

**City of Napa
Water Shortage Contingency Plan**

DRAFT

JOINTLY PREPARED BY



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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AF	Acre-Feet
AWSDA	Annual Water Supply and Demand Assessment
City	City of Napa
County	Napa County
CRMM	Community Relations & Media Manager
CWC	California Water Code
Delta	Sacramento-San Joaquin Delta
DWR	Department of Water Resources
ERP	Emergency Response Plan
FEMA	Federal Emergency Management Agency
GPCD	Gallons Per Capita Per Day
HMP	Hazard Mitigation Plan
MGD	Million Gallons Per Day
NMC	Napa Municipal Code
PIO	Public Information Officer
RRA	Risk and Resilience Assessment
SB	Senate Bill
SEMS	Standardized Emergency Management System
Supervisor	Water Treatment Facility Supervisor
SWP	State Water Project
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
WSCP	Water Shortage Contingency Plan
WTP	Water Treatment Plant

City of Napa

Water Shortage Contingency Plan

Water shortages occur whenever the available water supply cannot meet the normally expected customer water demand. This can be due to several reasons, such as climate change, drought, and catastrophic events. Drought, regulatory action constraints, and natural and manmade disasters may occur at any time. In 2018, the California State Legislature (Legislature) enacted two policy bills (Senate Bill (SB) 606 [Hertzberg] and Assembly Bill (AB) 1668 [Friedman]) (2018 Water Conservation Legislation) to establish a new foundation for long-term improvements in water conservation and drought planning to adapt to climate change and the resulting longer and more intense droughts in California. The 2018 Water Conservation Legislation set new requirements for water shortage contingency planning.

This Water Shortage Contingency Plan (WSCP) describes the City of Napa's (City) strategic plan for preparing for and responding to water shortages, including defining water shortage stages and associated shortage response actions. This WSCP provides a guide for the City to proactively prevent catastrophic service disruptions and addresses the 2018 Water Conservation Legislation requirements. As part of this WSCP, the City's legal authorities, communication protocols, compliance and enforcement, and monitoring and reporting are described. Chapter 13.10 of the Napa Municipal Code (NMC) describes the City's WSCP actions.

The City intends for this WSCP to be dynamic so that it may assess response action effectiveness and adapt to emergencies and catastrophic events. Refinement procedures to this WSCP are provided to allow the City to modify this WSCP outside of the Urban Water Management Plan (UWMP) process.

1.0 WATER SUPPLY RELIABILITY ANALYSIS

The City's water supply planning analysis and reliability are documented in the most recent UWMP. The UWMP provides a comprehensive assessment of existing and projected water demands (Chapter 4), existing and planned water supplies by source (Chapter 6), water supply reliability assessment and the Drought Risk Assessment (Chapter 7), and seismic risk assessment and mitigation planning (Chapter 8).

To proactively manage for a potential water shortage, the City conducts an annual water supply and demand assessment as described in Section 2.0.

2.0 ANNUAL WATER SUPPLY AND DEMAND ASSESSMENT PROCEDURES

Beginning July 1, 2022, California Water Code (CWC) Section 10632.1 required water suppliers to submit an Annual Water Supply and Demand Assessment (AWSDA) and an Annual Water Shortage Assessment Report to the Department of Water Resources (DWR). This section provides the procedures for the City to conduct its AWSDA, which informs the City's Annual Water Shortage Assessment Report and assists the City with planning for potential water supply shortages. The objective of the AWSDA is to forecast near-term supply conditions so that the City can prepare logistically and financially for any anticipated water supply constraints, as well as enact appropriate shortage response actions in a timely manner.

This section provides the decision-making process, key data inputs, and methodology necessary for the City to produce its AWSDA. This includes steps the City may take to declare a water shortage emergency and associated water shortage stage (see Section 3.0) and implement water shortage response actions (see Section 4.0).



Water Shortage Contingency Plan

2.1 Decision-Making Process

The City will use the decision-making process described below to consistently produce its AWSDA. The City may adjust and improve this process as needed.

The Deputy Utilities Director (or designee) is responsible for preparing the City's AWSDA and Annual Water Shortage Assessment Report and submitting them to DWR by July 1st of each year. Their team will gather key data inputs described in Section 2.2 and conduct the assessment in accordance with Section 2.3. In May of each year, the Deputy Utilities Director will finalize the AWSDA based on that year's final SWP allocation. The AWSDA and Annual Water Shortage Assessment Report will be presented to the Utilities Director for review and approval.

To conduct the AWSDA, the Deputy Utilities Director (or designee) will follow the schedule of activities shown in Table 1. for conducting the AWSDA and decision making. Due to variations in climate and hydrologic conditions, the timeframes shown in the table are approximate and may be adjusted as needed. The City intends to implement shortage response actions to effectively address anticipated water shortage conditions in a timely manner while complying with the State's reporting requirements.

Table 1. Schedule of AWSDA and Decision-Making Activities			
Schedule	Task	Activity or Decision	Responsible Party
AWSDA Activities			
April	Determine available water supply for current year and one subsequent dry year. Describe sources and quantities considering factors affecting supply as described in Section 2.2.	Activity	Deputy Utilities Director or designee
April	Determine water demands for current year and one subsequent dry year. Describe demand types and quantities considering factors affecting demands as described in Section 2.2.	Activity	Deputy Utilities Director or designee
Early May	Using the methodology described in Section 2.3, calculate the City's water supply reliability for the current year and one subsequent dry year.	Activity	Deputy Utilities Director or designee
Mid-May	Complete the AWSDA and Annual Water Shortage Assessment Report based on expected water deliveries, including the year's final SWP allocation. Submit to Utilities Director for review.	Activity	Deputy Utilities Director or designee
Mid-May	Review the AWSDA and Annual Water Shortage Assessment Report and provide comments, if needed.	Activity	Utilities Director
Late May	Finalize the AWSDA and Annual Water Shortage Assessment Report. Prepare City Council agenda item.	Activity	Deputy Utilities Director or designee
June	Receive the final AWSDA and Annual Water Shortage Assessment Report.	Activity	City Council



Water Shortage Contingency Plan

Table 1. Schedule of AWSDA and Decision-Making Activities			
Schedule	Task	Activity or Decision	Responsible Party
Decision-Making Activities If the AWSDA Shows Available Supply May Not Meet Expected Demands			
Mid-May	Based on finalized determinations of the AWSDA regarding water shortage condition and recommended actions, prepare recommendations on water shortage condition determination and actions.	Decision	Deputy Utilities Director
Mid-May	Prepare ordinances or resolutions approving determinations and actions.	Decision	Deputy Utilities Director
Mid-May	Coordinate interdepartmentally, with the region's water service providers, and with Napa County for the possible proclamation of a local emergency.	Decision	Utilities Director
Late May/Early June	Present finalized determinations and recommendations to the City Council, along with ordinances or resolutions approving determinations and actions.	Activity	Utilities Director
June	Receive presentation of finalized determinations and recommendations. Make determination of degree of emergency and act on resolutions that declare a water shortage emergency condition. Authorize water shortage response actions for implementation.	Decision	City Council
June	Revise the AWSDA and Annual Water Shortage Assessment Report to include City Council determinations and approved actions.	Activity	Deputy Utilities Director or designee
After City Council Meeting	If a water shortage emergency condition is declared, implement the WSCP and the water shortage response actions as approved by the City Council.	Decision	Utilities Director
AWSDA and Report Submittal			
On or before July 1	Submit the final AWSDA and Annual Water Shortage Assessment Report to DWR.	Activity	Deputy Utilities Director or designee

2.1.1 AWSDA Finding: Sufficient Water Supply to Meet Expected Demands

If the AWSDA finds that available water supply will be sufficient to meet expected demands for the current year and one subsequent dry year, no further action is required. City staff will submit the Annual Water Shortage Assessment Report to DWR by July 1st of each year.

2.1.2 AWSDA Finding: Available Water Supply Will Not Meet Demands

Should the AWSDA find that available supply will not meet expected demands, the City will coordinate internally, with the region's other water service providers, and with Napa County (County) for the possible proclamation of a local emergency. The Utilities Director will present the finalized assessment to the City Council, along with recommendations on water shortage condition determination and actions. Recommended actions may include declaration of a water shortage emergency, declaration of a water shortage stage, and water shortage actions.



Water Shortage Contingency Plan

Based on the findings of the AWSDA, the City Council will determine if a water shortage condition exists and, if needed, adopt a resolution declaring a water shortage emergency and an associated water shortage stage and authorizing water shortage actions. The Deputy Utilities Director (or designee) will then update the City's Annual Water Shortage Assessment Report, incorporating City Council determinations and approved actions.

2.2 Key Data Inputs

The State requires that the AWSDA evaluate supplies and demands for, at a minimum, the current year and one subsequent dry year. The planned water supply and demand for the current year and a subsequent dry year will be used to evaluate the City's water supply reliability.

In planning for water supplies, the following factors are considered as applicable and appropriate:

1. SWP annual supply allocation
2. Lake Hennessey and Milliken Reservoir storage levels
3. Options for supplemental water purchases
4. Hydrological conditions
5. Regulatory conditions
6. Contractual constraints
7. Surface water quality
8. Infrastructure capacity constraints or changes
9. Capital improvement project implementation

Planned water supply sources and quantities will be described and be reasonably consistent with the supply projections in Chapter 6 (Normal-Year Water Supply Characterization) of the City's most recent UWMP. Should supply sources and projections differ significantly between the AWSDA and the UWMP, the City will explain the difference.

The AWSDA will examine unconstrained water demands, which are customer demands where no water conservation measures are in effect. In planning for water demands, the following factors are considered as applicable and appropriate:

1. Weather conditions
2. Water year type
3. Population changes (e.g., due to development projects)
4. Demand trends and anticipated new demands (e.g., changes to land use)
5. Pending policy changes that may impact demands
6. Infrastructure operations

Planned water demand types and quantities will be described and should be reasonably consistent with the demand projections in Chapter 4 (Water Use Characterization) of the City's most recent UWMP. Should demand projections deviate significantly between the AWSDA and the UWMP, the City will explain the difference.



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2.3 Assessment Methodology

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

The City uses a spreadsheet to plan for current year and future year supplies and demands. Planned supply and demand inputs described in Section 2.2 will be entered in the spreadsheet in annual increments. As needed, the increments may be revised to monthly or seasonal periods to more closely evaluate specific conditions and needs.

Supply and demand will be compared to determine the City's water supply reliability in the current year and the following one dry year. The City's water supply will be deemed reliable if it can meet planned water demands in both the current year and the following dry year. If water supply cannot meet planned water demands in the current year or the following dry year, the extent of the water shortage condition will be determined, and the City will prepare response actions in accordance with this WSCP.

Findings from the AWSDA will be presented to the City Council for consideration, along with recommendations for action.

3.0 SIX STANDARD WATER SHORTAGE LEVELS

To provide a consistent regional and statewide approach for conveying the relative severity of water supply shortage conditions, the 2018 Water Conservation Legislation mandates that water suppliers plan for six standard water shortage levels that correspond to progressive reductions of up to 10, 20, 30, 40, 50 percent, and greater than 50 percent from the normal reliability condition. Each shortage condition should correspond to additional actions water suppliers would implement to meet the severity of the impending shortages.

For each of the State's standard shortage levels (also called "stages"), Table 2 summarizes the water shortage range (i.e., percent shortage from normal supplies) for each stage. These water shortage stages apply to both foreseeable and unforeseeable water supply shortage conditions.

As described in Section 2.0, the City will conduct an AWSDA to determine its water supply condition for the current year and the following one dry year. Preparing the AWSDA helps the City ascertain the need to declare a water shortage emergency and water shortage condition. In other cases, the City may need to declare a water shortage emergency due to unforeseen water supply interruptions. When the City anticipates or identifies that water supplies may not be adequate to meet the normal water demands of its customers, the City Council may determine that a water shortage exists and consider a resolution to declare a water shortage emergency and associated stage. The shortage stage provides direction on shortage response actions.



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Table 2. Water Shortage Contingency Plan - Shortage Levels

Shortage Level	Percent Shortage Range	Water Shortage Condition Definition	Shortage Response Actions
1	Up to 10%	Insufficient carryover storage and supplemental water to provide for 90% of normal supplies.	Voluntary conservation; implement actions per Table 4
2	Up to 20%	Insufficient carryover storage and supplemental water to provide for 80% of normal supplies.	Voluntary or mandatory conservation; implement actions per Table 4
3	Up to 30%	Insufficient carryover storage and supplemental water to provide for 70% of normal supplies.	Mandatory conservation; implement actions per Table 4
4	Up to 40%	Insufficient carryover storage and supplemental water to provide for 60% of normal supplies.	Mandatory conservation; implement actions per Table 4
5	Up to 50%	Insufficient carryover storage and supplemental water to provide for 50% of normal supplies.	Mandatory conservation; implement actions per Table 4
6	>50%	Insufficient carryover storage and supplemental water to provide for less than 50% of normal supplies.	Mandatory conservation; implement actions per Table 4

4.0 SHORTAGE RESPONSE ACTIONS AND EFFECTIVENESS

CWC Section 10632 (a)(4) requires shortage response actions that align with the defined shortage levels. The City's shortage response actions consist of a combination of supply augmentation, demand reduction, and operational changes. The specific suite of response actions implemented depends on the event that precipitates a water shortage condition, the time of the year the event occurs, the water supply sources available, and the condition of the City's water system infrastructure. In general, the City plans to use a balanced and dynamic approach, adapting its response actions to meet the water use goals associated with the declared water shortage condition.

The City will track progress toward water use reduction goals by analyzing weekly or monthly water production. The analysis will compare the drought production with the previous non-drought production to obtain a percent reduction. The City will increase or decrease its public outreach efforts based on observed usage reduction.

The shortage response actions discussed below may be considered tools that allow the City to respond to water shortage conditions. These actions are in addition to State mandated water conservation requirements at any water shortage stage. The City will implement both State-mandated prohibitions and its own actions.



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Because the City may continuously monitor and adjust its response actions to reasonably equate demands with available supply, the extent to which implementation of each action reduces the gap between water supplies and water demand is difficult to quantify and thus only estimated. Certain response actions, such as public outreach and enforcement, boost the effectiveness of other response actions and do not have a quantifiable effect on their own.

4.1 Supply Augmentation and Other Actions

Chapter 6 of the City’s most recent UWMP describes the City’s normal-year water supply portfolio, which includes local surface water and imported water through the SWP. In emergencies, the City can receive water via intertie connections with the Cities of American Canyon, St. Helena, and Calistoga, and the Town of Yountville. In dry years, the City may participate in the DWR Dry Year Transfer Program or the Yuba Accord Dry Year Water Purchase Program to bolster supplies. Table 3 summarizes the City's supply augmentation and other actions.

Table 3. Supply Augmentation and Other Actions (DWR Table 8-2 Retail)

Yes	Is the Supplier completing this table using the standard six levels? (yes/no)			
Shortage Level	Supply Augmentation Methods and Other Actions by Water Supplier Drop down list These are the only categories that will be accepted by the WUEdata online submittal tool	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)	
Add additional rows as needed				
1				No action at this shortage level
2				No action at this shortage level
3	Implement or Modify Drought Rate Structure or Surcharge	Percentage	10-15%	If determined necessary by City Council and set by resolution
4	Transfers	Volume	Market-dependent	SWP Dry Year Transfer Program
5	Other Purchases	Volume	Market-dependent	Yuba Accord Dry Year Purchase Program
6	Other Actions (describe)	Volume	Market-dependent	Intertie connections with other Napa County cities

4.2 Demand Reduction

Using lessons learned from the 2021-2023 drought, the City codified its Water Shortage Contingency Plan in NMC Chapter 13.10, while also clarifying and updating its permanent water waste prohibitions in NMC Chapter 13.09. During water shortage conditions, the City plans to reduce demand by implementing the actions described in NMC Chapters 13.09 and 13.10, shown here in Table 4. Demand reduction actions are organized by the triggering water shortage stage, and each action includes an estimate of how much its implementation will reduce the shortage gap. For each demand reduction action, Table 4 also indicates if the City uses compliance actions such as penalties, charges, or other enforcement. Demand reduction actions are only listed in Table 4 in the stage when they are first implemented. The City will continue to use these actions in higher stages unless otherwise noted.



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

Yes	Is the Supplier completing this table using the standard six levels? (yes/no)				
Shortage Level	Demand Reduction Actions Drop down list These are the only categories that will be accepted by the WUedata online submittal tool. Select those that apply.	How much is this going to reduce the shortage gap?		Additional Explanation or Reference (OPTIONAL)	Penalty, Charge, or Other Enforcement? For Retail Suppliers Only Drop Down List
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)		
Add additional rows as needed					
1	Expand Public Information Campaign			Boosts effectiveness of other, quantifiable actions	No
1	Offer Water Use Surveys	Percentage	0-2%	Standard offering for water customers	No
1	Provide Rebates on Plumbing Fixtures and Devices	Percentage	0-2%	Standard offering for water customers	No
1	Provide Rebates for Landscape Irrigation Efficiency	Percentage	0-2%	Standard offering for water customers	No
1	Provide Rebates for Turf Replacement	Percentage	0-5%	Standard offering for water customers	No
1	Other - Require automatic shut of hoses	Percentage	0-1%		Yes
1	Other - Prohibit use of potable water for washing hard surfaces	Percentage	0-1%		Yes
1	Landscape - Restrict or prohibit runoff from landscape irrigation	Percentage	0-2%		Yes
1	Landscape - Other landscape restriction or prohibition	Percentage	0-1%	Prohibit landscape irrigation during and within 48 hours after a quarter inch or more rain event	Yes
1	Other - Customers must repair leaks, breaks, and malfunctions in a timely manner	Percentage	0-1%		Yes
1	Landscape - Limit landscape irrigation to specific times	Percentage	0-2%	Prohibit landscape irrigation between 10:00 am and 5:00 pm	Yes
2	Increase Water Waste Patrols	Percentage	0-3%		Yes
2	Landscape - Limit landscape irrigation to specific days	Percentage	0-10%	Prohibit landscape irrigation on consecutive days, except for needs of newly planted	Yes
2	Other water feature or swimming pool restriction	Percentage	0-2%	Prohibit draining and refilling of pools or decorative ponds unless needed for repair	Yes
2	CII - Restaurants may only serve water upon request	Percentage	0-1%		Yes
2	CII - Lodging establishment must offer opt out of linen service	Percentage	0-1%		Yes
3	Landscape - Limit landscape irrigation to specific days	Percentage	5-20%	Landscape irrigation limited to two days per week	Yes
3	Implement or Modify Drought Rate Structure or Surcharge	Percentage	10-20%	If determined necessary and set by City Council	Yes
3	Pools and Spas - Require covers for pools and spas	Percentage	0-1%		Yes
4	Landscape - Limit landscape irrigation to specific days	Percentage	15-25%	Landscape irrigation limited to one day per week	Yes
4	Other	Volume	TBD	Maximum bimonthly water use allocations for customers, if determined necessary and set by City Council	Yes
4	Other	Volume	1-5 million gallons per month	Interruptible-Surplus Agricultural Water services suspended	Yes
4	Other - Prohibit use of potable water for construction and dust control	Percentage	0-1%		Yes
4	Other water feature or swimming pool restriction	Percentage	0-1%	Prohibit filling of any decorative lakes or ponds	Yes
4	Other - Prohibit vehicle washing except at facilities using recycled or recirculating water	Percentage	0-1%		Yes
5	Landscape - Prohibit all landscape irrigation	Percentage	15-35%		Yes
5	Landscape - Other landscape restriction or prohibition	Percentage	1-4%	Prohibit installation of new or replacement turf	Yes
5	CII - Other CII restriction or prohibition	Percentage	1-2%	Prohibit use of water for street cleaning, line flushing, fire sprinkler testing, firefighter training	Yes
5	Other	Percentage	2-5%	Implement special water conservation plans for largest water users, if determined necessary	Yes
6	Landscape - Prohibit all landscape irrigation	Percentage	5-10%	Remove previous exceptions for drip and micro-spray, hand watering, irrigation system testing	Yes
6	Other water feature or swimming pool restriction	Percentage	0-2%	Prohibit draining and refilling of all pools or spas, or filling new pools. No exceptions.	Yes
6	Other	Percentage	1-2%	Prohibit all agricultural irrigation	Yes

NOTES: Actions introduced in a lower shortage level will also be used in higher shortage levels unless otherwise noted.



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The City will monitor water production, water demands, and changing conditions to determine the intensity of its public outreach, the extent of its enforcement actions, and the need to adjust its water shortage condition declaration as discussed in Section 9.0.

4.3 Operational Changes

The City can make several operational changes to address a water shortage, including increasing water waste patrols and decreasing line flushing and flow testing (e.g., for fire sprinkler design or training of firefighting personnel). While the City always seeks to reduce water losses, these actions will further those efforts during a shortage. These operational changes are included in Table 4, as they either directly or indirectly reduce demands. Capital improvement projects can also be delayed or accelerated as needed.

4.4 Emergency Response Plan

As stated in Section 3.0, the City's water shortage stages outlined in Table apply to both foreseeable and unforeseeable water supply shortage conditions. The latter includes catastrophic water shortage conditions, which are addressed in the City's Emergency Response Plan (ERP). The ERP, updated in 2025 for compliance with America's Water Infrastructure Act, outlines preparation, response, and recovery procedures associated with unforeseeable incidents such as water supply contamination, earthquakes, infrastructure failure, and other events. Due to the confidential nature of the ERP, the document is not included with this plan, but some key provisions are discussed below.

For significant disasters, the City uses the Standardized Emergency Management System (SEMS) to allow rapid and effective coordination in the field. For example, in a major earthquake event, all Water Division employees fall under the Utilities Department's direction, the Operations section as defined by SEMS. The ERP includes these chain-of-command details for incidents, along with mutual aid agreements, emergency resources, emergency water supply calculations, and public notification procedures.

The South Napa Earthquake of August 24, 2014 provided a real-life exercise for the City's ERP. None of the three water treatment plants (WTPs) were significantly damaged or forced offline during that event, but main breaks caused customer outages.

The Water Division has developed a redundant system in the event of a disaster. The main points of this redundant system are:

1. The City has two major WTPs, each capable of producing 20 million gallons per day (MGD).
2. Each WTP has its own auxiliary power supply.
3. Each WTP has its own raw water source.
4. The two WTPs are more than 20 miles apart, which reduces the risk of a single event affecting both plants simultaneously.
5. Both WTPs were designed with redundant process components.

In the extremely unlikely event that the City loses all its water sources at once, the system's tank storage capacity of approximately 29 million gallons can help the City respond to the emergency. The City's best security in an extreme emergency may be the ability to deliver raw water to its customers from both Lake Hennessey and Milliken Reservoir. That allows the City to provide water for fire protection even if the pipelines have numerous leaks. The raw water would also be available for human consumption as long as it was boiled or treated with iodine.



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With some events, it could be necessary for the City to use an emergency supply source to maintain system pressure. The City has intertie connections with the Cities of American Canyon, St. Helena, and Calistoga, and the Town of Yountville. The City of American Canyon can supply the City with approximately 4 MGD for a limited time.

Overall, the ERP points out the flexible design of the water system and the City's ability to minimize service disruptions in the worst of emergencies. For all conceivable emergencies, a specific plan is in place to rapidly restore water service, ensure water for firefighting, and minimize adverse impacts on public health and safety.

4.5 Seismic Risk Assessment and Mitigation Plan

CWC Section 10632.5(a) requires that UWMPs include a seismic risk assessment and mitigation plan to assess and mitigate a water system's seismic vulnerabilities. Seismic risks that may affect water supply reliability are evaluated in Chapter 8 of the City's most recent UWMP and are incorporated into the City's overall water shortage response planning.

5.0 COMMUNICATION PROTOCOLS

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

5.1 Communication for Foreseeable Events

A water shortage may be foreseeable when the City prepares its AWSDA, as described in Section 2.0. When the City determines the potential of a water shortage event, the City Council may declare a water shortage emergency.

If a water shortage emergency is anticipated, City staff will coordinate interdepartmentally, with the region's water service providers, and with the County for the possible proclamation of a local emergency. If needed, City staff will communicate with the appropriate State agencies regarding the water shortage emergency.

In a duly noticed meeting, the City Council will receive a presentation of the current or predicted shortage as determined by the AWSDA. The City Council will determine if a water shortage emergency condition exists and the degree of the emergency, while considering the shortage response actions triggered or anticipated to be triggered by the shortage level. As necessary, the City Council will act on the water shortage emergency declaration, associated water shortage stage, and shortage response actions.

If the City Council declares a water shortage emergency, the Community Relations & Media Manager (CRMM) and City staff will coordinate to communicate with its customers and the public to inform them about the declared water shortage emergency, water shortage level, and authorized water use restrictions. The City may use any combination of the following outreach formats: newspaper publications, mailers, bill stuffers, door hangers, newsletters, social media, its website, local radio, public event appearances, mobile lighted message signs, and press releases.



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5.2 Communication for Unforeseeable Events

A water shortage may occur during unforeseeable events such as earthquakes, fires, infrastructure failures, civil unrest, and other catastrophic events. The City's ERP provides specific communication protocols and procedures to convey water shortage contingency planning actions during these events. The City may trigger any of these communication protocols at any water shortage stage, depending on the event.

In general, communications and notifications should proceed along the chain of command. Notification decisions will be made under the direction of the Director of Emergency Services, with external communications managed by the CRMM. The ERP provides a list of relevant contacts to notify at the local, regional, and state level.

The CRMM is the official spokesperson for the City and is responsible for establishing an information center and providing information for news media. In addition, the CRMM maintains a list of contacts to disseminate information to the public, typically via electronic media, radio, television, or newspapers.

6.0 COMPLIANCE AND ENFORCEMENT

After the City Council declares a water shortage emergency and adopts a water shortage condition, customers will be notified as described in Section 5.0. NMC Chapter 13.10 includes demand reduction actions and compliance and enforcement measures the City may implement when a water shortage is declared.

The Utilities Director is authorized to issue administrative citations for violations of demand reduction actions as noted in Table . After an initial educational warning, escalating fines may be imposed for repeated violations. Exceptions to demand reduction actions may be requested in writing, with the customer providing sufficient information, documentation, and verification, which establishes that the requested exception is necessary in order to: (1) protect the public health or safety, or (2) avoid undue hardship (including adverse economic impacts such as loss of production or jobs). The request shall also document that all feasible conservation measures are being used, and that there are no alternative available sources of water. The request shall be subject to the review and approval of the Utilities Director, whose decision will be final.

7.0 LEGAL AUTHORITIES

NMC Chapter 2.89 includes provisions related to the preparation and implementation of plans in the event of local emergencies. NMC Chapters 13.09 and 13.10 support the City's water shortage contingency actions. These chapters include provisions for declaring a water shortage emergency, determining customer use reductions, water use regulations and restrictions, and compliance and enforcement.

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



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In a duly noticed meeting, the City Council will determine whether a water shortage emergency condition exists and, if so, the degree of the emergency and what regulations and restrictions should be enforced in response to the shortage. The City shall declare a water shortage emergency in accordance with CWC Chapter 3 of Division 1.

California Water Code Division 1, Section 350

...The governing body of a distributor of a public water supply...shall declare a water shortage emergency condition to prevail within the area served by such distributor whenever it finds and determines that the ordinary demands and requirements of water consumers cannot be satisfied without depleting the water supply of the distributor to the extent that there would be insufficient water for human consumption, sanitation, and fire protection.

The water shortage emergency declaration triggers communication protocols described in Section 5.0 and compliance and enforcement actions described in Section 6.0.

8.0 FINANCIAL CONSEQUENCES OF WSCP

Pursuant to CWC Section 10632(a)(8)(C), the City complies with CWC Section 366 by prohibiting excessive residential water use during declared drought emergencies through the allocation and excess water use charge provisions of NMC Chapter 13.10. During water shortages, revenue is expected to decrease due to reduced customer consumption. Implementation of these provisions requires administrative, billing system, monitoring, enforcement, and appeal procedures, which generate compliance-related costs in addition to the broader financial impacts of drought conditions. To compensate for lost revenue and possible increase in expenditures, the City may need to use drought rates or financial reserves to maintain fiscal health. Both components are discussed in this section.

8.1 Drought Rate Structures and Surcharges

Current standard water rates are available on the City's website.¹ Standard rates consist of a fixed service charge based on meter size and a water quantity charge. For single-family residential customers, the water quantity charge is tiered, with higher rates charged for greater amounts of water consumed. The City reserves the right to change the water rate structure during a declared water shortage to more strongly encourage customers to reduce water use, to help cover water system costs, and to protect the financial stability of the water system as water demands are reduced.

Beginning with water shortage Stage 3, the City shall implement a drought rate structure or surcharge on water sales as set by a resolution of the City Council, in accordance with Proposition 218, if determined to be necessary (NMC Chapter 13.10).

8.2 Use of Financial Reserves

As part of the Water Fund, the City maintains an Emergency Reserve, a Water Supply Reserve, and a Stabilization Reserve. In the event of a significant drop in revenue during a drought, these funds are available to maintain operations and potentially augment supplies to reduce the water shortage. To compensate for loss of revenue from reduced water sales and increased staffing for the water shortage response effort, the reserves may be employed in water shortage Stages 4 through 6.

¹ <https://www.cityofnapa.org/606/Rate-Schedules>



Water Shortage Contingency Plan

9.0 MONITORING AND REPORTING

The City's water system is fully metered, from its water supply sources to individual customer meters. Meters may be used as monitoring tools for compliance and reporting purposes. Production meters at the three WTPs provide a systemwide overview of water supply and demand.

In normal-year water supply conditions, production figures are recorded daily. Production totals are reported daily to the Water Treatment Manager and weekly to the Deputy Utilities Director. During a Stage 1, 2, or 3 water shortage, the Supervisor compares the weekly production to the target to verify that the demand reduction goal is being met. If reduction goals are not met, the Deputy Utilities Director will notify the City Council so that corrective action can be taken. The City Council receives monthly production reports during Stage 1, 2, or 3 water shortages. In Stage 4 and higher, the same procedure is followed, with the addition of a daily production report to the Deputy Utilities Director.

Customer meters are used to determine adherence to any water allocations implemented at Stage 4 of a water shortage. This metered usage data will allow the City to adjust public outreach, enforcement, and other water shortage response actions as needed to meet available supplies.

The State Water Resources Control Board requires monthly reporting of water production and demand reduction measures, along with associated enforcement metrics. The City regularly records its water meter readings, along with enforcement actions, ensuring that the City is able to comply with these reporting requirements.

10.0 WSCP REFINEMENT PROCEDURES

This WSCP is an adaptive management plan. It is subject to refinements as needed to ensure that the City's shortage response actions and mitigation strategies are effective and produce the desired results. Based on monitoring described in Section 9.0 and the need for compliance and enforcement actions described in Section 6.0, the City may adjust its response actions and modify its WSCP. The City will also seek input from staff and the public regarding the effectiveness of its WSCP and ideas for improvements. When a revised WSCP is proposed, the revised WSCP will undergo the process described in Section 12.0 for adoption by the City Council and distribution to the County and the general public.

11.0 SPECIAL WATER FEATURE DISTINCTION

The City distinguishes special water features, such as decorative lakes and ponds, differently from pools and spas. Special water features are regulated separately. Regulations under NMC Chapter 13.10 prohibit the use of potable water to fill decorative lakes or ponds.

12.0 PLAN ADOPTION, SUBMITTAL, AVAILABILITY, AND AMENDMENT

This WSCP is adopted concurrently with the City's 2025 UWMP, by separate resolution. Prior to adoption, a duly noticed public hearing was conducted. An electronic copy of this WSCP will be submitted to DWR within 30 days of adoption.

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