

Water Shortage Contingency Plan

FINAL

1. Introduction

This Water Shortage Contingency Plan (WSCP) complies with California Water Code (CWC) Section 10632, which requires that every urban water supplier shall prepare and adopt a WSCP as part of its Urban Water Management Plan (UWMP). Section 10632.2 provides that, “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...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.”

The WSCP is the Supplier’s operations plan for water shortages and is best developed in a manner that is suited for a Supplier’s specific conditions, constraints, and opportunities. Understanding water supply reliability, factors that could contribute to water supply constraints, availability of alternative supplies, and what effect these have on meeting user demands provides the Supplier with a solid basis on which to develop appropriate and feasible response actions in the event of a water shortage.

2. Water Supply Reliability Analysis

The primary source of water for United’s OH System is the Oxnard Subbasin, which provides a reliable source of water for the OH System. The OH System produces blended water extracted from the Upper and Lower Aquifer Systems. During drought conditions, when nitrate concentrations in some Upper Aquifer System (UAS) wells may be elevated, operators extract more water from Lower Aquifer System (LAS) wells to manage water quality in the blended water and meet all Maximum Contamination Limits (MCLs). United’s Iron and Manganese Treatment Plant removes naturally occurring iron and manganese from the LAS water, so that LAS water can be used as needed to comply with nitrate MCLs and meet all OH System demands during drought conditions.

Groundwater overdraft for the Oxnard Subbasin and the resulting seawater intrusion has an impact on United’s water supply. The groundwater basin is managed by the Fox Canyon Groundwater Management Agency (FCGMA, or Agency) who serves as the Groundwater Sustainability Agency (GSA), adopts a Groundwater Sustainability Plan (GSP) and sets allocations for extraction facilities in the basin. Groundwater sustainability evaluations are described in section 6.2.2.2 of United’s 2025 UWMP. The FCGMA’s First Periodic Evaluation of the Groundwater Sustainability Plan for the Oxnard Subbasin (FCGMA, 2024) provided an assessment of whether GSP implementation is on track to achieve the sustainability goal of the Subbasin by 2040. The sustainable yield for current conditions is 32,900 AFY for the UAS and 10,600 AFY for the LAS. The evaluation also included updated estimates for future sustainable yield for different scenarios, including “Projects”, “Basin Optimization”, “Future Baseline with EBB”, and “Future Projects with EBB”, with estimated sustainable yields ranging from 34,000 to 40,000 AFY for the UAS and 13,300 to 28,200 AFY for the LAS. Only the simulated scenarios including United’s Extraction Barrier and Brackish Water Treatment (EBB) project (see United’s 2025 UWMP Section 6.2.10) limited landward migration of saline water in the UAS and LAS aquifers and demonstrated that projected pumping was equal to or less than sustainable yield, and therefore no pumping reductions would be required. The “Future Projects with EBB” scenario includes United’s planned project to expand

diversions from the Santa Clara River in addition to EBB. United's future supply estimates for the OH System are based on the scenarios that include EBB, which will not require allocation reductions.

The FCGMA adopted *An Ordinance to Establish an Allocation System for The Oxnard And Pleasant Valley Groundwater Basins, October 23, 2019* (OPV Allocation Ordinance). This ordinance set an initial groundwater allocation of 14,337 AFY for United's OH System. Based on the "Future Baseline with EBB" scenario from the First Periodic Evaluation of the Oxnard Subbasin GSP, United anticipates that the full initial allocation for the OH System can be maintained in the future.

United also has a contractual right to State Water Project (SWP) water that can be imported via either Pyramid Lake or Castaic Lake, and benefit District groundwater basins via reservoir releases to the Santa Clara River and diversions of a portion of the released water at the Freeman Diversion. This supplemental source benefits the District, including the Oxnard Subbasin and the OH System relying on the basin.

United is committed to providing its OH System Users with high quality water that meets all federal and state primary drinking water standards. Some contaminants are naturally occurring minerals. In some cases, the presence of animals or human activity can contribute to the constituents in the source waters. More detail is provided in Chapter 7 of United's 2025 UWMP which address constituents reported in the Santa Clara River Watershed Sanitary Survey Updates impacting water quality.

Potential risks to United's groundwater supplies include groundwater contamination caused by spillage of agricultural chemicals, runoff from industrial sites, spillage from tanker trucks carrying hazardous chemicals, or other accidents. Generally, United develops a response plan on a case-by-case basis depending on the severity of the risk. However, if a severe groundwater contamination event were to occur, water supplies for the OH System could be adversely affected. In the event of severe groundwater contamination, United would implement the appropriate WSCP action and response as described in more detail in the following sections.

The OPV Allocation Ordinance has several provisions that allow flexible operation of extraction facilities, which may help sustain water supply for certain emergencies. First, the OPV Allocation Ordinance allows carryover of unused extraction allocation up to a maximum of 50% of an extraction allocation, for use in a subsequent water year. Unused carryover extraction allocation does not expire until after five years. Second, allocation transfers are allowed if the FCGMA finds that it does not impede achievement of the sustainability goals of the GSP. Third, extractions in excess of pumping allocations are not expressly forbidden, but FCGMA imposes tiered surcharge rates on groundwater extractions that exceed a well's annual extraction allocation. Tiered surcharge rates effective January 1, 2024 range from \$1,200 to \$1,929 per acre-foot. Finally, the OPV Allocation Ordinance includes a provision that in the event of a local, State, or Federal declaration of emergency with the potential to affect water supplies within the Agency, the FCGMA Board will consider whether to allow an operator to request an adjustment of the extraction allocation as a result of the emergency. All of the above provisions may help United or other agencies by enabling increased pumping at certain facilities to mitigate local service disruptions, or to increase local water supply if water imports are disrupted. For example, if an emergency reduces supply from the OH System, the City of Oxnard could potentially increase pumping from their extraction facility to make up for the lower supply.

To determine the water supply reliability of United's OH System, an assessment was developed that includes a comparison of the total projected water demand with the supply available for the following conditions: (1) normal/average water year, (2) single-dry water year, and (3) five-consecutive-year drought. The basis of the water supply and demand assessment is summarized in Chapter 7 of United's 2025 UWMP. FCGMA allocations have been used in the assessment as this is considered the new normal supply for all types of water year. United anticipates full available allocation for its OH System accordingly for all year types. The OH System is physically robust to climate/drought, yet limitations from GSP related regulatory requirement potentially reduce the robustness. The OH System can physically pump and deliver more than allocated in order to meet demand, but the additional pumping will need to be coordinated with FCGMA and OH Users may be charged surcharges in certain cases.

3. Annual Water Supply and Demand Assessment Procedures

Pursuant to CWC Section 10632(a)(2), United has included the procedures proposed for conducting an Annual Water Supply and Demand Assessment (Annual Assessment). The Annual Assessment is a determination of the near-term outlook for supplies and demands and how a perceived shortage may relate to WSCP response actions. This determination is based on information available to United at the time of the analysis. The Annual Assessment is due on or before July 1 of each year.

3.1. Decision Process

United staff will draft and prepare the Annual Assessment per DWR guidelines. The Annual Assessment will use key data inputs from FCGMA and OH Users to determine available water supply and demand for the reporting period. The Annual Assessment will be presented to the District Board annually, as needed, determined by management, and the final Annual Assessment will be submitted to DWR by the reporting deadline of July 1. The District will determine if a supply shortage exists and may declare the appropriate shortage, as described in the Section titled "Six Standard Water Shortage Stages." Figure 1-1 shows an Annual Assessment Sample Timeline.

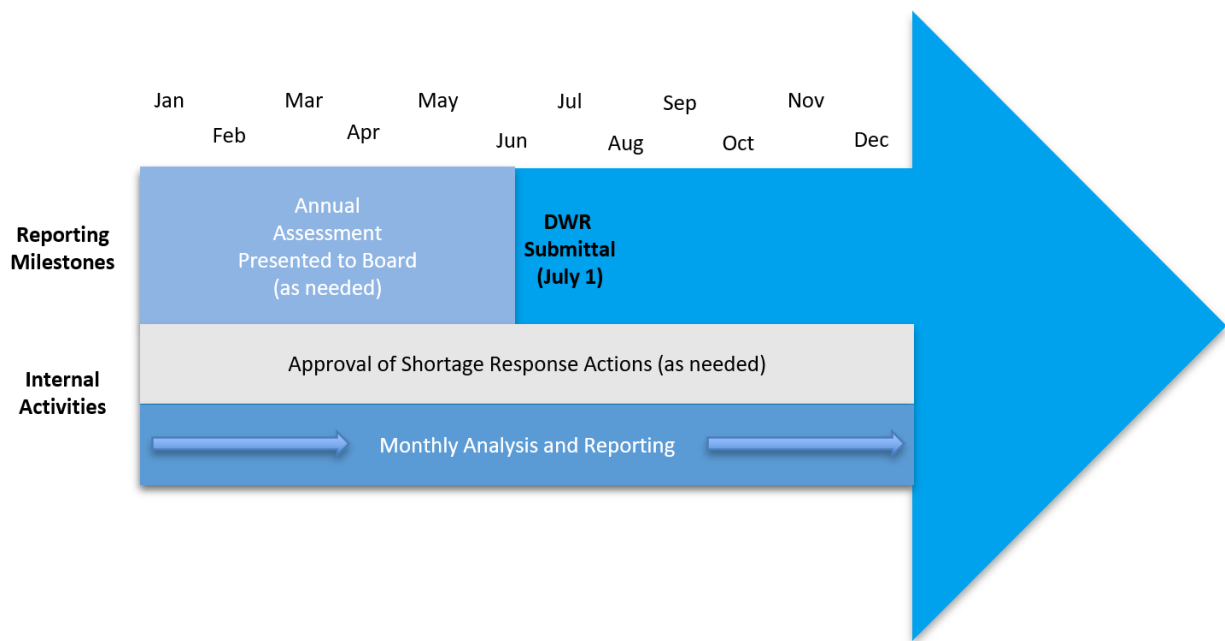


Figure 1-1 Annual Assessment Sample Timeline

3.2. Data and Methodologies

Evaluation Criteria

United applies a defined and consistently used set of evaluation criteria for each Annual Assessment, including FCGMA pumping allocations, projected OH System demand, regulatory constraints, and infrastructure operability. If allocation changes are implemented or stages of water shortage are declared by FCGMA, the District will inform OH users of those changes for implementation or notice and the District will continue to monitor water demand levels. The District will monitor emerging supply and demand conditions throughout the year and take appropriate actions consistent with the flexibility and adaptability inherent to the WSCP.

Current Year Water Supply

United's source of water supply for the OH System includes groundwater production from twelve (12) wells within the Oxnard Subbasin. This is the only source of potable water for the OH System. Key data inputs for water supply will include projected water supply that is based on the allocation for the OH System that is determined by FCGMA and infrastructure operability. In preparing the Annual Assessment, the District will rely on allocation information that is available from FCGMA during the Annual Assessment preparation process.

Current Year Unconstrained Demand

The District will need to evaluate expected water needs for the coming year or “unconstrained demand” per the Water Code Section 10632. Key data for water demand will include projected water demand that will be developed and evaluated based on previous year(s) delivery records as well as information gathered through coordination with the OH System's largest users, the City of Oxnard and Port Hueneme Water Agency (PHWA), in order provide an informed projection for the OH System water demand.

Planned Water Use for Current Year Considering Dry Subsequent Year

The District will evaluate anticipated supplies for the coming year, while anticipating that the following year will be dry. Key data for water supply considering the current year and one dry year will include projected water supply that is based on the allocation for the OH System that is imposed by FCGMA and infrastructure operability. The District will continue to review available allocation information from FCGMA and projections related to available groundwater for making decisions involving water shortage responses.

Infrastructure Consideration

Throughout each year, the District regularly carries out preventive and corrective maintenance of facilities, including regular replacement of anodes, a valve exercise program, and meter change-outs. The District has a well replacement program as part of ongoing CIP projects and frequent and scheduled maintenance in place for the El Rio facilities and OH Pipeline. The District plans and performs shutdowns to inspect and repair pipelines and facilities and support capital improvement projects. These shutdowns involve a high level of planning and coordination with OH users, as well as other affected organizations, and the community.

4. Six Standard Water Shortage Levels

Water Code Section 10632 (a)(3)(B) authorizes Suppliers to continue using their own water shortage levels that may have been included in past WSCPs. United follows, and is dependent upon, the actions taken by the FCGMA. Table 1-1 presents the six standard stages. United's six water shortage levels are implemented in direct coordination with, and in response to, FCGMA groundwater allocation actions and emergency determinations.

Submittal Table 1-1: Cross-reference for Standard vs Supplier Shortage Levels			
Water Code Section 10632(a)(3)(B)			
<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:			

5. Shortage Response Actions

The following section specifies the types of shortage response actions that may be undertaken before and during a shortage declaration. The actions will align with FCGMA allocation ordinances and emergency agreements and the WSCPs prepared by United's retail suppliers, the City of Oxnard and Port Hueneme Water Agency. Tables 1-2 and 1-3 provide a summary of Supply Augmentation, Demand Reduction, and other actions United may take.

5.1. Supply Augmentation

The OH System does not have guaranteed alternate water sources in the event of an emergency. The OH Users Agreement states that the water supply is interruptible and that users agree to use reasonable efforts to maintain their existing alternate sources of supply. United does not purchase or import water on a regular basis specifically for OH Users; however, several OH Users have augmented their supply through several one-year emergency contracts with surrounding cities in times of water shortage.

United is participating in the State Water Interconnection Project with the City of Ventura, which will provide United with an opportunity for emergency supply when available and based on a final agreement with the partner agencies. Construction of this project is planned to start in Fall 2026.

Submittal Table 1-2 Wholesale: Supply Augmentation and Other Actions Water Code Section 10632(a)(4)(A),(C) and (E)				
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	Other Actions (describe)	Percentage	0	No action is applicable
2	Other Actions (describe)	Percentage	0	No action is applicable
3	Other Actions (describe)	Percentage	0	No action is applicable
4	Other Actions (describe)	Percentage	0	No action is applicable
5	Other Actions (describe)	Percentage	0	No action is applicable
6	Other Actions (describe)	Percentage	0	No action is applicable
DWR NOTES: Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Submittal Table 2-3.				
NOTES: As a wholesaler provider with an interruptible water source, United does not have independent supply augmentation actions applicable at any shortage level.				

5.2. Demand Reduction

As a water wholesaler, United does not have the authority or the ability to implement many of the demand measures available to water retailers. However, United’s largest Users, the City of Oxnard and PHWA, have demand reduction measures in place, including water use prohibitions. United would coordinate with and provide resources to their Users to promote the success of these demand measures.

As indicated in United’s Users WSCP, water demand measure reductions can prohibit using potable water for street washing, filling of decorative fountains, car washing or filling or refilling pools. These prohibitions are available at all shortage stages but increase in severity in accordance with the water shortage level. Refer to the PHWA and City of Oxnard’s WSCP 2025 UWMP for more information.

Significant surcharges are levied on United’s OH Users by the FCGMA if they take delivery of water in excess of their allocations. To date, the threat of these surcharges has effectively discouraged the overuse of local groundwater within the boundaries of the FCGMA. Surcharges at the highest tier are set at the approximate cost to buy State Project Water from Calleguas Municipal Water District (MWD). FCGMA does not prohibit pumping above allocation but will apply surcharges for this action. In accordance with the OH Users Agreement and United’s Board Policy for the OH System, United will coordinate with FCGMA and the OH Users in case FCGMA imposes any allocation reductions in the future.

While many of the demand reduction measures are unavailable to United, United does have a public education and outreach campaign. United actively participates in regional public education and outreach programs, including an annual water symposium, tours of regional water facilities, and presentations to interested stakeholders. United has also developed a comprehensive Communications Plan and facilitates public quarterly tours of its facilities. Additionally, United has established an internal External Affairs team to further support and expand its public education and outreach efforts. The budget for each

fiscal year will include specific line items for public outreach, and United intends to continue enhancing its efforts in this area.

Previously, United's General Manager had the ability to request additional water conservation measures as determined necessary and appropriate for the protection of public health and safety, and the conservation of groundwater aquifers and supplies (Resolution No. 2014-01). However, these requests are non-binding and do not have any enforcement mechanism.

**Table 1-3 [UWMP Table 8-3]: Wholesale: Demand Reduction Actions
Water Code Section 10632(a)(4)(B) and (E)**

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)					
		Volume or Percentage Drop down	Shortage Gap Reduction Value (May be a range) (AF)						
Add additional rows as needed									
1	Expand Public Information Campaign	Percentage	Up to 20%						
2	Expand Public Information Campaign	Percentage	Up to 20%						
3	Expand Public Information Campaign	Percentage	Up to 20%						
4	Expand Public Information Campaign	Percentage	Up to 20%						
5	Expand Public Information Campaign	Percentage	Up to 20%						
6	Expand Public Information Campaign	Percentage	Up to 20%						
1	Other Actions (describe)	Percentage	Up to 10%	In accordance with the OH Users agreement and United's Board policy for the OH System, United will coordinate with the FCGMA and the OH Users in case FCGMA requires any allocation reductions in the future.					
2	Other Actions (describe)	Percentage	Up to 20%	Same as Stage 1					
3	Other Actions (describe)	Percentage	Up to 30%	Same as Stage 1					
4	Other Actions (describe)	Percentage	Up to 40%	Same as Stage 1					

5	Other Actions (describe)	Percentage	Up to 50%	Same as Stage 1
6	Other Actions (describe)	Percentage	>50%	Same as Stage 1
DWR NOTES: Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Submittal Table 2-3.				
NOTES: The OH System can physically pump and deliver more than allocated in order to meet demand, but Users may be subject to surcharges for over pumping by FCGMA. The OPV Allocation Ordinance includes provisions to allow flexibility for pumpers to carry over unused allocations, transfer allocations of pumping, and make up for over pumping without incurring surcharges. The FCGMA may also allow increased pumping during emergency conditions.				

5.3. Operational Changes

The General Manager, or designee, is authorized to identify additional operational actions which United could undertake as determined necessary and appropriate for the protection of public health and safety, and the conservation of groundwater aquifers and supplies.

5.4. Additional Mandatory Restrictions

California Water Code Section 10632(a)(4)(D) calls for “additional, mandatory prohibitions against specific water use practices that are in addition to state-mandated prohibitions and appropriate to the local conditions” to be included among the WSCP’s shortage response actions. However, this item is not applicable to United. As a wholesaler, United does not dictate or control the end uses of water by retail consumers served by the OH System.

5.5. Emergency Response Plan

In the event of a catastrophic supply interruption, United will implement their Water System Emergency Response Plan (ERP). The ERP serves as United’s response mechanism for catastrophic supply interruptions consistent with Water Code Section 10632(a)(3). Because of the sensitive nature of the information contained in the ERP, the ERP is not publicly available. The plan was last updated on April 20, 2026, and provides United with a standardized response and recovery protocol to prevent, minimize, and mitigate injury and damage resulting from emergencies or disasters of man-caused, natural, or dependency/proximity origin. The ERP also describes how United will respond to potential threats or actual scenarios identified in the vulnerability assessment (VA), as well as additional emergency response situations. The ERP includes specific action plans (APs) that will be used to respond to events and incidents.

The goals of United’s ERP are:

- Rapidly restore water service after an emergency.
- Ensure adequate water supply for fire suppression.

- Minimize water system damage.
- Minimize impact and loss to users.
- Minimize negative impacts on public health and employee safety.
- Provide emergency public information concerning user service.

Specific APs have been developed to address each of the high-risk threat scenarios identified in United's VA, including natural disasters and man-caused threats.

Earthquakes pose a significant threat to United's infrastructure. Should an earthquake occur in the region, staff will first inspect the El Rio Treatment Plant, the disinfection facilities, which hold chlorine and ammonia in storage for chloramine disinfection. This is to ensure that there is no immediate danger of fire or release of hazardous chemicals and that water meets the primary drinking water standards. Once the treatment plant is secure, the remaining facilities will be inspected for damage. If a rupture on the OH Pipeline occurs, the operators will take the necessary steps to isolate the leak as soon as practical and proceed with pipeline repairs.

Power outages also pose a threat to United's ability to provide water supplies. Back-up generators are in place for the El Rio Treatment Plant, chlorine disinfection facility and for priming pumps for gas booster pumps. United's OH Wellfield emergency generator provides back-up power for the well field UAS wells, and natural gas booster pumps are available as back-up for the VFD pumps supplying the OH pipeline.

Additional potential supply interruptions include groundwater contamination, sewage spills from wastewater treatment plants located upstream along the Santa Clara River, and petroleum spills from oil pipelines or overturned trucks near or at the plant. In these cases, United communicates with emergency personnel to shut down/isolate the OH System and notify Users of the interruption in service.

5.6. Seismic Risk Assessment and Mitigation Plan

Seismic Risk Assessment and Mitigation plan discussed in this WSCP is pertinent to United's OH System only. The OH System covering an area of approximately 43 square miles serves the City of Oxnard, PHWA, and several mutual water companies. The OH System's critical facilities include 12 groundwater wells, the El Rio Treatment Plant, located in the Oxnard Forebay, and a transmission pipeline that consists of an approximately eight-mile transmission main and a four-mile long lateral known as the Mugu Lateral. General seismic hazards regarding facilities that do not directly supply the OH System but are within United's operating area, such as Freeman Diversion structure on the Santa Clara River and Santa Felicia Dam and Lake Piru are not included in this plan but are referred to in the Ventura County Multi-Hazard Mitigation Plan (County of Ventura, 2022).

There are various faults located within the vicinity of the OH System facilities. These faults along with probable surface rupture, liquefaction, and landslides hazards to these facilities are discussed below, based on the information provided in the Ventura County Multi-Hazard Mitigation Plan (County of Ventura, 2022).

Faults

The Simi-Santa Rosa fault zone extends from the Santa Susana Mountains westward along the northern margin of the Simi and Tierra Rejada valleys and along the southern slope and crest of the Las Posas Hills to their westerly termination. The likely maximum magnitude along the Simi-Santa Rosa fault zone referenced as 6.7 with a recurring interval of 933 years. The District facilities are within less than a mile of this fault.

The Oak Ridge fault system is a steep (65 degrees) southerly dipping reverse fault that extends from the Santa Susana Mountains westward along the southerly side of the Santa Clara River Valley and into the Oxnard Plain. The system is more than 50 miles long on the mainland and may extend an equal or greater distance offshore. Several recorded earthquake epicenters on land and offshore may have been associated with the Oak Ridge fault system. Portions of the system are zoned by the state as active. The Ridge fault system is located less than five miles from the OH System. The likely Maximum Magnitude earthquake is 6.9 with a recurrence interval of 299 years.

The Ventura-Pitas Point fault system includes the western half known as the Pitas Point fault, and the eastern half known as the Ventura fault. The Pitas Point fault extends offshore into the Pacific Ocean and is roughly 14 miles long. The Ventura fault extends into the communities of Ventura and Sea Cliff and runs roughly parallel to portions of U.S. 101 and State Route 126. The fault is roughly 12 miles long with a likely Maximum Magnitude earthquake of 6.9 with and unknown recurrence interval. The Ventura-Pitas Point fault is a left-reverse fault located within 5 miles of the OH System.

The San Cayetano–Red Mountain–Santa Susana fault system consists of a series of major north-dipping reverse faults that extend over 150 miles from Santa Barbara County into Los Angeles County. Within this system, the San Cayetano fault is considered the greatest hazard to Ventura County. It is a major, north-dipping reverse fault that extends for 25 miles along the northern portion of the Ventura basin. The San Cayetano fault system's Likely Maximum Magnitude is 6.8 with a recurrence interval of 150 years. The Red Mountain fault system is located over 13 miles from the OH System and has a Likely Maximum Magnitude of 6.7 with a recurrence interval of 507 years.

See Figure 1-2 for the fault zones near the District's boundaries

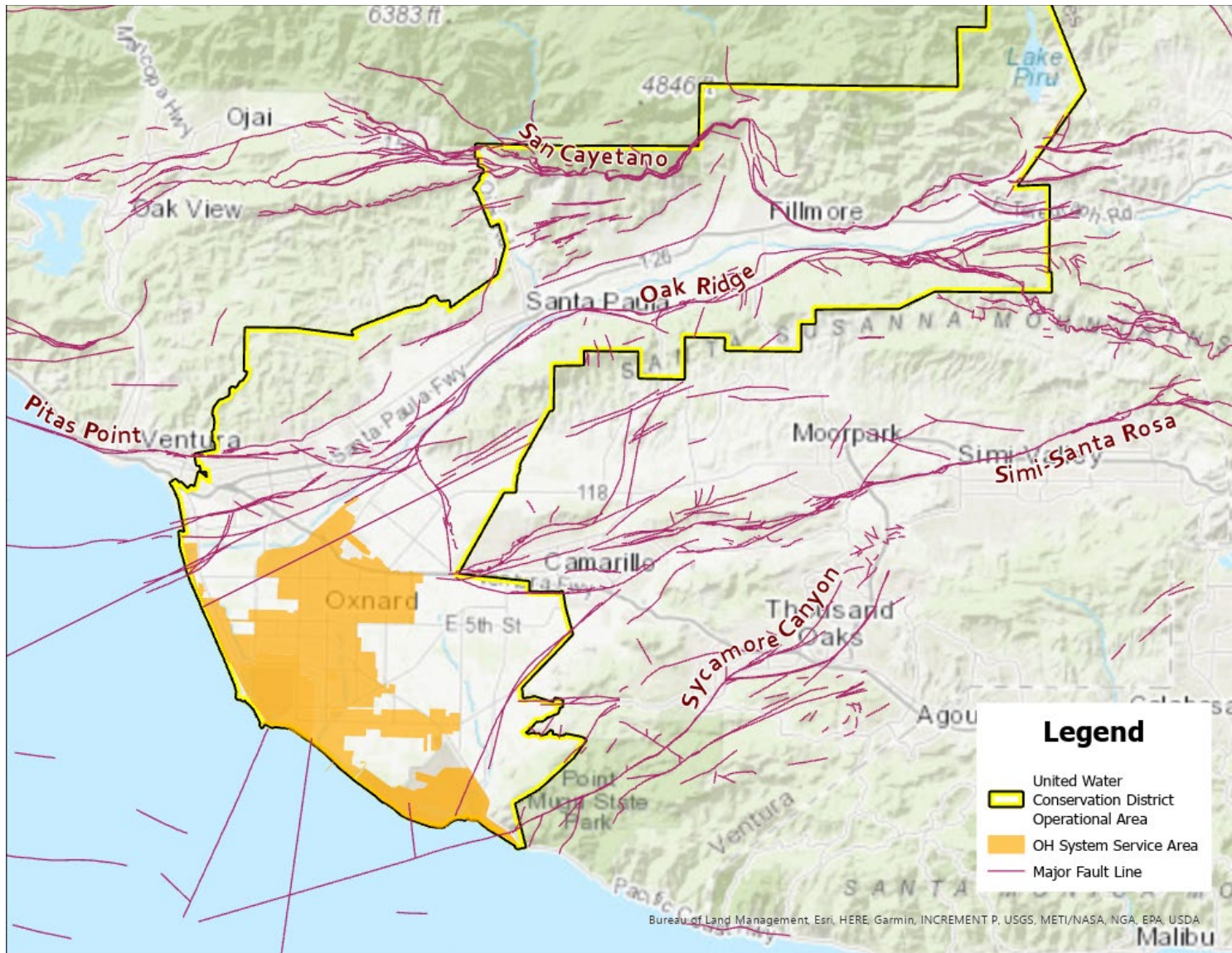


Figure 1-2 United's District Boundaries Proximity to Fault Zones

Seismic Risk

The OH System facilities are in close proximity to these faults but based on California Geological Survey Earthquake Hazard Zones maps for landslide, surface faults, and liquefaction as referenced in the Hazard Plan, the OH facilities including the groundwater wells, the treatment plant, and pipelines are only prone to liquefaction. Liquefaction can occur where sandy soils are saturated by the presence of shallow perched water. This could interrupt groundwater production, and damage the treatment plant, and the transmission line, and cause a water shortage to the OH System's Users.

In order to minimize the potential effects of liquefaction, United has constructed its El Rio Treatment Plant facility on a large monolithic slab. Mitigation for new foundations and structures at the El Rio Treatment site can be accomplished through adherence to the Seismic Zone 4 soil and foundation support parameters in Chapters 16 and 18 of the California Building Code, the grading requirements in Chapters 18, 33, and the appendix to Chapter 33 of the Code. United's recent chlorine and aqueous ammonia treatment systems 5-year update CalARP seismic assessment report was satisfactory, and no further actions were recommended related to the systems' buildings and equipment (UWCD, 2024).

United's OH facilities are not located near steep hills or sloped land that would be susceptible to landslides. The threat of a landslide at the site is not regarded as a likely event in the event of an earthquake.

Tsunamis are water waves produced by the rapid tectonic displacement of the ocean floor. Based on California Geological Survey Tsunami Hazard Zones maps. United's water production facilities are not located close enough to the coastline to be vulnerable to tsunamis but portions of the transmission main and Mugu Lateral are within one mile of the Tsunami Hazards Area and could be affected by potential tsunami inundation. The Small Woolsey basin, a previous gravel mining pit, is located less than half a mile from the El Rio Treatment Plant and is typically dry. Under certain circumstances, there is a potential for seiche inundation from this basin that could affect the El Rio wellfield and treatment facility (UWCD, 2024). A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin induced by earthquake shaking.

Mitigation

In the event of a pipeline break caused by liquefaction, there are no redundant pipelines for the OH System to deliver water to the OH System Users. United does have emergency response measures as described above in case of water shortage.

In the event of damage to the well field and /or El Rio Treatment facilities, United currently has no alternative source of water production. The turnouts on the new pipeline that will be constructed as part of the City of Ventura's State Water Interconnection Projects will provide opportunities for some back-up supply to United's facilities. Construction of the project is anticipated for Fall 2026.

In the event of an earthquake, if there is a disruption to the OH System due to liquefaction or a seiche event, United may not be able to successfully deliver water supplies. If such event were to occur, United will activate their ERP (this document is considered sensitive and is not available to the public). Details on how United would address a disruption on their water supplies from a natural disaster is described in the emergency response plan.

5.7. Shortage Response Action Effectiveness

Unforeseen events and conditions can also lead to temporary or long-term water shortages. These could include situations such as wildfires, earthquakes, civil unrest, sudden adverse weather, critical infrastructure failure, and others.

United has limited options to increase the supply to its service area during disruption of the OH System. It is currently unknown how much State Water could be imported via the future State Water Interconnection Project with the City of Ventura, as the project construction has not started and no water delivery agreements are in place.

6. Communication Protocols

United has several communication tools and methods in place to inform retail Users, the public, elected officials, and other agencies about water supply conditions. These include written notices to Users, updates on United's website, social media outreach, and collaboration with other agencies. These methods are not limited to any single water shortage level but would be used in varying degrees at all levels.

In the event that a water shortage results in decreased allocations, the General Manager or designee, upon agreement with the Board of Directions, may choose to send out a "Water Supply Availability Notice" to the OH system Users. The notice would provide the availability of supply for each User and an anticipated timeline. Depending on the circumstances, United would ensure to provide a notice in advance of any major allocation reduction. The retail Users are encouraged to contact United with any questions or concerns.

United uses various outreach methods to communicate with Users and the public. Important communication is facilitated primarily by email or telephone, but other communication methods such as e-flyers, social media, and website updates are also employed. United maintains Facebook, YouTube, Instagram, NextDoor, and LinkedIn accounts to provide timely updates about water supply issues, infrastructure issues, and road closures due to construction. United also produces handouts covering its projects, initiatives, drought messaging and services, and conducts targeted outreach through digital and print media buys to reach specific audiences with relevant messaging. In addition, United hosts quarterly public tours of its facilities and participates in meetings with interested stakeholders to foster direct engagement with the community. United provides information on the Home and News and Press Release pages of their website (<https://www.unitedwater.org/connect/#news-press>). This webpage provides a Media Toolkit with links to United's YouTube channel and an informational fact sheet. It is the responsibility of the General Manager or designee to oversee these communications which would be carried out by United's External Affairs team. United plans to use these methods at all water shortage levels.

In the event of an emergency, the General Manager or designee would inform the Ventura County Association of Water Agencies to initiate the coordination of response and support with those agencies and member agencies. United is a member of the Association of Water Agencies (AWA) Disaster Preparedness Subcommittee (Subcommittee). The AWA Subcommittee is comprised of AWA members selected from geographical areas of the county. Each member represented by an Area Captain is responsible for relaying incident reporting information up the chain of command for emergency response

assistance. The AWA Subcommittee serves as a platform for information and resources sharing among the members. United through the AWA Subcommittee and directly has access to the Ventura County Office of Emergency Services (OES). The OES is responsible for countywide disaster planning, mitigation, response, and recovery activities and can activate the County's Emergency Operations Center (EOC) in response to major events and disasters.

The tools and methods outlined above augment and complement the efforts by FCGMA, Calleguas MWD, the County of Ventura, and the retailers served by United. All entities have extensive communication and outreach campaigns as outlined in their WSCPs. To ensure the collaboration and continuity of these outreach efforts, United's staff currently attend regular meetings with FCGMA.

7. Legal Authorities

7.1. Legal Authorities

United is a public entity formed in 1950 pursuant to the Water Conservation District Law (California Water Code Section 74000, et seq.).

7.2. Declaration of Water Shortage

As a water conservation district, United does not have independent authority to directly regulate individual groundwater usage within its boundaries. United can declare a water shortage or adopt an ordinance or resolution that would inform pumpers and other water users within its boundaries about the availability of supply or lack thereof.

7.3. Proclamation of Local Emergency

United is required to "coordinate with any city or county which it provides water supply services for the possible proclamation of a local emergency" (California Government Code Section 8558) and will adhere to water shortage emergency ordinances adopted by the FCGMA and/or the County of Ventura."

United is a wholesale water provider to the City of Oxnard, PHWA, and several mutual water companies. According to Section 2 of the Water Supply Agreement for Delivery of Water through the Oxnard/Hueneme Pipeline Agreement that went into effect on June 7, 1996, the parties acknowledged that the delivery of water made by United under this agreement is subject to the ongoing regulatory authorities of the Fox Canyon Groundwater Management Agency.

8. Financial Consequences of a WSCP

United's current pricing structure for OH System Users includes the following elements:

- Variable rate, based on usage (per AF)
- Marginal rate based on usage (per AF)
- Fixed monthly costs
- Unrecovered Variable rate (per AF)

The inclusion of “fixed” charges in the pricing structure allows United to continue receiving revenue for maintenance of its facilities even when water purchases by OH users decrease. The rates are based on usage, and a decreased volume can result in an increase per unit. United does not apply a drought rate structure or surcharge to account for lost revenue from sales. However, United may consider the delay of capital improvements and reduction of expenditures to overcome impacts to revenues and expenditures.

Financial policies referenced herein are consistent with United’s adopted Board financial policies and the OH Users Agreement. United operates the OH System as an enterprise fund and maintains financial reserves at levels sufficient to absorb unpredictable revenue shortfalls and to ensure fiscally prudent/desired cash flow levels. The United Board’s Financial Reserve Policy was last revised and adopted on July 1, 2023. The policy states United and the OH System users agree to meet and confer about developing a plan, which may include, but not be limited to, temporary rate increases, surcharges, capital contributions, or other reasonable methods that will restore the reserves, in the event the reserves are depleted by more than thirty percent in any fiscal year. In accordance with the Board’s Financial Reserve Policy and the OH Users Agreement, the current (fiscal year 2026-2027) minimum reserve level for the OH fund is \$1.3 million.

9. Monitoring and Reporting

Monitoring and reporting key water use metrics is fundamental to water supply planning and management. Monitoring is also essential to ensure that the response actions are achieving their intended water use reduction purposes, or if improvements or new actions need to be considered. United will monitor and report on implementation of its WSCP.

On a monthly basis, United staff generate a technical report detailing the forebay available storage levels. This data is used to measure the effectiveness of any water shortage contingency stage that may be implemented. As stages of water shortage are declared by FCGMA, the District will follow implementation of those stages and continue to monitor water demand levels. United’s Board reserves its right to undertake future actions in support of water conservation as authorized by law, including but not limited to declaration of a water shortage emergency, the filing of judicial actions concerning the ownership or use of water within the service area, and the enactment of ordinances for the operation of OH facilities.

10. WSCP Refinement Procedures

United, elected officials, or members of the public may suggest changes to the WSCP as part of the public hearing that considers the adoption of this document. Once a motion has been made, the District will evaluate and respond within 45 days.

The WSCP will be periodically re-evaluated to ensure that the shortage risk tolerance is adequate, and the shortage response actions are effective and up-to-date based on lessons learned from implementing the WSCP. At a minimum, the WSCP will be revised and updated during the UWMP update cycle to incorporate updated and new information. For example, new supply augmentation actions may be added, and actions that are no longer applicable for reasons such as program expiration will be removed. If revisions to the WSCP are warranted before the UWMP is updated, the WSCP will be updated outside of the UWMP update cycle.

While preparing the Annual Assessment each year, United will routinely consider the functionality of the overall WSCP and will prepare recommendations for United's Board of Directors if changes are found to be needed. Elected officials or members of the public may also suggest changes to the WSCP during a public meeting. Once a request or comment has been made, the District will evaluate and respond within 45 days. If the District deems that no change is necessary, it will put out a brief statement which will be made available on their website, social medial platforms, and announced at the next board meeting. If the District deems a change is needed, District staff will update the WSCP and post the revisions to their website for a 30-day comment period. Following the comment period, District staff will make any final adjustments and present the latest version to the Board of Directors for approval.

11. Special Water Feature Distinction

United is a wholesaler and as such does not dictate or control the end uses of water by retail consumers. This applies to limitations placed on special water features as well and thus is not applicable.

12. WSCP Adoption, Submittal, and Availability

The United WSCP was developed and is included as an appendix in the 2025 UWMP and shall be made available to its Users and any city or county within which it provides water supplies no later than 30 days after adoption. Below is a description of how the WSCP will be adopted, submitted, implemented, and amended. The WSCP may be periodically amended independently of the UWMP, as needed.

United provided notice of availability of the draft 2025 UWMP and 2025 WSCP in accordance with CWC. A public hearing was held prior to the adoption of the United's OH System WSCP. The public hearing provided a platform for cities, counties, and members of the public to comment on the WSCP prior to its adoption. Notice of the public hearing was given to cities and counties within which water is supplied and to the general public.

A public hearing was held at United's Board Room located at 1701 N. Lombard Street, Oxnard CA 93030 on May 13, 2026 to receive public comments. The 2025 WSCP was adopted on June 10, 2026 during a regularly scheduled board meeting. A copy of the meeting agenda and Board Adoption Resolution for the UWMP and WSCP is included in Appendix C of the UWMP.

Not later than 30 days after filing a copy of its plan with the Department of Water Resources (DWR), the urban water supplier and the DWR shall make the plan available for public review during normal business hours. The adopted 2025 UWMP and WSCP for the OH System will be made publicly available on United's website <https://www.unitedwater.org/>.

13. References

County of Ventura, 2022, Ventura County Multi-Jurisdictional Hazard Mitigation Plan, Update 2022, Prepared by Tetra Tech, Oakland, CA, June 2022.

Department of Conservation California Geological Survey, Tsunami Hazard Area Maps. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=ts_evacuation.

FCGMA, 2019a, An Ordinance to Establish an Allocation System for the Oxnard and Pleasant Valley Groundwater Basins (“OPV Allocation Ordinance”), October 2019, Amended March 2021. Available at: <https://fcgma.org/allocation/>.

FCGMA, 2019b, Oxnard Subbasin Groundwater Sustainability Plan (GSP), Prepared by Dudek, Encinitas, CA, December 2019. Available at: https://pwportal.ventura.org/WPD/FoxCanyon/GroundwaterReports/Oxnard/ox%20gsp%20table%20of%20contents%20acronyms%20and%20executive%20summary_signed.cleaned.pdf.

FCGMA, 2024, First Periodic Evaluation for the Groundwater Sustainability Plan for the Oxnard Subbasin (GSP), Prepared by Dudek, Encinitas, CA, December 2024. Available at: <https://fcgma.org/gsp-evals-draft-comments/>.

UWCD, 2024, United Water Conservation District Chlorine & Aqueous Ammonia Treatment Systems 5-yr Update CalARP Seismic Assessment, Prepared by Olweny and Associates, Signal Hill, CA, June 2024.