



commentletters@waterboards.ca.gov

January 28, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
PO BOX 100
Sacramento, CA 95812-10100

Re: 2/2/16 BOARD MEETING (Conservation Extended Emergency Regulation)

Dear Chair Marcus and Members of the State Board:

Thank you for the opportunity to provide input on the proposed extended Emergency Urban Water Conservation Regulation (Regulation). I am writing on behalf of the Sonoma Marin Saving Water Partnership (SMSWP), which consists of the following: the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, and Petaluma; the Town of Windsor; the North Marin, Marin Municipal and Valley of the Moon Water District's; the Sonoma County Water Agency; and Cal American Water – Larkfield District. The SMSWP provides the following comments on the proposed Regulation:

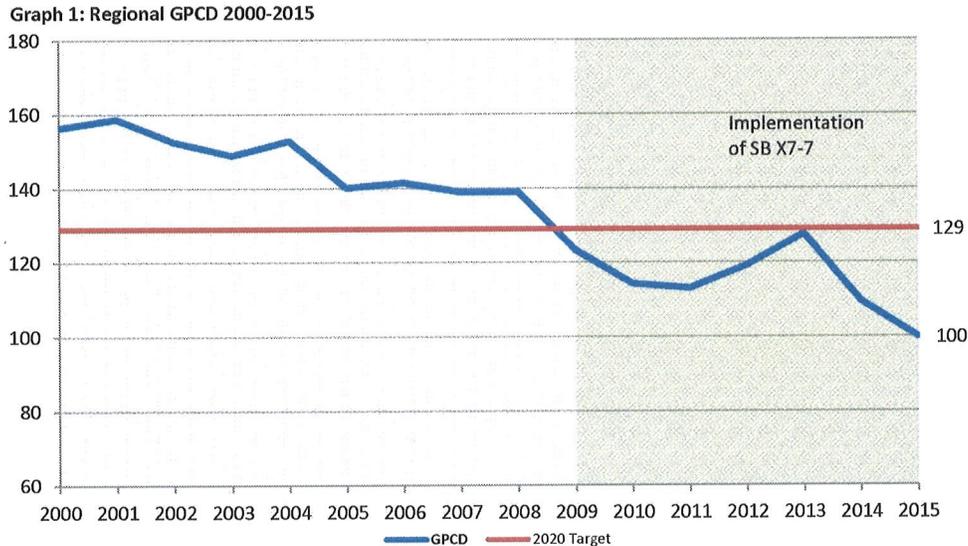
1. The SMSWP again requests that a regional compliance option be authorized in the Regulation. Details about the regional compliance option were presented to the State Board at your workshop on December 7, 2015 and we continue to believe that this option has merit and should be included in the Regulation.
2. The SMSWP requests the State Board include a 4% conservation standard pursuant to Regulation Section 865(c)(2) for agencies in regions that have water storage at or above 90% of reservoir capacity on April 1, 2016. The conservation standard for agencies in regions could be proportionately higher if water storage levels on April 1st are below 90%.

Regional Compliance

Established in 2010, the SMSWP maintains a regional commitment to work collaboratively on the implementation of appropriate water use efficiency, education and outreach programs in Sonoma and Marin counties. A regional alliance of SMSWP members was formed to comply with SBx7-7, the Water Conservation Act of 2009. SBx7-7 calls for a 20% reduction in water use by the year 2020. The regional alliance was developed pursuant to the Department of Water Resources methodology for calculating baseline and compliance urban per capita water use, for agencies that receive water from a common wholesale water supplier, in this case the Sonoma County Water

Agency (SCWA), also a SMSWP signatory.

The graph below demonstrates the long term progress that our region and the SMSWP have made towards incorporating water use efficiency in Sonoma and Marin counties.



Since the year 2000, the SMSWP has reduced per capita water use in the region by over 36%, while experiencing a 10% increase in population. To date, water production savings since June 2015 in accordance with the current Regulation among the SMSWP partners has exceeded the cumulative Conservation Standard on a regional basis by 5% (see table attached). We understand that compliance with the extended Regulation will continue to be measured from June 2015 and appreciate that the savings noted above which exceeds the Conservation Standard for individual agencies will be rolled over and credited during the extension period.

Water Supply Storage Conservation Standard

Water supply for the SMSWP region is derived from surface water reservoirs. Current water supply in local reservoirs as of January 26, 2016 is nearing capacity: Lake Mendocino (97%), Lake Sonoma (93%), Marin Municipal Water District reservoirs (97%) and Stafford Lake (75%). The SMSWP is pleased to know that State Water Board staff is committed to monitoring and evaluating available data on reservoir storage levels, intends to report back to the State Water Board in March and April 2016, and if conditions warrant, promptly bring a proposal to adjust or eliminate the Regulation. The SMSWP requests that the Regulation include a trigger enabling the Conservation Standard to be reduced to a 4% Conservation Standard when water supply, as determined by reported water storage levels, are sufficient to meet the region's needs. Since the SMSWP region is not hydraulically connected to any other area of the state, adherence to the Conservation Standard now proposed in the extended Regulation will reduce water sales revenue further, requiring

significant rate increases and add to the conundrum expressed by our retail water customers who have achieved significant water savings to date, yet will be faced with increased water costs to backstop the revenue loss; all while sufficient water storage is available.

Furthermore, the SMSWP and member agencies have expended significant resources to educate retail water customers to help them better understand the complexities of managing the region's water supplies. The results achieved from this effort are customers who are savvy and question the validity of a continued drought declaration when reservoirs are full in our region. Declarations of water shortage emergencies must be factual otherwise water suppliers risk losing credibility which can result in customer complacency and non-compliance.

The Sonoma Marin Saving Water Partnership respectfully requests you consider these items for inclusion in any extended Regulation.

Sincerely,



Chris DeGabriele
General Manager
North Marin Water District,
Chair Technical Advisory Committee to SCWA

State Water Resources Control Board Conservation Standard Tracking for the Sonoma-Marín Saving Water Partnership

Table 1: Monthly Water Use Relative to 2013 Benchmark

| Water Retailer | December 2015 (Gallons) | 2013 Benchmark (Gallons) | Relative to 2013 Benchmark | Conservation Standard | December 2015 GPCD* |
|--------------------|----------------------------|-----------------------------|-------------------------------|--------------------------|------------------------|
| Cal Am | 15,966,699 | 19,473,000 | 18% | 25% | 57 |
| Cotati | 18,305,462 | 20,919,634 | 12% | 20% | 81 |
| Marin Municipal | 465,693,215 | 615,207,494 | 24% | 20% | 80 |
| North Marin | 145,137,294 | 182,000,000 | 20% | 24% | 76 |
| Petaluma | 165,206,457 | 199,520,416 | 17% | 16% | 87 |
| Rohnert Park | 99,840,746 | 116,000,000 | 14% | 16% | 74 |
| Santa Rosa | 366,596,990 | 511,526,234 | 28% | 16% | 70 |
| Sonoma | 32,143,572 | 35,224,539 | 9% | 28% | 90 |
| Valley of the Moon | 46,221,964 | 75,151,115 | 38% | 20% | 66 |
| Windsor | 55,978,269 | 71,488,219 | 22% | 16% | 66 |
| SMSWP Total | 1,411,090,669 | 1,827,037,651 | 23% | 19% | 77 |

* GPCD is provided as information only

Table 2: Aggregate June 2015 to Current Month Relative to 2013 Benchmark

| Water Retailer | Aggregate June 2015 to Date (Gallons) | 2013 Benchmark (Gallons) | Relative to 2013 Benchmark | Conservation Standard |
|--------------------|---|-----------------------------|-------------------------------|--------------------------|
| Cal Am | 148,617,378 | 201,135,000 | 26% | 25% |
| Cotati | 158,875,992 | 210,239,065 | 24% | 20% |
| Marin Municipal | 4,629,632,355 | 5,895,307,276 | 21% | 20% |
| North Marin | 1,514,641,342 | 2,158,000,000 | 30% | 24% |
| Petaluma | 1,551,360,318 | 2,050,929,538 | 24% | 16% |
| Rohnert Park | 877,497,192 | 1,066,000,000 | 18% | 16% |
| Santa Rosa | 3,429,143,822 | 4,640,213,418 | 26% | 16% |
| Sonoma | 358,747,744 | 493,449,850 | 27% | 28% |
| Valley of the Moon | 491,867,848 | 693,796,341 | 29% | 20% |
| Windsor | 635,954,273 | 837,384,402 | 24% | 16% |
| SMSWP Total | 13,796,338,265 | 18,045,319,890 | 24% | 19% |