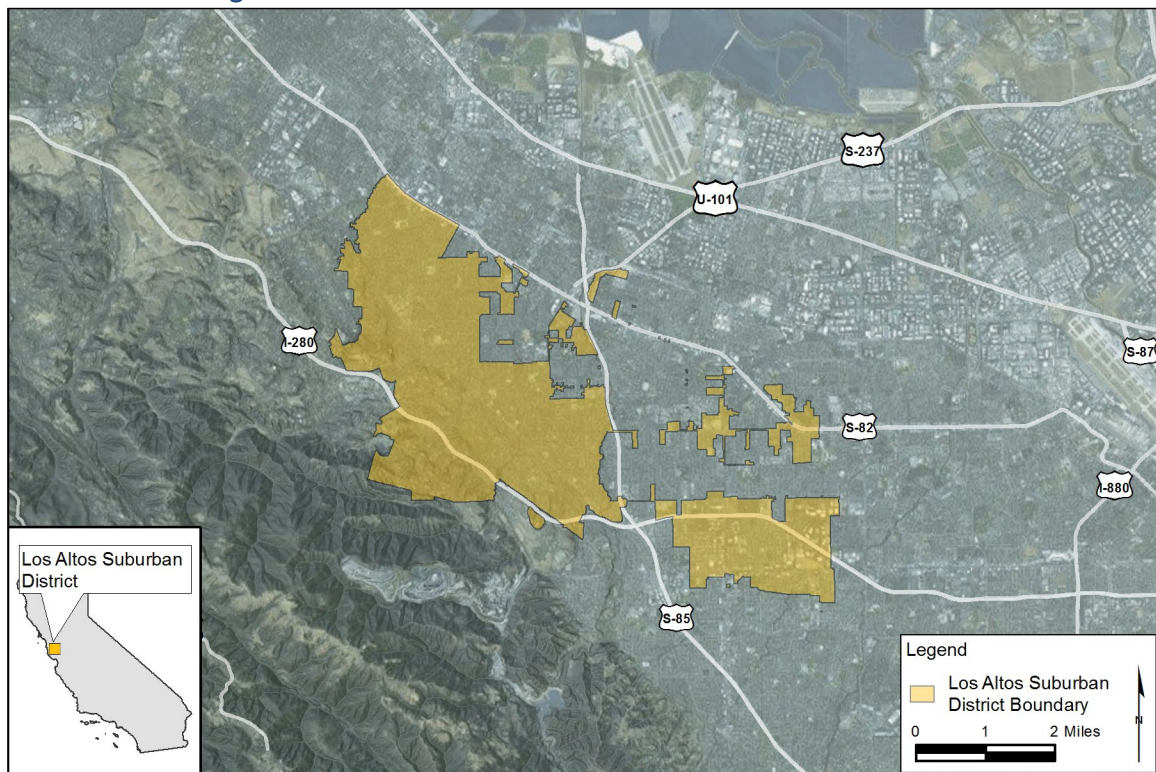
2 District Overview

District Quick Facts:

- Communities Served: Los Altos, fringe sections of the cities of Cupertino, Los Altos Hills, Mountain View, Sunnyvale
- Population served in 2025: 63,559
- Residential Customers: 93% of total services and 74% of total use
- Sources of Supply: imported surface water, local groundwater, and recycled water
- Average Annual Water Deliveries Last Five Years: 10,900 AF
- Average Per Capita Water Use Last Five Years: 154 GPCD

The Los Altos Suburban District serves the entire city of Los Altos, sections of the cities of Cupertino, Los Altos Hills, Mountain View, Sunnyvale and adjacent unincorporated areas of Santa Clara County. On average, the District delivers up to 9.7 million gallons of water per day to 18,500 service connections through a system that includes 297 miles of pipeline, 65 booster pumps, and 46 storage tanks. A map of the service area boundaries is shown in Figure 1.

Figure 1. Los Altos Suburban District Service Area Boundaries



Service area population has grown at an average annual rate of approximately 0.3 percent over the past decade, increasing from 61,967 in 2015 to 63,559 in 2025. The District provides water service to residential, commercial, industrial, and governmental customers. Residential customers account for approximately 92 percent of service connections and 74 percent of total water use within the District. The distribution of service connections and water sales by customer category is shown in Figures 2 and 3.

On a per capita basis, water use in the District has been steadily declining since the early 2000s. Between 2000 and 2025, water use per person decreased by 43 percent (Figure 4), falling from 260 gallons per capita per day (GPCD) to 149 GPCD. Despite service area population increasing 22 percent during this period, total demand decreased by 30 percent—from 15,111 AF in 2000 to 10,619 AF today.

Several factors have contributed to this long-term reduction in use. Tiered residential pricing was adopted in 2009, strengthening incentives for efficient household water use. Additionally, beginning in 2012, Cal Water tripled conservation program expenditures, expanding customer access to tools and resources that support water-use efficiency. Lastly, state and federal efficiency standards have significantly reduced water use from toilets, showers, clothes washers, and other plumbing fixtures.

Collectively, these actions have resulted in a sustained reduction in water use across the service area.

Figure 2. Share of Services in 2025 by Customer Category

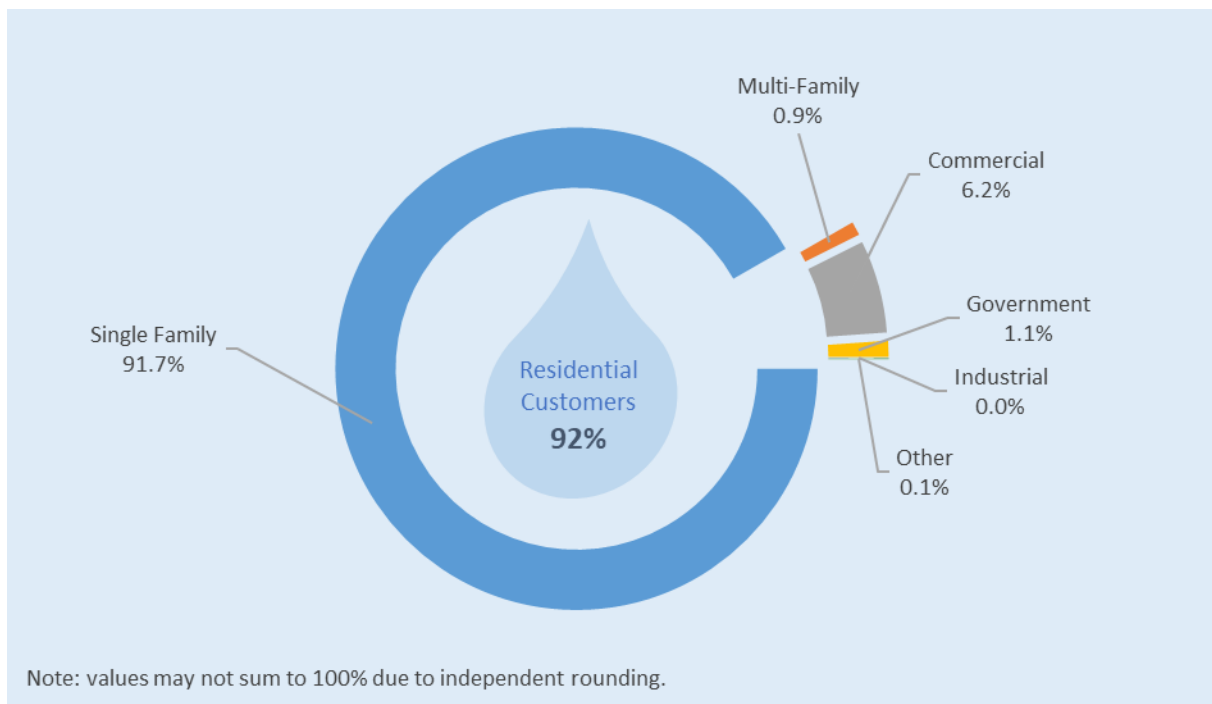


Figure 3. Share of Water Sales by Customer Category: 2021-2025

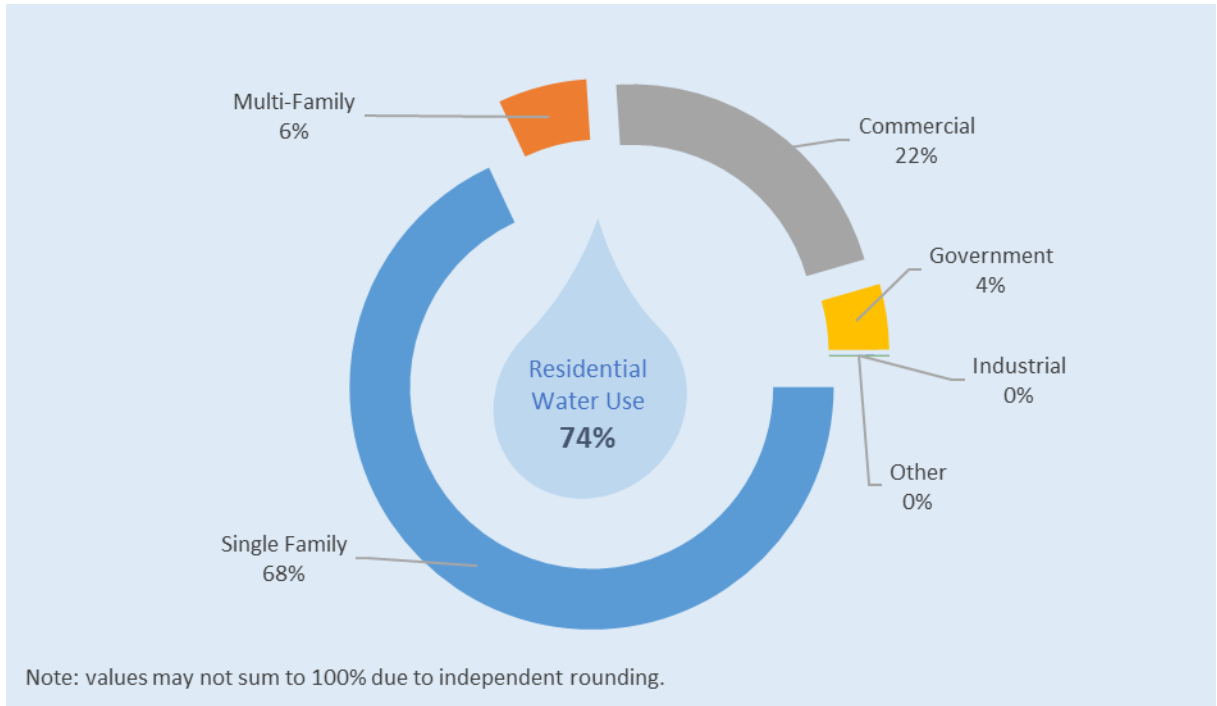
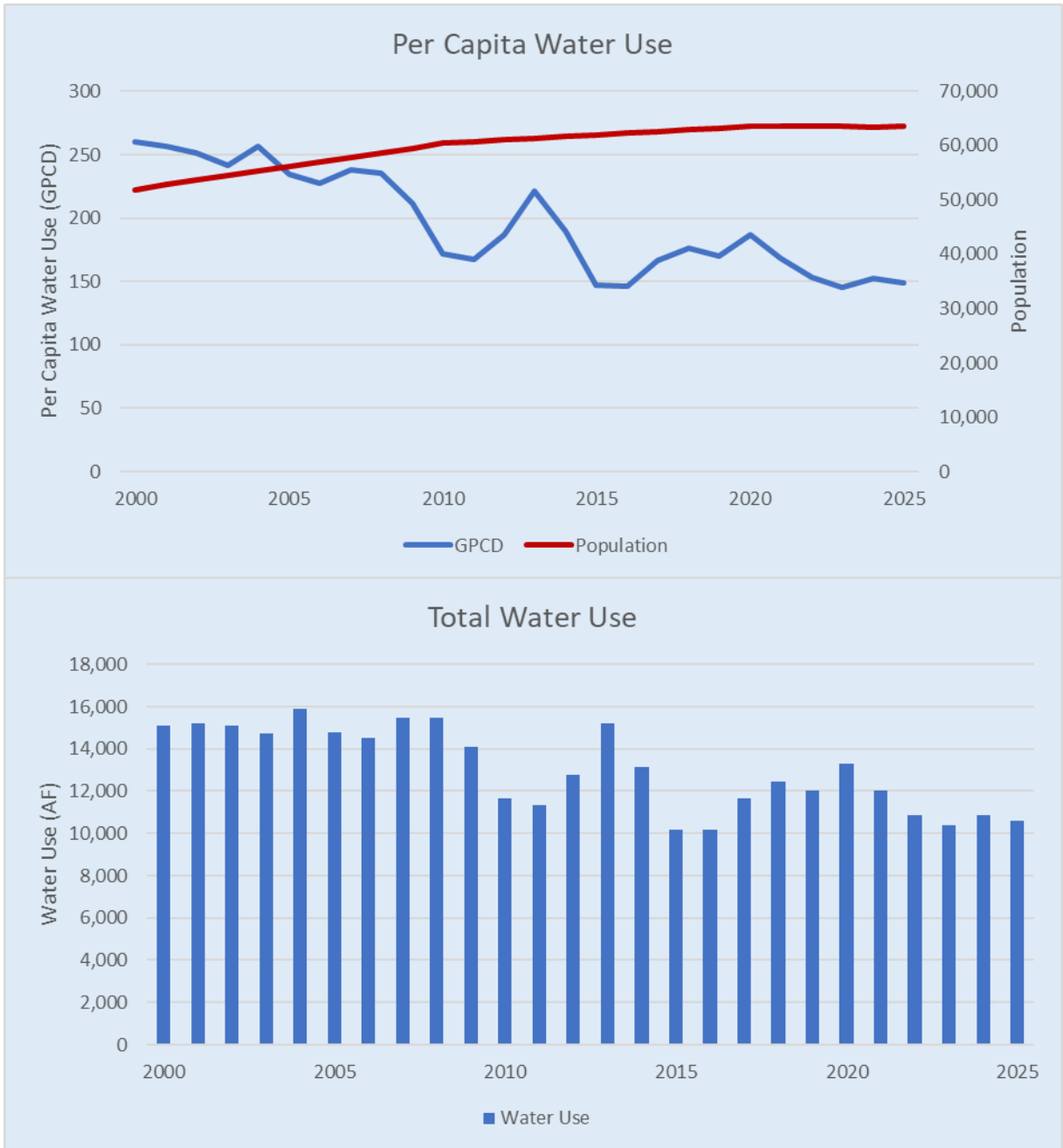


Figure 4. Total and Per Capita Water Use: 2000 – 2025



3 Need for Expanded Conservation

While the Los Altos Suburban District has achieved substantial reductions in per capita water use over the past two decades, evolving regulatory requirements, water supply sustainability challenges, and rising water supply costs are increasing the need for additional conservation. Expanded conservation efforts will play a central role in meeting new state efficiency standards, supporting long-term supply reliability, and managing the cost of service for customers. The following sections describe these drivers in greater detail and explain how they shape the District’s conservation planning priorities.

3.1 New State Regulations for Urban Water Use

In 2018, the California State Legislature enacted Senate Bill 606 and Assembly Bill 1668 to enhance the state's resilience against droughts and climate change. These laws – collectively referred to as the *Making Conservation a California Way of Life* legislation -- set stringent water efficiency standards that retail water suppliers must meet within an accelerated timeline. Starting in 2027, these suppliers are mandated to keep their water consumption within the limits of an Urban Water Use Objective (UWUO). The UWUO encompasses the aggregate efficient use of indoor and outdoor residential water uses, commercial landscape irrigation, and distribution system water loss. Furthermore, the regulations stipulate that water suppliers implement comprehensive commercial performance measures and substantially increase their reporting to the state on their progress in meeting these new requirements.

3.1.1 UWUO Compliance Requirements

An urban retail water supplier’s UWUO represents the cumulative volumes of water shown in Figure 5.

Figure 5. Components of UWUO Standards



Residential Indoor Standard

The Residential Indoor Standard sets the maximum allowable indoor water use, measured in gallons per capita per day (GPCD). Initially, Assembly Bill 1668 established a statewide standard of 55 GPCD until January 1, 2025, then reducing to 52.5 GPCD until January 1, 2030, when it drops further to 50 GPCD. However, adjustments were made with the enactment of Senate Bill 1157 in 2022, which now sets the indoor standard at 55 GPCD in 2024, decreasing to 47 GPCD in 2025, and further to 42 GPCD by 2030.

It has been estimated that indoor residential use in California currently averages about 50 GPCD.¹ Thus, meeting the 2030 standard implies a 16 percent reduction from current indoor usage levels.

Residential Outdoor Standard

The outdoor standard is tailored to the efficient water use required for residential landscaping within each district's climate. It involves an aggregate water budget calculated as follows:

$$\text{Outdoor Residential Budget} = \text{LAM} \times \text{LEF} \times (\text{ETo} - \text{Peff}) \times 0.62$$

In this equation:

- **LAM** is the measured residential landscape area in square feet.
- **ETo** represents the reference evapotranspiration, measured in inches per year.²
- **Peff** is the effective precipitation, also in inches per year.³
- **LEF** (Landscape Efficiency Factor) is a regulatory factor that dictates the overall water budget.

The LEF poses significant compliance challenges due to its stringent reduction targets. Initially set at 0.80, the LEF will decrease to 0.63 starting July 1, 2035, and further to 0.55 by July 1, 2040.

For new residential landscapes, the standard is immediately more stringent, set at a LEF of 0.55 from the outset. This means that all new residential landscaping must meet this lower efficiency factor regardless of the current LEF enforced for existing landscapes. This regulation ensures that new developments contribute to water conservation efforts from their inception.

¹ See [Results of the Indoor Residential Water Use Study](#) prepared by the California Department of Water Resources.

² The amount of water needed to maintain cool season turf grass in a healthy condition.

³ The portion of annual rainfall available for plant water requirements thereby reducing the amount needing to come from irrigation.

The introduction of progressively lower LEF values for existing landscapes, combined with the standard for new developments, presents a considerable challenge. Maintaining the health of turf grass will be particularly difficult when the LEF drops below 0.8. Many communities may need to significantly reduce or even eliminate turf grass, a change that will transform the visual and functional aspects of residential outdoor spaces.

CII Dedicated Irrigation Meter Standard

The water budget for CII Dedicated Irrigation Meters (DIMs) is calculated similarly to residential landscaping but adheres to a stricter standard. Starting July 1, 2040, the required efficiency factor for these meters will be set at 0.45, making the maintenance of landscapes with significant amounts of turf nearly unattainable. It is the responsibility of each retail water agency to accurately measure and map the landscape area for their dedicated irrigation accounts. These measurements are then incorporated into a landscape water use equation to establish a supplier-specific CII landscape budget.

For retail water suppliers, including Cal Water, that do not currently have a CII DIM customer classification, the regulations impose additional requirements. These suppliers are mandated to identify all CII Mixed Use Meters (MUMs) within their service areas that serve landscapes of half an acre or more of irrigated area. They must either install DIMs for these landscapes or implement at least two equivalent in-lieu technologies designed to measure and enhance landscape water-use efficiency at these sites. This aspect of the legislation ensures that all significant landscape areas, regardless of their current meter classification, are brought under stringent water use monitoring and management. The actions Cal Water will be required to take to satisfy these requirements are described in a subsequent section of this plan.

Water Loss Standard

The Water Loss Standard, established by Senate Bill 555, sets rigorous criteria for managing "real" water loss, which includes actual physical leakage from a water supplier's distribution system. The standard specifies the maximum allowable water loss per connection per day for each urban water retailer's service area. This is determined using system-specific validated baseline water loss audit data.

Every year, water suppliers must conduct a detailed audit of their distribution systems to pinpoint where and how water losses occur—whether through leaks, meter inaccuracies, unauthorized consumption, or other inefficiencies. The primary objective is to accurately gauge the extent of water loss and to develop effective strategies to reduce it, thereby enhancing the overall efficiency of the water supply system and conserving water resources.

It is crucial to note that compliance with the Water Loss Standard is mandatory for all suppliers, regardless of their total water use relative to their UWUO. Even if a supplier's aggregate water usage falls below their designated UWUO, they must still

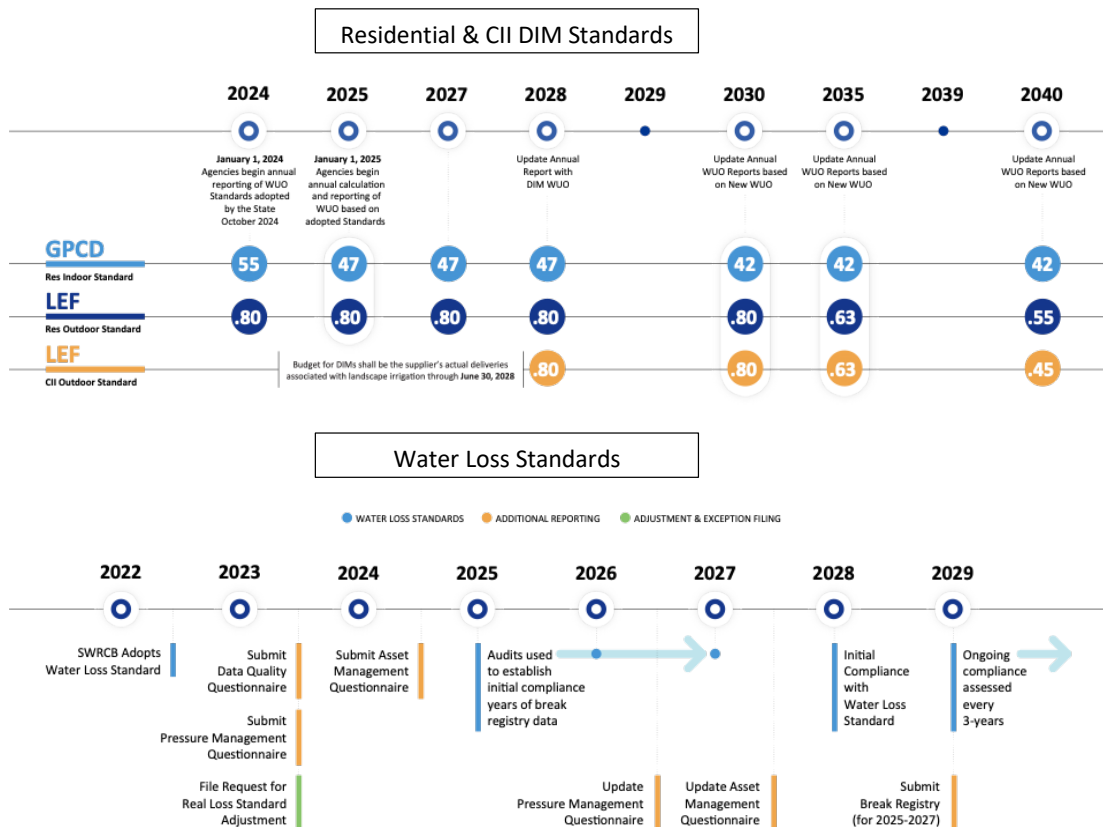
Los Altos Suburban District Conservation Master Plan: 2026-2030

meet their specific water loss standards. This separate and independent compliance requirement underscores the importance of including water loss monitoring, management, and reporting tasks in the plan.

WUO Compliance Timeline

Compliance with these standards will require rigorous documentation and adherence to evolving guidelines, underscoring the escalating complexities water suppliers face under the UWUO compliance framework. Figure 6 outlines the compliance timelines for these regulatory components.

Figure 6. Compliance Timeline for Meeting WUO Standards



3.1.2 Mixed-Use Meter Requirements

As discussed above, the regulations mandate that each retail water agency must identify all CII MUM accounts with landscaped areas of half an acre or more by June 30, 2027. These sites must either be converted to dedicated irrigation meters by 2039 or be equipped with at least two approved in-lieu water management technologies. By June 30, 2040, suppliers are required to achieve and maintain a 95% conversion rate to dedicated irrigation meters or equivalent interventions annually.

For water suppliers opting to implement in-lieu water management technologies on CII large landscapes, they have until June 30, 2029, to identify all sites that will require treatment. Acceptable in-lieu water management technologies include:

1. Water budget-based management programs without a specific rate structure.
2. Water budget-based rate structures.
3. Installation of technologies that support detailed monitoring and analysis of outdoor water use, such as Advanced Metering Infrastructure.
4. Use of remote sensing or similar technologies to monitor and analyze outdoor water usage.
5. Other technologies that assist in water use analysis or enhance outdoor water use efficiency, pending Board approval.

Additionally, the proposed regulations require water suppliers managing large landscapes without Dedicated Irrigation Meters to implement the following water management practices:

1. Regular communications with users about water efficiency.
2. Maintenance of irrigation systems to ensure optimal performance.
3. Adherence to efficient irrigation scheduling practices to minimize waste.

These requirements are designed to ensure more precise water use monitoring and management, helping these sites to meet conservation goals and comply with regulatory standards.

3.1.3 CII Performance Measures

For CII properties, the state has not set efficiency standards per se but has mandated specific performance measures due to the high variability and insufficient data on water use across commercial properties. The proposed measures aim to identify high water users and promote efficiency within this sector.

These new requirements entail substantial utility staff efforts to analyze the water usage of CII customers. One such task requires categorizing all CII accounts into 19 Energy Star Portfolio Manager property types, in addition to three specialized water-centric business categories: water recreation, vehicle washes, and laundries.

Additionally, suppliers are required to identify all buildings within their service area that are 50,000 square feet or larger by June 30, 2024, or when the regulations take effect—whichever is later. The regulations require water suppliers to provide an aggregate water use report to each of these properties upon request from the building owner or their representative.

Water suppliers are also tasked with identifying their Top Water Users in CII and choosing from three tracks of Best Management Practices (BMP) compliance to

address the highest water users. Full implementation for all tracks must be finalized by June 30, 2039. Each track is detailed as follows:

- **Track 1:** By June 30, 2025, identify both the top 2.5% and top 20% of all CII water users. Implement a conservation program that includes at least two BMPs from each of five BMP categories for the top 2.5% (10 BMPs in total), and one BMP from the same categories for the top 20% (5 BMPs in total).
- **Track 2:** By June 30, 2027, identify the top 2.5% and top 20% of water users within each of the 22 CII classification categories. Implement a conservation program that includes at least two BMPs from each of five BMP categories for the top 2.5% users, and one BMP from the same categories for the top 20% in each category.
- **Track 3:** By June 30, 2029, identify existing CII connections deemed inefficient based on Key Business Activity Indicators (KBAI) developed for each of the 22 CII categories. Implement a conservation program that includes at least one BMP from each of the five BMP categories.

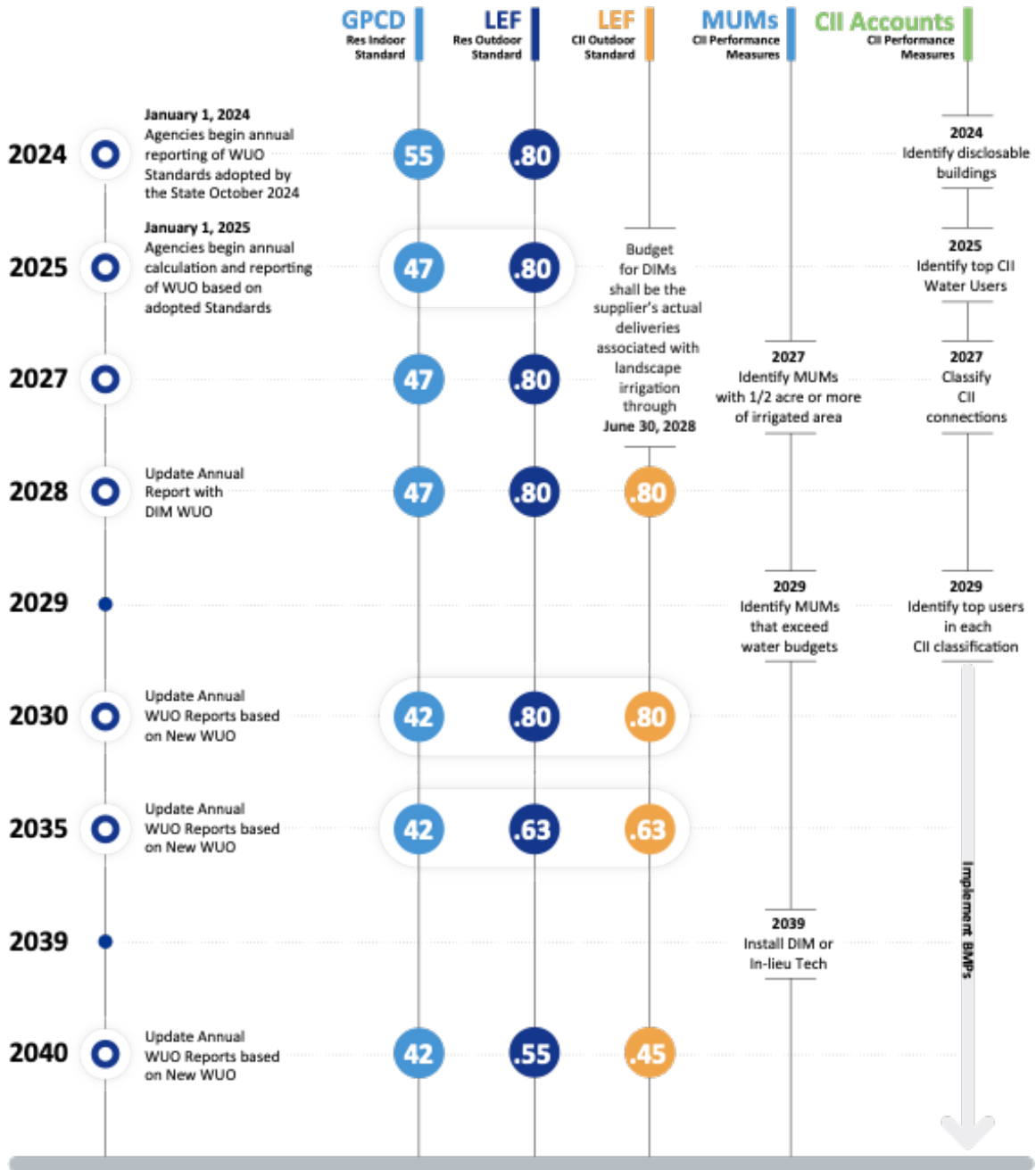
CII Performance Measures and UWUO Compliance

Despite the comprehensive nature of these measures, it is important to note that none of the savings achieved through these efforts will count towards a water agency's compliance with their UWUO. Although these measures are a legally mandated and significant undertaking, they do not directly contribute to UWUO compliance, presenting a challenging scenario for suppliers who must fulfill these obligations without them counting towards their UWUO compliance requirements.

3.1.4 Overall Compliance Timeline and Enforcement Provisions

Figure 7 outlines the critical reporting dates and compliance milestones associated with the *Making Conservation a California Way of Life* regulatory framework. This schedule details the progressive tightening of standards from 2025 to 2040. Starting on January 1, 2027, water suppliers are required to demonstrate compliance with the UWUO on an annual basis.

Figure 7. Making Conservation a California Way of Life Regulatory Framework Timeline



Beginning in 2027, under the new regulations, retail water suppliers are mandated to maintain their actual water use at or below the levels specified by their UWUO. After November 1, 2027, the State Water Board is empowered to enforce civil penalties for non-compliance. These penalties can reach up to \$1,000 per day in non-drought years and escalate to \$10,000 per day during drought conditions. In addition to monetary

finances, the State Water Board may issue informational orders demanding specific data and information needed for assessing compliance, as well as conservation orders that mandate actions to be taken by the water supplier to enhance water resource conservation.

Although the State Water Board has indicated a possible delay in enforcement to allow water suppliers adequate time to adhere to these standards, it is important to acknowledge that the 2018 legislation codifies these deadlines. Consequently, water suppliers remain at risk of third-party lawsuits grounded on claims of waste and unreasonable use if they do not achieve UWUO compliance by the stipulated dates.

3.1.5 Non-Functional Turf Watering Ban

Alongside the *Making Conservation a California Way of Life* framework, a separate regulation now exists that restricts the use of potable water for watering "non-functional" turf. Drawing inspiration from a similar initiative in Nevada, the California Legislature enacted Assembly Bill 1572 in October 2023. This law prohibits the irrigation of non-functional turf on CII properties using potable water. Although property owners retain autonomy to determine what qualifies as "functional" versus "non-functional" turf, water suppliers are tasked with updating their ordinances and communicating the prohibitions to customers. Additionally, suppliers may choose to provide technical or turf replacement program support to customers facing turf removal, necessitating further allocation of staff and budgetary resources.

3.2 Addressing Supply Reliability

The District relies on imported water supplies delivered through the State Water Project (SWP). SWP reliability is shaped by highly variable Northern California hydrology, operational constraints in the Sacramento–San Joaquin Delta, and increasing climate-driven extremes that affect both supply availability and the system's ability to convey water when and where it is needed.

SWP deliveries can fluctuate substantially from year to year, reflecting changes in snowpack and runoff, reservoir storage conditions, and Delta export constraints. As a result, the effective reliability of imported supplies can vary sharply across water years, requiring agencies dependent on SWP imports to plan for periods of reduced deliveries and heightened uncertainty.

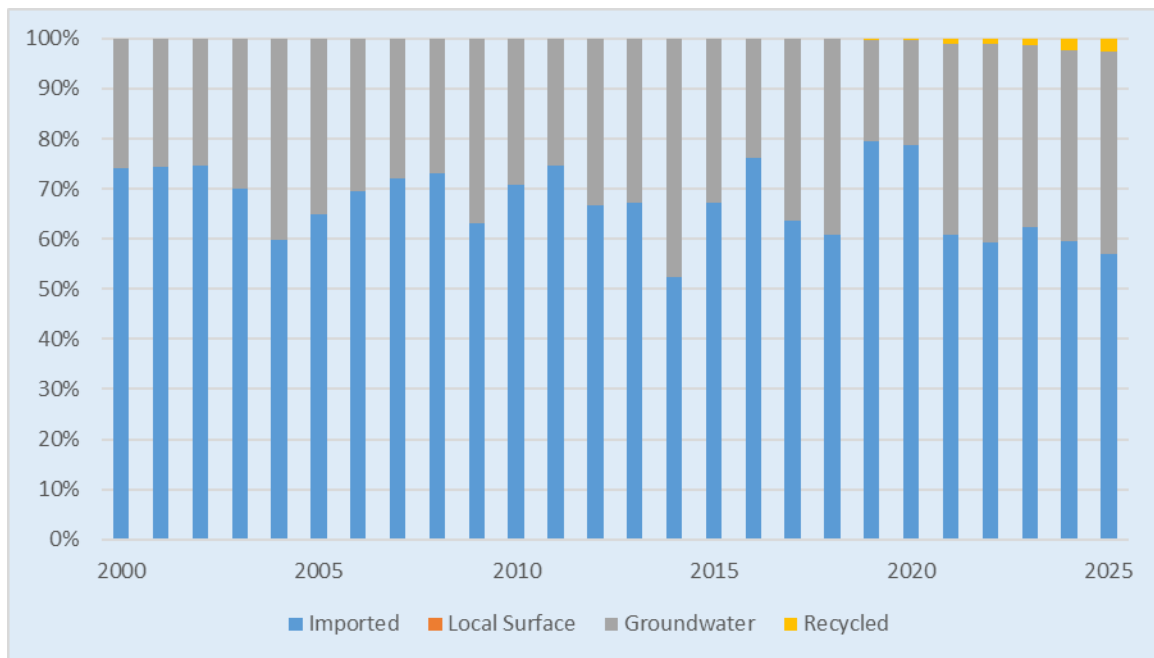
The State has also emphasized that climate change is expected to affect SWP delivery capability and reliability through changes in flow patterns and more frequent extremes, reinforcing the importance of modernization and adaptation planning for long-term reliability.

Conservation and demand management remain foundational tools for managing SWP-related reliability risk. By reducing potable demand—especially discretionary

outdoor use—conservation lowers exposure to imported supply variability, provides additional operational flexibility during dry years, and can help moderate long-term cost pressures associated with purchased water and future supply investments.

As shown in Figure 8, historically 60 to 80 percent of District water supply has come from imported supplies from the State Water Project. Accordingly, the District’s conservation strategy is an important component of maintaining reliable service in the face of supply variability and long-term reliability risks affecting SWP deliveries.

Figure 8. Imported Water as Share of Total District Supply



3.3 Managing Cost of Service

In addition to meeting regulatory and supply requirements, expanded conservation plays an important role in managing the long-term cost of water service. Many of Cal Water’s conservation programs are able to generate verified water savings at a cost in the range of approximately \$500 to \$1,000 per acre-foot (AF), placing conservation among the lower-cost water resource options available to the District. By comparison, purchased surface water supplies often cost more than \$1,000 per AF, and the development of new supply sources—such as recycled water, groundwater remediation, desalination, or new surface storage—can exceed \$2,000 per AF when capital, treatment, conveyance, and operating costs are considered.

Because conservation can reduce the volume and timing of higher-cost supply acquisitions, it helps moderate upward pressure on rates while also improving supply reliability. In many situations, enhanced conservation represents one of the lowest-

cost sources of incremental water supply available to the District and plays an important role in managing future cost-of-service impacts for customers, even as additional supply investments may still be required over the long term.

3.4 Summary of Conservation Drivers

Taken together, regulatory, hydrologic, and economic factors create a strong and continuing need for sustained conservation in the Los Altos Suburban District. The State's Making Conservation a California Way of Life (MCCWL) regulations establish increasingly stringent water use efficiency standards and reporting requirements that will require continued reductions in residential, landscape, and system water use over time. At the same time, the District relies heavily on imported supplies derived from the State Water Project (SWP). SWP deliveries are subject to significant interannual variability driven by Sierra Nevada hydrology, Delta pumping constraints, environmental regulations, and evolving operational rules. Periods of drought, reduced allocations, and uncertainty in annual SWP announcements underscore the importance of managing demand to enhance supply reliability and maintain service stability.

In parallel with these regulatory and resource challenges, the cost of imported water and long-term system investments continues to rise. Compared with developing new supplies or expanding system capacity, conservation often represents the least-cost resource available to meet incremental demand and preserve reliability margins. Sustained conservation therefore serves multiple objectives: supporting compliance with State efficiency standards, strengthening resilience to SWP supply variability, and helping manage long-term cost-of-service impacts for customers. For these reasons, conservation will remain a central component of the District's resource management strategy over the 2026–2030 planning period and beyond.

4 Progress Towards Conservation Goals and Targets

This section summarizes the Los Altos Suburban District’s progress toward key state and regulatory conservation requirements and assesses the District’s outlook for compliance with new state conservation requirements. It reviews performance relative to the Water Conservation Act of 2009 (SB X7-7) and the California Public Utilities Commission (CPUC) conservation goals, both of which reflect historical reductions in per capita water use. It then evaluates future compliance with the State’s Urban Water Use Objective (UWUO) framework under the *Making Conservation a California Way of Life* regulations, which establish increasingly stringent efficiency requirements beginning in 2027.

Together, these measures provide a bridge between past conservation achievements and the additional reductions that will be required in the coming decades. The analysis highlights that while the District has met or exceeded prior conservation targets, further conservation beyond currently authorized levels will likely be necessary to maintain compliance with post-2030 state efficiency standards.

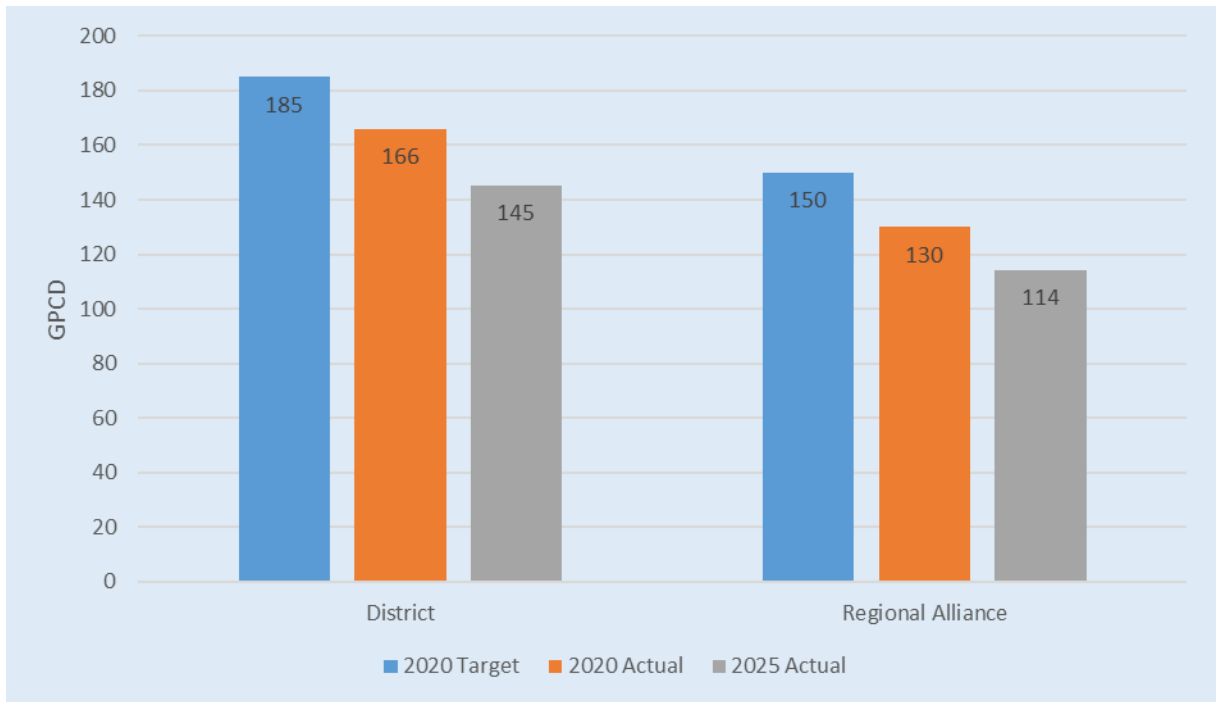
4.1 Compliance with Water Conservation Act of 2009

The Water Conservation Act of 2009 (SB X7-7) required urban retail water suppliers to achieve a 20 percent reduction in per capita water use by 2020. To comply, each supplier was required to establish a 2020 per capita water use target based on historical water use. The statute also allowed suppliers to meet the requirement through participation in a Regional Alliance with other urban retail water suppliers.

The Los Altos Suburban District formed a Regional Alliance with other Cal Water districts located within the San Francisco Bay Hydrologic Region. Under SB X7-7, compliance is achieved if either the District’s individual per capita water use or the Regional Alliance’s aggregate per capita water use remains below the applicable target.

As shown in Figure 9, the District has maintained compliance with the Water Conservation Act of 2009. In 2025, both the District’s and the Regional Alliance’s per capita water use remained well below their respective targets, reflecting on-going improvements in water-use efficiency by the District and its customers.

Figure 9. 2020 Target and Actual Per Capita Water Use



4.2 Compliance with CPUC Conservation Goals

In 2008, the CPUC established a water conservation goal of 1 to 2 percent per annum for Class A water utilities, including California Water Service Company. As shown in Figure 10, the Los Altos Suburban District has consistently exceeded this goal. Since adoption of the CPUC’s conservation goal, District per capita water use has declined by approximately 37 percent.

Figure 10. District Per Capita Water Use Relative to CPUC Conservation Goals



4.3 UWUO Compliance Assessment

As described in Section 3, the UWUO establishes an aggregate water-water budget calculated from: (1) a residential indoor water use standard; (2) a residential outdoor water budget; (3) a CII landscape outdoor water use budget for landscapes served by dedicated irrigation meters; (4) a water loss budget; (5) allowable variances; and (6) a potable reuse bonus. Beginning in 2027, the District must annually assess whether the sum of its regulated water uses—residential indoor and outdoor use, dedicated irrigation meter use, and distribution system water loss—is at or below its UWUO. Additionally, starting in 2028, the District must demonstrate that real and apparent distribution system water loss rates are less than their corresponding standards.⁴ As noted in Section 3, compliance with the water loss standards is required even if the District’s total regulated water use is below its UWUO.

The state standards underlying the residential indoor, residential outdoor, and CII outdoor components of the UWUO will become increasingly stringent over time. As a result, compliance is expected to require continued reductions in water use beyond those achieved under the SB X7-7 framework.

⁴ Real losses refer to physical loss of water through leaks, spills, and seeps, while apparent losses refer to unaccounted for water due to meter inaccuracies, administrative or record keeping errors, or theft.

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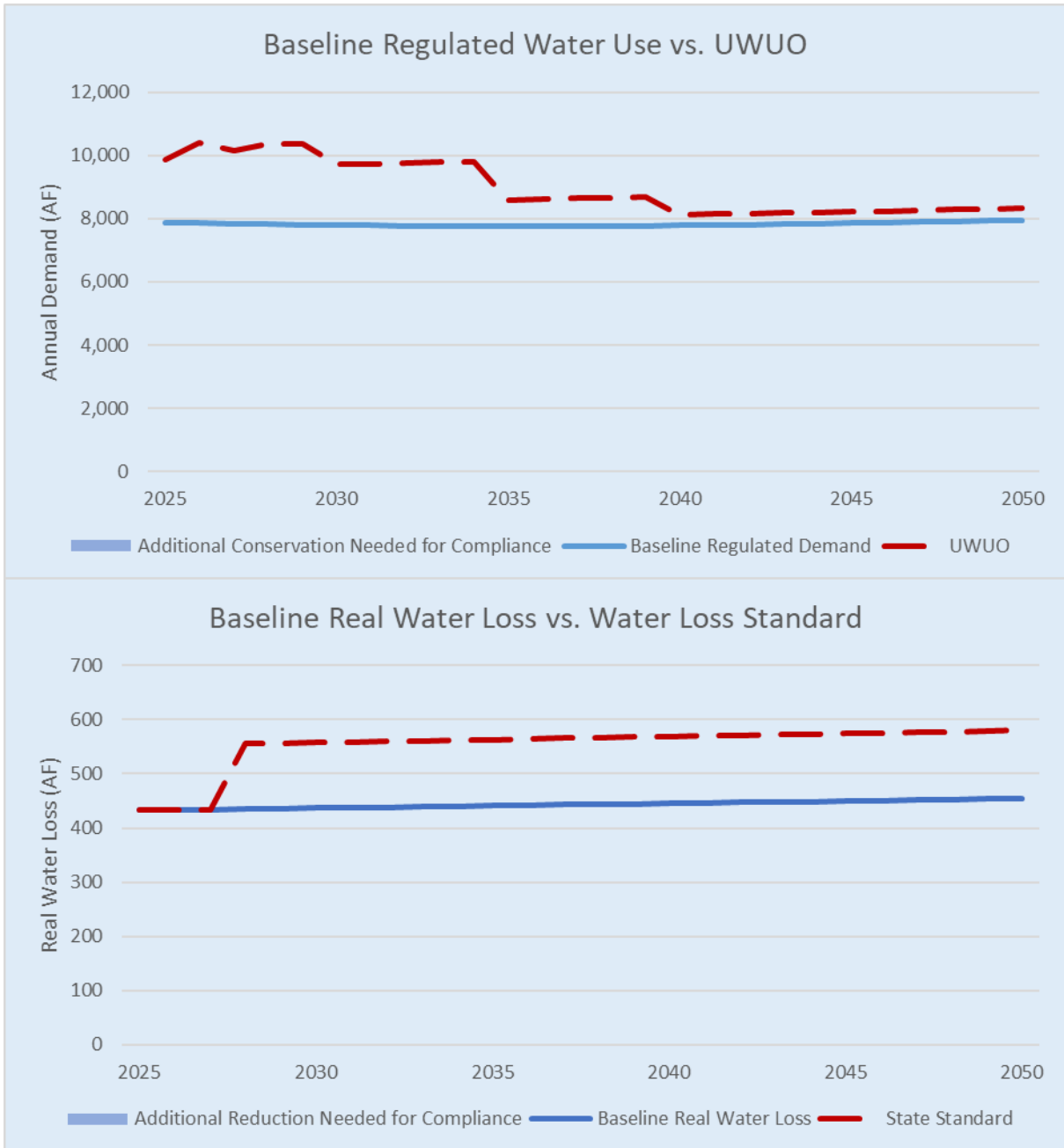
Cal Water has evaluated how projected regulated water use in the Los Altos Suburban District compares to anticipated UWUO requirements over the UWMP 2025-2050 planning horizon. The assessment is predicated on levels of conservation that are currently authorized by the CPUC, together with anticipated passive conservation savings. These passive savings include continued turnover of plumbing fixtures and appliances subject to state and federal efficiency standards and customer behavioral responses to conservation-oriented rate structures.

Under this baseline demand scenario, both regulated water use and real water loss in the Los Altos Suburban District are projected to remain below the applicable UWUO and the state's real water loss performance standard throughout the forecast period, as shown in Table 1 and Figure 11.

Table 1. Los Altos Suburban District Projected Regulated Demands vs UWUO

Regulated Water Use					
Year	Service Area Population (a)	Water Demand Subject to UWUO Compliance (b)	UWUO Projections	Over (+)/Under (-) UWUO	
		(AF)	(AF)	(AF)	(GPCD)
2025	63,559	7,874	9,879	-2,005	-28
2030	64,186	7,795	9,719	-1,924	-27
2035	64,821	7,753	8,598	-844	-12
2040	65,461	7,788	8,123	-335	-5
2045	66,108	7,857	8,223	-366	-5
2050	66,761	7,932	8,324	-392	-5
Distribution System Real Water Loss					
Year	Service Area Population (a)	Baseline Real Water Loss Projections	Real Water Loss Standard Projections	Over (+)/Under (-) Standard	
		(AF)	(AF)	(AF)	(GPCD)
2025	63,559	433	433	0	0
2030	64,186	437	558	-121	-2
2035	64,821	441	563	-122	-2
2040	65,461	445	569	-123	-2
2045	66,108	450	574	-125	-2
2050	66,761	454	580	-126	-2
<p>NOTES:</p> <p>(a) From 2025 UWMP Table 3-1.</p> <p>(b) Water demand subject to UWUO compliance includes single family, multi-family, dedicated irrigation meter, and water loss sectors (excluding unbilled authorized consumption) and is detailed in 20205 UWMP Table 4-2.</p>					

Figure 11. Los Altos Suburban District Projected Regulated Demand vs. UWUO



4.4 Summary of Progress Toward Goals and Targets

The Los Altos Suburban District has demonstrated strong performance relative to historical conservation requirements. Per capita water use has declined substantially over the past two decades, enabling the District to maintain compliance with the Water Conservation Act of 2009 and to consistently exceed CPUC conservation goals for Class A water utilities. These results reflect the combined effects of conservation

programming, universal metering, conservation-oriented pricing, and state and federal plumbing and appliance efficiency standards.

Looking forward, the District's baseline demand projections—reflecting currently authorized conservation programs and anticipated passive efficiency gains—indicate that regulated water use is expected to remain below applicable state standards throughout the forecast period.

In summary, the District has successfully met past conservation targets and is projected to comply with future UWUO and distribution system water loss requirements under baseline conservation levels. However, the Los Altos Suburban District relies heavily on imported supplies from the State Water Project (SWP). SWP deliveries are subject to hydrologic variability in the Sierra Nevada, Delta pumping and environmental constraints, evolving regulatory requirements, and uncertainty in annual allocation levels. These factors introduce supply and cost volatility that can affect long-term planning and rate stability. While additional conservation may not be required strictly to meet MCCWL compliance targets, sustained investment in demand management will enhance resilience to SWP supply variability, moderate exposure to wholesale cost increases, and strengthen the District's overall resource reliability. Continued program refinement and strategic expansion in future planning cycles will therefore remain an important component of the District's long-term water resource strategy.

5 Water Conservation Program Strategy

This section describes the strategy Cal Water uses to manage water demand in the Los Altos Suburban District and to support compliance with state conservation regulations and water supply reliability and cost-of-service objectives. Rather than relying on any single measure, the District’s approach combines regulatory tools, pricing signals, system efficiency improvements, and customer-focused conservation programs to achieve sustained reductions in water use.

The strategy is implemented within a centrally administered program framework that promotes consistency, cost-effectiveness, and regulatory compliance across Cal Water’s service areas. Within this structure, the District applies a coordinated set of actions that include water waste prevention and enforcement, universal metering and conservation-oriented pricing, water loss management, residential and non-residential conservation programs, and expanded efforts to transform outdoor landscape water use in response to emerging state efficiency standards. The subsections that follow describe how these elements work together to form an integrated long-term demand management strategy.

5.1 Program Administration

Cal Water administers its conservation programs on a centralized basis across its service districts. This structure reflects both operational and regulatory considerations. Because Cal Water operates as a single regulated utility, conservation program budgets, designs, and performance are reviewed and authorized through statewide CPUC General Rate Case proceedings. Centralized administration helps ensure that programs are implemented consistently with CPUC authorizations and reporting requirements while allowing Cal Water to maintain standardized tracking, evaluation, and compliance processes.

Central administration also creates important efficiencies. By offering a core set of programs across multiple districts, Cal Water can leverage economies of scale in program design, marketing, rebate fulfillment, data management, and vendor contracting. These scale advantages reduce per-unit program costs and improve overall cost-effectiveness. Consistent program offerings also simplify customer communications and expectations, as customers across districts have access to a similar suite of rebates, services, and educational resources.

While program administration is centralized, implementation is informed by local conditions. Marketing emphasis, customer targeting, and outreach strategies are adjusted to reflect district-specific conservation drivers, such as supply reliability objectives, UWUO compliance needs, and customer water use characteristics. This structure allows Cal Water to balance systemwide efficiency with responsiveness to the Los Altos Suburban District’s particular conservation needs.

5.2 Water Waste Prevention

Cal Water’s authority to enforce water waste prevention measures and water use restrictions is established and overseen by the CPUC through Rule 14.1 or Schedule 14.1. In addition, local governments within Cal Water districts may adopt ordinances regulating water use. Cal Water coordinates its water waste prevention efforts with applicable local jurisdictions. For the Los Altos Suburban District, this coordination includes the communities of Los Altos, Cupertino, Los Altos Hills, Mountain View, and Sunnyvale.

CPUC Rule 14.1 defines the District’s Water Shortage Contingency Plan, including, but not limited to, permanent prohibitions on water waste and restrictions on water use. Prohibited water waste practices include, but are not limited to, the following:

- Use of potable water through a broken or defective plumbing fixture or irrigation system after Cal Water has provided written notice to repair the condition and the customer has failed to complete repairs within seven business days of receipt of the notice.
- Application of potable water to landscapes in a manner that results in runoff onto adjacent property, non-irrigated areas, sidewalks, roadways, parking lots, or structures.
- Use of a hose to wash vehicles—including cars, trucks, buses, boats, aircraft, and trailers—unless the hose is equipped with a shut-off nozzle or similar device that immediately stops water flow when not in use.

During water shortage conditions, Schedule 14.1 also authorizes Cal Water to implement additional water use restrictions, which may include the following:

- Limitations on outdoor irrigation, including restrictions on time of day and frequency of watering.
- Requirements to repair leaks, breaks, or malfunctions following written notification by Cal Water.
- Application of potable water to driveways, sidewalks, and other hardscapes.
- Use of potable water in water features unless the feature operates as a recirculating system.
- Application of potable water to outdoor landscapes during and within 48 hours following measurable rainfall.
- Serving drinking water in eating or drinking establishments unless requested by the customer.

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- Irrigation of ornamental landscaping on public street medians.
- Irrigation of landscapes at newly constructed homes or buildings using potable water in a manner inconsistent with requirements established by the California Building Standards Commission or the Department of Housing and Community Development.
- Requirements for hotels and motels to provide guests with the option to decline daily laundering of towels and linens, with clear and prominent notice provided in each guest room.
- Limitations on filling ornamental lakes or ponds.
- Use of potable water for street cleaning, except for initial wash-down associated with construction activities.
- Use of potable water for construction-related purposes, such as dust control or backfill consolidation, unless no alternative water source or method is available.

These measures are a component of the District’s overall demand management strategy and support compliance with state water conservation regulations.

5.3 Metering and Conservation Pricing

Metering provides the measurement needed to track usage, identify leaks and high-use patterns, and manage demand effectively—because water use cannot be managed if it is not measured—while volumetric and tiered pricing structures create clear financial incentives for customers to use water efficiently.

Metered Service

All services in the District are metered and routinely calibrated and tested for accuracy. Metering water use provides improved customer awareness of water use, stronger price signals under volumetric billing, and the identification and repair of leaks. Metered households typically use 10 to 30 percent less water than similar unmetered households.⁵

Advanced Metering Infrastructure

Cal Water is also piloting automatic meter reading (AMR) and advanced metering infrastructure (AMI). If deployed more broadly in the future, AMI would enhance the District’s ability to detect leaks and other system issues and to notify customers of potential problems. AMI would also allow the provision of more timely and detailed

⁵ Tanverakul, S. A., & Lee, J. (2015). *Impacts of Metering on Residential Water Use in California*. Journal of the American Water Works Association, 107(2).

water use information, supporting customer engagement as well as enabling customers to more closely monitor their own water usage and take appropriate actions to improve their water use efficiency.

Conservation Pricing

The District uses a four-tier increasing block rate structure for residential water use and a single-tier uniform rate for non-residential customers. Under the residential rate design, the unit price of water increases as usage rises, providing progressively stronger financial incentives for customers to use water efficiently and to limit discretionary outdoor use. The District also offers rate assistance to lower-income households through its Customer Assistance Program (CAP). All District water rates are reviewed and authorized by the CPUC through the General Rate Case process conducted every three years.

5.4 Water Loss Management

The District conducts annual distribution system water loss audits using the American Water Works Association (AWWA) Free Water Audit Software and reports the results to the California Department of Water Resources.⁶

To guide ongoing water loss management, Cal Water has developed a Water Loss Control Compliance Plan and a Water Loss Control Policy. These documents provide a framework for:

- Meeting current and future CPUC and state water loss standards and regulatory requirements;
- Improving audit data quality and validation scores; and
- Identifying and implementing cost-effective water loss control actions.

Cal Water has also conducted a comprehensive assessment comparing each district's current and projected distribution system water loss to applicable water loss standards. The results show that the Los Altos Suburban District is currently on track to comply with the state-established efficient water loss standards pursuant to Senate Bill 555.

5.5 Customer Conservation Programs

Cal Water has a long-standing water-use efficiency program designed to reduce water use across residential and non-residential customer classes. The program includes landscape conversion incentives, irrigation equipment rebates, indoor device rebates,

⁶ Completed water audits may be accessed at: <https://wuedata.water.ca.gov/>

and customer education resources. Core programs available to residential customers are summarized below. Additional programs are offered to non-residential customers, and program offerings may be adjusted over time based on district-specific needs and program performance.

5.5.1 Current Customer Conservation Programs

Cal Water currently offers residential customers a range of water-use efficiency rebates, support services, and educational resources, including the following:

Turf Replacement

- Turf replacement rebates of up to \$3 per square foot for removal of turf and conversion to California-friendly, low-water-use landscaping with efficient irrigation.

Irrigation Equipment Rebates

- Smart Landscape Tune-Up: A free, site-specific irrigation assessment that includes approved repairs to existing irrigation systems and installation of high-efficiency sprinkler nozzles and smart irrigation controllers, as appropriate.
- Smart irrigation controllers: Rebates of \$125 per controller for weather- and soil-based irrigation controllers that adjust watering schedules based on site conditions.
- High-efficiency sprinkler nozzles: Rebates of \$5 per nozzle for replacing conventional spray nozzles with high-efficiency nozzles that apply water more uniformly.

Indoor Device Rebates

- High-efficiency clothes washers: Rebates of \$150 per washer for eligible models that use substantially less water than standard washers.
- MaP Premium high-efficiency toilets: Rebates of \$50 per toilet for models using 1.1 gallons per flush or less.
- Conservation kits: Free kits containing water-saving plumbing devices, such as high-efficiency showerheads, faucet aerators, hose nozzles, leak detection tablets, and educational materials.

Online Resources

- Cal Water maintains a suite of online water-use efficiency resources to help customers understand and adopt water-saving practices.

School Education

- Cal Water’s school education program includes the Aqua Adventures, A Splash of Creativity, H2Oath, and Water Smart Grant programs. Cal Water’s Teacher Toolkit provides teachers with practical guidance and teaching rubrics for helping students learn about resource sustainability and the importance of using water wisely.

In addition to these core offerings, Cal Water may implement non-core programs in select districts to address specific local needs or emerging opportunities. For example, in recent years Cal Water implemented a direct-install bathroom retrofit program targeting lower-income households and multifamily properties in several of its districts.

Cal Water’s customer conservation programs are implemented through a combination of in-house staff and contracted service providers. Cal Water conducts ongoing outreach and customer engagement to promote awareness and participation. In addition, customer service representatives are trained to assist customers with high water use or billing concerns by directing them to appropriate conservation programs and educational resources.

5.5.2 Future Customer Conservation Programs

Cal Water understands that its conservation programming must be adapted to the new MCCWL regulatory requirements. For instance, meeting the rigorous outdoor water use standards will require transitioning substantial amounts of turf area to more water efficient landscaping. Therefore, outdoor conservation measures, including turf replacement incentives and support services, will need to be further prioritized to drive future water savings. While targeted indoor efficiency measures have also been retained to maximize water savings, the focus remains heavily on outdoor improvements.

Achieving Landscape Transformation

Achieving the required level of water savings in the Los Altos Suburban District requires a rapid market transformation towards landscape efficiency. Typically, market transformations can span decades as they require shifting both consumer behaviors and supply chain dynamics, even with incentives. Early adopters have already made necessary adjustments, but many property owners have not yet embraced this change. Landscape transformation represents a significant departure

from traditional practices, often perceived as complex and undesirable by many. Overcoming this resistance and encouraging participation will be challenging.

A crucial aspect is convincing customers that embracing landscape efficiency enhances, rather than detracts from, the value of their property. The traditional view equates lush, green lawns with success and economic status. Therefore, changing this deep-seated perception to appreciate the aesthetics and benefits of water-sustainable landscaping is essential.

Given the urgency to transform landscapes without the luxury of time, Cal Water faces several challenges that require:

- Robust customer education.
- High levels of customer motivation.
- Accessibility to landscape design and plant knowledge.
- Considerable labor investment.
- Significant financial resources.

To increase customer engagement, Cal Water's programs must offer compelling incentives, clear communication about the required processes, and substantial support to guide customers through these changes. Table 2 outlines the key barriers to successful deployment of landscape transformation programs.

Many water users currently do not prioritize landscape water efficiency, lacking both understanding of its urgency and motivation to implement drastic changes.

Cal Water's strategy is to significantly enhance education about the need for outdoor water use reduction and how to achieve it. Fortunately, studies indicate a growing customer interest in aesthetically pleasing, water-efficient landscaping. Many property owners consider turf removal but require assistance to proceed. Time and cost are significant barriers.

To effectively encourage this shift, Cal Water must not only convince customers of the necessity of these changes but also provide them with extensive support—from design assistance to continuous engagement and resources. Additionally, incentives must be compelling enough to convince customers of the value of investing in these changes.

Success will depend on expanding education, services, and incentives to accelerate market transformation. To support this enhanced program structure, Cal Water must accordingly increase its staff, marketing efforts, operational support, and budget to meet these elevated service demands.

Table 2. Barriers and Customer Requirements of Landscape Transformation Programs

Landscape Transformation Barriers	Customer Requirements
<ul style="list-style-type: none"> • Customers lack motivation to reduce their water use. • Most customers are unaware of, or overwhelmed by, landscape efficiency programs. • Landscape efficiency solutions must be “customized” for each property. • Water suppliers do not currently have a deep understanding of their customers. • Agencies do not possess the resources to uniquely target and engage their customers. 	<ul style="list-style-type: none"> • Customers desire to have a beautiful landscape. • Each customer has a different vision of what comprises landscape beauty. • Most customers have considered converting their lawn, but they need help to accomplish this. • Customers confirmed that design support is the most important need. • Incentives are necessary to pull the trigger on converting their lawn. • There are a number of misperceptions that disconnect the customer from their actual water usage. They believe most water is used indoors; that they already have efficient equipment; and saving money is the main driver.

Beyond Landscape Transformation

In addition to turf replacement, Cal Water has identified a suite of customer conservation programs with demonstrated water-saving potential and meaningful market impact. Together, these measures represent a comprehensive portfolio that—subject to adequate staffing and funding—is intended to support achievement of the water use reduction levels required under the MCCWL regulations. The measures summarized in Table 3 are representative of Cal Water’s current conservation approach. As program performance is evaluated and technologies evolve, Cal Water may refine this portfolio by modifying, replacing, or adding measures to ensure continued program effectiveness.

Table 3. Representative Conservation Measures with Significant Savings Potential

Conservation Measure	Remaining Potential	Reasoning for Selecting
Home Water Budgets	All single-family homes	<ul style="list-style-type: none"> • Identifies customers with inefficient usage, thus allowing better targeting of programs and assistance. • Provides a foundational step in educating customers with powerful and personal information that identifies site-specific efficiency opportunities. • As an educational tool alone, shown to reduce water use.
Outdoor Efficiency		
Turf Replacement	All properties with remaining turf	<ul style="list-style-type: none"> • Required measure for meeting landscape and irrigation standards. • Huge remaining opportunity. • Long lifespan measure.
Sprinkler Tune-up	All properties with remaining turf	<ul style="list-style-type: none"> • Nearly all irrigation systems need repair. • Repairs are necessary before efficiency upgrades are made otherwise new products will not work as designed. • High customer demand.
Smart Controllers	All properties with irrigation	<ul style="list-style-type: none"> • High customer receptivity due to technical aspect of device. • Reduces overwatering by providing the appropriate amount of water based on the local weather.
Pressure Regulating Spray Heads	All properties with popup spray heads	<ul style="list-style-type: none"> • Millions of non-pressure regulating spray heads. • Reduces water use due to high water pressure and low head drainage.
High Efficiency Sprinkler Nozzles	All properties with popup spray heads	<ul style="list-style-type: none"> • Millions of high flow nozzles are available for retrofit. • Solution for customers electing to keep turf. • Reduces runoff. • High cost effectiveness. • Generally easy retrofit.
Indoor Efficiency		

Conservation Measure	Remaining Potential	Reasoning for Selecting
Premium Efficiency Toilets	Nearly 50% of existing fixtures are 1.6 GPF or above	<ul style="list-style-type: none"> Reliable 25-year life of water savings. Easy retrofit.
High Efficiency Clothes Washers	All single-family homes and multi-family in-unit washers	<ul style="list-style-type: none"> Customers prefer high efficiency models. Easy to administer. Washers have 10–12-year life

5.5.3 CII BMPS

The MCCWL regulations require that the District implement CII BMPs for non-residential customers with very high usage.

The regulations specify that the District must implement at least one BMP from each of the following categories for customers with usage above the 80th percentile, while it must implement at least two BMPs from these categories for customers with usage above the 97.5th percentile.

Outreach, Technical Assistance, and Education BMPs

1. Direct contacts via site visits or phone calls
2. Informative or educational bill inserts
3. Conducting workshop or developing training videos
4. Webpage portals to access information, tools, and rebates
5. Cost-effectiveness analysis tools
6. Commercials or advertisements
7. Grass roots marketing
8. Community based social marketing
9. Other CII-best management practices derived from additional innovation and technology advancement that can be taken by suppliers, subject to Water Board approval

Incentives BMPs

1. Rebates and cost-sharing for replacing inefficient fixtures, equipment, irrigation systems or landscapes with water efficient ones
2. Certification or branding programs that recognize customers as water efficient
3. Incentives for technologies that enable customers to identify, measure, and analyze indoor and outdoor water use

4. Other CII-best management practices derived from additional innovation and technology advancement that can be taken by suppliers, subject to Board approval

Landscape BMPs

1. Landscape and irrigation management practices to promote improved water use efficiency
2. Irrigation system inspections, audits, or surveys
3. Training or guidance on irrigation scheduling and maintenance
4. New development landscape inspection, workshops, and training
5. Programs to remove turf and replace it with climate-ready vegetation
6. Programs to decrease urban heat and reduce turf water use by planting trees
7. Programs to install green infrastructure such as swales or rain gardens that offset irrigation needs
8. Other CII-best management practices derived from additional innovation and technology advancement that can be used by suppliers, subject to Water Board approval

Collaboration and Coordination BMPs

1. Coordination with “green” building certification or recognition programs to promote water use efficiency
2. Coordination with land use authorities to check new landscapes design and implementation
3. Collaboration with non-governmental organizations on outreach and education
4. Collaboration with municipal arborists and tree planting organizations to expand and maintain urban forests
5. Collaboration with stormwater agencies to install green infrastructure such as swales or rain gardens to also offset irrigation needs
6. Other CII-best management practices derived from additional innovation and technology advancement that can be taken by suppliers, subject to Water Board approval

Operational BMPs

1. Infrastructure changes (for example, smart meter replacement programs)
2. Billing or data collection procedures (for example, data tracking, analysis, and reporting improvements)
3. Other operational best management practices to facilitate CII best management practices program implementation and evaluation
4. Other CII best management practices derived from additional innovation and technology advancement that can be taken by suppliers, subject to Water Board approval

Table 4 shows the key tasks and milestones related to these new CII BMP requirements.

Table 4. Tasks and Milestones for Regulatorily Prescribed CII BMPs

Task	Frequency	Timing
Identify the top 2.5% and the top 20% of CII water users	One time and on-going	June 30, 2025
Identify the top 2.5% of CII water users and top 20% of connections in each water use classification	One time and on-going	June 30, 2029
Identify existing CII connections that appear to be inefficient according to key business activity indicators	One time and on-going	June 30, 2029
Implement at least 2 programs from each BMP category for top 2.5% of CII water users	Annually	June 30, 2039
Implement at least 1 program from each BMP category for top 20% of accounts in each water use classification	Annually	June 30, 2039
Conduct marketing and outreach to targeted commercial customers	Annually	Continuous
Administer Commercial Rebate and Support Programs	Annually	Continuous

5.6 Program Monitoring and Reporting

Ongoing monitoring, evaluation, and reporting are central components of Cal Water’s conservation program strategy. These activities ensure that programs are performing as intended, that water savings estimates are supported by empirical evidence, and that the District meets CPUC and state regulatory requirements. Together, these efforts provide accountability, support continuous program improvement, and inform future program design and funding decisions.

Program Tracking

Cal Water uses the Alliance for Water Efficiency (AWE) Water Conservation Tracking Tool to systematically track program participation, expenditures, and estimated

water savings across conservation programs. This system allows Cal Water to track implementation activity, evaluate program cost-effectiveness, identify participation trends, and assess progress toward water savings targets. The tracking data also support demand forecasting, program planning, and regulatory reporting.

Savings Evaluations

In addition to routine tracking, Cal Water conducts periodic savings evaluations to assess the actual water use impacts of its conservation programs. These evaluations typically use statistical and econometric methods to compare water use patterns before and after program participation, often relative to control groups. Recent and ongoing evaluations include:

- Toilet, showerhead, faucet, and complete bathroom retrofit water savings evaluations
- Lawn-to-Garden Program turf replacement water savings evaluation
- Smart Landscape Tuneup Program water savings evaluation
- Flume Rebate Program water savings evaluation

CPUC and State Reporting

Cal Water fulfills multiple conservation-related reporting requirements at both the CPUC and state levels. These include:

- **CPUC reporting:** Annual reports detailing conservation program activities, expenditures, and estimated water savings by district. These reports support regulatory oversight and future budget authorizations.
- **State reporting:**
 - Annual distribution system water loss audits and reporting to the California Department of Water Resources
 - Annual Urban Water Use Objective (UWUO) compliance assessments
 - Annual Commercial, Industrial, and Institutional (CII) performance measure compliance reporting

These monitoring and reporting functions require substantial data management, analytical support, and regulatory coordination, and are a key driver of the administration and research budget described in Section 6.

5.7 Water Conservation Program Staffing

Cal Water's Conservation Department is currently staffed by nine full-time equivalent (FTE) positions. A prior staffing evaluation by Cal Water indicated that the industry standard staffing ratio is 12 FTEs per million people served. At present, Cal Water has only 9 FTEs serving a customer base of 2 million people, or roughly one-third the

standard level. This evaluation, conducted before the *Making Conservation a California Way of Life* regulations were introduced, already demonstrated a stark understaffing issue. The additional responsibilities introduced by the new regulations will undoubtedly intensify this challenge.

In light of mandated UWUO reductions and the extensive reporting and performance requirements associated with the MCCWL regulations, Cal Water has identified a need to expand its conservation program staffing.

While the use of consultants could provide short-term support, the ongoing and long-term nature of the regulatory requirements makes exclusive reliance on temporary staffing impractical. In particular, the data analysis, program tracking, and reporting obligations associated with the MCCWL framework require sustained institutional knowledge and continuity that are best supported through permanent staff.

Cal Water's staffing strategy therefore emphasizes strengthening internal capacity to manage conservation programs, lead outreach and customer engagement efforts, support customers, oversee ongoing CII activities, and fulfill reporting and compliance obligations. Consultants are expected to continue to play a targeted role by providing short-term, specialized expertise as needed, allowing flexibility while maintaining a strong in-house program foundation.

Consistent with this strategy, Cal Water has proposed in its 2024 GRC an increase in Conservation Department staffing from nine to fifteen positions. The six requested positions and their primary responsibilities are summarized in Table 5. At the time this plan was prepared, a final decision in the 2024 GRC had not yet been issued. As a result, it remains uncertain whether the CPUC will authorize the requested staffing increases necessary to support compliance with state conservation requirements.

Table 5. Proposed New Conservation Staff Positions

New Position	Responsibilities
Conservation Manager	<ul style="list-style-type: none"> • Program development/implementation/management • Budgeting • Staff oversight
Regional Conservation Coordinator (2 positions)	<ul style="list-style-type: none"> • Regional program implementation • District coordination • Customer engagement
Water Resource Sustainability Analyst	<ul style="list-style-type: none"> • Program tracking/analysis • Compliance assessment/reporting • Data management
Water Resource Sustainability Assistant	<ul style="list-style-type: none"> • Data entry • Analysis support • Compliance reporting support
Conservation Assistant	<ul style="list-style-type: none"> • Program application/rebate processing • Customer assistance • Data entry/processing

5.8 Summary of Water Conservation Program Strategy

Cal Water’s conservation strategy for the Los Altos Suburban District integrates regulatory tools, pricing signals, system efficiency measures, customer-focused programs, and rigorous monitoring and reporting to achieve sustained reductions in water demand. This multi-layered approach reflects the need to meet evolving state conservation standards, support water supply reliability, and manage long-term cost-of-service impacts.

Centralized program administration provides consistency, economies of scale, and strong cost-effectiveness, while district-level implementation focuses outreach and resources where they are most needed. Foundational elements of the strategy include water waste prevention and enforcement, universal metering and conservation-oriented rate design, and proactive water loss management. These structural measures create the conditions for efficient water use and system performance.

Building on this foundation, customer conservation programs deliver direct savings through rebates, technical assistance, education, and market transformation initiatives. In response to *Making Conservation a California Way of Life* requirements, increasing emphasis is being placed on outdoor landscape efficiency and support for high-water-use residential and commercial customers. Ongoing program tracking, empirical savings evaluations, and CPUC and state reporting ensure that program performance is documented, savings assumptions remain evidence-based, and the District can demonstrate compliance with UWUO, CII, and water loss standards.

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Together, these elements position conservation as a long-term resource management strategy that supports regulatory compliance, water supply reliability, and cost-effective water supply planning for the District.

6 Current and Requested Conservation Budget

Cal Water is proposing an increase in the Los Altos Suburban District’s conservation budget in the 2024 General Rate Case (GRC). The proposed annual budget increases from \$352,357 to \$452,477, representing an increase of approximately 28 percent. This proposed increase is driven primarily by compliance requirements associated with the *Making Conservation a California Way of Life* regulations, as well as the need to expand conservation efforts in areas dependent on imported water and in districts either with currently high water supply costs or high supply development costs, such as Los Altos Suburban.

6.1 Conservation Program Budget Components

The District’s conservation budget consists of four primary components: (1) program implementation, (2) public information, (3) school education, and (4) administration and research. The program implementation budget is the largest component and covers the costs of delivering conservation programs, excluding marketing and internal staffing costs. The public information budget supports program marketing as well as broader conservation outreach and customer communications. The school education budget funds school-based conservation education programs offered within the District. The administration and research budget covers the District’s allocated share of conservation staffing costs, along with expenditures for external consultants performing research, program evaluation, and water savings verification.

6.2 Conservation Program Budget Adjustments

In its 2024 GRC, Cal Water proposed three key adjustments to the currently authorized conservation program budget to address evolving regulatory and operational needs:

1. UWUO Compliance Budget Adjustment:

To support compliance with UWUO requirements, Cal Water conducted a detailed cost analysis using a representative portfolio of conservation measures. This analysis identified the measures and activity levels needed to achieve projected savings, estimated associated annual and cumulative water savings, and calculated the corresponding costs required to meet UWUO targets.

2. Adjustments for Supply-Impacted and High-Cost Districts:

Additional adjustments were proposed for districts affected by imported supply uncertainty and for those facing high incremental water supply costs. These adjustments allocate additional conservation resources to address supply reliability challenges and to pursue conservation as a cost-effective alternative to higher-cost supply development.

3. Adjustments to Mitigate Potential Implementation Feasibility and Cost-of-Service Concerns:

Because the first two adjustments resulted in substantial budget increases in some districts, a moderating adjustment was applied to limit potential cost-of-service impacts. This constraint effectively capped proposed program budget increases at no more than five times a district's currently authorized conservation budget, balancing regulatory compliance needs with affordability and implementation feasibility.

6.3 Conservation Program Budget Comparison

Figures 12 and 13 compare the Los Altos Suburban District's currently authorized conservation budget with the budget requested in the 2024 GRC. Overall, total conservation funding increases from \$351,457 to \$452,477, an increase of approximately 28 percent.

The program implementation budget increases from \$175,513 to \$263,270, an increase of roughly 50 percent. As a result, the share of total conservation funding devoted to direct customer programs rises from 50 percent to 58 percent. This shift reflects a clear prioritization of on-the-ground conservation measures that generate measurable savings and reduce demand on State Water Project supplies, strengthening long-term supply reliability.

The public information budget increases modestly from \$50,062 to \$52,654, while its share declines from 14 percent to 12 percent of the total budget. This adjustment reflects a rebalancing of resources toward direct program delivery while maintaining core outreach and customer communication efforts.

The administration and research budget decreases slightly from \$102,888 to \$100,721, and its share declines from 29 percent to 22 percent. Although overall conservation funding increases, a larger proportion of total resources is directed toward direct program implementation rather than administrative overhead.

The school education budget increases from \$23,894 to \$35,832, increasing its share from 7 percent to 8 percent, supporting continued investment in community education and long-term water use awareness.

Taken together, the proposed budget represents both an expansion and a reprioritization. Total conservation funding increases by nearly 30 percent, and a larger share of resources is directed toward direct program implementation. The District is projected to remain below both its UWUO and the State's real water loss performance standard under baseline conditions. Accordingly, the expanded conservation funding is not driven by a modeled compliance shortfall, but rather by the need to enhance supply reliability, reduce exposure to State Water Project allocation variability, and moderate long-term wholesale water cost risk associated with reliance on imported supplies.

Figure 12. Los Altos Suburban District Conservation Budget: Authorized and Requested

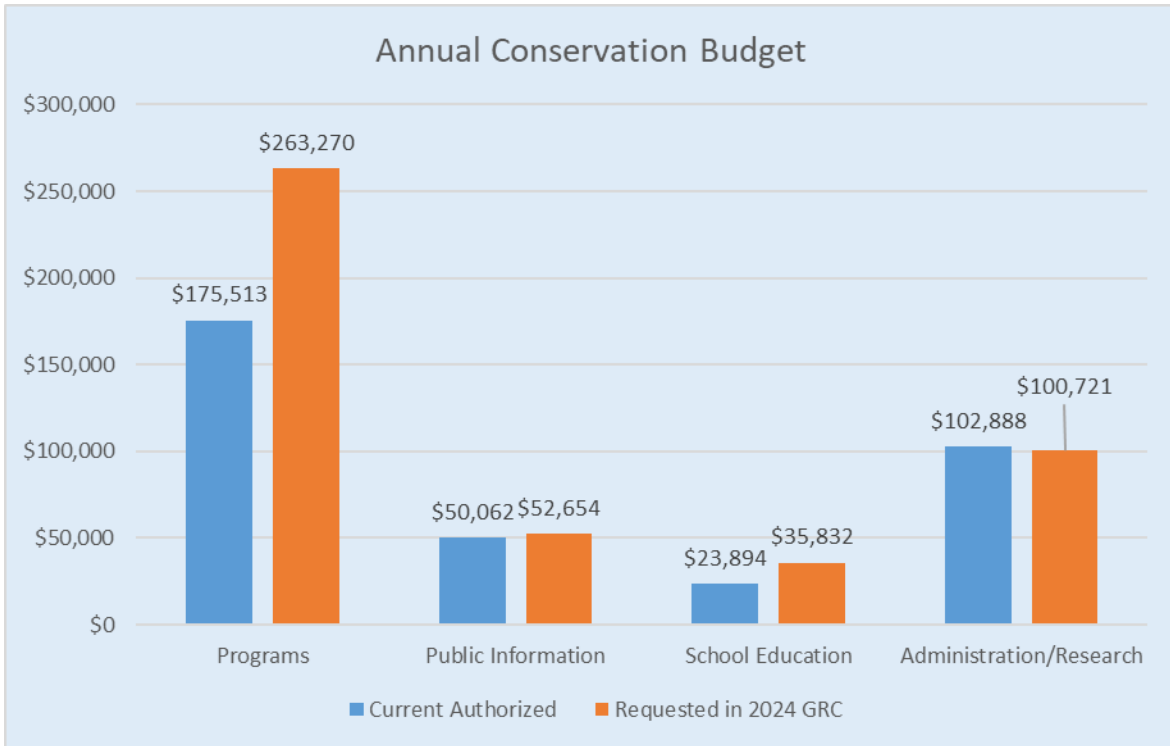
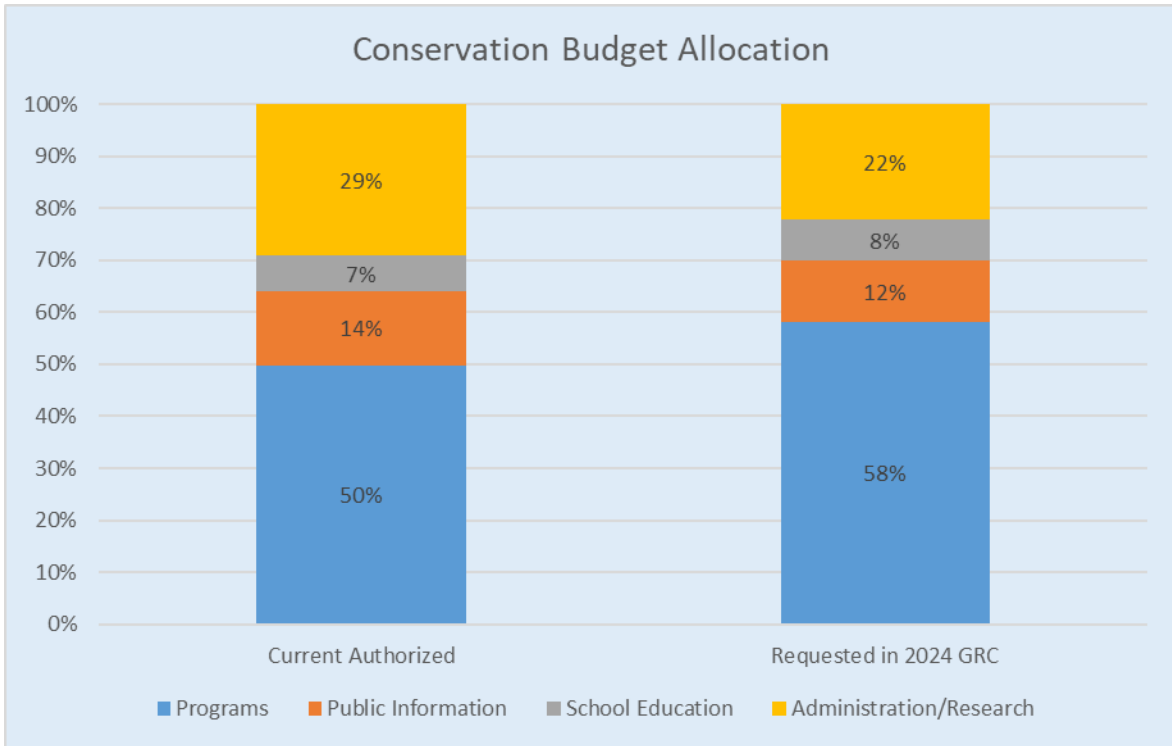


Figure 13. Los Altos Suburban District Conservation Budget Shares



7 Conclusion

The Los Altos Suburban District has achieved sustained reductions in water use over the past two decades through universal metering, conservation-oriented pricing, expanded customer programs, and state and federal efficiency standards. As documented in this plan, these efforts have enabled the District to meet or exceed historical conservation requirements—including compliance with the Water Conservation Act of 2009 and CPUC conservation goals—while continuing to provide reliable service.

Looking ahead, the primary regulatory driver is the State’s Making Conservation a California Way of Life (MCCWL) framework, which establishes increasingly stringent efficiency standards and reporting requirements beginning in 2027 and extending through 2035 and beyond. Under currently authorized programs and anticipated passive efficiency gains, the District is projected to remain below its Urban Water Use Objective (UWUO) and in compliance with the State’s distribution system water loss performance standard throughout the planning horizon. Maintaining that position will nonetheless require sustained implementation, performance monitoring, and periodic refinement of conservation strategies as standards tighten over time.

At the same time, the District relies on imported supplies from the State Water Project. SWP deliveries are inherently variable and are influenced by hydrologic conditions in Northern California, Delta regulatory constraints, and allocation decisions that can fluctuate significantly from year to year. Extended drought conditions, evolving environmental requirements, and long-term climate variability introduce both supply and cost uncertainty. These factors underscore the value of continued demand management as a means of strengthening reliability and moderating exposure to wholesale cost volatility.

The conservation budget increase proposed in the 2024 General Rate Case is therefore not driven by a modeled compliance gap. Rather, it reflects a strategic decision to expand on-the-ground program implementation, enhance long-term supply reliability, and reduce dependence on imported water supplies subject to allocation variability and rising costs. By moderating demand growth and improving efficiency, conservation provides operational flexibility during dry years and supports long-term cost stability for customers.

Cal Water’s conservation strategy integrates conservation-oriented rate design, system efficiency measures, and customer-focused programs within a centrally administered framework designed to promote consistency and cost-effectiveness. Expanded program implementation—supported by monitoring, evaluation, and reporting—will help ensure that savings are measurable, sustained, and adaptable as regulatory requirements and State Water Project conditions continue to evolve.

Appendix I: Resolution to Adopt