

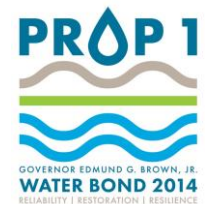
SB 552 Overview For Small Systems

Upper Santa Clara River

September 26, 2023 10-11:30am



UPPER SANTA CLARA RIVER
Integrated Regional Water Management





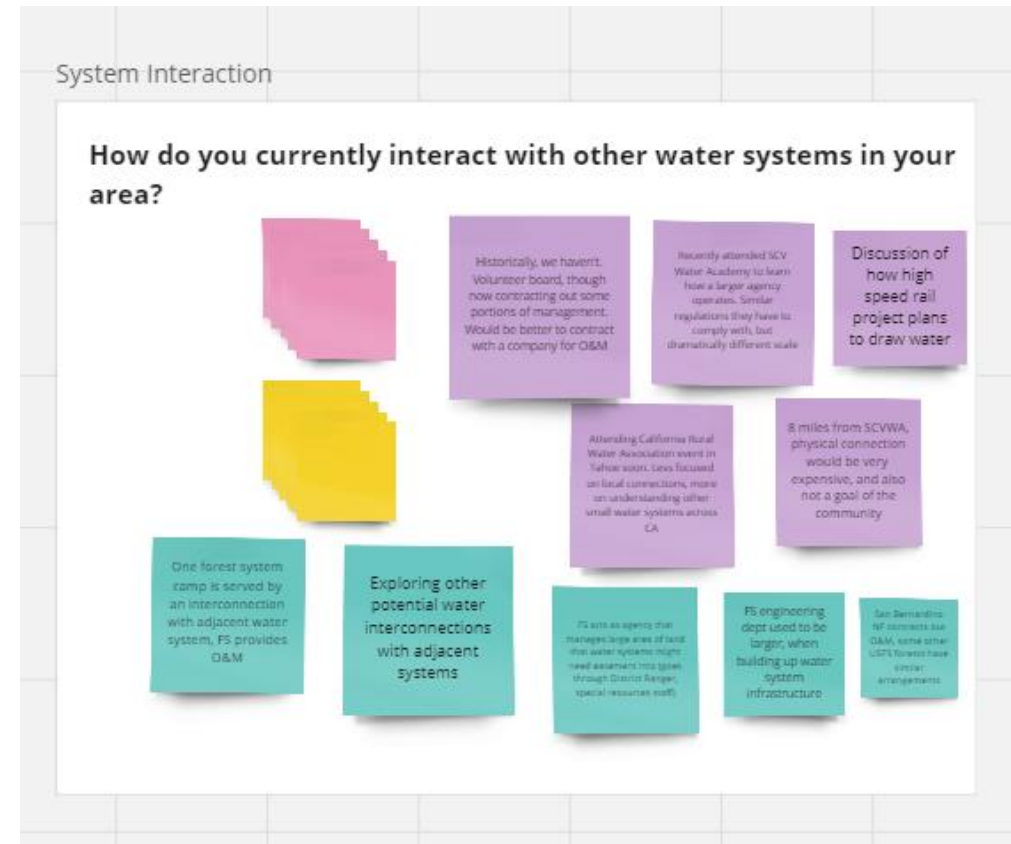
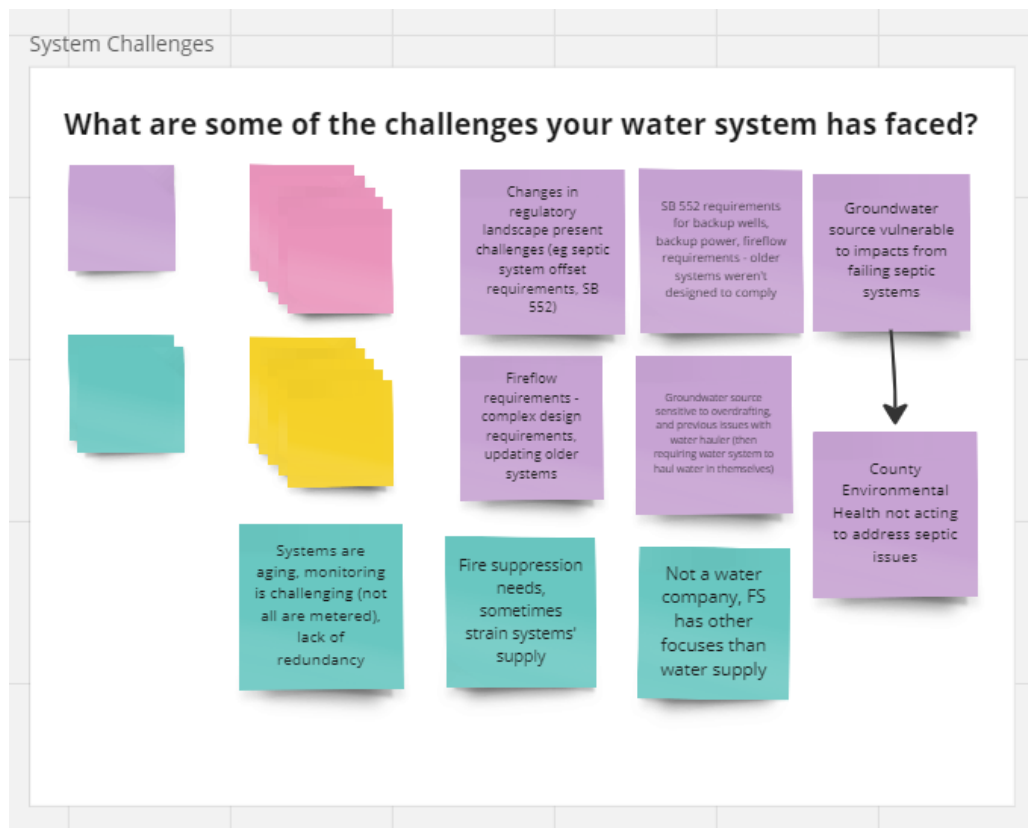
Agenda

1. Welcome & Icebreaker
2. Setting the Stage: WaterTalks Small Systems Partnerships
3. SB 552 for small water suppliers
 - Overview
 - Requirements
 - Resources
4. Round Robin: Agency Perspectives
5. Q&A

WaterTalks: Water Systems Partnerships Workshop 1



- Held April 4, 2023
 - Identified shared challenges and strengths among smaller water systems in the Santa Clara River Watershed
 - Partnership efforts so far
 - Opportunities for increased collaboration



SENATE BILL 552 (2021)

DROUGHT PLANNING FOR SMALL WATER SUPPLIERS

Slides adapted from California Department of Water Resources presentation, courtesy of Julia Ekstrom



Mike Antos, Principal
Stantec
WaterTalks Small Water System Partnership Workshop
September 26, 2023

Drought impacts

- **Many small systems...**
 - Found their wells going dry
 - Found naturally occurring contaminants became more concentrated with lower well levels
 - Faced unexpected costs (“rate shocks” for customers) for purchase of water, additional pumping and rehabilitation of wells
 - Turned to bottle water or potable water delivered by trucks
 - Unprepared for the drought and did not know what to do or who to call for help



Where did SB 552 come from?

- 2012-2016 Drought → AB 1668
- DWR hosted process focused on small water suppliers and rural communities (County Drought Advisory Group, CDAG)
 - Vulnerability Scoring and Tool
 - Develop recommendations on how to cover them with water shortage contingency plans

CDAG Recommendations informed SB 552

**Small Water Systems and Rural Communities
Drought and Water Shortage Contingency Planning
and Risk Assessment**

Part 1 – Recommendations for Drought and
Water Shortage Contingency Plans

**REPORT PURSUANT TO
SECTION 10609.42 OF THE CALIFORNIA WATER CODE
March 2021**



State Lead Agencies

Department of Water Resources – California Natural Resources Agency

- Water shortage contingency plan template
- Water shortage vulnerability tool
- Interagency drought and water shortage task force
 - Drought Resilience Interagency and Partners Collaborative (DRIP Collaborative)

State Water Board – Cal Environmental Protection Agency

- Water shortage contingency plan template
- Technical Assistance < 1,000 connections
- Water supply and program reporting
- TA for counties to address <15 connections and domestic wells



CALIFORNIA DEPARTMENT OF
WATER RESOURCES



Purpose of SB 552 for Small Water Suppliers

The Legislative requirements serve as a starting point for drought and shortage planning

- Improve small water system preparedness in addressing shortage/drought conditions
- Consider locally relevant conditions and County concerns related to water shortage impacts
- Inform the state of additional measures and support assistance that will be needed



SB 552 (2021): New Requirements

Small Water Suppliers*

- 1,000-2,999 connections + schools: Water shortage contingency plan
- 15-999 connections: Drought assessment/element into Emergency Response or Emergency Notification Plan
- All Small Suppliers: Supply and demand reporting
- All Small Suppliers: Drought resiliency standards – infrastructure upgrades

Counties

- Create a standing Drought & Water Shortage Task Force for state smalls and domestic wells (or similar alternative)
- Develop Water Shortage Plan (and assessment) for state smalls and domestic wells in the county (or similar alternative)

State

- Water Shortage Vulnerability Tool (small suppliers, state small systems, domestic wells)
- Establish Standing Interagency Drought & Water Shortage Task Force (with local government and stakeholder membership)

*Includes water suppliers serving less than 3,000 connections and 3,000 Acre Feet. Includes non-transient, non-community water systems serving schools; **excludes** those covered under an Urban Water Management Plan





Zoom Poll 1

- **How many service connections do you serve water to?**



Zoom Poll 2

- **"I better understand which SB 552 requirements apply to me"**



Summary of requirements for small water suppliers

Table 1. Summary of Small Water Supplier Requirements for Implementation of Senate Bill 552

Task	Summary of Requirement	Community Water Systems 1,000-2,999 Connections	Community Water Systems 15-999 Connections	NTNC Water Systems That Are Schools	Water Code Section
1	Drought Resiliency Measures	Yes	Yes	Yes	10609.62 (a-f)
2	Abridged Water Shortage Contingency Plan	Yes	No	Yes	10609.60 (a)
3	Drought Element added to Emergency Notification or Response Plan	No	Yes	No	10609.60 (b)
4	Annual reporting of water supply condition information to the State Water Board	Yes	Yes	Yes	10609.61 (a)
5	Annual water demand reporting to the State Water Board	Yes	Yes	Yes	10609.61 (b)



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures

Implement drought resiliency measures, subject to funding availability:

- a) Detect production well groundwater levels - *Jan 1, 2023*
- b) Mutual aid organization membership - *Jan 1, 2023*
- c) Continuous operation during power failures - *Jan 1, 2024*
- d) Backup source of water supply or a water system intertie - *Jan 1, 2027*
- e) Meter each service connection and monitor water loss - *Jan 1, 2032*
- f) Meet fire flow requirements - *Jan 1, 2032*



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures

Implement **monitoring systems** sufficient to detect production **well groundwater levels**

- *Target due date: Jan 1, 2023*



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures: Maintain **membership** in a mutual aid organization like California Water/Wastewater Agency Response Network (CalWARN)

- *Target due date: Jan 1, 2023*

What is mutual aid?

- Process for sharing emergency resources (such as equipment, supplies, and personnel) among network agencies
- CalMutuals provides [instructions](#) with easy steps to register with CalWARN
- CalWARN membership is free, has over 600 member agencies



1 Articles of Agreement
2 California Water/Wastewater Agency Response Network
3 WARN 2007 Omnibus Mutual Assistance Agreement
4
5 This AGREEMENT is made and entered into by those water and wastewater utilities which have
6 adopted and signed this agreement to provide mutual assistance in times of emergency in
7 accordance with the California Emergency Services Act and the California Disaster and Civil
8 Defense Master Mutual Aid Agreement; and to provide reimbursement for equipment, supplies
9 and personnel made available on an emergency basis.
10
11 All of said water and wastewater utilities being herein referred to collectively as "the parties."
12
13 In consideration of the mutual covenants and agreements hereinafter set forth, the parties agree
14 to provide mutual assistance to one another in times of emergency as follows:
15
16
17 ARTICLE I.
18 PURPOSE
19
20 Recognizing that emergencies may require assistance in the form of personnel, equipment, and
21 supplies from outside the area of impact, the signatory utilities hereby establish an Intrastate
22 Program for Mutual Aid and Assistance. Through the Mutual Aid and Assistance Program,
23 Members coordinate response activities and share resources during emergencies. This
24 Agreement sets forth the procedures and standards for the administration of the Intrastate
25 Mutual Aid and Assistance Program and is available to all water and wastewater utilities, public
26 and private, in the State of California.
27
28
29 ARTICLE II.
30 DEFINITIONS
31
32 A. *Authorized Official* – An employee or officer of a Member who is authorized to: (1) request
33 assistance; (2) offer assistance; (3) refuse to offer assistance or (4) withdraw assistance
34 under this.
35
36 B. *Emergency* – A natural or human caused event or circumstance causing, or imminently
37 threatening to cause impact to the operations of a member utility's system, loss of life, injury
38 to person or property, human suffering or financial loss, and includes, but is not limited to,
39 fire, flood, severe weather, earthquake, civil disturbance, riot, explosion, drought, volcanic
40 activity, spills or releases of oil or hazardous material, contamination, utility or transportation
41 emergencies, disease, blight, infestation, intentional acts, sabotage, declaration of war, or
42 other conditions which is, or is likely to be beyond the control of the services, personnel,
43 equipment, and facilities of a Member and requires mutual assistance.
44
45 C. *Member* – Any public or private water or wastewater utility that manifests intent to
46 participate in the Mutual Aid and Assistance Program by executing this, the California
47 Water/Wastewater Agency Response Network (CalWARN) Agreement.
48
49 D. *Associate Member* – Any non utility participant, approved by the State Steering Committee,
50 that provides a support role for the WARN program, for example State Department of Public



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures: Ensure **continuous operations** during **power failures**, provide adequate backup electrical supply.

- *Target due date: Jan 1, 2024*
- State Board offers financial assistance to qualifying water suppliers: [Backup](#)

[Generator Funding Program](#)



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency

Measures: Have at least one **backup source of water supply**, or a water system **intertie**, that meets current water quality requirements and is sufficient to meet **average daily demand**.

- *Target due date: Jan 1, 2027*



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures: Meter each service connection and monitor water loss due to leakages.

- *Target due date: Jan 1, 2032*



Small Water Suppliers: All (15-2,999 connections)

Drought Resiliency Measures: Have source system capacity, treatment system capacity if necessary, and distribution system capacity to **meet fire flow requirements** (Water Code §10609.62)

- *Target due date: Jan 1, 2032*

Fire flow requirements

The 2018 International Fire Code and the 2019 California Fire Code (Appendix B, Section B105) provides fire flow requirements (e.g., 1,000 gallons per minute for 2 hours)





Zoom Poll 3

Have you implemented drought resiliency measures?

Drought Resiliency Measures

Detect production well groundwater levels

Mutual aid organization membership

Continuous operation during power failures

Backup source of water supply or a water system intertie

Meter each service connection and monitor water loss

Meet fire flow requirements





Questions for Participants

What resources/ best practices have you used to implement drought resiliency measures?

Detect production well groundwater levels

Mutual aid organization membership

Continuous operation during power failures

Backup source of water supply or a water system intertie

Meter each service connection and monitor water loss

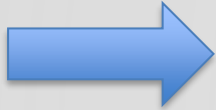
Meet fire flow requirements



Summary of requirements for small water suppliers

Table 1. Summary of Small Water Supplier Requirements for Implementation of Senate Bill 552

Task	Summary of Requirement	Community Water Systems 1,000-2,999 Connections	Community Water Systems 15-999 Connections	NTNC Water Systems That Are Schools	Water Code Section
1	Drought Resiliency Measures	Yes	Yes	Yes	10609.62 (a-f)
2	Abridged Water Shortage Contingency Plan	Yes	No	Yes	10609.60 (a)
3	Drought Element added to Emergency Notification or Response Plan	No	Yes	No	10609.60 (b)
4	Annual reporting of water supply condition information to the State Water Board	Yes	Yes	Yes	10609.61 (a)
5	Annual water demand reporting to the State Water Board	Yes	Yes	Yes	10609.61 (b)



Small Water Suppliers (1,000-2,999 connections)

Abridged Water Shortage Contingency Plan Elements

- *Target due date: July 1, 2023*

Who to notify,
who covers
what

I. Drought Planning Contacts

- One contact at the water system, local public safety partners and potential vendors, State and local agencies, Regional water planning groups or mutual aid networks

What to do
and when

II. Triggering Mechanisms and Levels for Action

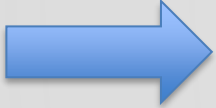
- Standard water shortage levels
- Water shortage mitigation, response, customer communications, enforcement, and relief actions that align with the water shortage levels



Summary of requirements for small water suppliers

Table 1. Summary of Small Water Supplier Requirements for Implementation of Senate Bill 552

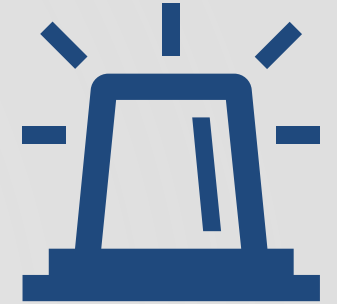
Task	Summary of Requirement	Community Water Systems 1,000-2,999 Connections	Community Water Systems 15-999 Connections	NTNC Water Systems That Are Schools	Water Code Section
1	Drought Resiliency Measures	Yes	Yes	Yes	10609.62 (a-f)
2	Abridged Water Shortage Contingency Plan	Yes	No	Yes	10609.60 (a)
3	Drought Element added to Emergency Notification or Response Plan	No	Yes	No	10609.60 (b)
4	Annual reporting of water supply condition information to the State Water Board	Yes	Yes	Yes	10609.61 (a)
5	Annual water demand reporting to the State Water Board	Yes	Yes	Yes	10609.61 (b)



Incorporating drought planning elements into your Emergency Notification Plans/ Emergency Response Plans

Suppliers with 15 to 999 connections

- Drought planning elements including
 - Drought-planning contacts
 - Standard water shortage levels
- Emergency Notification Plan (ENP) or Emergency Response Plan (ERP)
 - Must describe public notification process for when:
 - Primary drinking water standards are not complied with,
 - Monitoring requirement is not performed, or
 - The conditions of any variance or exemption are not complied with



Incorporating drought planning elements into Emergency Notification Plans/ Emergency Response Plans

- Water system serving > 3,300 people,
 - ERP must incorporate findings of a risk assessment
- State Water Board technical assistance to support water suppliers with < 1,000 connections
 - Subject to funding availability



WATER QUALITY EMERGENCY NOTIFICATION PLAN

This form is intended to assist the Division of Drinking Water (DDW) and the public water system in contacting responsible individuals in the event of an emergency affecting the water system operations.

ADMINISTRATIVE INFORMATION

Public Water System Name:	[Insert Water System Name]
Public Water System Number:	[Insert Water System Number]
Public Water System Type (CWS, NTNC, TNC):	[Insert Water System Classification]
Public Water System Address/Location:	[Insert Water System Location Address]

The following persons have been designated to implement the plan upon notification by the State Water Resources Control Board Division of Drinking Water that an imminent danger to the health of the water users exists:

Water Utility Contact Name and Title	Contact Type	Email Address	Daytime Telephone	Cell phone Number
[Insert Water Utility Number 1 Contact Name and Title]	Water Operator	[Insert Water Utility Number 1 Email Address]	[Insert Water Utility Number 1 Daytime telephone number]	[Insert Water Utility Number 1 Cell phone number]
[Insert Water Utility Number 2 Contact Name and Title]	Backup Water Operator (if applicable)	[Insert Water Utility Number 2 Email Address]	[Insert Water Utility Number 2 Daytime telephone number]	[Insert Water Utility Number 2 Cell phone number]
[Insert Water Utility Number 3 Contact Name and Title]	Water Shortage Contingency Response (if different than operator)	[Insert Water Utility Number 3 Email Address]	[Insert Water Utility Number 3 Daytime telephone number]	[Insert Water Utility Number 3 Cell phone number]
[Insert Water Utility Number 4 Contact Name and Title]	Water Hauler ¹	[Insert Water Utility Number 4 Email Address]	[Insert Water Utility Number 4 Daytime telephone number]	[Insert Water Utility Number 4 Cell phone number]

¹ Use only licensed water haulers from the California Department of Public Health, see website below under "Licensed Water Haulers by County" – hit "cancel" when it requests a username and password:
<https://www.cdph.ca.gov/Programs/CEH/DFDCS/pages/fdbprograms/foodsafetyprogram/water.aspx>



Summary of requirements for small water suppliers

Table 1. Summary of Small Water Supplier Requirements for Implementation of Senate Bill 552

Task	Summary of Requirement	Community Water Systems 1,000-2,999 Connections	Community Water Systems 15-999 Connections	NTNC Water Systems That Are Schools	Water Code Section
1	Drought Resiliency Measures	Yes	Yes	Yes	10609.62 (a-f)
2	Abridged Water Shortage Contingency Plan	Yes	No	Yes	10609.60 (a)
3	Drought Element added to Emergency Notification or Response Plan	No	Yes	No	10609.60 (b)
4	Annual reporting of water supply condition information to the State Water Board	Yes	Yes	Yes	10609.61 (a)
5	Annual water demand reporting to the State Water Board	Yes	Yes	Yes	10609.61 (b)



New Reporting Requirements

All small suppliers (15-2,999 connections)

- Quarterly reporting of **water supply** conditions, capacity and production information to State Water Board:
 - Supply conditions include:
 - An inventory and assessment of each water supply source
 - The reporting year's total water demand volume for each month, and average and peak flowrate demand for each month and annually
- Quarterly reporting of **Water demand** to State Water Board



New requirements for Counties

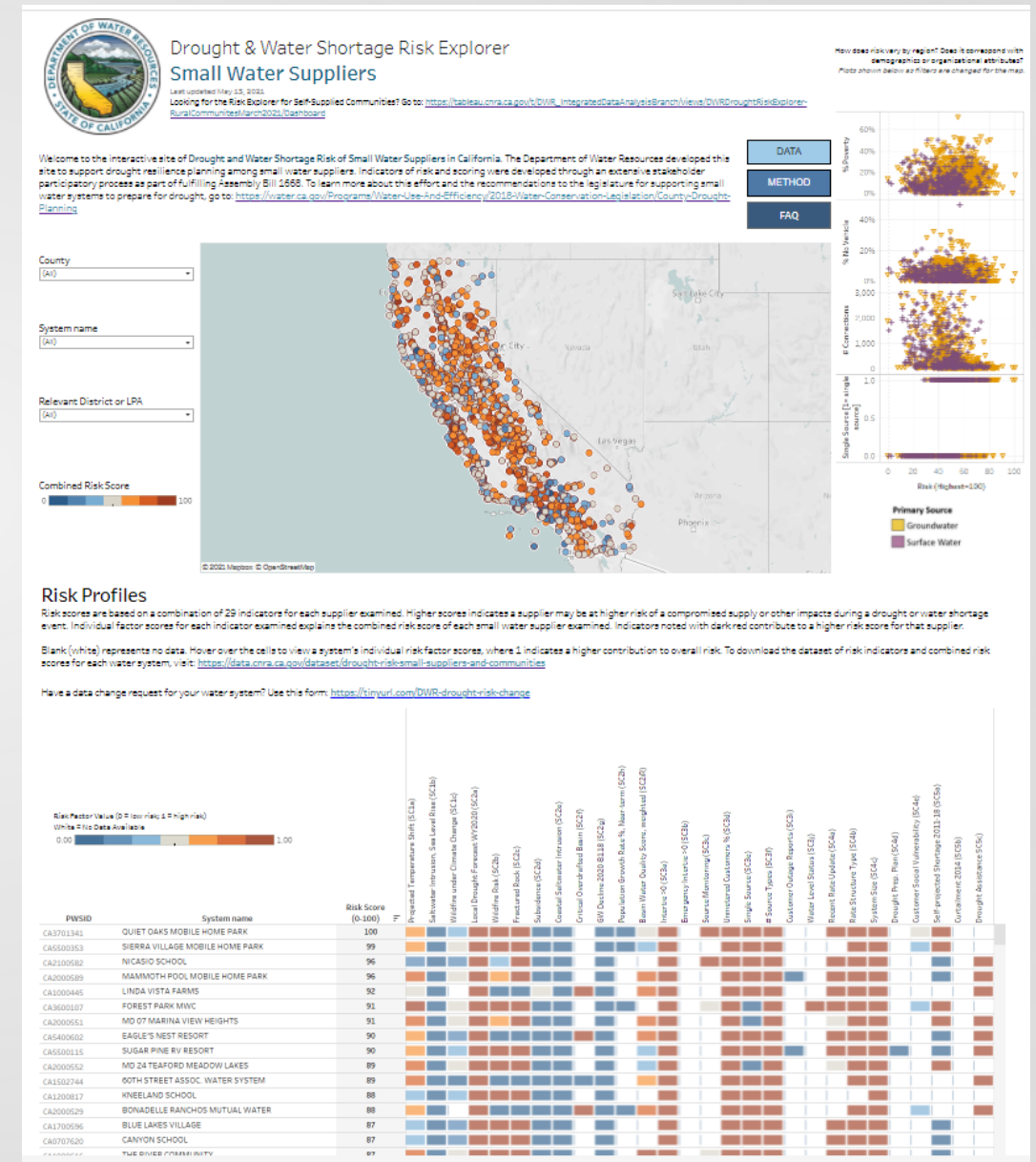
- Establish a **standing drought task force**
- Develop a County Drought Resilience Plan for those served by state small water systems and domestic wells
- DWR has [financial and technical assistance programs](#) to help counties meet these new planning requirements
- Guidebook developed with 12 county workgroup

Table 2. Summary of County Requirements for Implementation of Senate Bill 552

Task	Summary of Requirement	Timeline to Implement, If Any	Water Code Section
1	Establish a standing county drought and water shortage task force or alternative process that facilitates drought and water shortage preparedness for state small water systems and domestic wells.	January 1, 2022	10609.70 (a)
2	Assess potential drought and water shortage risk.	No mandated timeline	10609.70 (b)
3	Provide emergency and interim drinking water solutions in the county drought and water shortage risk mitigation plan (plan).	No mandated timeline	10609.70 (b)(3)
4	Consider consolidations for existing water systems and domestic wells in the plan.	No mandated timeline	10609.70 (b)(1)
5	Consider domestic well drinking water mitigation programs in the plan.	No mandated timeline	10609.70 (b)(2)
6	Consider an analysis of steps to implement the plan.	No mandated timeline	10609.70 (b)(4)
7	Consider an analysis of local, state, and federal funding sources available to implement the plan.	No mandated timeline	10609.70 (b)(5)

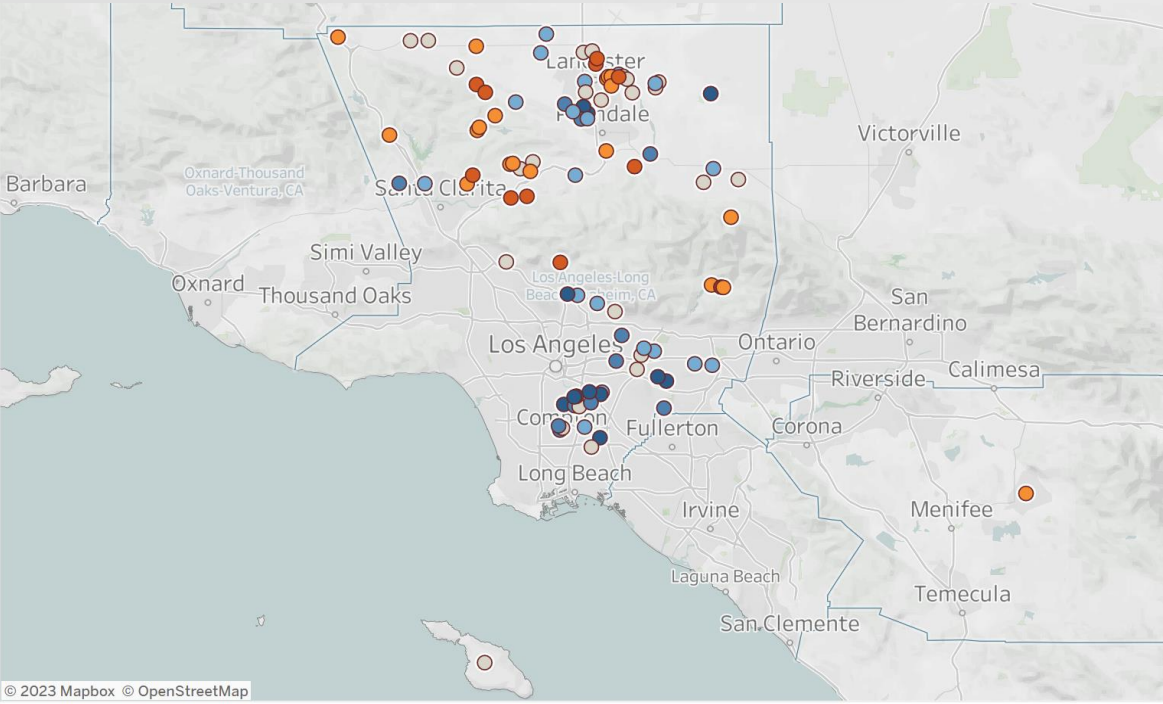


- CALIFORNIA DEPARTMENT OF
WATER RESOURCES

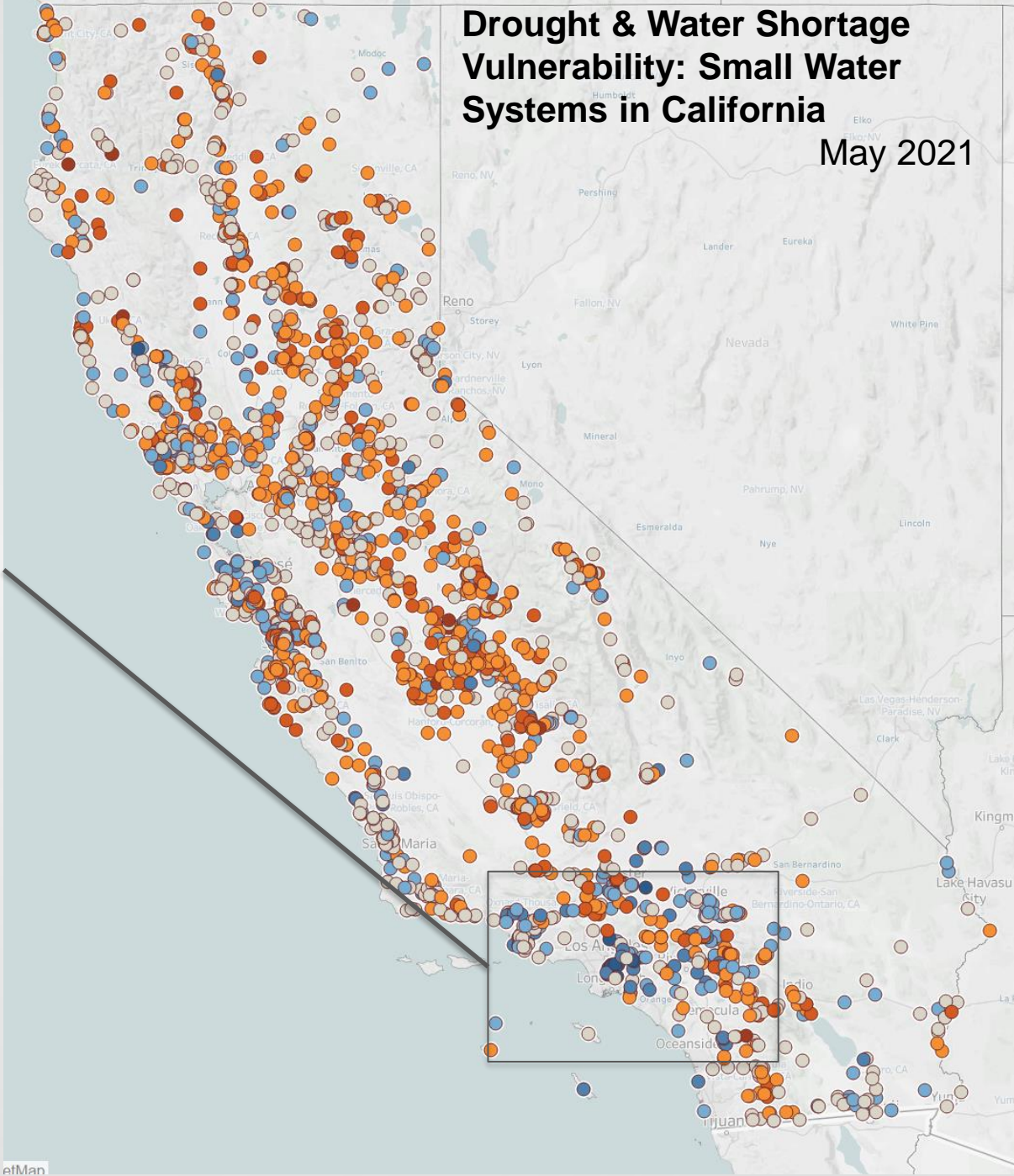


Los Angeles County Drought & Water Shortage Vulnerability

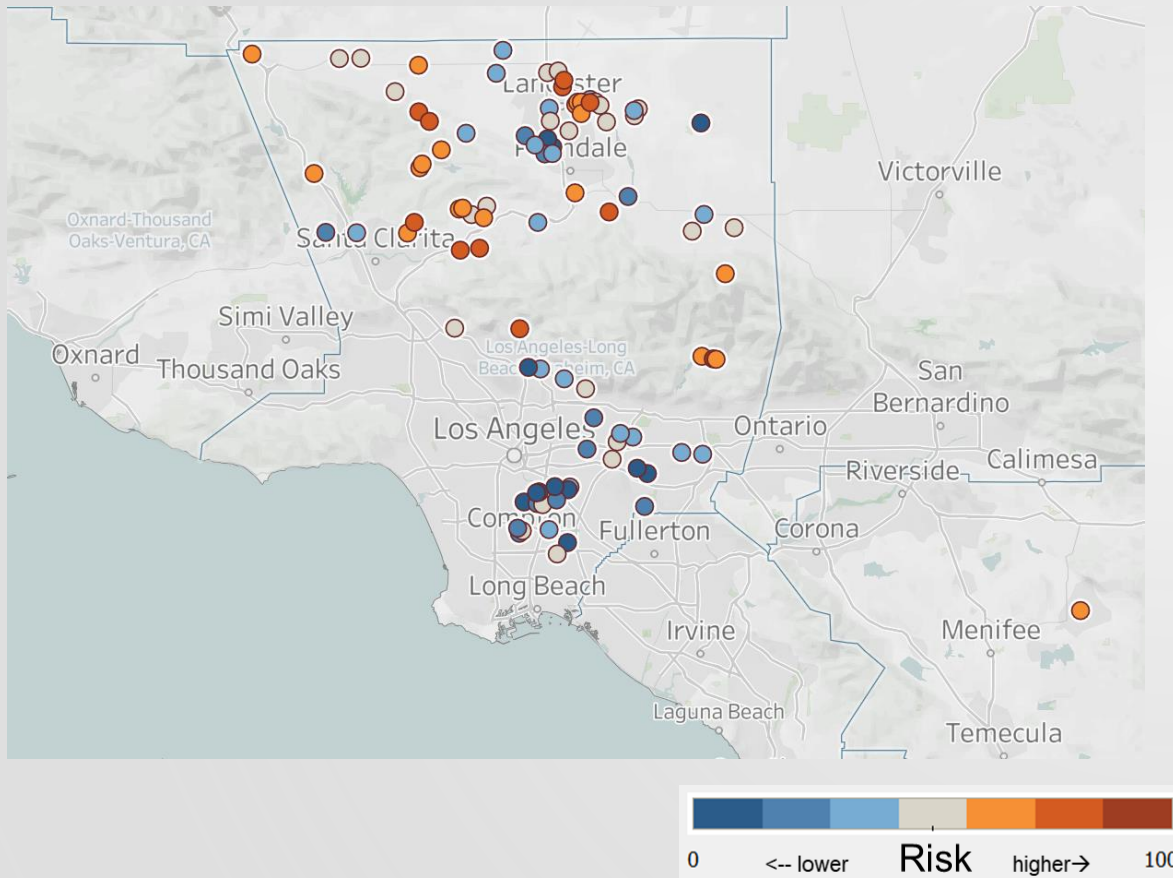
Link to Tool [here](#)



CALIFORNIA DEPARTMENT OF
WATER RESOURCES



Los Angeles County



Summary Small Water Systems & Schools

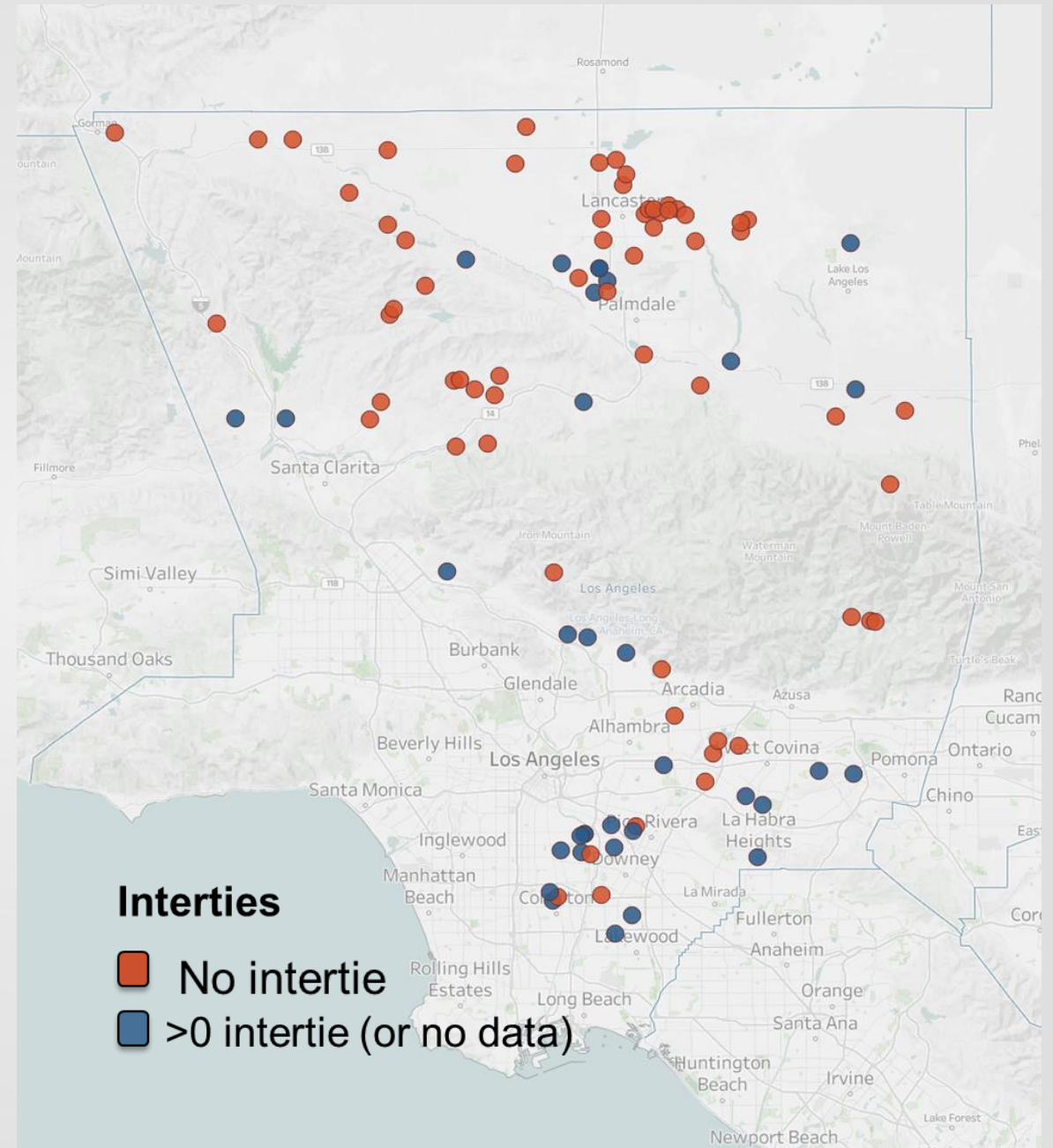
- 99 small water systems (analyzed)
- **Connections:** Range 1 to 2,988 (most <1,000)
- **Vulnerability scores:** ranges 0 to 87
- **Key drivers of vulnerability**
 - Projected temperature
 - Current wildfire
 - Local Drought Forecast
 - Basin quality
 - Infrastructure & Organizational vulnerabilities



Interties

(LA County)

- Intertie can be an important way to receive water in shortage
- 65/99 with no intertie
- 21 with emergency intertie (out of 27 reported)

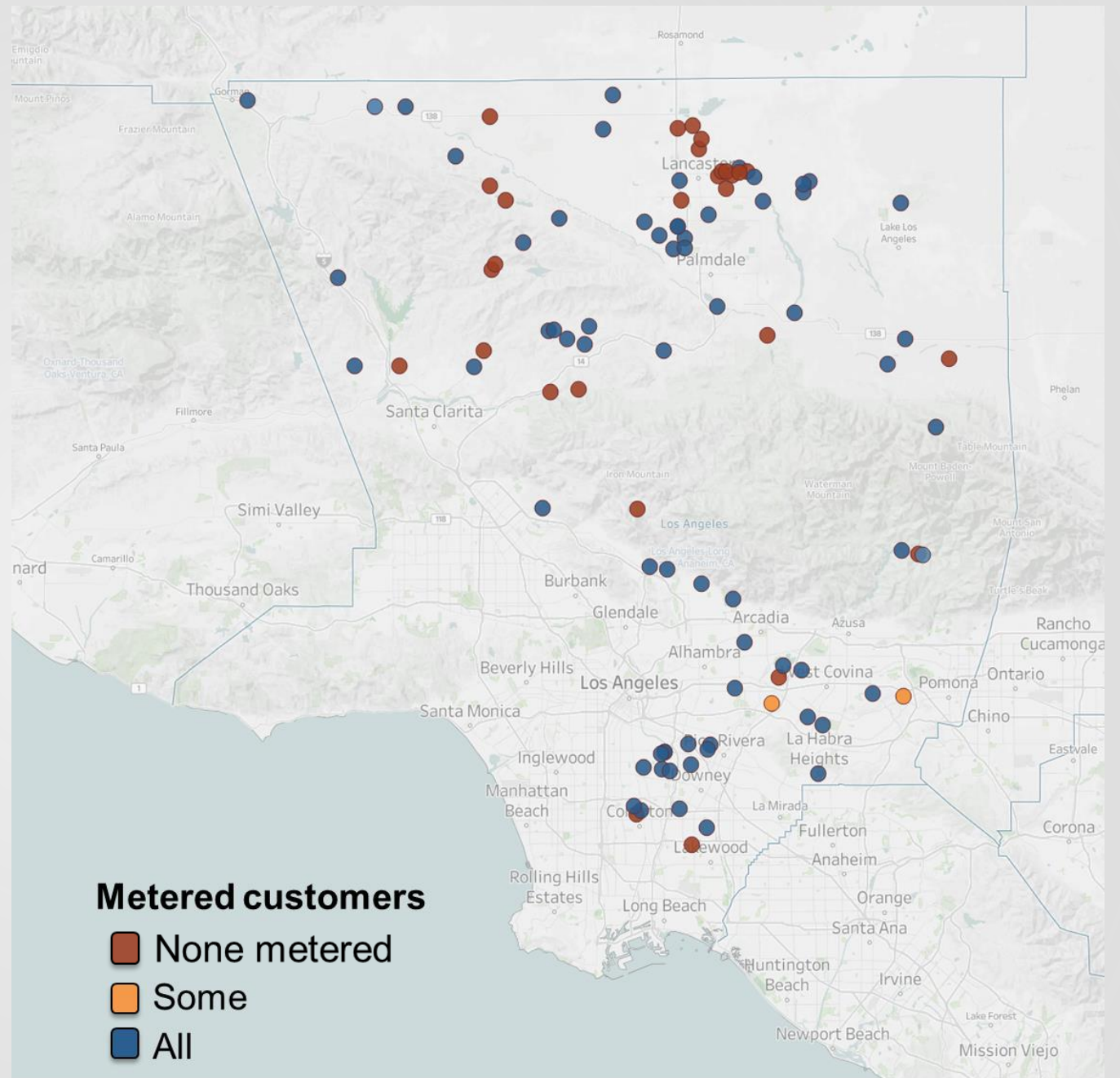


Metering

(LA County)

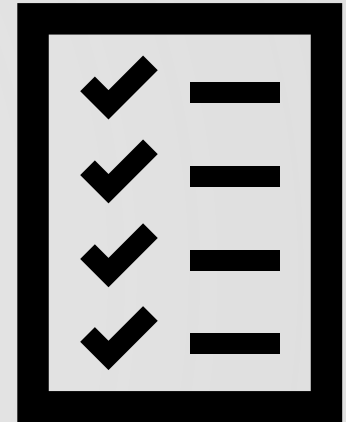
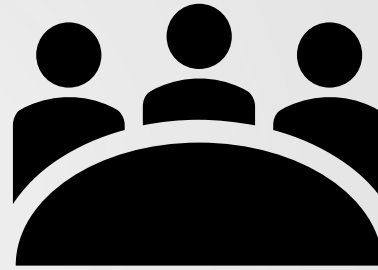
Demand Management

- Metering is useful in shortage to gauge effectiveness of conservation and if there are areas of excessive use
- Wide range in how many customers are metered across systems analyzed



Other Organizational Risk Factors

- **Drought Plan**
 - 17 report having it, others no reporting
- **Rate Structure**
 - Flat base rate:
32 systems
 - Rate update: 51 recent update; 19 >15 years



Resources

- [SB 552 Primer](#)
- [Water Shortage Vulnerability Exploring Tool](#)
- Recorded presentations
 - Webinar 1: [Water Shortage Contingency Plan Template Development for Small Water Suppliers](#), April 20, 2022
 - Webinar 2: [Water Shortage Contingency Plan Template Input Workshop for Small Water Systems](#), September 30, 2022
 - Webinar 3: [Water Shortage Contingency Plan Template Input Workshop for Schools with a Water System](#), September 30, 2022
- For additional comments/questions, please reach out to DWR: drip@water.ca.gov and to State Water Board at ddw_drought@waterboards.ca.gov



Lead Agencies



Lead Agencies



Local Agencies



Local Agencies



Local Agencies



Department of Public Health (DPH)

- The State Water Resources Control Board (SWRCB) delegates the authority to the DPH to enforce the California Safe Drinking Water Act for the regulation of small public water systems with less than 200 service connections.
- Delegation only includes water systems using groundwater sources. Surface water systems remain with the SWRCB.

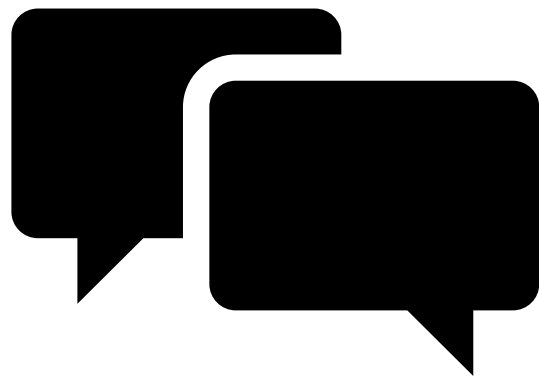


Role of DPH:

- Permitting small water systems under our jurisdiction.
- Conducting routine inspections and complaint investigations.
- Reviewing Electronic Annual Reports, Consumer Confidence Reports, and Certificates.
- Reviewing Water Quality Data.
- Preparing Unsafe Water Notices.
- Reviewing Technical/Managerial/Financial documents.
- Preparing Notices of Violations, Compliance Orders, and Citations.
- Preparing monitoring waivers.
- Assisting small system operators to navigate and comply with complex State and Federal regulations.
- Assisting water systems operators to prepare necessary forms and reports (Bacteriological Sample Siting Plan, Emergency Notification Plan, Emergency Disaster Response Plan).



Questions and Open Discussion





Thank you!

