

## A SHORT NOTE

### **LAFCO Responsibility: Is a *Water Availability Analysis* Enough?**

LAFCOs across the State are increasingly finding themselves faced with the issue of having to deal with water, and all of its intriguing implications. While certainly challenging, this should come as no surprise since water, in all its contexts, represents the single most significant natural resource in California; both today and for the future. It is a fundamental necessity for our cities, agriculture, industry, recreational pursuits, and environment, in short; a pre-requisite to economic viability and the lifeblood of society. Accordingly, properly integrating this resource, along with all of the values (and threats) that it provides, within the framework for land use planning and smart growth will be critical in the years ahead.

As LAFCOs continually gain knowledge in water resources, their actions have taken on a more thorough and considered evaluation of water. Today, in fact, most LAFCOs clearly recognize the importance of water and are constantly improving and expanding their understanding of the water industry, its resources, mandates, and constraints. Incorporating this expanding knowledge base into traditional LAFCO actions (e.g., annexations, MSRs, spheres of influence) is occurring across the State; an excellent first step!

Much of the initial recognition and application by LAFCOs has focused on water supply availability. This seems intuitively appropriate since so much of what we do, build, and plan for, must start with a water supply. However, we should be careful not to place too much emphasis on water availability. Moreover, we should not assume that our responsibility necessarily ends at simply verifying a water supply. So many other important sequential factors must also be considered.

In reality, a water supply, and its defined *availability*, represents only one of several important considerations in water resources management. While water availability may be genuine, justified, and, for all intents and purposes secured, it is only effective and utilizable if it can meet other considerations. By this, I mean, it must be unconstrained. For example, if the water availability analysis confirms a *firm yield* supply, yet there is inadequate storage, one may wonder whether such a project should gain the support of LAFCO. Another example might be where there is a significant bottleneck in the delivery infrastructure from source to treatment facility, but where, again, a raw water supply is verified. If one knows that the primary raw water delivery infrastructure has a history of failures, does not possess adequate redundancy, and is undersized, should an available water supply trump these other considerations and clear the way for LAFCO approval? A further example is where either the treatment capacity is far less than the available supply or, where there are significant constraints to building distribution infrastructure (for treated water) to the intended buildout areas.

The important point in all of these examples is this; regardless of how *available* a water supply might be, if it cannot be stored, conveyed, treated, and distributed under the same degree of assuredness from which the water supplies were verified, its *availability* becomes irrelevant. Water availability is unquestionably important, but we should be mindful that it does not stop there. LAFCOs need to ask the important follow-up questions; can it be stored and released for

use on a schedule coincident with expected demands; can the raw water conveyance handle the expected delivery quantities; can the existing treatment facilities treat that much; and, what, if any, are the treated water delivery constraints? Getting the answers to these questions will help assure that LAFCO's overall water resources evaluation is complete and representative of the true water resources status of the project.

All of this comes back to the fundamental edict of hydrology, and that is, the hydrologic cycle. Water resources, regardless of location, physiology, climate, economic status, or political influence are governed by the principles of the hydrologic cycle. In the water industry, it's the same; where, supply, storage, conveyance, treatment, distribution, and waste recovery represent the industry water cycle. Going beyond just water supply availability, and reviewing the constraints for each of these elements will help ensure that LAFCOs are indeed making their important decisions on the complete picture.

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