

**WR P1 Reduce Reliance on the Delta and Improve Regional Self-Reliance  
Example of How the Policy Would Apply to a Wholesale Water Supplier**

*Water Agency A is a large regional wholesaler of water. It receives about half of its water supply from the Delta. Water Agency A delivers water to 30 member agencies, at least 10 of which rely solely on Delta water for their supply. These 30 member agencies take water from Water Agency A and deliver it to over 200 private and public retail water agencies across 7 counties. These water suppliers include a wide variety of public and private retailers, cities, special districts, counties mutual and others.*

***Water Agency A applies for a multi-year water transfer.  
How would Water Agency A comply with WRP1?***

**First: *Is the proposed water transfer a covered action?***

This example assumes the answer is YES.

**Second: *Will the proposed transfer have a significant adverse environmental impact in the Delta?***

Water Agency A, as the applicant for the proposed action, will make this determination based upon the environmental assessment it prepares for the project.

- If NO, then Water Agency A provides the necessary documentation in the self-certification form to document this finding.
- If YES, then Water Agency A needs to address the three compliance requirements listed in WRP1 for the water suppliers that would receive water as a result of the proposed transfer.

*Note: The WRP1 compliance requirements only apply to urban water suppliers and agricultural water suppliers (defined in water code) that by law must prepare and update (every five years) water management plans. Also, water agencies must have their management plans reviewed by DWR for compliance with applicable legal requirements to be eligible for state grants and loan. The WR P1 compliance requirements build upon existing law.*

**Third: *Have one or more water suppliers that will receive water as a result of the proposed transfer failed to comply with the three requirements listed in WR P1?***

Water Agency A will need to provide a finding in the self-certification form on whether one or more water suppliers that will receive water as a result of the proposed transfer have failed to comply with the three requirements. The three compliance requirements are:

1. *Comply with water management laws.* A water supplier has a current water management plan that has been reviewed for compliance with applicable laws by DWR;

2. *Analyze and implement.* The water supplier has identified, evaluated and commenced implementation, consistent with the schedule they identify in their plan, of the technically feasible, locally cost effective programs and projects that will reduce reliance on the Delta; and,
3. *Report.* Commencing in 2015, water suppliers will report on the expected outcome for measureable reduction in Delta reliance and improvement in regional self-reliance.

There are a number of ways in which the information can be gathered. Water Agency A could send out a letter requesting that each water supplier certify that the status of their compliance. Water Agency A could request its member agencies to be responsible for submitting their own information and obtaining the information from their sub-agencies (and the sub-agencies would be responsible for their own sub-agencies). Water Agency A will also report on its own fulfillment of the three compliance requirements (under law, wholesale water agencies are required to complete Urban Water Management Plans, but have some different responsibilities from retail water suppliers).

*Note: The next update of the Urban and Agricultural Water Management Plans is due in 2015. Wholesale water suppliers are required by law to include information in their plans that have been approved by the water suppliers they serve. Compliance information can be included in the plans at this time and submitted to the wholesale water supplier.*

**Fourth: Has the failure of one or more water suppliers to comply with the three requirements listed in WRP1 significantly caused the need for the proposed transfer?**

Water Agency A will need to provide a finding in the self-certification form on whether the failure of one or more water suppliers to comply with the three requirements significantly caused the need for the proposed transfer. Water Agency A will use the information collected from the water agencies as the basis for making the determination.

**For the proposed water transfer to be inconsistent with WR P1, Water Agency A would have to make three findings:**

- The proposed transfer will have a significant adverse environmental impact on the Delta
- One or more water suppliers that will receive water from the proposed transfer have failed to complete the three WRP1 compliance requirements to demonstrate how they are contributing to reduce reliance on the Delta; and,
- The failure of those water suppliers was a significant cause for the need for the proposed transfer.