

CHAPTER FOUR

DROUGHT RESPONSE STAGE DECLARATION, IMPLEMENTATION, AND RESPONSE MEASURES

The City of Tucson Water Department Drought Preparedness and Response Plan provides guidelines for determining the current drought response stage, higher or lower drought response stages, termination of all drought response stage declarations, and the response measures suggested for implementation at each stage. The Utility's authority to establish a system of priorities for delivery of potable and reclaimed water during times of shortage is recognized in this Plan. Authority for this plan and its enforcement is derived from Ordinance 10380 (Appendix E).

In general, the Plan provides guidelines, rather than “hard lines,” to provide the Water Director (Director) with sufficient information and flexibility to consider current circumstances pertinent to the declaration of specific drought response stages and implementation of specific drought response measures. Because Tucson Water’s water resources include both local groundwater and Colorado River water, this approach will better serve the community than establishing rigid criteria that may not adequately reflect water supply availability or water distribution system conditions.

Tucson Water’s Plan includes four drought response levels ranging from Stage 1 to Stage 4. A Stage 1 drought response level will be declared based on either one or both of the following: monitoring of local drought conditions and an associated declaration of drought by ADWR in its monthly “Arizona Drought Monitor Report” or a severe and sustained drought on the Colorado River Watershed. These Stage 1 triggers are among the primary hard line or mandatory triggers in Tucson Water’s Plan. Once a Stage 1 level has been declared for Tucson Water’s service area, progression through Stages 2, 3 and 4 will be declared based on threats to Tucson Water’s Colorado River supplies *and/or* local system indicators that indicate negative impacts to the Utility’s groundwater supplies.

DROUGHT DECLARATION

A Stage 1 or 2 drought response in the Tucson Water service area will be declared by the City Manager on the advice of the Director (Figure 4.1). Following the City Manager’s declaration of Stage 1 or 2 drought response level, Tucson Water will implement appropriate response actions, including but not limited to various conservation measures. The Director will continually monitor drought conditions and promptly recommend to the City Manager and Mayor and Council that the level increase to Stages 3 or 4 if conditions worsen. Declaration of a Stage 3 or a Stage 4 drought response level requires approval of the Mayor and Council (Tables 4-1 through 4-4). Water reduction goals will be

developed for each drought stage at the time the stage is triggered. At that time, Tucson Water will have a better understanding of the causes for the trigger, and the response measures needed to relieve drought impacts. Similarly, based on continual monitoring of drought indicators and conditions, the Director will advise the City Manager to rescind Stages 1 or 2, or recommend termination of Stages 3 or 4 to Mayor and Council as warranted by changing conditions.

DROUGHT INDICATORS

Drought indicators are measurable variables that describe drought conditions. For example, the state of Arizona uses its watersheds to describe drought conditions throughout Arizona. Tucson Water's drought indicators (Figure 4.2) include variables for both regional and local drought and are designed to measure potential drought impacts on Tucson Water's available water supplies and/or potential distribution system impacts related to drought.

Staff from the System Planning, Water Resources Management, and Operations sections selected drought indicators based on their specific applicability to Tucson Water's water resources and distribution system. Staff also assigned values or "triggers" to these indicators to assist the Director in determining drought response stages appropriate for the Tucson Water service area.

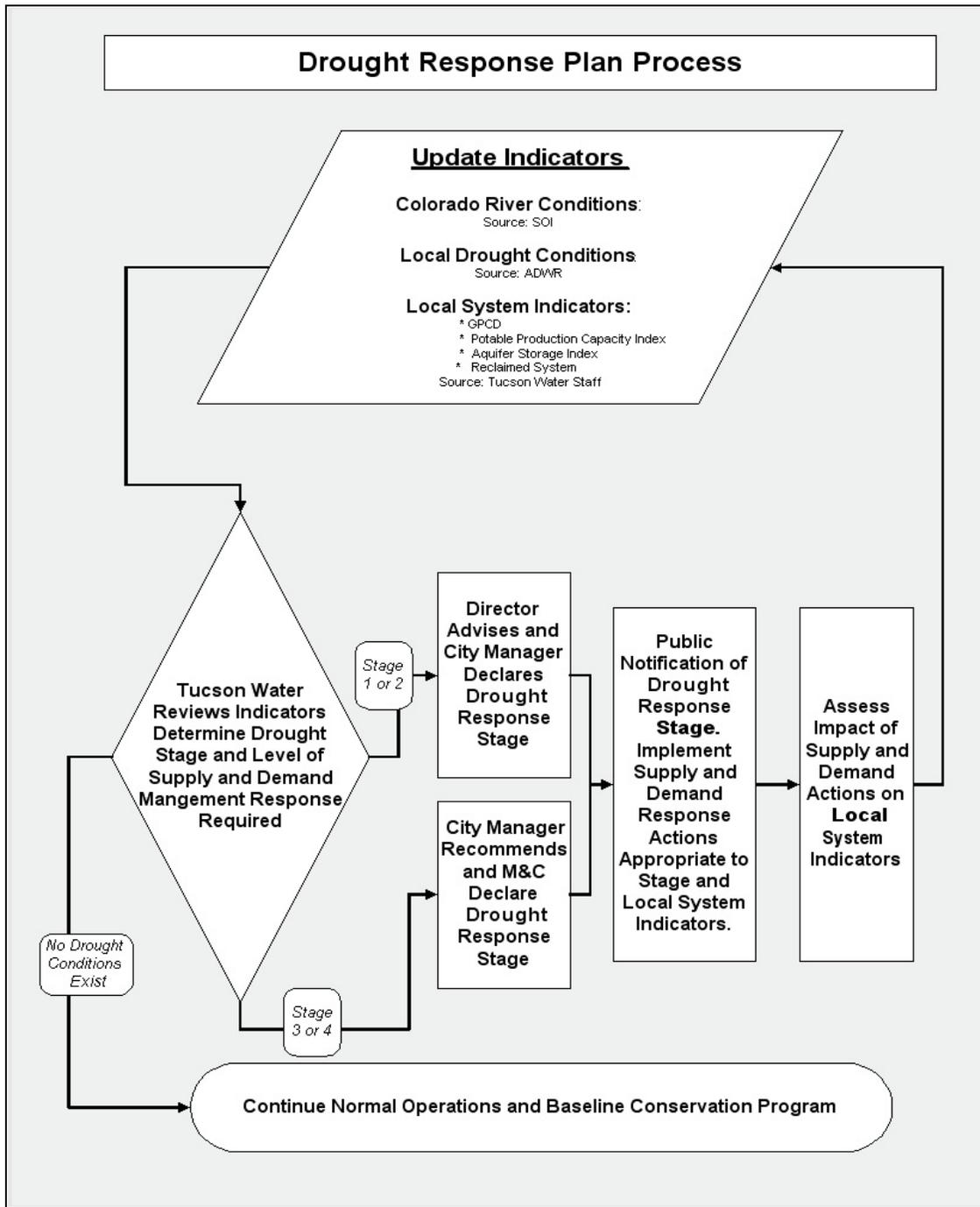


Figure 4.2. Drought Declaration Process Flow Chart

DROUGHT INDICATORS	DROUGHT RESPONSE STAGES and THEIR TRIGGERS			
REGIONAL INDICATORS	Stage 1: Declared by City Manager on advice of Water Director	Stage 2: Declared by City Manager on advice of Water Director	Stage 3: Declared by M&C based on recomm of City Manager (per advice of Water Director)	Stage 4: Declared by M&C based on recomm of City Manager (per advice of Water Director)
<p>Colorado River - Shortages and Associated CAP Reductions</p> <p>Arizona Department of Water Resources Drought Stage above "Normal"</p>	<p>Either one or both of the following: Severe and sustained drought in the Colorado River watershed or ADMTC declares drought in Tucson's watershed.</p>	<p>Either one or both of the following: Secretary of Interior declares shortage on Colorado River with CAP deliveries to excess and Ag Users reduced or Local System Indicator Values*</p>	<p>Either one of both of the following: Continuing shortage on Colorado River with CAP deliveries to M&I users reduced; or Local System Indicator Values*</p>	<p>Either one of both of the following: Continued shortage on Colorado River with additional reductions in CAP deliveries to M&I users, or Local System Indicator Values*</p>
LOCAL SYSTEM INDICATORS				
<p>Potable Production Capacity Index: a ratio of Production Capacity (how much water can be produced reliably over a 30 day period) divided by Average Demand (the peak 30 day average)</p> <p>Aquifer Storage Index: Groundwater levels in the aquifer as measured at selected wells and compared to groundwater levels in a particular (index) year.</p> <p>Reclaimed Production Capacity Index: Can operational requirements be met?</p>	<p>Local System Indicators are not a trigger in this stage but may be used for determination of required response actions.</p>	<p>One or more index numbers that are low or trending downward, in conjunction with ADMTC declared drought, could trigger elevation of a drought response stage. **Local system indicators may also be used to determine response actions.</p>	<p>One or more index numbers that are low or trending downward, in conjunction with ADMTC declared drought, could trigger elevation of a drought response stage. **Local system indicators may also be used to determine response actions.</p>	<p>One or more index numbers that are low or trending downward, in conjunction with ADMTC declared drought, could trigger elevation of a drought response stage. **Local system indicators may also be used to determine response actions.</p>
<p>Response Monitoring Tool: GPCD</p>	<p>Changes in GPCD will be used as a tool for monitoring customer reaction to response actions and may be used in conjunction with other Local System Indicators to determine needed response actions.</p>			
<p>Tucson Water Isolated Systems</p>	<p>ADMTC Declaration of Drought triggers Stage 1; Shortage on Colorado River has no impact</p>	<p>Local System Indicator values that are low or trending downward</p>	<p>Same triggers are monitored for elevation to Stage 3</p>	<p>Same triggers are monitored for elevation to Stage 4</p>
<p>Focus of Responses Actions: *See Drought Response Measures tables for specific menu of actions for each stage</p>	<p>Public Education and Information Focus on Drought, Operational or System Maintenance Actions and City Depts to "lead by example" by conducting water-use self-audits.</p>	<p>All Stage 1 actions plus mandatory city dept water reductions and voluntary customer water reductions</p>	<p>All Stage 1 and 2 actions plus mandatory potable water use reductions/ restrictions</p>	<p>All Stage 1,2, and 3 actions plus implement Ordinance 8461 with mandatory restrictions on all non-essential water uses</p>

*Local system indicators act as triggers only in conjunction with an ADMTC declared drought in the Tucson area.

Figure 4.2: Indicators and Triggers

Footnote for Figure 4.2:

Mandatory or hard-line triggers primarily relate to potential impacts from drought on Colorado River water availability. Sustained drought on the Colorado River will trigger Stage 1. A declaration of shortage on the River by the Secretary of the Interior will trigger Stage 2. A reduction in CAP deliveries to municipal users (including Tucson Water) will trigger Stage 3; and further reductions in deliveries will trigger Stage 4.

The Arizona Drought Monitoring Technical Committee's (ADMTC), declaration of drought in the Tucson region, as posted on ADWR's website and based on local climatic indicators, is a mandatory trigger as well and will trigger a Stage 1 regardless of conditions on the River. However, increased severity of drought status posted by ADWR will not be mandatory triggers for Tucson Water's drought response stages, but will be used to implement specific public information or education related to drought.

Advisory triggers relate to drought impacts on local system indicators. These indicators must be analyzed in conjunction with the ADMTC's declaration of drought in the Tucson region and other water conditions to determine if drought response Stages 2, 3 or 4 should be triggered. Local system indicators will not trigger a Stage 1, but may be used to implement specific response actions.

Regional Indicators

Regional indicators specific to Tucson Water's Plan are either drought and shortages on the Colorado River, or a declaration of drought by the ADMTC for the Tucson region, or both.

Shortages on the Colorado River

A regional drought on the Colorado River Watershed could lead to a declaration of shortage on the river by the Secretary of the Interior. Section 301 (b) of the Colorado River Basin Project Act of 1968 provides for Arizona to curtail use of its CAP entitlement to assure water availability to satisfying uses in California and water rights in Arizona and Nevada which are prior to the Central Arizona Project if Colorado River water supplies are below normal. This means that a declaration of shortage could potentially reduce CAP deliveries to Tucson Water, eventually impacting the water resources available to meet customer demand depending on the severity and duration of the shortage and the quantity of Arizona Water Banking Authority (AWBA) firming credits available to pump. Because of this potential impact, a severe and sustained drought in the Colorado River Watershed will trigger a Stage 1 drought response within the Tucson Water service area. A severe and sustained drought in the Colorado River Watershed will be determined by climatological data and the reservoir levels of Lake Mead and Lake Powell, as reported by ADMTC, which includes CLIMAS (Climate Assessment for the Southwest Project), a collaboration of researchers who study the effects of climate for organizations who need climate information to make informed decisions. The impact of drought conditions on the City of Tucson's Colorado River supplies will be determined by the Secretary of the Interior's designation of shortage conditions on the River.

Declaration of Drought by ADWR

ADWR publishes on its web site a monthly Drought Monitor Report (Figure 3.3) that graphically depicts the severity of drought for each of the fourteen surface watersheds in Arizona. Tucson is located in the Santa Cruz Watershed. These reports use climatological and environmental data collected by the ADMTC including precipitation, temperature, stream flows, vegetation status, and reservoir status describing state conditions in each of the watersheds.

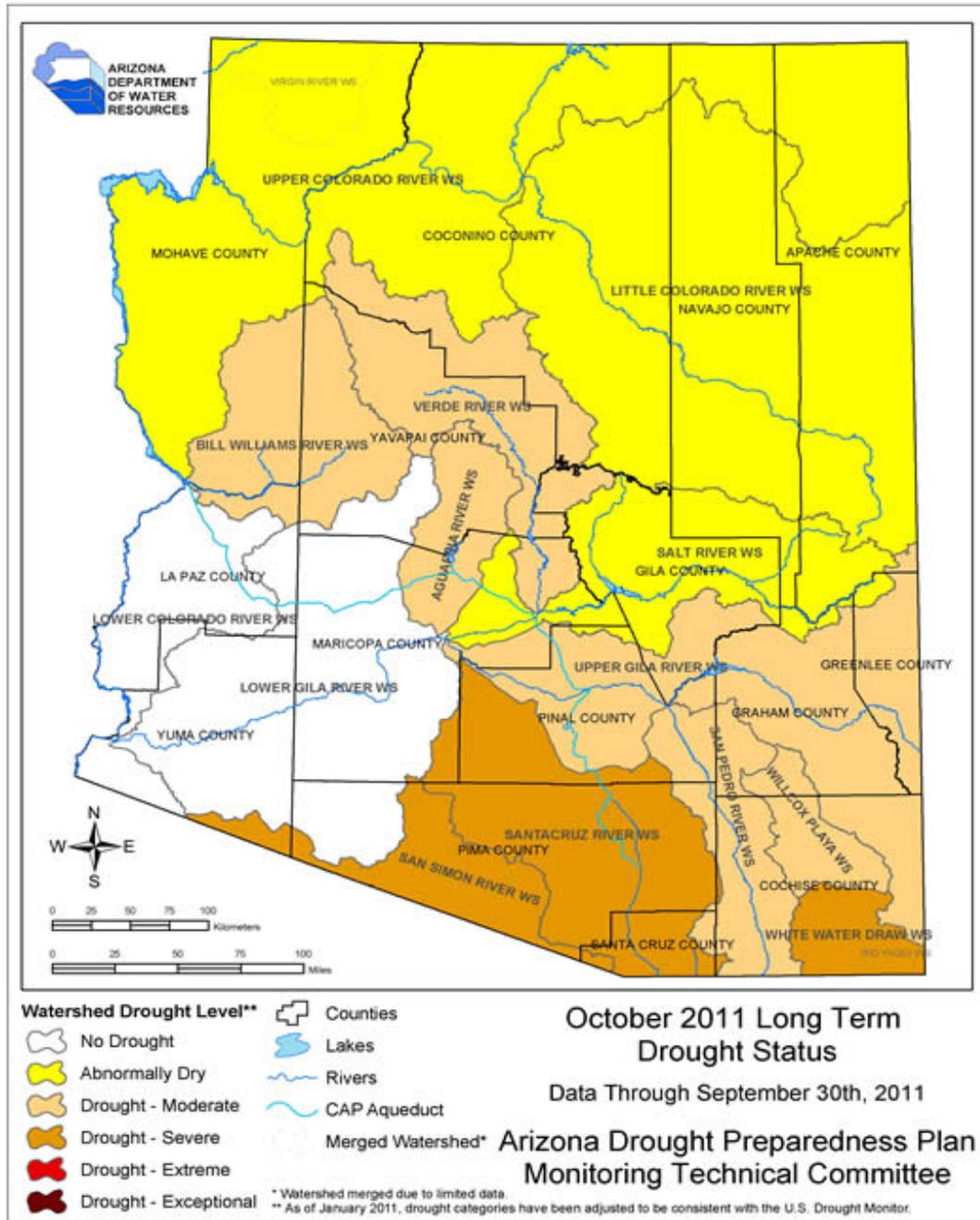


Figure 4.3: Long-Term Drought Status Graphic from Arizona Department of Water Resources October 2011 Drought Monitor Report

Tucson Water's drought indicators do not include specific climate or environmental variables because the state already monitors these indicators and announces drought conditions throughout the state. Instead, the Utility will rely on the state's declaration of drought (any stage above normal) within the Santa Cruz Watershed to trigger a Stage 1 drought response level within the Tucson Water service area.

Local System Indicators

Local system indicators are measures specific to Tucson Water's customer use patterns and water system that are not only useful in good resource management practices, but also provide a means of forecasting potential system impacts related to drought, and in assessing the implementation of drought response measures. Local system indicators include production capacity indices for both potable and reclaimed water, an aquifer storage index, and GPCD. A discussion on the selection and development of Tucson Water's local system indicators is included in Appendix A.

DROUGHT TRIGGER MECHANISMS

The System Assessment Team assigned guidelines, rather than rigid values, to the regional and local system indicators that can be used to trigger declaration of drought response stages. The triggers assigned to local system indicators will generally function in combination with another trigger, such as the ADMTC's declaration of drought in the Tucson region--these are primarily "advisory" triggers. However, certain triggers will, by themselves, initiate, elevate, or terminate drought response stages--these are "mandatory" or "hard line" triggers. For example, reductions in Colorado River water supply declared by the Secretary of the Interior or reductions in Central Arizona Project water supply declared by the State of Arizona will trigger changes in drought response stages regardless of the values of other drought indicators. The System Assessment Team will regularly monitor drought indicators and advise the Director when any indicator requires closer monitoring or when a trigger point has been reached for a specific drought response stage.

DROUGHT RESPONSE STAGES AND RESPONSE MEASURES

Tables 4.1 through 4.4 describe response actions City departments and Tucson Water customers will be asked or required to do to reduce water demand during drought response Stages 1 through 4. Drought response measures supplement rather than replace ongoing water conservation and education programs. One or more response actions may be implemented when a drought response stage is declared. Additional actions may be implemented if needed based on continual monitoring of local system indicators and other tools such as the GPCD. Specific conservation measures included in Tucson

Water's drought response actions were developed based on the following general principles:

1. Emphasize the need for visible leadership from City-maintained facilities.
2. Reduce or restrict highly visible, non-essential uses of water.
3. Avoid or minimize economic impacts to the community except under extreme conditions.
4. Work with large commercial water users to determine their own operational strategies for reducing water use well in advance of implementing advanced drought response stages.
5. Continue to proactively educate all customers on the importance of using water efficiently regardless of climatic conditions.
6. Ensure that any water restrictions do not impact community health and safety.

TABLE 4.1

STAGE 1

Trigger: Either one or both of the following: a severe and sustained drought on the Colorado River Watershed or any declaration of drought status above normal by the ADMTC will trigger a Stage 1 drought response.

Theme: Continuation of baseline conservation program (all stages--Appendix B). Public notification and education on drought issues for customers and a requirement that City Departments initiate plans to review (audit) a representative sample of water to maintain and/or increase efficiency. Self-administered water audits at all non-residential facilities are voluntary during this stage, with incentives offered during later stages for conducting and implementing conservation measures.

City of Tucson	<ul style="list-style-type: none">• Require City departments to self audit a representative sample of their facility's water use to determine if there is conservation potential beyond existing water-efficient practices.• Tucson Water continues or accelerates ongoing operations such as well drilling and well maintenance and other system maintenance programs to reduce system losses (meter replacement, leak detection).
Residential Customers	<ul style="list-style-type: none">• Continue baseline conservation program (Appendix B).• Public notification through local and social media and/or water bill inserts.• Implement an information program designed to specifically address the drought situation and need for voluntary water reductions (e.g., WaterSmart program).
Multi-Family Customers	<ul style="list-style-type: none">• Implement Stage 1 measures for residential customers and may include:• Conduct voluntary self-audits and develop water budgets for possible exemptions from mandatory restrictions in Stage 2. For example, utilizing the WaterSmart business program and informing customers how to implement business specific voluntary measures.

Commercial Customers	<ul style="list-style-type: none"> • Implement Stage 1 measures for multi-family customers and may include: • Encourage customers to implement business-specific voluntary measures (Examples: encourage restaurants to serve water only upon request or ask plant nurseries to promote the sale of low-water-use vegetation).
Industrial Customers	<ul style="list-style-type: none"> • Implement Stage 1 measures for commercial customers.
Reclaimed Water Users	<ul style="list-style-type: none"> • Continue customer education on efficient-water-use especially related to drought conditions. • Voluntary self-audits and developing water budgets to potentially gain exemptions from mandatory reductions in advanced drought response stages. • Tucson Water staff prepares a methodology to monitor wastewater treatment plant flows and calculate reclaimed water customer reductions for later drought stages if approved water budgets are not implemented.

TABLE 4.2

STAGE 2

Trigger: A declaration by the Secretary of the Interior of a shortage on the Colorado River will result in a reduction in Central Arizona Project supply to excess uses, agricultural and other non-municipal users and will trigger a Stage 2 drought response level. If ADWR has declared a drought response stage above normal for the Santa Cruz Watershed, local system indicators may also trigger progression to Stage 2 drought response. In addition, local system indicators will be used to determine the level of initial or continuing response actions needed for this stage.

Theme: Continues all Stage 1 measures. Voluntary reductions by Tucson Water residential and multi-family customers. Implementation of water savings/efficiencies identified during Stage 1 for City Departments. Adds a requirement for self-audits and conservation plans for commercial/industrial customers with a volume usage at/or exceeding 325 Ccf monthly.

City of Tucson	<ul style="list-style-type: none">• City Departments are required to budget for the implementation of cost effective water saving and efficiency practices identified in Stage 1 audits.• Develop a plan for managing public fountains and other non-essential uses within City operations.• Tucson Water continues system operation, maintenance, and well drilling activities initiated during Stage 1 and expedites if warranted.
Residential Customers	<ul style="list-style-type: none">• Continue baseline conservation program (Appendix B).• Consider implementation of voluntary irrigation schedule based on suggested schedule. <p>Encourage voluntary reductions of all uses of non-essentials, including decorative fountains.</p>
Multi-Family Customers	<ul style="list-style-type: none">• Continue Stage 1 measures, implement Stage 2 measures for residential customers, and may include:• Develop and initiate irrigation restrictions with exemptions for sites that have developed water budgets meeting efficiency standards established by Tucson Water.

Commercial Customers	<ul style="list-style-type: none"> • Continue Stage 1 measures, implement Stage 2 measures for multi-family customers, and may include: • Require commercial facilities with monthly demand at/or exceeding 325 Ccf to conduct a self-audit and develop a conservation plan.
Industrial Customers	<ul style="list-style-type: none"> • Continue Stage 1 measures; implement Stage 2 measures for commercial customers.
Reclaimed Water Users	<ul style="list-style-type: none"> • Continue Stage 1 measures. • Prepare customers for potential reductions if wastewater flow reductions occur and if an approved water budget is not implemented. • Potable water will not provide backup supplies to the reclaimed water distribution system.

TABLE 4.3
STAGE 3

Trigger: Continuing shortages on the Colorado River resulting in reductions in CAP deliveries to municipal subcontractors, including the City, will trigger a Stage 3 drought response level. Local system indicators, in combination with an ADWR declared drought in the Santa Cruz Watershed, may also trigger a Stage 3 drought response. Local system indicators will be used to determine the implementation of specific drought response actions during this stage.

Theme: Addition of mandatory customer reductions as conditions warrant. Response actions from Stages 1 and 2 will continue. In addition a drought surcharge may be implemented in Stage 3 if determined necessary to recover additional operating costs including increased public education and enforcement efforts due to drought conditions. A drought surcharge will be developed, based on an annual (October) evaluation of need, as part of Tucson Water’s rate process subject to the same review and approvals as other rates and charges. In cases of severe, prolonged drought, the Mayor and Council may consider implementing a temporary moratorium on new water connections or require implementation of an "offset" program that would reduce water use in one area in order for water use to occur in another (see Glossary). Construction water use will be limited and only on approval by the Water Director.

<p>City of Tucson</p>	<ul style="list-style-type: none"> • Continue Stage 1 and 2 measures. • Restrict washing down of paved areas with exception of public/animal health and safety issues (e.g.,: Reid Park Zoo, Fire and Police, emergency vehicles).
<p>Residential Customers</p>	<ul style="list-style-type: none"> • Continue Stage 1 and 2 measures and may include: • Develop restrictions on vehicle washing except at commercial facilities with reuse features. • Intensify water waste monitoring and enforcement. The City Manager may request or direct assistance from other City staff to monitor and cite repeat violators. • Develop watering restrictions and publicize through Tucson Water website, social media and in public information materials. • Implement interior retrofit on resale of property requirements.

Multi-Family Customers	<ul style="list-style-type: none"> • Continue Stage 1 and 2 measures and Stage 3 residential measures and may also include: • Intensify water waste monitoring and enforcement. • Implement watering restrictions. • Prohibit operation of public fountains. • Prohibit fall overseeding of turf areas unless irrigated with reclaimed water. • Implement interior retrofit on resale of property requirements for pre-1991 construction. • Implement landscape retrofit on resale of property requirements if warranted.
Commercial Customers	<ul style="list-style-type: none"> • Implement all Stage 1 and 2 measures and Stage 3 multi-family measures and may include implementing conservation plan recommendations developed in Stage 2: • Implement twice a week watering restrictions. (Water use linked to some commercial customer's products, e.g. nurseries, can apply for exemption.) • Implement mandatory retrofit on resale of property requirements for interior and exterior uses. • Prohibit operation of fountains at commercial and industrial sites. • Prohibit fall overseeding of turf unless reclaimed water is used. • Restrict washing of sidewalks, driveways, parking lots or any other paved surface.
Industrial Customers	<p>Implement all Stage 1 and 2 measures and all measures for commercial customers and may include implementing conservation plan recommendations developed in Stage 2.</p>
Reclaimed Water Users	<ul style="list-style-type: none"> • Implement all Stage 1 and 2 measures and may include: • Require irrigation restrictions, with potential exemptions for sites that have conducted audits, upgraded systems to meet minimum efficiency standards, and irrigate with budget-based irrigation schedules. • Require signage for facilities that implement budgets stating they are in compliance with current drought restrictions. • Potable water will not provide backup supplies to the reclaimed water distribution system.

TABLE 4.4
STAGE 4

Trigger: Additional reductions to CAP municipal deliveries, inadequate AWBA firming credits to offset the CAP delivery reductions, deteriorating local system indicators, or a failure to significantly reduce water demand in Stage 3 could trigger a Stage 4 drought response.

Theme: Eliminate all non-essential uses. Continuation of drought surcharge if implemented in Stage 3. In cases of severe, prolonged drought, the Mayor and Council may consider implementing a temporary moratorium on new water connections or require implementation of an "offset" program that would reduce water use in one area in order for water use to occur in another (see Glossary). Construction water use will be limited and only on approval by the Water Director.

<p>City of Tucson</p>	<ul style="list-style-type: none"> • Continue all Stage 1, 2, and 3 measures and implement appropriate provisions from the City’s Emergency Water Conservation Ordinance (No. 8461) including but not limited to: • No operation of large-scale water-cooled systems below 2 cycles of concentration. • No outdoor irrigation (or implementation of further reduced watering schedule at the discretion of City Manager and Mayor and Council) • No washing of paved areas with any pressurized water source except in the case of meeting health and safety issues. • No use of any water-based play apparatus connected to a pressurized water source. • No restaurants and other food service establishments will serve water to their customers unless water is specifically requested by customers. • No operation of outdoor misting systems to cool public areas. • No filling of new swimming pools, fountains, spas, or other exterior water features, including no draining and refilling of existing exterior water features. • No washing of autos, trucks, trailers, and other types of mobile equipment except at facilities equipped with wash water recirculation systems, and for vehicles requiring frequent washing to protect public health, safety, and welfare.
<p>Residential Customers</p>	<ul style="list-style-type: none"> • Continue Stage 1, 2, and 3 measures and implement appropriate provisions from the City’s Emergency Water Conservation Ordinance (No. 8461) including but not limited to:

	<ul style="list-style-type: none"> • No outdoor irrigation, or establish an irrigation schedule (discretion of City Manager and Mayor and Council). • No washing of paved areas with any pressurized water source except in the case of meeting health and safety issues. • No use of water-based play apparatus. • No filling of new swimming pools, fountains, spas, or other exterior water features. Existing pools may be topped off to maintain water level but may not be refilled if drained. • No washing of autos, trucks, types of mobile equipment except at facilities with wash water re-circulating systems.
Multi-Family Customers	<ul style="list-style-type: none"> • Continue Stage 1, 2, and 3 measures and include Stage 4 measures listed for residential customers.
Commercial Customers	<ul style="list-style-type: none"> • Continue Stage 1, 2, and 3 measures and include Stage 4 measures for multi-family customers. • No operation of large-scale water-cooled systems below 2 cycles of concentration. • No restaurants and other food service establishments will serve water to their customers unless specifically requested by customers. • No operation of outdoor misting systems to cool public areas.
Industrial Customers	<ul style="list-style-type: none"> • Continue Stage 1, 2, and 3 measures in addition to appropriate provisions under Stage 4 for Commercial Customers.
Reclaimed Water Users	<ul style="list-style-type: none"> • Continue Stage 1, 2, and 3 measures.

Customer Notification

Upon approval by the City Manager and/or Mayor and Council, the Director shall instruct the Utility's Public Information Office to notify customers of the stage of drought response. Declaration of any drought response stage will initiate public education and information programs to advise and educate customers on potential drought impacts in the Tucson Water service area and the need for possible conservation measures. Public notification will be made through various channels including but not limited to media releases and water bill inserts.

Enforcement

Enforcement of Ordinance 10380 will be done by Tucson Water's "Water Cop" staff. Additional Tucson Water staff may be temporarily assigned to enforcement if conditions warrant. The City Manager is authorized to designate additional City employees to assist in the enforcement of the Plan as authorized through the ordinance. Enforcement assistance will be coordinated with the Water Director.

Violation

Violations of Ordinance 10380 will result in a written notice placed on the property where the violation occurred. A duplicate notice will be mailed to the person who is regularly billed for the water service where the violation occurs, and to any person known to the Department who is responsible for the violation or its correction. The notice will describe the violation and order that it be corrected, ceased, or abated immediately or within such specified time as the Department determines is reasonable under the circumstances. The notice of violation will include a description of the possible fees and associated penalties. If the order is not complied with, the Department may disconnect the service where the violation occurs and the then current disconnection charge will be applied to the customer account. Reconnection of any service disconnected for non-compliance will require payment of the then current complete new service connection charge in addition to other fees or charges imposed by this ordinance for disconnection of service.

In addition to being grounds for discontinuation of service, violation of any provision of this article shall be a civil infraction. An individual or corporation convicted of violating provisions of this ordinance will be assessed a civil penalty of not less than \$250 or more than \$1,000 per violation as determined by the Court upon review of the Utility's recommendation based on a description of the violation.

Essential Uses

Essential uses that are exempted from drought restrictions include but may not be limited to:

- Any use to maintain the health, welfare, and safety of Tucson Water customers, City residents, and visitors, including hospitals, other health care facilities, and fire departments;
- Any use to maintain public sanitation, including washing of sanitation trucks, trucks used to carry food or other perishables, and commercial establishments that must wash paved areas for sanitation purposes.

Variances

The Director, or designee, is authorized to review special cases within which strict application of the ordinance would result in serious hardship to a customer. A variance may be granted only for reasons involving health, safety, or economic hardship. Application for variance must be made on a form provided by the Director. The Utility will charge a fee to process a variance request (Appendix F).

DROUGHT RESPONSE STAGE TERMINATION

When the conditions warranting declaration of Drought response Stage 1 or 2 no longer exist, the Director will advise the City Manager that the drought response stage should be terminated or reduced. The Manager will declare the change or termination of Stage 1 and 2. When the conditions warranting declaration of Drought Response Stage 3 or 4 no longer exist, the Director will recommend the change or termination of the drought response stage to the City Manager and the Mayor and Council. Changes in, or termination of, Drought Response Stage 3 and 4 will require the approval of the Mayor and Council. Response actions will be reduced to the appropriate level as drought response stages are terminated or reduced.