NORTH MARIN
WATER DISTRICT

999 Rush Creek Place
P.O. Box 146
Novato, CA 94948

PHONE
415.897.4133

FAX
415.892.8043

EMAIL
info@nmwd.com

WEB
www.nmwd.com

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Grant Davis, General Manager
Sonoma County Water Agency
404 Aviation Boulevard
Santa Rosa, CA 95406

Re: North Marin Water District Comments on SCWA May 2010 Draft Water Supply Strategy Action Plan

Dear Mr. Davis:

Thank you for the opportunity to comment on the subject comprehensive action plan. North Marin Board of Directors has reviewed the Plan and offers the following comments:

1. Page 4, Technical Advisory Committee (TAC) Priorities

It's noted that at the November 2, 2009 Water Advisory Committee meeting, the WAC considered the TAC priorities and narrowed them to five. Priority 1 was restated to read:

"Protect water quality and restore reliability of current water supply and current transmission system capacity (75,000 acre feet per year and 92 mgd respectively)."

It is suggested that the Water Advisory Committee priorities be stated for comparison with the SCWA goals, and the correction noted above be made.

2. Page 6, Water Supply Strategy One – Address Dry Creek Summer Flows

North Marin believes that a priority action should be added to seek federal funding to carry out the Biological Opinion requirements on Dry Creek. Over time we have understood from SCWA that it is difficult to engage the Army Corps of Engineers to pay attention to the Russian River System and its funding needs. Thus, North Marin believes this should be a Top Priority Action.

3. Page 6, Water Supply Strategy 1, Immediate Action 2 – Reduce Peak Demand on Transmission System

This action seems out of place, and it's suggested to include it in Water Supply Strategy 9, Integrated Water Management. Additionally, we are not sure actions B and C will reduce peak demand or to what extent any listed action will reduce peak demand to have a material impact on Dry Creek summer flows. For Project B: Storage – Groundwater Banking Feasibility Study, any surface water banked to groundwater will still have to be pulled out and delivered through the transmission system in the summer months. And for Project C: Retrofit/Conservation, we believe this is a base demand reduction and will not significantly impact peak demand.

4. Page 7, Water Supply Strategy 1, Long Term Action 2 – In the event that the habitat enhancement efforts are unsuccessful, build Dry Creek Bypass Pipeline

It's our understanding that the Biological Opinion will require a bypass pipeline by 2021 if the first three miles of restored Dry Creek is found to be unsuccessful by NMFS and CDFG. We believe this is important and should be stated in the Long Term Action status. Sufficient time should be scheduled to enable the completion of the project requirements by the 2021 deadline.

NMWD also recommends adding a Near Term Action to evaluate the cost effectiveness of constructing the by-pass pipeline earlier in lieu of pursuing the second and third miles of Dry Creek habitat enhancement.

5. Page 8, Water Supply Strategy 2, Modify Operation of Russian River System – Immediate Action One, Modify D1610 minimum instream flow requirements as required by BO and make technical adjustments to existing water rights. E. Project: Submit Interim Change Petition for Summer 2010 and Complete State Board Requirements.

It's our understanding that per the Biological Opinion, interim change petitions are required through the summer of 2016 for the Russian River Estuary operations.

6. Page 9, Water Supply Strategy 2; Modify Operation of Russian River System, Immediate Action Three, Four and Five

We believe these are Strategy Nine Actions (Implement Integrated Water Management), but related to agricultural activities.

7. Page 9, Water Supply Strategy 2, Immediate Action Five: Support enhanced weather forecasting for frost protection and irrigation by agriculture.

The project is to provide funding to the Winegrape Commission for a more sophisticated weather forecasting service ostensibly through the water contractors. What is the Water Contractor funding requirement? Is this a one-time contribution or are there annual cost involved and what fund will water contractor dollars come from?

8. Page 10, Water Supply Strategy Two, Immediate Action Eight, Agency Water Rights Reporting.

How is this a water supply strategy? Each water right holder in California has an obligation to report to the State Water Resources Control Board, and it is not clear what the intent of the reporting as noted in this action will have on modification of the Russian River system operations.

9. Page 10, Water Supply Strategy Two, Long Term Action One, Address Potter Valley Diversion Issues, B. Project: Modify Storage Curve

SCWA doesn't control Lake Pillsbury operations and it's not clear how the storage curve modification can be achieved as currently stated.

10. Page 11, Water Supply Strategy Three, Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection, Immediate Action Two: Support development of Hydrometeorology Test bed (HMT) for the Russian River basin. A. Project: Support Federal Partners

The action states to support federal agencies in installing additional weather sensors to provide more accurate forecasting. Can this be combined with Water Supply Strategy Two, Immediate Action Five (see comment 7) for cost savings not only for Water Contractors but for grape growers and Sonoma County Winegrape Commission.

11. Page 11, Water Supply Strategy Three, Near Term Action One: Develop Adaptation Measures, A. Project: Develop Reliability Actions

It's not clear what this action contemplates. Will the actions to be developed be physical improvements or operational measures and what costs may be involved?

12. Page 13, Water Supply Strategy Five, Develop Water Smart Development (WSD) Standards, Immediate Action One, Develop countywide guidance manual...

This would seem to be a better fit as part of Water Supply Strategy Nine, Implement Integrated Water Management.

13. Page 14, Water Supply Strategy Six, Work with Stakeholders to Promote Sound, Information-Based Water Supply Planning Programs

This Strategy Six relates only to groundwater, thus, it is suggested that the title state these are "Information-Based Groundwater Supply Planning Programs." Additionally, North Marin suggest a Near Term Action be added to consider assisting Marin County in responding to recent legislation requiring groundwater-level monitoring in Bulletin 118 identified basins. A similar effort to that proposed in Near Term Action One, but proposed on a cost reimbursement basis from Marin County.

14. Page 16, Water Supply Strategy Seven, Improve Transmission System Reliability, Immediate Action One: In consultation with Water Contractors, develop plan to provide consistent funding for natural hazard reliability projects.

Listed is long-term projects C. RDS Liquefaction Mitigation and G. Mirabel Dam Response Plan. It's noted that the rubber dam is currently 15 years old. The prior rubber dam was replaced at 21 years of age, and it's suggested that a complete replacement be included in the reliability projects, not just seismic mitigation.

Additionally, SCWA has authored studies and reports on the Adequacy of the Petaluma Aqueduct since 1998 which identified that water demands on the Petaluma Aqueduct have reached the capacity of the aqueduct. The South Transmission System Project, to benefit Transmission System Reliability for Petaluma Aqueduct customers should be classified as a Reliability Project and included herein.

15. Page 19, Water Supply Strategy Eight, Take Advantage of Energy and Water Synergies, Near Term Action One: Pursue revenue opportunities associated with renewable energy efficiency projects, C. Project: Solar

NMWD recommends the SCEIP concept be expanded to Water Contractor solar generation at their facilities.

16. Page 20, Water Supply Strategy Nine, Implement Integrated Water Management, Near Term Action One: Consult with Water Contractors to evaluate feasibility of base demand system instead of continued peak summer demand system.

What would be the pros and cons for a base demand system for both SCWA and the Water Contractors?

17. Page 21, Water Supply Strategy Nine, Implement Integrated Water Management, Near Term Action Three: Develop ongoing process with Water Contractors to monitor impacts of land use decisions on water supply; and Long Term Action One: Conduct periodic updating of demand projections by Water Contractors in advance of UWMP updates.

The Urban Water Management Plan is updated each five years. Monitoring more frequently

will be costly and not likely to offer insight into land use decisions since water demand from year to year is very weather dependent.

18. Page 22, Water Supply Strategy Ten, Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning; Near Term Action Three: Study possibly Agency governance structures.

NMWD suggests that this become an Immediate Action. Surveys of elected officials have already been authorized by SCWA Board of Directors, and it's important to determine whether there is interest in a governance structure change.

19. Page 23, Water Supply Strategy Ten, Long Term Action One: Develop comprehensive data management system that builds off demonstration project and includes date from other non-water supply sources and models. A. Project: To be determined

It's not clear what purpose this action serves. Strategy Ten currently has a demonstration project as an Immediate Action and extension of the demonstration project including AMR to other water contractors as a Near Term Action. The SCWA staff has plenty to do as it is, and the benefit of a "To Be Determined" project to expand the data management system is a mystery.

20. Page 25, Water Contractors' Actions

Please add two projects under the North Marin Water District list:

C. Stafford Lake Solar Project

A new solar energy production facility to power Stafford Lake Water Treatment Plant, Status: Evaluating project proposals; Scheduled Completion: Fall 2010; Involved Parties: NMWD, SPG Solar, PG & E.

And include

D. NMWD Energy Efficiency Project

Enlarge North Marin aqueduct to avoid pumping from Kastania Pump Station. The aqueduct requires relocation due to the Marin-Sonoma Narrows Highway 101 Widening Project. Status: Environmental Review ongoing; Involved Parties: NMWD, Transportation Authority of Marin, Sonoma County Transportation Authority and Caltrans.

Sincerely,

Jack Baker
President
North Marin Water District

Cc: TAC Members
Jay Jasperse
Ann DuBay

CD/rr

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