WATER RESOURCES & CONSERVATION
COMMITTEE MEETING SUMMARY MINUTES
Wednesday, July 28, 2021
4:15 p.m.

ATTENDANCE

Directors: Jim Gunther (Chair), Aziz Akbari
Staff: Ed Stevenson, Laura Hidas, Jonathan Wunderlich, Stephanie Nevins, Leonard Ash, Devon Becker, Gisselle Delgadillo, Russell Perry
Public: Carol Mahoney, John Weed

The monthly Water Resources and Conservation Committee Meeting was held on July 28, 2021, at 4:15 PM. Due to COVID-19 and in accordance with Governor Newsom's Executive Order N-25-20 which suspends portions of the Brown Act, this meeting was conducted by Zoom Webinar and Teleconference and members of the public were invited to participate. Materials presented to the Committee were posted in advance of the meeting at www.acwd.org and copies of materials as presented are attached to these minutes.

DISCUSSION TOPICS

1. Drought Update: Leonard Ash, Water Supply Supervisor, provided an update on drought conditions and actions. Staff summarized weather forecasts showing increased chances for above-normal temperatures this summer and for the next several months. On July 8, 2021, the Governor issued an Executive Order calling for 15% voluntary water conservation statewide and a new drought emergency proclamation that expanded the drought emergency to now cover 50 of the state's 58 counties. The Department of Water Resources (DWR) is coordinating with the U.S. Bureau of Reclamation, which manages the federal Central Valley Project, to work collaboratively to meet their shared objectives. For planning related to imported water supplies, staff continues close coordination with DWR and other water agencies. DWR indicates they can maintain the District's 2021 deliveries as requested, even in the challenging summer and fall months, and DWR's Delta Field Division continues to work closely with District and the other South Bay contractors to keep Lake Del Valle as full as possible. Following the Governor's actions on July 8, the San Francisco Public Utilities Commission (SFPUC) has notified the District that minimum purchase obligations are waived for FY 2022-23 due to the drought, in accordance with the terms of the Water Supply Agreement with San Francisco. Staff continues to ensure water supply contingency plans are updated in the event 2022 is a third dry year.

   Staff continues to further develop and refine drought messaging after the Governor's request for 15% voluntary conservation, and staff has noted that the Drought and Water Conservation Resource Center Webpage has generated over 5,500 views. Targeted outreach continues to seniors, underrepresented groups, and businesses, while digital outreach includes social media and targeted e-mail to customers. Some upcoming activities related to continued public outreach on drought messaging includes a Drought Townhall with Supervisor David Haubert and increased targeted outreach to businesses, homeowners' associations, and multi-family residential units.

Gisselle Delgadillo, Water Conservation Specialist, provided an update on the District's Water Use Efficiency Program activity. Customer inquiries and participation in all water use efficiency measures have increased significantly since late April 2021 due to drought concerns, with the majority of customer interest being related to the District's Water-Efficient Landscape rebate measure. As part of the District's drought response, staff is developing a continuation of the income-qualified Water Savings Assistance Partnership Program with expanded leak detection services that will be brought to the Board for approval in September.

Staff presented a graph of current District demands, showing June demands and partial demands for July. As there are several factors affecting customer demands, such as the persistent dry weather, changing customer behaviors due to COVID-19, and regional attention on the drought. Russell Perry, Water Operations Analyst, presented preliminary findings from a new analytic tool developed to evaluate the influence of these variables on customer demands. While it is too soon to determine how effective the public conservation messaging campaign will be in reducing customer demands, staff evaluation of demand data to date finds no indication of an overall reduction in water use attributable to near-term conservation actions, with current water use patterns attributable to weather differences from 2020. Staff will continue to monitor customer demand data and further develop this analytic tool.

2. Update on Los Vaqueros Expansion Partnership Opportunity and Review of Lake Del Valle Reoperation Analyses: Devon Becker, Water Resources Engineer, provided an update on the current analyses of the Los Vaqueros Reservoir Expansion (LVE) opportunity to help inform a decision on whether the District should join the Joint Powers Authority (JPA). Staff presented updated water resources analyses for LVE using currently available cost data from consultant Clean Energy Capital (CEC), estimated LVE delivery data provided by CCWD, as well as the District's Integrated Resources Planning Model (IRPM). Staff also presented a summary of previous Lake Del Valle (LDV) studies in the context of a project comparison for LVE consideration.

   The LVE Project would add 275,000 acre-feet of storage to the existing 160,000 acre-feet reservoir owned and operated by Contra Costa Water District (CCWD). The project is adjacent to the Sacramento/San Joaquin Delta (Delta) and has the potential to capture Delta surpluses, provide additional operational flexibility, and facilitate efficient transfers to and from any LVE partners and their respective sources of supply. Additionally, LVE fulfills the definition of a "South of Delta" storage project upstream of the District and could therefore provide emergency water supply to the District in case of a Delta outage. There is currently no "Transfer-Bethany Pipeline only" project; the Transfer-Bethany Pipeline is a component of the LVE Project and only available for Local Agency Partners investing in the LVE Project.

   Jonathan Wunderlich, Director of Finance, explained that currently available cost data for LVE includes the following estimated components: share of fixed costs for new storage and conveyance facilities, operating costs for conveyance, usage fees to compensate East Bay Municipal Utilities District and CCWD for use of existing facilities, and JPA administrative costs. District staff has also adjusted CEC's cost estimates where appropriate to account for more realistic interest timing, an updated operations scenario informed by the District's IRPM

modeling, and amortization of all pre-2030 costs. However, all financial estimates used in this analysis are subject to uncertainty; estimates to construct new facilities will be updated in the future with a detailed engineer's estimate. Cost allocation for new facilities has yet to be determined and will be finalized by the JPA, and the methodology for usage fees has yet to be determined. It is unclear if these factors would lead to higher or lower costs for the District. Importantly, not all relevant financial information will be available prior to JPA formation, so the District must evaluate the benefits and costs based on current estimates. Mr. Wunderlich noted that there are additional "off-ramps" built into the JPA agreement, so joining the JPA does not commit the District to funding the full project at this time, and more certainty on cost information is expected to be available prior to making a binding commitment to participate.

Mr. Becker explained that the water resources analyses used to evaluate the LVE opportunity compared reliability performance, cost, and other operational elements in two model runs, a "Future without LVE" run and a "Future with LVE" run. The "Future without LVE" run mirrored the future buildout run from the 2020-2025 Urban Water Management Plan (UWMP) in terms of water supply assumptions but included updated buildout demand numbers from the final Plan Bay Area 2050 document and a refined reoperation of future water supplies to best meet the District's reliability criterion. The "Future with LVE" used identical demands and assumptions as those used in the "Future without LVE," but included a conceptualized future of LVE based on the ability to capture surplus Delta-based supply, the ability to store up to 9,000 AF of water supply for the District in LVE, the recommissioning of the Mission San Jose Treatment Plant (TP1) at an 8 mgd capacity, and draft operating rules to maximize new water supply and provide additional local storage for dry years. Notably, no new unique partnerships or transfers were modelled in the "Future with LVE" run.

The results from the water resources analyses showed that a future without LVE would require heavy annual use of San Francisco Public Utilities Commission (SFPUC) water, yield lower Semitropic storage levels long-term, create greater water quality inconsistency between the north and south end of the system, and likely require upper zone storage and boosting enhancements. A future with LVE participation would result in a similar ability to meet single critical year shortage criteria but would allow for more optimal use of existing assets such as the Semitropic storage bank, Water Treatment Plan No. 2, South Bay Aqueduct capacity, and the existing distribution system. Furthermore, a future with LVE would provide for greater water quality consistency between the north and south end of the distribution system. In terms of costs, the estimated net reduction in future annual operating costs for a future with LVE compared to a future without LVE is $2.6-$5.6M in 2020 dollars. Additionally, LVE provides significant "un-costed" benefits, such as improved Semitropic storage levels, greater water supply insurance against a Delta outage, future flexibility to optimize local storage and reliability, and future partnership opportunities with other water agencies participating in the project. Consequently, analysis shows that LVE appears to remain a good investment for the District and that participation in the JPA is warranted.

Staff also provided a review of prior analyses that evaluated storage usage in LDV. These analyses included 1) a reoperation scenario that would expand LDV storage by reallocating designated flood pool storage to water supply storage and adopting Forecast-Informed Reservoir Operations (FIRO), and 2) a reoperation scenario that would lower the annual

minimum operating level of LDV to increase capture of local run-off. Both LDV scenarios have potential benefit and are cost-effective; however, neither LDV scenario provides the District with operational discretion to manage the additional storage, unlike the benefits afforded by the LVE opportunity. Implementation of either LDV scenario would require a political coalition to advance and would require the California Department of Water Resources to take the lead. Staff did not previously make a recommendation to the Board on the LDV reoperation scenarios; the staff assessment remains that there is not enough potential merit to warrant increased effort on LDV at this time.

Ms. Hidas explained that next steps include refinement of the cost and benefit analyses and completion of a Joint Powers Authority (JPA) agreement for the project. Future action items that will be coming to the Board for consideration include approval of a JPA agreement to continue participating as a project partner, and approval of an amendment to the existing multi-party Cost Share Agreement to continue funding for planning and design activities through 2022.

Staff responded to Directors' questions. Specifically, staff explained that the SFPUC water supply assumption used in the modeling analyses included the 40% unimpaired flow criteria on the Lower San Joaquin River. Additionally, staff clarified that the Transfer-Bethany pipeline costs were included in the project costs presented in the LVE analysis.

3. Water Supply Assessment for the Station District Specific Plan: Devon Becker, Water Resources Engineer, provided an overview of the Water Supply Assessment requested by the City of Union City for the Station District Specific Plan (Project). The Project will result in the intensification of existing planned land use, through infill and redevelopment, of 471 acres inside the regional Priority Development Area (PDA) and surrounding the Union City BART Station. The PDA was identified by the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) in Plan Bay Area 2050 as a regional priority growth area to create housing and jobs near mass transit. Buildout of the proposed Project would result in an increase of 2,520 housing units and 3,173,000 ft^2 of non-residential building area and approximately 955 acre-feet/year of demand for water over previously planned buildout numbers. Because the Project was included in Plan Bay Area 2050, it is included in the District's most recently adopted 2020-2025 Urban Water Management Plan. Staff will bring the WSA to the regular September Board meeting and recommends the item be added to the consent calendar.

4. Public Comments: There were no public comments.

RECOMMENDATIONS

Topics discussed by the Committee were informational only, and no recommendations are being made.

Alameda County Water District

Drought Update

ONE SAVES WATER
Action. Person. Community.


Photo Credit: DWR, 2021

Water Resources and Conservation Committee
July 28, 2021
Agenda Item 1

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Recent Updates

- Weather forecast modeling indicates increased temperatures through the summer and into 2022
- Governor's July 8 actions:
  - o called for 15% voluntary water conservation
  - o Drought Emergency Proclamation adds nine more counties to drought emergency
- Dept. of Water Resource (DWR) coordinating with U.S. Bureau of Reclamation to optimize Projects' operations

Recent Updates (Continued)

- DWR projected to maintain 2021 deliveries as requested
- District updating contingency plans for 2022
- SFPUC waiving minimum purchase requirement
- DWR's Delta Field Division is keeping Lake Del Valle as full as possible
- Continued close coordination with DWR, Semitropic, San Francisco, and other agencies
- Continued coordination with Public Affairs staff

Water Conservation Campaign

We continue to collaborate with the Public Affairs team to provide content, information and direction for the water conservation campaign "One Saves Water." Campaign outreach is increasing with implementation of more marketing initiatives that also emphasize the State's Executive Order for voluntary conservation.

ONE SAVES WATER
Action. Person. Community.

Printed Collateral

- Fact Sheet for Businesses - indoor/outdoor saving tips to hotels and restaurants, program and rebate info
- Yard Signage - messaging to encourage water conservation
- Bill Message
- Seniors & Underrepresented Group Outreach

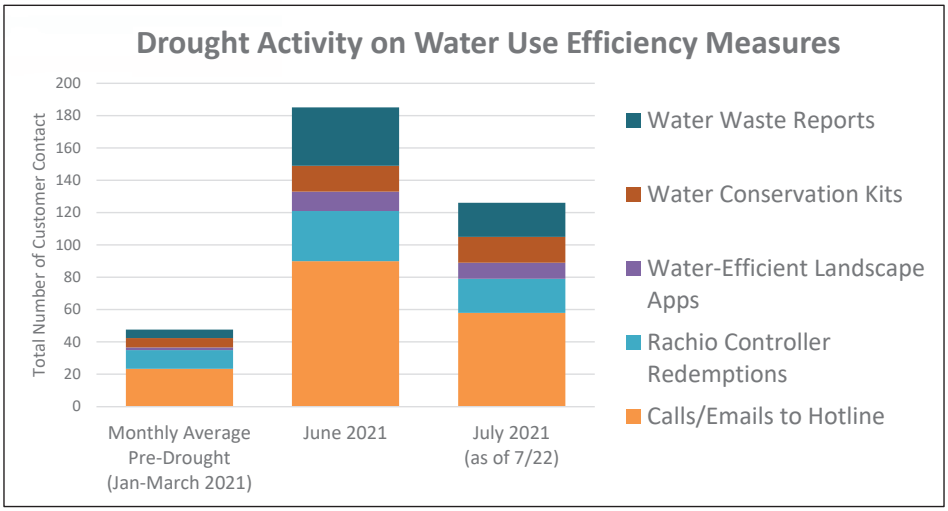
Digital

- Engaged Customer Outreach: Email sent to 5,907 recipients
- Media: Earned and Paid
- Social Media: Facebook, Twitter & Instagram
  - Nextdoor/5,000+ impressions
- Drought & Water Conservation Resource Center Webpage/5500+ views

Next Steps

- Aqueduct newsletter
- Bill inserts
- Target Outreach: HOA's, Multi-family Residential, Businesses
- Drought Townhall
- Explore creative outreach – possible events

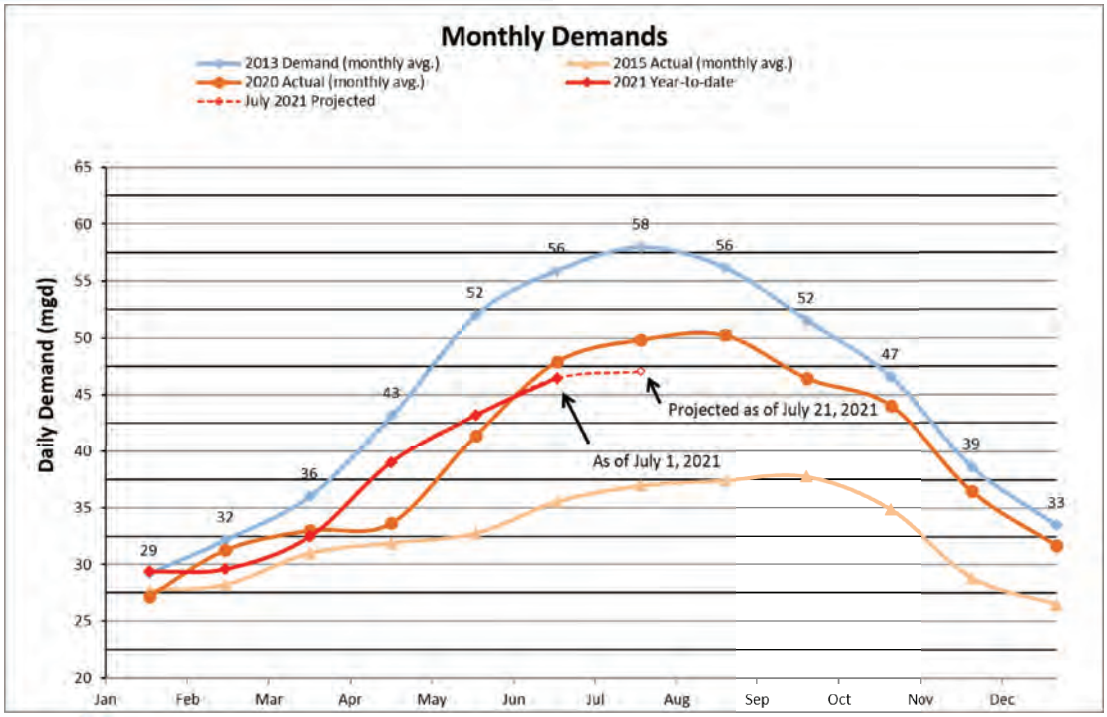
Water Use Efficiency Activity



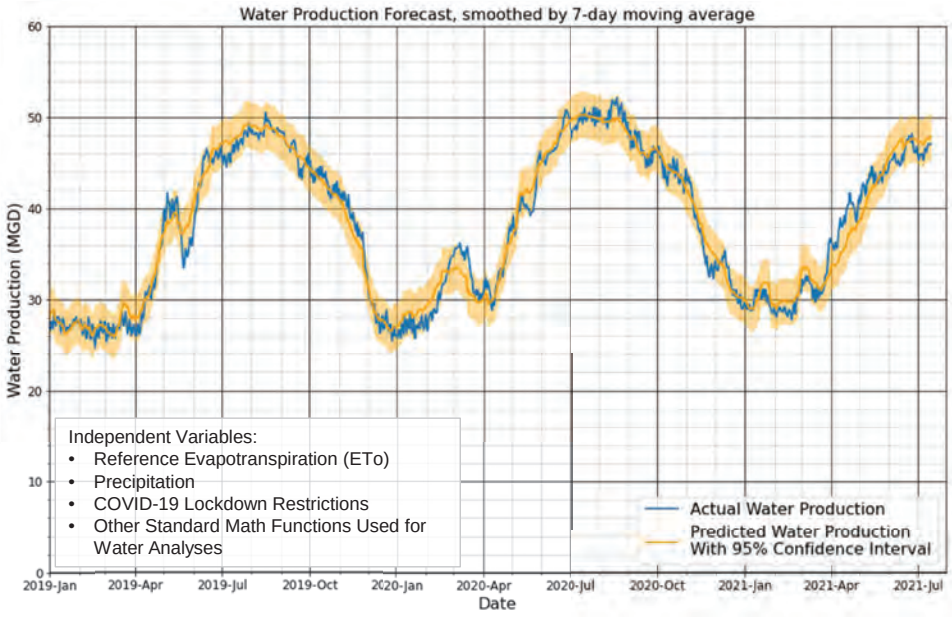
Upcoming:

- Program renewal with expanded leak detection services for the income-qualified Water Savings Assistance Partnership Program (WSAPP)
  - Leak services include hose bib, sprinkler, faucet, and flapper repair or replacement
  - $200,000 for 300 homes served

2021 Demand Tracking



Analysis of 2021 Demands



- Developed a linear mixed-effects model to analyze water demands.
- At present, no changes in demand that cannot be attributed to weather and COVID-19.

Alameda County Water District

Update on Los Vaqueros Partnership Opportunity and Review of Lake Del Valle Analyses

Photo credit: Marco Siragusa

Water Resources & Conservation Board Committee Meeting
July 28, 2021

Presentation Overview

Purpose:

- Review current analyses of Los Vaqueros Reservoir Expansion (LVE) to support a decision on whether to join a Joint Powers Authority (JPA)

Outline:

- LVE Overview
- Review Finance and Water Resources analyses
- Revisit past Lake Del Valle (LDV) studies in the context of a project comparison for the LVE consideration

Review

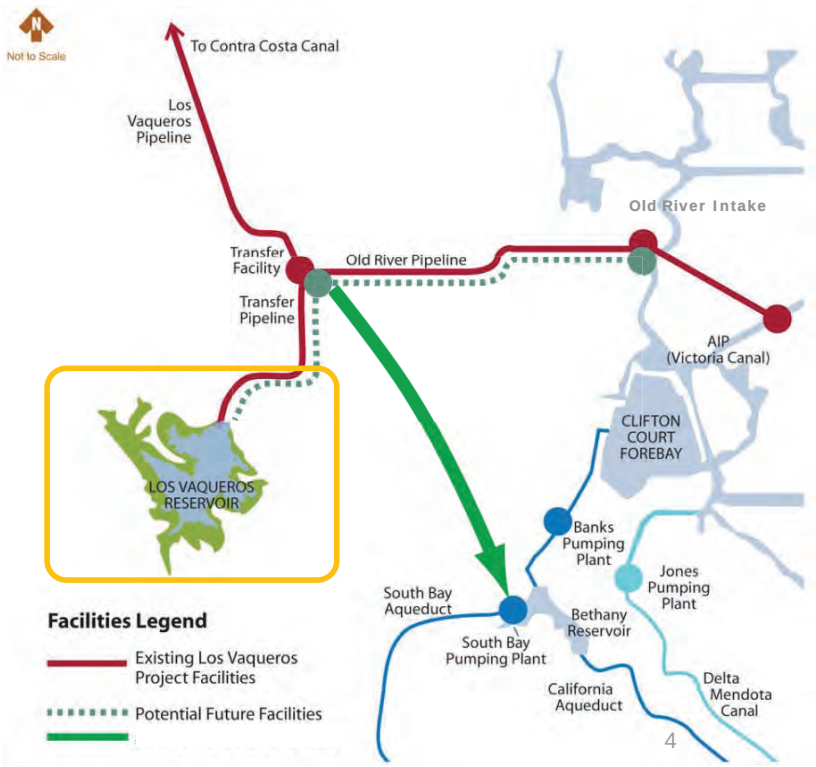
Los Vaqueros Reservoir Overview

- Owned and operated by Contra Costa Water District (CCWD)
- "Off-stream" reservoir, adjacent to the Delta
- 160,000 acre-feet (AF) of existing storage
- Phase 2 expansion to 275,000 AF storage proposed
  - Multiple partners & benefits
  - Uses existing, shared & new facilities
  - California Water Commission (Prop 1) Funding Awarded in 2018, including Early Funding
  - Estimated total project cost of $895M*

Estimate in 2018 dollars; does not include outside funding
Source: February 2021 Project Fact Sheet, available www.ccwater.com/lvstudies

Review

What are ACWD's interests in Los Vaqueros?



- Location
  - Adjacent to SWP
  - South of Delta yet "Upstream" of ACWD
- Provides emergency/ resiliency for Delta outage
- Potential to capture Delta surpluses
- Could provide more operational flexibility
- Facilitate easy transfers to and from any and all LVE partners and sources of water

Preliminary Costs & Benefits Analysis

- Water Resources and Finance staff have analyzed currently available data for cost and operations developed by CCWD together with the Local Agency Partners
- <u>All content in this section of the presentation reflects critical inputs that are subject to change</u>
- At this stage, an analysis constitutes little more than a "gut check" - sufficient to support a decision on whether to continue LVE participation

Financial Analysis

- ACWD's LVE costs are comprised of:
  - Share of fixed costs for new storage and conveyance facilities
  - Operating costs to convey water
  - Usage fees to compensate EBMUD and CCWD for use of their existing facilities
  - JPA administrative costs
  - Amortization of pre-2030 costs
- Agency-specific costs are currently estimated by Clean Energy Capital (CEC), a consultant working on the project
- Where appropriate, staff has adjusted CEC estimates

Financial Analysis

- Current financial estimates are subject to uncertainty:
  - Preliminary estimates for cost to construct new facilities – detailed engineer's estimate to be developed prior to firm project commitment
  - Cost allocation for new facilities still to-be-developed (will be finalized by the JPA)
  - Methodology for usage fees not yet finalized
  - Potential for ACWD to change its participation
- Unclear whether these factors would lead to higher or lower costs for ACWD
- Not all relevant financial decisions and information will be available prior to JPA formation

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Water Resources Analysis Overview

- Developed two computer models to simulate:
  1. "Future without LVE"
  2. "Future with LVE"
- Compared reliability performance, cost, and other operational elements of the two scenarios

Water Resources Analysis "Future without LVE" Model

An updated version of the UWMP buildout model for 2045. Reflects:

- Lower demand associated with reduced buildout numbers from the Final *Plan Bay Area 2050* (~1.5 mgd lower than UWMP)
- Refinement and reoperation of ACWD's future supplies to best meet reliability policy criterion.

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Water Resources Analysis "Future with LVE" Model

Conceptualized future using our existing supplies and facilities plus LVE

- LVE capture of surplus SWP supply *(provided by CCWD and using CALSIM)*
- Includes Mission San Jose Treatment Plant at 8 mgd
- Includes draft operating rules to maximize 'new supply' while also improve local storage for dry years
- No new or unique partnerships are modeled

Narrative Description of Future Operations

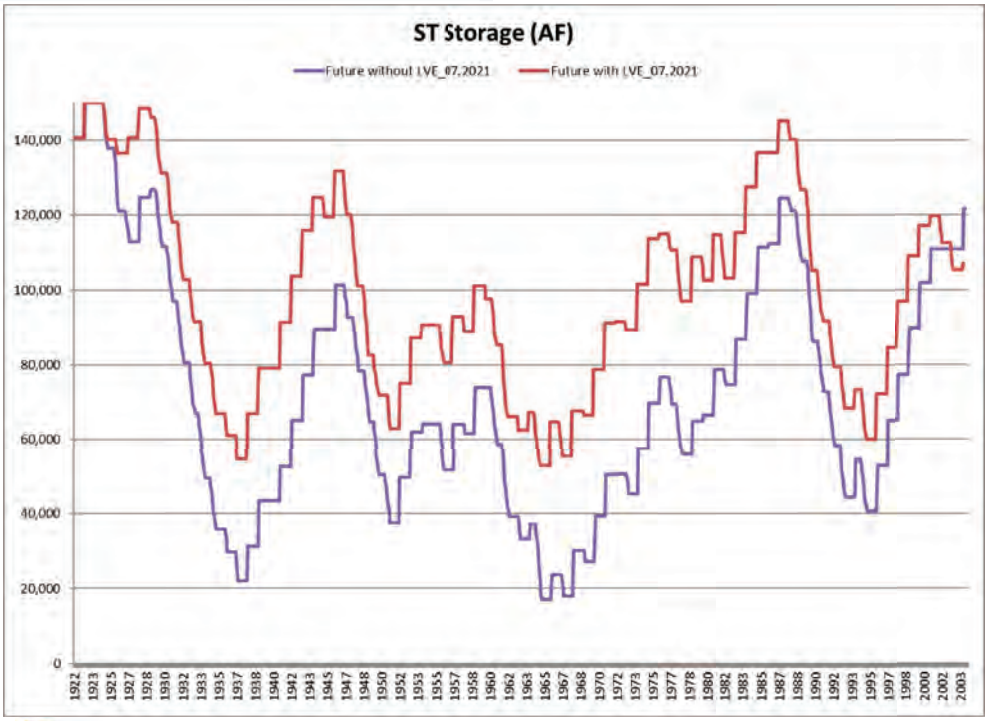
	Future without LVE	Future with LVE
General Operations	In order to offset lost SWP supply, ACWD must purchase full SFPUC contract in all years as SFPUC is "use it or lose it". Allows ACWD to keep water in Semitropic for use in droughts. Requires heavy annual use of direct SFPUC supply, creating greater WQ inconsistency between north and south end of system Low SWTP production will likely require upper zone storage and boosting enhancements	LVE supply helps mitigate lost SWP supply, however SFPUC purchases will likely still need to be higher than today's levels Overall operations look largely like today's preferred operations, in part with the return of TP1 which avoids distribution system improvements needed to serve upper zones LVE local storage provides improved south of Delta storage - or "insurance" against Delta failure

Narrative Description of Future Operations

	Future without LVE	Future with LVE
Reliability	Able to meet single critical year shortage criteria of between 10 and 15% Increased SFPUC usage does result in larger allocated share during droughts, based on the current formula which favors higher demonstrated use. *(This formula is regularly renegotiated however)*	Similar result. Conclusion is sensitive to global modeling assumptions & staff believes individual dry-year reliability performance will be easier to optimize with LVE* Addition of Delta based supply from LVE provides for healthier Semitropic storage. *(Note: acquiring transfers contracts could similarly provide this benefit)*

** Current year is a good example; if LVE were online, Staff would have begun delivering available Semitropic returns to LVE in December of 2020*

Semitropic Storage Comparison



Narrative Description of Future Operations

		Future without LVE	Future with LVE
Annual Cost *(in $2020)*	Variable Operating	$51.4M	$46.1M
	LVE partnership cost:	$0M	$3.3M
	TP1*	$ 0 M	$2.3 M
	Other Enhancements**	$2.9M - $5.7	$0 M
	Total	$54.3 M – $57.1 M	$51.7 M

* Amortization of $40M (CIP)
** Amortization of $50M - $100M for boosting, storage and distribution system enhancements *(rough estimate for purposes of this analysis)*

Narrative Description of Future Operations

	Future without LVE	Future with LVE
Other Operational Elements	Heavy use of direct SFPUC creates greater distribution system WQ inconsistency between North and South of System (similar to 1980s)	By providing a somewhat 'in-kind' replacement of lost SWP supply, this scenarios makes better use of existing assets including Semitropic, TP2, SBA Capacity, current distribution system

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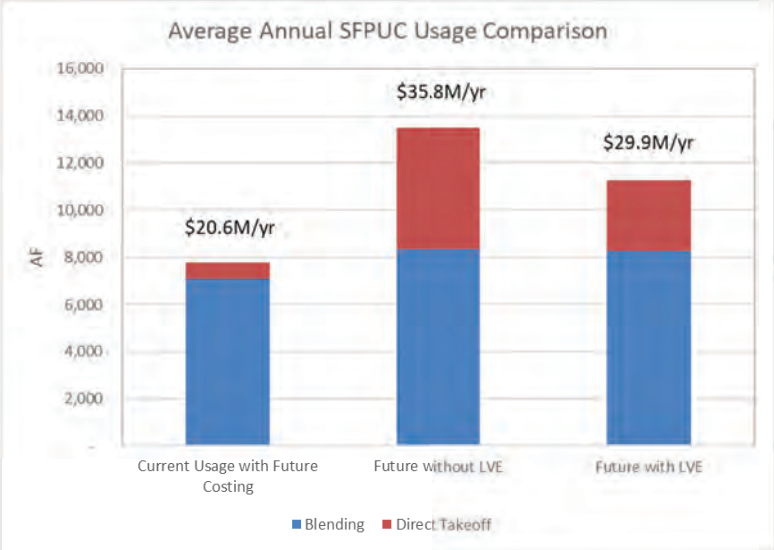
SFPUC Usage Comparison



Used to supplement insufficient production or water supply

Used for blending with local GW

LVE – Conclusions

- Estimated net reduction in future operating costs of $2.6 – 5.4M in (2020$)
- Improves offsite reserves in Semitropic
- Uncosted benefits:
  - Provides “insurance” against a Delta outage*
  - New flexibility to optimize local storage & reliability
  - Opens new partnering opportunities with other water agencies
- **Note: None of this applies to a Transfer-Bethany Pipeline only project**
- LVE appears to remain a good investment for ACWD; appears to warrant participation in JPA

** Value of insurance can be estimated from ‘cost of failure of supply’ which is not included*

Lake Del Valle Analyses

- Per Board request, staff is providing a high-level refresher on prior analyses that revaluated storage usage in LDV
- LDV analyses included:
  - Expand storage by reallocating designated flood storage in LDV for water supply and adopt Forecast-Informed Reservoir Operations ("LDV Raise w/ FIRO")
  - Lower the annual minimum operating level to increase capture of local run-off ("LDV Lowering")

Review

Important Constraints about Lake Del Valle

- LDV owned and operated by DWR
- ACWD & Zone 7 each have 7.5 TAF of storage and can only store local runoff from the Arroyo Valle Watershed
- Increased storage likely a 'system' benefit for all South Bay Contractors and DWR operations.
- ** Increased storage in LDV would not operate under ACWD's discretion

	LVE	LDV raise w/ FIRO	LDV lowering
Concept / Description	Invest in 5 to 10 TAF of Storage in Expanded reservoir	Reallocate 25 TAF of flood storage for regular water supply storage. Increases south of delta storage; FIRO operation increases yield for ACWD and Zone 7. Concept benefits from existing, reservoir capacity and therefore a low $/AF for new water supply storage	Modify EBRPD facilities (lower treatment plant intake and boat ramp/dock facilities) so that the annual operational low-point can be further reduced. Allows EBRPD to remain operational when LDV drawn down below normal conservation pool; allows ACWD & Zone 7 to capture more local water
Primary Benefits	Increased south of Delta storage ACWD new supply Enhanced Flexibility	Increased south of Delta storage ACWD new supply Enhanced Flexibility	ACWD new supply Enhanced Flexibility
Enhance resilience for Delta Outage	Yes - increased south of Delta Storage	Yes - increased south of Delta Storage	No - same level of south of Delta Storage
Estimated water supply benefit (TAF/yr.)	1.6	2.3 (upper bound)	1.3
Estimated ACWD cost	~$120M	Share of $50M (likely more)	Share of $10M (likely more)
Ability for ACWD to manage storage?	Yes. Can place State Water Project supplies into LVE. Most notably the ability to recover extra Semitropic supply for dry years	Only Arroyo Valle water. Cannot "park" our State Water Project supplies	Only Arroyo Valle water. Cannot "park" our State Water Project supplies
Implementability	MODERATE - HIGH Large and complex project with many partners. However enjoys: - State and Fed participation - Prop 1 & other funding secured - Advanced discussions including partner funding and governance	LOW - Requires federal approval - Requires DWR to lead (currently not engaged) - Objections from EBRPD - Concerns from flood management agencies regarding high volume releases needed as part of 'normal' operations	LOW – MODERATE - Requires DWR to lead (currently not engaged) - Potential objections from EBRPD - Not supported by all SBCs due to increased risk exposure (Delta outage)

Status of LDV Discussions

- LDV scenarios have potential benefit but require political coalition to advance
- ACWD cannot operate additional storage in LDV at its own discretion, unlike LVE
- Staff did not make a recommendation
- Direction has been
  - To continue to discuss these concepts with interested parties
  - Be ready to advance them if future opportunities arise
- Staff assessment: There is not enough potential to merit increased effort on LDV; staff recommends maintaining current direction

Next Steps for LVE

- Staff to continue:
  - Refinement of cost & benefit analyses
  - Participation in JPA agreement finalization
- Staff will be bringing future items to the Board for consideration, including:
  - Approval of JPA Agreement to continue participating as a Project partner in planning & design activities
  - Approval of Multiparty Agreement Amendment No. 3 to continue funding for planning & design activities through 2022

Alameda County Water District

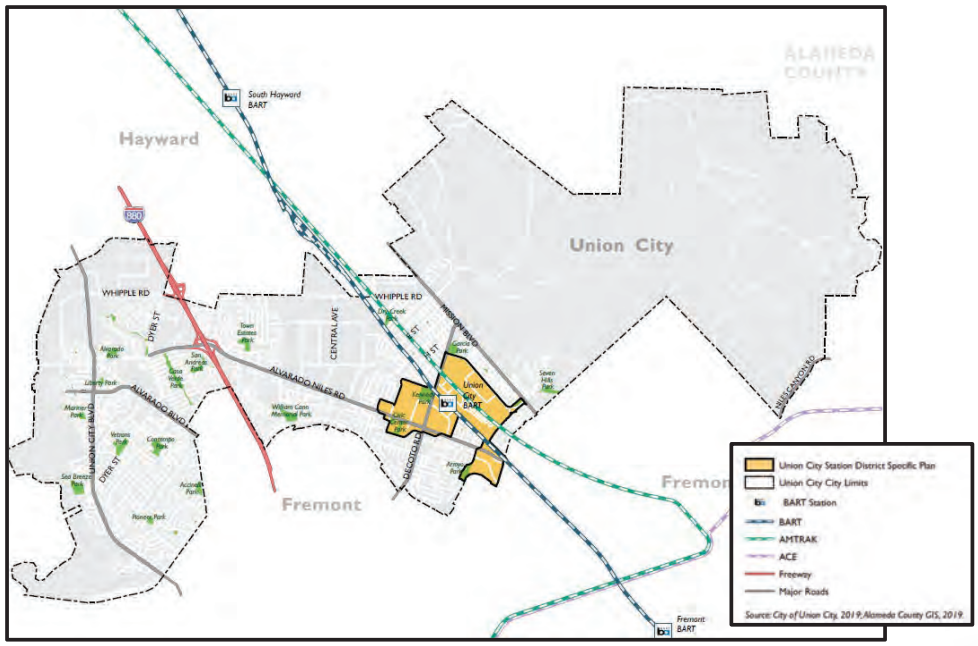
Water Supply Assessment for the Station District Specific Plan

Water Resources & Conservation Board
Committee Meeting
July 28, 2021

Overview

- On 6/4/2021, the District received a request for a Water Supply Assessment (WSA) from the City of Union City for the Station District Specific Plan (Project).
- The Purpose of a WSA is to determine the sufficiency of water supply during normal, single dry, and multiple dry water years for the next 20 years for the proposed project, in addition to existing and planned future uses.
- Water Code Sec. 10910 requires the District to complete a WSA within 90 days, or 9/2/2021
- Staff requested an extension pursuant to the Water Code and will bring the WSA to the 9/9/2021 regular Board meeting

Project Location



Station District Specific Plan Project Details

- The Project proposes infill and intensification of existing planned land use on 471 acres around the Union City BART Station
- The Project is included in Plan Bay Area 2050

	Existing + Previous Plans	New with Project	Total at Build Out
Residential units	3,130	2,520	5,650
Non-residential Building area (ft^2)	2,254,000	3,173,000	5,427,000

Estimated Water Demand for the Project

- Full buildout is projected to use:

	Existing + Previous Plans	New with Project	Total at Build Out
Water Demand (AF/yr.)	830	955	1,785

- The estimated new water demand as a result of the Project is 955 acre-feet/year.
- Because the Project was included in Plan Bay Area 2050, it is included in the District's most recent water demand forecast and Urban Water Management Plan

Findings of WSA

- All Project demands are included in the District's Demand Forecast and UWMP (2020-2025), therefore:
  - The District has sufficient supplies for the Project in normal years.
  - The Project will not result in increased shortages from those already included in the District's UWMP during dry periods.
- Staff is evaluating if there are any additional water conservation enhancements that can be made as part of the Project.

Next Steps

- WSA will be brought to the regular September Board meeting and is recommended for consent
- Upon Board approval of the WSA, the District will provide the WSA to the City of Union City
- City of Union City to draft EIR and include WSA; public review and comment
- A written verification of sufficient water supply may be needed for individual elements of the Project