

Water Supply Strategy Action Plan - SCWA Response to Comments from Contractors

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
1	Cotati	1	1	Address Dry Creek Summer Flows	_General		It is recommended that an immediate action be added to identify and secure outside funding for Biological Opinion-related work, including ensuring that the US Army Corps of Engineers (ACOE) contribute their share of the Biological Opinion Costs. To increase the chances of securing the ACOE contribution in a timely manner, the City suggests that SCWA act as a coordinator in this effort by informing us of when and how we can better assist, including providing template letters, resolutions, and contact information for the appropriate officials. In parallel, it is recommended that SCWA pursues grants and any other outside funding partners to defray the cost of the projects. In these efforts, the City is ready to assist in any way possible.	Action initiated and has been included in revised action plan.
2	North Marin Water District	1	1	Address Dry Creek Summer flows	_General		Comment 2: 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.	Action initiated and has been included in revised action plan.
3	North Marin Water District	1	1	Address Dry Creek Summer flows	_General		Comment 4: 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.	Constructing Dry Creek bypass pipeline in lieu of second and third miles of habitat enhancement would not comply with the Biological Opinion (BO). In response to comment #16 by Windsor, contingency planning will be initiated upon conclusion of Dry Creek bypass pipeline feasibility and engineering studies and first mile of habitat enhancement. Action plan modified to relect this new activity.
4	Santa Rosa	1	1	Address Dry Creek Summer Flow	_General		The SRCC believes that seeking federal funding and considering bond funding should be a high priority for implementation of the requirements of the BO.	Action initiated and has been included in revised action plan.
5	Windsor	1	1	Address Dry Creek Summer Flow	_General		Add an action to seek federal funding to help offset the costs of projects/studies required to fulfill BO requirements.	Action initiated and has been included in revised action plan.
6		1	1	Address Dry Creek Summer Flows	_General		Add another immediate action item to seek federal funding to carry out the Biological Opinion requirements on Dry Creek.	Action initiated and has been included in revised action plan.

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7	Windsor	1	1	Address Dry Creek Summer Flow	Immediate Action 2	Reduce peak demand on transmission system.	The Town relies on peaking operations from the RR water system as part of its operations. Taking this away could result in significant infrastructure construction costs as the Town will have to construct additional storage to handle the daily peaks. Furthermore, we do not yet know if the groundwater basin underlying the Town has sufficient capacity to meet the Town's peaking requirements. Finally, water demands with the Town are fairly hard; possible additional conservation savings may be insufficient to offset the loss of peaking capabilities.	The Agency acknowledges comment and supports Town's efforts to diversify its portfolio to increase the reliability of its water supply. Constructing new pipelines, storage tanks, and water supply facilities to provide water for a few weeks a year is expensive. It will be costly to maintain a Russian River system that responds to an accentuated summer peak demand. Summer peaking need not be eliminated, but reducing in peak summer demand will result in cost benefits (e.g., deferring or downsizing expensive capital projects) and reduced risks to water supply reliability (e.g., compliance with Endangered Species Act). Because part of Windsor's water supply system consists of direct diversion of Russian River water below the confluence of Dry Creek, such diversions also impact the summer releases from Warm Springs Dam. Immediate Action 2 has been modified to reflect that it relates to those peak demands that affect releases from Warm Springs Dam.
8	Santa Rosa	1	1	Address Dry Creek Summer Flow	Immediate Action 1	Habitat enhancement	The SRCC suggests adding a project under this immediate action for SCWA to work with NMFS & CDFG and other stakeholder to define success for the habitat enhancement along Dry Creek. The council also recommends including additional detail and description of the Phase 1 & Phase 2 studies referred to in this action item, as well as adding a Near Term Action describing the needed environmental work and seeking the funding needed for implementation of the conclusions of the feasibility studies.	Language has been added to Action Item that reflects existing process in which NMFS, CDFG and Water Agency are jointly defining success for Dry Creek habitat enhancements. Additional detail will be provided in online version of Water Supply Strategies Action Plan.
9	Cotati	1	1	Address Dry Creek Summer Flows	Immediate Action 2	Reduce peak demand on transmission system.	This appears to be a better fit under Strategy Seven (Improve Transmission System Reliability), as these actions are generally intended to reduce peak demands. However, the water retrofit and conservation projects can reduce demand all year, but there should be a focus on outdoor water use efficiency to additionally target peak demand reductions.	The Agency agrees that reducing peak demand does increase the physical reliability of the transmission system. The plan links Strategy 7 (now Strategy 6, Immediate Action 3) to this action.

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10	North Marin Water District	1	1	Address Dry Creek Summer flows	Immediate Action 2	Reduce peak demand on transmission system.	Comment 3: 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.	<p>The Agency agrees that peak demand reduction measures are linked to Strategy 9 (now Strategy 8) and has included text in the action plan that identifies this linkage.</p> <p>In regard to Project B (Groundwater Banking), a benefit would be realized if water is stored near or within some water contractor service areas. Also a regional program could reduce the extent the transmission system is impacted by additional peak demand, instead of diverting peak water from the river and transmitting it through the entire transmission system.</p> <p>In regard to Project C (Conservation), all conservation helps reduce peak demand. Further, the projects described include conservation methods focused on outside irrigation.</p>
11	Santa Rosa	1	1	Address Dry Creek Summer Flow	Immediate Action 2	Reduce peak demand on transmission system.	The council recommends adding a project to investigate the feasibility of implementing a region wide turf removal program to assist with reducing peak demand.	Comment noted. Proposed action will be included in future budget discussions.
12	Santa Rosa	1	1	Address Dry Creek Summer Flow	Immediate Action 2	Reduce peak demand on transmission system -- Groundwater banking feasibility study.	The Council suggests that information on the estimated entire life-cycle cost of implementing groundwater banking, including capital costs, operational costs, energy costs and environmental costs, including but not limited to potential water quality impacts and greenhouse gas emissions, as well as information on the potential reduction in peak demand be included for this project.	The study being conducted by the Water Agency and five water contractors will evaluate many of these issues. Cost estimates will be prepared for developing the pilot study programs, including project improvement capital costs, annual project operation and maintenance costs, including energy requirements. A relatively simple estimate of greenhouse gas emissions could also be conducted based on estimated energy requirements. Reasonable estimates of "entire life-cycle costs" for a full-scale program would not be developed until after the pilot study phase. The study will also evaluate the potential reduction in peak demand from the transmission system.
13	Santa Rosa	1	1	Address Dry Creek Summer Flow	Immediate Action 3	Bypass pipeline feasibility study	The Council recommends including cost estimates and potential funding options for construction the Dry Creek bypass pipeline in the Action Plan.	The feasibility study and the subsequent engineering study will provide cost estimates.

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14	Santa Rosa	1	1	Address Dry Creek Summer Flow	Long Term Action 1	Construct fourth, fifth and sixth miles of DC habitat enhancement.	The Council recommends including cost estimates, based on costs for implementation of the first miles of habitat enhancement, as well as potential funding options for implementation of the fourth, fifth and sixth miles of habitat enhancement along Dry Creek. The Council also recommends providing additional information and detail on this action, including a description of environmental work needed, timeline for implementation, and funding needed.	The Agency will provide initial cost estimates based on best available information for the restoration work as part of the long term financial planning (Strategy 8). As better information becomes available regarding restoration cost, preliminary costs will be updated and refined for long term financial planning efforts.
15	Santa Rosa	1	1	Address Dry Creek Summer Flow	Long Term Action 2	In the event that habitat enhancement efforts are unsuccessful, build DC bypass pipeline.	The Council concurs with NMWD board's comment #4 regarding the DC bypass pipeline and believes that the Water Agency needs to have a contingency plan ready to implement should habitat enhancement be unsuccessful. The Council recommends adding a Near Term Action to evaluate the cost effectiveness of constructing the DC bypass pipeline in lieu of pursuing the second and third miles of DC habitat enhancement.	See responses to comments 10 and 16.
16	Windsor	1	1	Address Dry Creek Summer Flow	Long Term Action 2	In the event that the habitat enhancement efforts are unsuccessful, build Dry Creek bypass pipeline.	We recommend for the Dry Creek Habitat Enhancements to set milestones for evaluating the effectiveness of work along miles 1 through 3. Should the evaluations indicate a below-expectation success rate, the Town would like to see steps taken by the Agency to ensure we are not left in a position where we have a failed Habitat Enhancement project and have not taken adequate planning steps for the Dry Creek Pipeline. The Town Council would like to have formal reports made at Council meetings at the set milestones. Additionally, the Town understands the Agency is planning to complete a Dry Creek Feasibility Study in December of this year to be followed with the completion of an Engineering Study, complete with a construction cost estimate, sometime in the Spring of 2011.	The Water Agency is participating in facilitated process with NMFS, the Corps and CDFG to define performance criteria. The action plan has been modified to reflect this by adding to Strategy 1: (1) Project C, Immediate Action 1: Developing performance criteria for habitat enhancement; (2) including outreach to water contractors and other stakeholders reporting on the degree of success of habitat enhancement for Immediate Action 1, Project B; Near Term Action 1, Project A; and Long Term Action 1, Project A; and (3) adding Near Term Action 2, Project A: Contingency Planning for the Dry Creek Pipeline if habitat enhancement is unsuccessful.
17	North Marin Water District	1	1	Address Dry Creek Summer flows	Long-term Action 2	In the event that habitat enhancement efforts are unsuccessful, build Dry Creek bypass pipeline.	Comment 4: 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.	See response to comment 16.
18	Santa Rosa	1	1	Address Dry Creek Summer Flow	Near Term Action 1	Construct second and third miles of DC habitat enhancement.	The Council recommends including cost estimates, based on costs for implementation of the first miles of habitat enhancement, as well as potential funding options for implementation of the second and third miles of habitat enhancement along Dry Creek. The Council also recommends providing additional information and detail on this action, including a description of environmental work needed, timeline for implementation, and funding needed.	Cost estimates, timeline and environmental documentation of Dry Creek habitat enhancements are included in the Biological Opinion schedule and budget. These documents will be linked to the online version of the action plan.

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19	North Marin Water District	2	2	Modify operations of Russian River system	Immediate Action 1	Modify D1610 flow requirements as required by the BO and make technical adjustments to existing water rights.	Comment 5: In regard to Project E, 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.	The revised action plan reflects the need for interim change petitions through the summer of 2016 to reduce Russian River flows (both for enhancement of Chinook habitat in upper river and to support estuary management in lower river).
20	Santa Rosa	2	2	Modify Operation of Russian River System	Immediate Action 1	Modify D1610 instream flow requirements as required by BO and make technical adjustments to existing water rights -- Demand Analysis	The Council believes that in order to meet the current and future demands of our region and adequately manage the RR system, the Water Agency needs to have an understanding of the amount of water that is illegally diverted from DC and the RR. The Council recommends including an estimate of illegal diversions in the water demand analysis modeling.	Because the Water Agency includes all existing diversions in its water demand analysis modeling, any diversions that may be illegal are included. The Water Agency is not the appropriate entity to enforce compliance with state water law. Water rights are regulated by the State Water Resources Control Board. Recognizing the need for increased water rights reporting and enforcement, 2009 legislation authorized 25 new enforcement positions at the SWRCB and required increased water rights reporting requirements and penalties. In addition, in May 2010, the SWRCB adopted its Policy for Maintaining Instream Flows in Northern California Coastal Streams, applicable in the Russian River watershed. This policy includes an enforcement element. A better understanding of the scope of illegal diversion may follow implementation of the new legislation and policy. For planning purposes the Water Agency will assume continuation of existing water uses.
21	Santa Rosa	2	2	Modify Operation of Russian River System	Immediate Action 1	Modify D1610 instream flow requirements as required by BO and make technical adjustments to existing water rights -- Interim Change Petitions	The Council suggests expanding the project to include the annual submission fo the interim change petitions and to include collaboration and coordination with the Water Contractors on this project before submittal by the Water Agency.	Annual submission of interim change petition has been added. The Water Agency expects to continue to discuss these annual petitions with the water contractors as Water Agency staff did before filing the 2010 petition.
22	Santa Rosa	2	2	Modify Operation of Russian River System	Immediate Action 3	Work with grape growers to support development and implementation of ag water conservation strategies.	The Council supports water conservation implementation for all water users and recommends that the Water Agency include Near Term Actions for implementation of the recommendations from the vineyard irrigation and frost protections water conservation pilot studies.	Comment noted. Proposed action will be included in future budget discussions.

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23	North Marin Water District	2	2	Modify operations of Russian River system	Immediate Action 3-5	Work with grape grower on ag conservation, water management, and forecasting.	Comment 6: We believe these are Strategy Nine Actions (Implement Integrated Water Management), but related to agricultural activities.	The strategies are interrelated and most activities could be listed under a number of headings. In this case, modifying operation of the Russian River system by reducing instream flows, as required by the BO, may affect agricultural interests who depend on these flows and interconnected groundwater. System improvements that benefit agriculture will also benefit the Water Agency as it moves through the SWRCB process to amend D-1610 because the SWRCB must balance the needs of all Russian River water users.
24	North Marin Water District	2	2	Modify operations of Russian River system	Immediate Action 5	Support enhanced weather forecasting for frost protection and irrigation by agriculture.	Comment 7: 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?	As shown in action plan Attachment B, there is no water transmission system funding for this project. This is a one-time contribution to provide partial funding for two years of weather forecasting.
25	Petaluma	2	2	Modify Operation of Russian River System	Immediate Action 5	Support enhanced weather forecasting for frost protection and irrigation by agriculture.	This action while important does not preclude Ag users from using the water. It is understood that this information will provide predictive operation of the Upper portion of the Russian River. However, the refinement of the predictive tools beyond what is currently available does not warrant the effort or expense at this time. This item should be moved to Long-term status and await a time when this type of resolution is necessary.	This action was not intended to preclude agricultural water use. Increased coordination and information sharing with agricultural water users as we move to the future with generally reduced river flows during the summer (per the BO) will help all water users more reliably manage this resource. Activities that support this common benefit are in the interest of the Water Agency and its water contractors. Improved weather forecasting will not only assist agriculture in more efficient use of water for frost protection and summer irrigation, but will also assist the Water Agency's river management operations (flow releases and meeting in-stream flow requirements) and management of its diversion facilities. Increased information will help retail water suppliers manage their systems by providing enhanced weather information via the collaboration platform (Strategy 9) to assist preparation for heat waves. This project is not funded by the Water Transmission Fund.
26	Santa Rosa	2	2	Modify Operation of Russian River System	Immediate Action 5	Support enhances weather forecasting for frost protection and irrigation by ag.	The Council concurs with the questions raised in NMWD's Board letter, comment number 7. The Council recommends that the Water Agency provide additional details on how this project is funded and what, if any, cost it being incurred by the Water Contractors to implement this project.	See response to comments 24 and 25.

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27	Petaluma	2	2	Modify Operation of Russian River System	Immediate Action 6	Implement water management in Dry Creek per agreement with Dry Creek property owners.	The City of Healdsburg is also a permitted Dry Creek User and should be addressed as an involved party.	This action relates to implementing the 2009 Revised Amended Agreement with the Dry Creek Agricultural Water Users Corporation. The City of Healdsburg is not a party to that Agreement and is not involved in its implementation. Agency staff recognizes, however, that all Dry Creek water users, whether parties to the Revised Amended Agreement or not, have a role in managing Dry Creek flows.
28	Cotati	2	2	Modify operation of Russian River system.	Immediate Action 8	Agency water rights reporting.	This action could use further clarification to understand the goals.	The immediate goal is to comply with the Water Agency's water rights permits which require that the Agency submit "permittee progress reports" to the SWRCB each year. These reports must identify not only the amount of water the Agency diverts from the Russian River watershed but also the amount of water that the water contractors save through conservation and use from recycled water and groundwater sources. Compiling the required information will be an ongoing effort between the Agency and its contractors. Maintaining current water conservation, and water use information is also critical to water supply planning efforts, including development of urban water management plans and water supply demand modeling necessary for environmental analyses for D1610 changes.
29	North Marin Water District	2	2	Modify operations of Russian River system	Immediate Action 8	Agency water rights reporting.	Comment 8: 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.	See response to comment 28.
30	Santa Rosa	2	2	Modify Operation of Russian River System	Immediate Action 8	Agency water rights reporting.	The Council concurs with the questions raised and comments in NMWD's Board letter, comment number 8. The Council understands this to be a regulatory requirement of the State water Resources Control Board and recommends deleting this action from the Action Plan.	See response to comment 28.
31	Windsor	2	2	Modify Operation of Russian River system	Immediate Action 8	Agency Water Rights Reporting	It is not clear the purpose of this action nor the intended use of the data. The Town already prepares regular reports that incorporates many of these data.	See response to comment 28.

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32	Cotati	2	2	Modify operation of Russian River system.	Immediate Actions 3-7	Work with grape growers on ag conservation, water management, forecasting, Dry Creek agreement. Enhance Lake Mendocino operations.	Although this work with the agricultural community is apparently not funded by the Water Contractors, it is requested that the Water Contractors be given periodic updates on the status of this work, including specific initiatives that are being pursued under these actions due to the potential to affect other projects.	Comment noted. Periodic updates will be provided in SCWA Enews, at WAC and/or TAC meetings.
33	North Marin Water District	2	2	Modify operations of Russian River system	Long term Action 1	Address Potter Valley Diversion issues -- modify storage curve.	Comment 9: SCWA doesn't control Lake Pillsbury operations and it's not clear how the storage curve modification can be achieved as currently stated.	Subsequent to the release of the draft Water Supply Strategy Action Plan, Mendocino County Inland Water and Power Commission (MCIWPC) requested that FERC review language in the Final Order amending PG&E's license to operate the PVP. MCIWPC contends that the model used to evaluate the proposed flow alternatives assumed that PVP could operate at a maximum diversion if the reservoir was in a forced spill and the flood gates could not be lowered to store more water. The Water Agency supports this endeavor and has added this as an immediate action. The target storage curves defined in the FERC Final order amending PG&E's PVP license do not accurately reflect the actual storage capacity of the reservoir or the timing of when flood gates can be lowered to achieve maximum storage in Lake Pillsbury. As a long term strategy, the Water Agency and its municipal customers should be prepared to advocate during the FERC relicensing that proposed target storage curves reflect current and future physical parameters for Lake Pillsbury (i.e., there must be a mechanism for the target storage curves to be adjusted when bathymetric survey data is collected and the reservoir storage is adjusted).

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34	Santa Rosa	2	2	Modify Operation of Russian River System	Long Term Action 1	Address Potter Valley Diversion Issues	The Council believes that this is an important action to address and suggests that the Water Agency determine if there are any immediate or near term actions that need to be included in order to implement this action. In addition, the Council recommends that the Water Agency expand the involved parties to include other stakeholders, such as Friends of the Eel river.	The action plan has been modified to include an immediate action to support the recent MCIWPC request that FERC evaluate the potential discrepancies between the final order and the technical evaluation that served as the basis of the NEPA/CEQA analyses for the final order, as discussed in comment 33. In addition, the Water Agency has moved former long term action 1, project A (Prepare for Potter Valley Project re-licensing proceedings), to near term action 2, project A. In regard to inclusion of specific advocacy groups to this action, the plan notes that although the public is not identified in each action as an "involved party, public involvement is critical."
35	Windsor	2	2	Modify Operation of Russian River system	Long Term Action 1	Address Potter Valley Diversion issues -- modify storage curve.	It is unclear why the Town is expected to participate in modifying the storage curve for Lake Pillsbury; this is outside of its purview.	The water contractors are included in the Potter Valley re-licensing process because Potter Valley diversions are a component of the Water Agency's (and water contractors) water supply.
36	Valley of the Moon Water District	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	_General		Because of the costs and expenses required, this strategy should be eliminated, but may be added back at a future date when the basis for the modeling can be identified with sufficient clarity and certainty so as to eliminate the otherwise necessary speculation and assumptions.	The Water Agency's Board has provided direction on the need to prepare for the possible impacts of climate change on future water supply. The climate change modeling is underway and will provide valuable information about timing and amount of rainfall on local watersheds that impact water management decisions such as reservoir operations.

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37	Petaluma	3	3	Evaluate Potential Climate Change Impacts on Water Supply and Flood Protection	Immediate Action 1	Initiate climate change modeling for Russian River and Sonoma Valley watersheds.	This action neglects the Petaluma River Watershed. Given that this watershed is mentioned in other strategic actions, and its interrelation to regional operations, it should be added to the work effort.	This action is focused on the Russian River Watershed given the Agency's interest in evaluating potential impacts on Russian River system management. The study was extended to Sonoma Valley because of synergies that could be realized with existing programs and models in that region. Given those tools and programs, such an extension could be accomplished in a cost-effective manner. Further, stakeholders in the Sonoma Valley expressed interest in participating in the USGS study. To date, there has not been a similar level of interest expressed by stakeholders in the Petaluma Valley regarding development of such tools and models. The Agency continues to be willing to discuss such opportunities should the city and local stakeholders wish to engage.
38	Windsor	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Immediate Action 1	Initiate climate change modeling for Russian River and Sonoma Valley watersheds.	Will the Water Contractors be expected to help pay for the cost of the climate change down-scaling model development and maintenance? Further, how does the Agency anticipate handling modeling inputs, especially as the Global Climate Modeling that has been currently completed has been inconclusive relative to the potential changes to precipitation in Northern California as a result of climate changes.	As shown in action plan Attachment B, funding is provided through both Water Transmission System funds and non-Water Transmission System funds. The USGS will complete a modeling analysis which will provide a range of potential climate outcomes based on predicted greenhouse gas (GHG) emission scenarios developed with the Parallel Climate Model and the National Oceanic and Atmospheric Administration (NOAA) Geophysical Fluid Dynamics Laboratory CM2.1 model. The study recognizes the differing response to climate change for our region (e.g., fog) from other regions that rely, for example, on the Sierra Nevada snowpack. The study includes leading researchers in coastal climate analysis. Results will provide direct input as unimpaired flows into the Agency's new HEC-ResSim Russian River system management model and will inform long-term planning process. Predicting impacts of climate change is complicated and uncertain but the study uses the best available science. In order to stay current, continued monitoring and refinement of analysis will be required.

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39	North Marin Water District	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Immediate Action 2	Support development of Hydrometeorology Test bed (HMT) for the Russian River basin. A. Project: Support Federal Partners	Comment 10: 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?	Inclusion of weather stations operated by agriculture and others entities to the HMT network is one strategy that is being pursued to demonstrate local support for this effort. The plan has been modified to reflect this.
40	Santa Rosa	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Immediate Action 2	Support development of hydrometeorology test bed (HMT) for RR basin.	The Council concurs with the questions and comments in NMWD board's letter, comment #10, regarding considering if this project could be combined with strategy 2, immediate action 5 to acheive cost savings.	See response to comment 39.
41	North Marin Water District	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Near term Action 1	Develop adaptation measures -- develop reliability actions.	Comment 11: 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?	This action contemplates building off of the USGS climate change modeling to identify regional measures for adjusting to changing climatic conditions. DWR and other water purveyors believe a proactive stance is the best way to make decisions. The types of adaptive measures will depend on the outcome of modeling and other water supply planning efforts (e.g., demand projections). Adaptive measures could include conjunctive management, revised reservoir operations, modified river operations to enhance habitat, watershed based measures to support local communities that are vulnerable to saline water intrusion (e.g., Sonoma and Petaluma). There may be opportunities to coordinate water supply reliability efforts with other entities working on evaluating changes to habitat and ecological systems due to the effects of climate change. This analysis will allow the water contractors, the Water Agency and other entities to be more proactive in maintaining a reliable water supply. Some measures may have regional applications while other measures may be more applicable on a local or sub-regional basis. Costs must be evaluated by interested parties.

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42	Santa Rosa	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Near Term Action 1	Develop adaptation measures.	The Council concurs with the questions and comments in NMWD board's letter, comment #11. The Council recommends that the Water Agency provide additional detail on the support that the Water Agency will be providing and what costs may be involved.	See response to comment 41.
43	Windsor	3	3	Evaluate Potential Climate Change Impacts on Water Supply & Flood Protection	Near Term Action 1	Develop adaptation measures.	What is the expected participation from the Water Contractors under this action?	See response to comment 41.
44	Cotati	4	4	Pursue Combined Water Supply & Flood Control Projects	_General		It is suggested that an action be added to utilize the USGS groundwater model to quantify and map locations of existing infiltration/inflow areas at a planning level. Specifically, the water supply benefit of Low Impact Development (LID) treatments or joint water supply/flood control project needs to be better quantified to be able to utilize these in local and regional water supply planning. Therefore, this effort may fit well under the Groundwater Management Planning process, as it exists in Sonoma Valley and Santa Rosa Plain.	Although not explicitly stated in the plan, the Water Agency is planning to utilize the USGS models developed for the Sonoma Valley and the Santa Rosa Plain to help identify areas where combined flood control and groundwater recharge could be implemented. The Santa Rosa Plain model is well suited for this purpose because it couples surface water and groundwater. The Water Agency hopes to upgrade the Sonoma Valley model to a similar level of functionality.
45	Sonoma	4	4	Pursue Combined Water Supply & Flood Control Projects	Immediate Action 1	Identify Projects within Agency Flood Control Zones that Reduce Flooding and Increase Groundwater Recharge	The City strongly supports this strategy and believes this to be an important strategy in the Sonoma Valley basin. We have the governance and inter-agency structures in place to effectively implement this strategy. It is our request that the City continue to be included in the SCWA's identification and prioritization of these "conjunctive use" projects that combine these two important activities. It is suggested that the SCWA pursue continued Zone 3A funding through the countywide benefit assessments tax as this is a valuable source of flood control project funding to both the City and the SCWA.	Comment noted. Proposed action will be included in future budget discussions.
46	Windsor	4	4	Pursue Combined Water Supply & Flood Control Projects	Immediate Action 1	Identify projects within Water Agency flood control zones that reduce flooding and increase groundwater recharge.	Will other funding pathways be pursued for projects besides the green infrastructure grant? Should this be expanded to include possible Federal funding opportunities?	The action has been modified to include other funding sources per the suggestion by Windsor.

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47	Petaluma	4	4	Pursue Combined Water Supply & Flood Control Projects	Near Term Action 1	Initiate efforts to obtain property rights for project sites identified during immediate steps. Obtain funding for such projects.	Action seems like a place holder for an action. While it does identify future work it fails to meet the needed degree of specificity to warrant or qualify as a near-term action. It may be more appropriate to add implemented projects when they happen as opposed to this placeholder.	This item depends on the outcome of Immediate Action 1, Project A. Until the feasibility study is complete, it would be premature to identify specific project sites. However, it is important to be prepared to complete Near Term Action 1 because it will be critical to implementing Strategy 4.
48	North Marin Water District	5	8	Develop Water-Smart Development Standards.	Immediate Action 1	Develop countywide guidance manual...	Comment 12: This would seem to be a better fit as part of Water Supply Strategy Nine, Implement Integrated Water Management.	Recommendation has been included in revised action plan.
49	Windsor	5	8	Pursue Combined Water Supply & Flood Control Projects	_General		We recommend changing this action to include development and implementation of a basin-wide groundwater monitoring program for compliance with new state regulations and/or combining this action with Intermediate Action #1 and including the monitoring plan development and implementation as part of the Groundwater Management Plan (GWMP) development and implementation. This program can be overseen/coordinated by the same group tasked with implementing the GWMP.	The plan already contains Near Term Action 1 that involves working with stakeholders within Sonoma County to comply with SBx7-6. However, given recent activities by the State, this action has been reclassified as Immediate Action 5.
50	Santa Rosa	5	8	Develop water Smart Development Standards			The Council supports the development of water smart development standards and requests that the Water Agency include additional information on the costs of implementation as well as quantification of the water supply benefits. In addition, the Council believes that is is one Action as opposed to a Strategy and suggests including this as an Action under Water Supply Strategy 9 -- Implement Integrated Water Management.	Comment noted. As there is no "set" Water Smart Development practice, actual costs and water savings will differ depending on site-specific implementation and other factors. This strategy is no longer a separate item and has been incorporated into Strategy 8.
51	North Marin Water District	6	5	Work with Stakeholders to Promote Sound, Information-Based Water Supply Planning Programs	_General		Comment 13: 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.	Immediate Actions 3 and 4 involve river management issues and are not strictly focused on groundwater. In regards to compliance with SBx7-6, Near Term Action 1 has been changed to Immediate Action 5 per response to comment 49. The Water Agency would need direction from its Board regarding providing support for SBx7-6 compliance for Marin County on a reimbursement basis.
52	Cotati	6	5	Work With Stakeholders to Promote Sound, Information-Based Water Supply Planning Programs	Immediate Action 3	Initiate discussions on form of collaborative agreement with Alexander Valley & Upper Russian River Valley growers.	It appears that this refers to Strategy 2 only.	Revised Action Plan has been corrected to reflect this comment.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
53	Petaluma	6	5	Work With Stakeholders to Promote Sound, Information-Based Water Supply Planning Programs	Near Term Action 1	Assist Sonoma County in responding to recent legislation requiring groundwater level monitoring in Bulletin 118-identified basins. Monitoring plans need to be developed by 2012.	This action assumes, wrongly, that entities other than the Agency will not move forward to become the Groundwater Elevation Monitoring Entity. The City of Petaluma City Council has already indicated its intent to assume the responsibility as the GEME in the Petaluma watershed. The action should be amended to reflect the collaboration between Sonoma County as an entity and the cities within the watersheds.	To clarify, the action does not assume that only the Water Agency can become a groundwater elevation monitoring entity. The key to successful compliance will be participation of local stakeholders within each groundwater basin. For this reason, the action specifies the involvement of several stakeholders. If Petaluma is willing to become a groundwater monitoring entity, the Water Agency encourages the city to work with stakeholders to implement a basinwide monitoring program. Water Agency staff participate in an SBx7-6 ACWA working group that provides input to DWR on implementation guidelines and outreach to entities potentially affected by this legislation. The Water Agency looks forward to working with Petaluma and other stakeholders in complying with the requirements of this legislation.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
54	North Marin Water District	7	6	Improve Transmission System Reliability.	Immediate Action 1	In consultation with Water Contractors, develop plan to provide consistent funding for natural hazard reliability projects.	Comment 14: 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.	The inflatable dam system is a critical facility. The RDS caisson component was identified in the Water Agency's natural hazard assessment as vulnerable to damage during a seismic event. Although the inflatable dam itself was not identified as highly vulnerable, the point that the dam has a relatively short lifespan is valid. Given the concerns regarding rate increases, it is unlikely that water contractors will agree to fund a replacement of the dam if it is still operational. An alternative approach is to develop a contingency plan that would: (1) provide guidance and details regarding short-term operational modifications in the event of a failure of the inflatable dam; and (2) develop cost estimates in addition to engineering and schedule requirements and vendor information for the replacement of the inflatable dam. Based on this information, the Water Agency and water contractors can evaluate how to mitigate this risk. To accomplish this, a contingency plan has been added (Near Term Action 4) under strategy 6 and will be included in the FY 2010/11 budget discussions with contractors.
55	North Marin Water District	7	6	Improve Transmission System Reliability.	Immediate Action 1	In consultation with Water Contractors, develop plan to provide consistent funding for natural hazard reliability projects.	Comment 14: 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.	The South Transmission System Project (STSP) would provide reliability and additional capacity for future additional water demand to Petaluma and Marin County users. The STSP was not identified as a natural hazard reliability project by the Agency in its natural hazard reliability assessment so it is not included in the list of projects listed in immediate action 1, which refers specifically to natural hazard reliability projects. If the water contractors agree to fund the STSP via activities specified by Strategy 8, it will improve water supply reliability to the Petaluma and Marin County segment of the Agency's service area.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
56	Petaluma	7	6	Improve Transmission System Reliability	Immediate Action 1	In consultation with Water Contractors, develop plan to provide consistent funding for natural hazard reliability projects.	This action items seems to be taking the place of the Capital Improvement Plan. Is it the intent of the Agency to defer infrastructure planning decisions to the Contractors as implied by this action and others in this document as a whole?	To clarify, immediate action 1 of Strategy 7 (now Strategy 6) refers only to one type of capital project: natural hazard reliability projects. During the recent budget discussions, the water contractors (including Petaluma) stated they wanted to be included in determining which capital projects should be carried forward based on benefit to water contractors and affordability. The Water Agency has developed tools to support this collaboration.
57	Petaluma	7	6	Improve Transmission System Reliability	Immediate Action 2	Continue to pursue state and federal funding for natural hazard reliability projects.	Missing Status	Revised Action Plan has been corrected to reflect this comment.
58	Petaluma	7	6	Improve Transmission System Reliability	Immediate Action 3	Work with water Contractors to reduce peak demand on transmission system via conservation, groundwater banking, local supply and recycled water.	This action is connected to 5 other strategies and is not temporally aligned with the other Near Term and Long Term Designations with similar designations. This action should be removed from this Strategy. While related to reliably, this is an oblique reference. This action is better defined and established in Strategy 1.	Reducing peak demand will increase transmission system reliability. As shown in the plan, there are links to several other strategies, which illustrates the multiple benefits of this action.
59	Windsor	7	6	Improve Transmission System Reliability	Immediate Action 3	Work with Water Contractors to reduce peak demand on transmission system via conservation, groundwater banking, local supply and recycled water.	The Town relies on peaking operations from the RR water system as part of its operations. Taking this away could result in significant infrastructure construction costs as the Town will have to construct additional storage to handle the daily peaks. Furthermore, we do not yet know if the groundwater basin underlying the Town has sufficient capacity to meet the Town's peaking requirements. finally, water demands with the Town are fairly hard; possible additional conservation savings may be insufficient to offset the loss of peaking capabilities.	See response to comment 7.
60	Petaluma	7	6	Improve Transmission System Reliability	Near Term Action 1	Develop emergency response capabilities for collaboration platform (Strategy 10)	This action item seems unnecessary as it is currently located in S10 and is merely a placeholder. This could make updates to the document difficult. Actions that are broad in nature or redundant, as this one is, should be connected to the Strategy with the greatest portion of the work effort or directive force.	This action item illustrates the linkage between two key strategies. As requested by contractors in previous comments, where appropriate, the Action Plan is designed to show existing linkages and overlap between strategies.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
61	Santa Rosa	7	6	Improve Transmission System Reliability			The Council believes that this is a critical strategy and should be one of the top priorities of the Water Agency. The Council recommends that the Water Agency include cost estimates for all projects listed in Immediate Action 1. In addition, the Council concurs with NMWD's comment #14 regarding the rubber dam and recommends that replacement of the rubber dam be included as one of the Water Agency's reliability projects.	These cost estimates have been provided to the water contractors. Because this plan needs to be concise, links to documents which contain cost estimates will be included on the web-version of this plan. In regard to the comment on the inflatable dam, please see response to comment 54.
62	Santa Rosa	8	7	Take Advantage of Energy & Water Synergies	_General		The Council recommends including an action item to explore opportunities for storing water closer to point of use to reduce the energy needed to move water.	Comment noted. Funding this evaluation should be part of the budget discussions with water contractors.
63	Windsor	8	7	Take advantage of energy & water synergies	_General		We feel that the SCEIP concept should be expanded to include Water Contractor solar generation at their facilities.	Per state law, SCEIP financing is available to property taxpayers only. Generally, contractor-owned facilities would not be eligible for SCEIP financing.
64	Windsor	8	7	Take advantage of energy & water synergies	Immediate Action 1	Promote programs emphasizing water and energy efficiency of Water Agency's transmission systems operations.	The Town is not sure how solar generation at Windsor facilities fits into increasing the Agency's renewable energy portfolio. Specifically, who gets credit for solar projects completed by the Town?	The Water Agency currently tracks its own carbon emission reductions. We assume that any sharing of credits would require agreement among the parties.
65	Cotati	8	7	Take Advantage of Energy & Water Synergies	Immediate Action 2	Develop and implement programs to increase Agency's renewable energy portfolio to achieve "Carbon Free Water."	Currently, it is not clear what the proposed path is to achieving "Carbon Free Water". It is suggested that Water Contractors be periodically briefed on proposed actions.	Carbon Free Water will be achieved when the GHG emissions inventory for the water transmission system that the Water Agency performs each year indicates that our activities have not released any GHG's. The Water Agency's intent is to develop renewable energy projects that reduce the carbon intensity of power consumed. These projects are being developed directly by the Water Agency or in partnership with PWRPA.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
66	Rohnert Park	8	7	Take Advantage of Energy & Water Synergies	Immediate Action 2	Develop and implement programs to increase Agency's renewable energy portfolio to achieve "Carbon Free Water"	The Action Plan describes the cost of developing the 'carbon free water' as being "paid from a PWRPA (Power and Water Resources Pooling Authority) fund through the purchase of electrical power." The concern is that certain carbon free energy projects tend to be much more expensive than other existing power sources. Power costs are a substantial portion of the Agency budget, so a significant increase in power costs from carbon free energy initiatives will result in large wholesale water rate increases. In the coming years, the Agency and its customers face severe cost increases as a result of the biological opinion for endangered species and transmission system reliability projects. Carbon free water is a laudable goal and one component of comprehensive changes we will need to make over time. However, water is a lifeline resource that people cannot live without. We mustn't ignore the current economic realities. Carbon free water should only be pursued if it does not increase costs for rate payers (i.e. results in decreased power costs).	Power costs represent about 14 % of expenditures in the Water Transmission Fund (2010/11 budget). Renewable energy projects do, in general, cost more than most traditional sources of power. In addition to contributing to the critically important goal of reducing emissions responsible for climate change, the benefit of renewable projects is that the Water Agency is able to lock in rates for long periods of time. Given the age of the existing power infrastructure and the likelihood of increased renewable power standards being placed on investor owned utilities, the cost of power is expected to increase. The Water Agency strives to make the cost of its renewable projects competitive with traditional sources of power. The power costs for the water transmission system decreased significantly in recent years when the Water Agency became a member of the Power and Water Resource Pooling Authority. More recently, as the amount of power used has dropped and the fixed costs associated with solar installations have become a larger percentage of the total power bill, the Water Agency's energy costs are comparable to the per kilowatt costs charged by PG&E.
67	Santa Rosa	8	7	Take Advantage of Energy & Water Synergies	Immediate Action 2	Develop and implement programs to increase Agency's renewable energy portfolio to achieve "carbon free" water -- fuel cells.	The Council recommends that the Water Agency include the need to thoroughly examine the operations and maintenance costs of using fuel cells, as well as the potential environmental costs of using fuel cells.	The Water Agency does not intend to own fuel cells, but to enter into power purchase agreements for the power produced by fuel cells. All operations and maintenance costs would be borne by the owners. The same would be true of the environmental costs.
68	Windsor	8	7	Take advantage of energy & water synergies	Immediate Action 1		Sonoma County Regional Climate Protection Authority may be the more appropriate agency to account for development of contractors's solar projects.	The most appropriate entity to account for development of contractors' solar project depends on the project.
69	Petaluma	8	7	Take Advantage for Energy & Water Synergies	Long Term Action 1	Coordinate and size reliability, natural hazard and expansion projects to eliminate pumping wherever possible.	These projects are being addressed in other areas and at a higher action tier that is more appropriate to the Agency's need.	See response to comment 70.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
70	Petaluma	8	7	Take Advantage for Energy & Water Synergies	Long Term Action 1	Coordinate and size reliability, natural hazard and expansion projects to eliminate pumping wherever possible.	Please provide a better definition of what this action effort entails and create the necessary nexus for "Reliability, Natural Hazard, and Expansion Projects" in taking advantage of Energy & Water Synergies. While we have no doubt it is understood by SCWA staff, the item fails to make that clear. Timing of this action seem disharmonious with other similar items, See S7.IA5.A	The action plan has been modified to clarify that as projects are planned, the energy requirements of the projects will be evaluated. To reflect this, Strategy 6 (formerly Strategy 7), Immediate Action 5, Project A has been modified to include energy requirements. Long term action 1 of Strategy 7 (formerly Strategy 8) has been deleted.
71	North Marin Water District	8	7	Take Advantage of Energy and Water Synergies	Near term Action 1	Pursue revenue opportunities associated with renewable energy efficiency projects -- solar.	Comment 15: NMWD recommends the SCEIP concept be expanded to Water Contractor solar generation at their facilities.	Per state law, SCEIP financing is available to property taxpayers only. Generally, contractor-owned facilities would not be eligible for SCEIP financing.
72	Petaluma	8	7	Take Advantage of Energy & Water Synergies	Near Term Action 1	Pursue revenue opportunities associated with renewable energy efficiency projects -- develop possible revenue strategy for SCEIP & city/county programs.	SCEIP is not part of the Agency's core mandate. The Agency should focus its efforts on making itself more energy efficient.	Action plan has been revised. When strategies were written, the Water Agency was seeking approval from its board to shift part of its investments portfolio to the SCEIP program to provide seed funding. The Board has since approved this item.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
73	Sonoma	9	8	Implement Integrated Water Management	_General		Based on response from SCWA staff at the July 7 th meeting, it is our understanding that the City's priority for the SCWA to fulfill contractual water supply obligations to the water contractors is addressed in Strategy 9. On page 20 of the action plan, we believe that groundwater banking should be identified and included as a priority program in the "Immediate Action One" for Strategy 9. This is more crucial to our City than a recycled water program. In addition, there should be provision within this strategy for allowing temporary "side" agreements between water contractors for the transfer or "wheeling" of contracted water supply during periods of drought and other water shortage conditions to alleviate the severity of mandatory rationing that may affect the various water contractors differently	<p>The text in Immediate Action 1 of Strategy 8 (formerly Strategy 9) is intentionally broad to account for the different priorities of the water contractors. The text of Immediate Action 1 specifies "... to develop regional and local supply, conservation/demand management, and recycled water projects and programs to meet reasonable future needs of Agency customers." Groundwater banking is one type of regional project that could be implemented to help provide a reliable supply. We agree with Sonoma that groundwater banking could be a valuable strategy for the city and merits further assessment.</p> <p>In regard to the comment concerning "side" agreements related to water transfers, this could require amending the Restructured Agreement and therefore such an action would fit under Near Term Action 4 of Strategy 8 (Develop a term sheet for proposed changes to Restructured Agreement for Water Supply to better reflect current and anticipated future conditions).</p>
74	Cotati	9	8	Implement Integrated Water Management	Immediate Action 2	Conduct long-term financial analysis to support evaluation & development of water supply, conservation, demand management & recycled water projects and programs.	It is suggested that the long-term financial analysis tool be made available during the UWMP process to develop and prioritize the proposed project mix, including the potential rate impacts. In addition, the avoided-cost information should be used to compare the rate impacts of the primary water supply options (or the "no project option" i.e. conservation/local supply) to meet the projected future needs. Ultimately, this information will be critical in selecting the best mix of regional or local projects and initiatives that preserve access to safe, reliable and affordable water for the essential needs of our customers. Additionally, this will be critical in communicating both the proposed projects and the effect of conservation on future rates.	The Water Agency agrees that the long-term financial analysis model should be integrated into the water supply planning process required by the Urban Water Management Plan. Attachment D of the plan shows how this integration is anticipated to occur. As described to the water contractors, the Water Agency's financial model will evaluate the costs of the Water Agency's projects and programs. The water contractors will need to identify their estimated costs for their conservation measures, reuse projects and local supply projects in order to estimate their retail water rates. The Water Agency will support the water contractors in this endeavor.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
75	Santa Rosa	9	8	Implement Integrated Water Management	Immediate Action 2	Conduct long-term financial analysis ...	The Council supports the creation of a long-term financial analysis to determine the most cost-efficient projects to meet current and future water supply needs. The Council recommends that the financial analysis compare both regional and local water supply, conservation, demand management, and recycled water projects to determine the most cost-effective supply for the ratepayer.	See response to comment 74.
76	North Marin Water District	9	8	Implement Integrated Water Management	Long term Action 1	Conduct periodic updating of demand projections by Water Contractors in advance of UWMP updates.	Comment 17: 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.	The intent of this action is to monitor actual water demand, in addition to evaluating how that demand was met, on a more frequent basis than every 5 years. Closer coordination between land use and water supply planning will promote more informed water management decisions. Monitoring of water demand as required by the Water Agency's water rights can provide the basis for this assessment. In recognition of the stated concern about the level of effort required to coordinate water supply and land use planning, the plan has been revised to make it clear that Near Term Action 3 entails monitoring of water demand in comparison to projections used in Urban Water Management Planning and evaluating how that demand is met using the information required for annual water rights reporting. Long-Term Action 1 has been deleted.
77	Santa Rosa	9	8	Implement Integrated Water Management	Long Term Action 1	Conduct periodic updating of demand projections by Water Contractors in advance of UWMP updates.	The Council concurs with NMWD's comment #17 regarding updating of water demand projections.	See response to comment 76.
78	Cotati	9	8	Implement Integrated Water Management	Near Term Action 1	Consult with contractors to evaluate feasibility of base demand system instead of peak summer demand system.	The City supports exploring alternate rate models that promote multi-year rate stability, increase operational flexibility, are more closely tied to water supply benefit, and promote more efficient use of water.	Comment noted. Changes to the water Agency's rate structure would require an amendment of the Restructured Agreement for Water Supply.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
79	North Marin Water District	9	8	Implement Integrated Water Management	Near term Action 1	Consult with Water Contractors to evaluate feasibility of base demand system instead of continued peak summer demand system.	Comment 16: What would be the pros and cons for a base demand system for both SCWA and the Water Contractors?	The advantages of a base demand system are described by Cotati and Rohnert Park in comments 78 and 81, respectively. In addition, a more stable (consistent) summer diversion rate from the river reduces O&M costs and environmental issues associated with meeting peak summer demands. A possible disadvantage of a base demand system is that it requires sufficient local supplies, reuse and storage. However, this also increases the reliability of the overall water delivery system by making the system less reliant on one central source. It is important to recognize that any reduction in peak is beneficial.
80	Petaluma	9	8	Implement Integrated Water Management	Near Term Action 1	Consult with Water Contractors to evaluate feasibility of base demand system instead of continued peak summer demand system.	As indicated by the status this action is already being addressed and should be moved to an Immediate Action.	The Agency agrees with this comment and the item is now an immediate action.
81	Rohnert Park	9	8	Implement Integrated Water Management.	Near term Action 1	Consult with Water Contractors to evaluate feasibility of base demand system instead of continued peak summer demand system.	We believe there may be potential to generate future significant savings through this action. Expanding the Agency's transmission system to meet future peak summer demands may prove to be prohibitively expensive. Historically, Rohnert Park chose to make significant investments in its own local supply and recycled water systems. Implementing the above action will reduce the need to expand the Agency transmission system thus reducing costs for our ratepayers, costs for future homeowners and businesses, and construction related environmental impacts. Furthermore, local supply and recycled water reduce green house gas emissions associated with moving water long distances.	Comment noted.
82	Santa Rosa	9	8	Implement Integrated Water Management	Near Term Action 1	Evaluate based demand system.	The Council would like to understand what the Water Agency believes are the advantages and disadvantages of a base demand system. The Council recommends that the Water Agency include an analysis of impacts and benefits to water supply and the environment, as well as financial benefits and impacts to the Water Agency's and Water Contractor's customers from implementation of a base demand system.	See comments by Cotati (78) and Rohnert Park (81) and response to comment 79.

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83	Windsor	9	8	Implement Integrated Water Management	Near Term Action 1	Consult with Water Contractors to evaluate feasibility of base demand system instead of continued peak summer demand system.	The benefits of a base demand system to the Town are not clear. Furthermore, the Town depends on the peaking system capabilities and the loss of these abilities could result in increased infrastructure costs as the Town adds storage and pumping capacity to compensate for the loss of peaking capabilities.	The Water Agency acknowledges that the Town's situation is different than the other water contractors, however, a reliance on a high degree of peaking from the Russian River system will still result in high costs (e.g., bypass pipeline, environmental compliance). The analysis specified by this action is a worthwhile endeavor for the Town.
84	Cotati	9	8	Implement Integrated Water Management	Near Term Action 2	Evaluate alternative revenue models such as season rates and fixed versus variable costs.	The City supports exploring alternate rate models that promote multi-year rate stability, increase operational flexibility, are more closely tied to water supply benefit, and promote more efficient use of water.	Comment noted. Proposed action will be considered when Water Agency is reviewing rate alternatives.
85	Rohnert Park	9	8	Implement Integrated Water Management.	Near term Action 2	Evaluate alternative revenue models such as seasonal rates and fixed versus variable costs.	We would like to emphasize the importance of this action. Under the current rate system—one constant rate regardless of when or how much water is used—there is no incentive to avoid peaking off the transmission system. This creates additional stress and wear on the fifty-year-old system. Pricing water lower when demand is low and higher when demand is high will change use patterns positively, preserve the existing system, and reduce environmental impacts.	Comment noted.
86	Cotati	9	8	Implement Integrated Water Management	Near Term Action 3	Develop ongoing process with contractors to monitor impacts of land use decision on water supply.	This appears to be a sub-five year tracking of water supply impacts of land use decisions. The water supply assessments conducted with General Plan updates and UWMPs should be frequent enough to track this metric.	See response to comment 76.
87	North Marin Water District	9	8	Implement Integrated Water Management	Near term Action 3	Develop ongoing process with Water Contractors to monitor impacts of land use decisions on water supply	Comment 17: 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.	See response to comment 76.
88	Santa Rosa	9	8	Implement Integrated Water Management	Near Term Action 3	Develop ongoing process with Water Contractors to monitor impacts of land use decisions on water supply.	The Council concurs with NMWD's comment #17 regarding updating of water demand projections.	See response to comment 76.
90	Windsor	9	8	Implement Integrated Water Management	Near Term Action 3	Develop ongoing process with Water Contractors to monitor impacts of land use decisions on water supply...	The Town supports development of process with Contractors to monitor impacts of land use on water supply.	Comment noted.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
91	Petaluma	9	8	Implement Integrated Water Management	Near Term Action 4	Negotiate and develop new Restructured Agreement for water supply to reflect current conditions and identify future transmission system improvements.	This item's status is TBD and the renegotiation of the Restructured Agreement is not anticipated in the next 3 years. This item should possibly be moved to Long term until actions can be defined temporally.	This action was classified as a near term action based on input from other water contractors on earlier versions of the plan. Project A, the development of a term sheet by each respective party, is an action that should be completed in the near term and will be the basis for Project B, negotiation of a new agreement or amendment. The Water Agency has kept the action classified as near term with the understanding that its status will be revisited during the next update of the plan and depends on actions by the water contractors.
92	Santa Rosa	9	8	Implement Integrated Water Management	Near Term Action 4	Negotiate new Restructured Agreement.	The Council would like to better understand what portions of the Restructured Agreement that the Water Agency believes need to be amended. Therefore, the Council recommends that the Water Agency amend this item to identify areas where specific amendments to the Restructured Agreement need to be made in lieu of opening up the entire agreement for renegotiation. In addition, the Council fully support maintaining the integrity of Section 3.5 of the Restructured Agreement should any amendment of the Restructured Agreement need to occur.	Project A, the development of a term sheet by each party addresses the request in this comment. A logical time to develop term sheets would be once the Urban Water Management Planning process is completed. As stated in our response to comment 91, the status of this activity depends on the water contractors and should be updated in future plans.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
93	Petaluma	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Immediate Action 1	Develop data management system "Collaboration Platform" in partnership with IBM that provides operational data of Water Agency's water supply and transmission system in addition to Water Contractors' systems -- demonstration project.	The water and power efficiencies mentioned in this item are assumed and should not be mentioned. These increases will not occur unless control of the mentioned cities systems is turned over to the Agency. The Data Management System (DMS) will only identify current and known inefficiencies within the Agency's system and help tighten their operations.	The Agency disagrees with the first sentence of this comment. The water and power efficiencies possible through increased data monitoring are realistic goals. To be clear, these benefits do not require, nor is it even contemplated, that the water contractors would turn over control of their system to the Water Agency. The Water Agency strongly encourages each water contractor to logically evaluate the benefits of increased information sharing and coordination as a form of transparency (which has been repeatedly called for by the water contractors in recent months). As the comment later states, the data management system will help "tighten" the Water Agency's operations which will result in cost efficiencies beneficial to water contractors. Beyond this significant benefit, improved communications and data sharing between systems that are <u>physically connected</u> will help us better deal with continued summer water supply constraints and emergency response (e.g., wildfires, earthquakes). As stated in action plan, coordination and cooperation are essential for Water Agency and water contractor success.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
94	Petaluma	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Immediate Action 1	Develop data management system "Collaboration Platform" in partnership with IBM that provides operational data of Water Agency's water supply and transmission system in addition to Water Contractors' systems -- Metering.	The installation of AMR meters will not by themselves improve operations nor will they increase water efficiency. This item should state only the fact that it is to install AMRs in support of the DMS system.	Rather than claiming any benefits of AMR meters by themselves, the action plan states: "Automated meter reading (AMR) capability integrated with IBM data management system (emphasis added) will reduce costs, improve operations (especially summer), and increase water efficiency". The combination of AMR and the automated processing and utilization of continuous flow readings at each of the Agency's turnouts will result in several benefits to both the Agency and contractors. For example, flows from each turnout are currently manually read on an interval that spans several weeks. This does not allow for close management of system demand or possible leaks by the Agency and its water contractors, especially during the critical summer months. In addition, the billing process will be streamlined using AMR and the collaboration platform, thus increasing cost efficiencies. Also, utilization of continuous turnout flow data rather than monthly manually collected data allows engineers and operators to better analyze system performance. Finally, once the communication network is in place, the water contractors will have the opportunity to piggyback on this system and monitor turnouts on their own distribution system to realize these same benefits.

#	Contractor	Strategy May /Sept		Description	Action	Description	Comments	Water Agency Response
95	Santa Rosa	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Immediate Action 1	Collaborative platform	The Council recommends that the Water Agency include more information to describe the water supply benefits of implementing this action.	Better coordinated monitoring of physically connected systems will improve overall efficiency of water use and power consumption. For example, Santa Rosa has indicated that improved coordination of chlorine dosing operations and measurement of residual concentrations by the City and the Water Agency can reduce the amount of water that must be wasted because of low residual concentrations. Better coordination of pumping schedules can optimize pumping requirements, reducing the amount of time the Water Agency and contractors are pumping against each other and lower power costs and greenhouse emissions. Planning, design, and decision making can also be assisted through greater data sharing and coordination. It will take a partnership and collaboration to realize these mutual benefits. As described in the California Water Plan 2009, increased data management and analysis for decision-making is a top priority for the state.
96	Windsor	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Immediate Action 1	Develop data management system "Collaboration Platform" in partnership with IBM that provides operational data of Water Agency's water supply and transmission system in addition to Water Contractors' systems.	The Town is not sure what benefits a collaborative management system will bring to the Town.	See response to comment 95.

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97	North Marin Water District	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Long term Action 1	Develop comprehensive data management system that builds off demonstration project and includes data from other non-water supply sources and models.	Comment 19: 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	This long term action does not require staff time or funding at this time. An ultimate goal for the collaboration platform would be to include not only infrastructure related data, but also other water resource data, such as river water quality data, climate data, flood control data, fishery data, groundwater levels, etc. If the collaboration platform evolves to this level, it will take several years and will be done gradually as funding permits. With advances in technology, it is prudent to structure the current system so that is adaptable for such evolution. The water contractors would have access to all data to assist in the management of their systems.
98	Petaluma	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Long Term Action 1	Develop comprehensive data management system that builds off demonstration project and includes data from ther non-water supply sources and models.	The crafter of this item should have a more defined idea as to what the additional models are; these should be identified. The point of this action is to expand the base plan and make it more comprehensive. The project description should clearly identify the action for the reader.	See response to comment 97. Models include the various basin groundwater models, hydraulic stream models, and climate models.
99	Windsor	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Long Term Action 1	Develop a comprehensive data management system that builds off demonstration project and includes data from other non-water supply sources and models.	See comments above.	See response to comment 97.
100	Windsor	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near Term Action 1	Extend demonstration project including AMR to other water contractors.	The Town is not sure what benefits the AMR will have for the Town of Windsor, especially if the data is being fed into the Agency's system.	See response to comment 94. In addition, this action involves extending AMR to the turnouts on the Agency's transmission system that service the other water contractors, including Windsor. It is important to understand that the collaboration platform provides 2-way communication, not just communication from the water contractors to the Water Agency.

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101	Petaluma	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near Term Action 2	Develop emergency response capabilities for collaboration platform	Emergency response systems are currently in place through the County's Emergency Services Department and Local ICS Emergency Operation Centers. This item seems to be a redundant action, outside the purview of the Agency except with regard to water supply. Add Sonoma County Fire and Emergency Services Department to the involved parties.	This action will entail extending the collaboration platform so that it supports (not replaces) existing emergency response procedures and protocols using current technology. The functionality that could be provided by the collaboration platform does not currently exist for emergency responders. Coordination of information, communications, personnel, equipment and materials could be significantly enhanced by this action. This project could be ideal for grant funding.
102	Windsor	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near Term Action 2	Develop emergency response capabilities for Collaboration Platform.	The Town is not sure what benefits the collaborative platform will confer to the Town, especially as it relies on its off-river groundwater wells (which is managed) in time of emergency.	See response to comment 101.
103	North Marin Water District	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near term Action 3	Study possibly Agency governance structures.	Comment 18: 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.	The Draft Action Plan has been edited to make it clear that this Board-directed survey was intended to be broader than Agency governance or water supply. Water supply benefits could result from increased collaboration, but as originally authorized, the survey would have evaluated whether officials in Sonoma, Marin and Mendocino counties were interested in a more collaborative approach to natural resource management generally. Staff had proposed to work with the Chair and Vice Chair of the Water Advisory Committee and Board liaison members and stakeholders to develop the survey and will now schedule discussions among those parties to reevaluate the need for and timing of a survey.
104	Santa Rosa	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near Term Action 3	Agency governance structure.	It is not clear what water supply benefits would be generated by this action. The Council recommends that the Water Agency describe the goal of this action, including potential processes to facilitate governance structure changes and the potential water supply benefits associated with these changes.	See response to comment 103.

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105	Valley of the Moon Water District	10	9	Overcome Organizational Fragmentation to Promote Efficiency of Water System Operations & Planning	Near term Action 3	Study possible Agency governance structures.	This should be elevated to an immediate action since the survey of elected officials have already been authorized by the SCWA Board of Directors in fall 2009	See response to comment 103.
106	North Marin Water District	General					Comment 1: 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.	Comment noted. WAC priorities have been substituted for the TAC priorities in the revised document.
107	Petaluma	General					The levels of action have excessive subjective variables attached and are not consistent throughout the planning process. <i>Immediate Action</i> items have a different set of "because" issues than do the other two action levels. For the document to be more relevant it is suggested that benchmark objectives or constraints be consistent across the three levels. (e.g. Funding is the topic for <i>Immediate Action</i> #4, <i>Near-term Action</i> #2, and <i>Long-term Action</i> #3).	The criteria for how an action is classified as immediate, near term, or long term is described on page 5 of the action plan. As shown in the plan, there are different reasons why an action is categorized as it is - this reflects the reality of the environment which the Water Agency works in. Consequently, it is not possible to have a consistent benchmark across all three levels.
108	Petaluma	General					The action descriptions are sporadic and lack a clear methodology in terms of descriptive construction. It is difficult to evaluate the action if the description is vague or non-existent.	Comment noted. When the action plan is periodically updated, corrections for consistency can be made where appropriate.
109	Petaluma	General					Status for a number of items does not reflect the current status of the project. If the document is intended to be a living publication, it should have current up-to-date descriptions and status.	The revised action plan has been updated to reflect the updated status of specific projects. When the action plan is periodically updated, the status of the projects will be changed also.
110	Petaluma	General					"Strategy" items should have a specific goal associated, which should be identified.	Comment noted. The goals for the strategies are provided in the plan. The action plan is meant to be a synopsis of major activities, rather than a full-fledged description of all strategies and associated projects. The online version of the plan will include additional details.

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111	Petaluma	General				"Action" items should be tied to specific goals, those items should be prioritized for the whole plan to provide continuity and guidance throughout the process. This would allow the Agency to maintain focus on the most important core functions and not sidetrack to ancillary functions. This would also allow prioritization of funding allocations by the Board of Supervisors.	Comment noted.
112	Petaluma	General				Water Supply Strategy Five is misidentified in the text, page 13, as "Water Smart Development Standards" (WSD) but as "Low Impact Development Standards" (LID) in the Summary of Immediate Actions Chart, page 33. Overall the actions contained within the strategic items do not sort well or in some cases seem to belong to the assigned strategic item. We recommend rethinking the sorting and assignment of the action items to better reflect the primary level of strategic work and its associated strategic goal.	See response to comment 50.
113	Petaluma	General				Overall the actions contained within the strategic items do not sort well or in some cases seem to belong to the assigned strategic item. We recommend rethinking the sorting and assignment of the action items to better reflect the primary level of strategic work and its associated strategic goal.	Comment noted.
114	Petaluma	General				There are items throughout the document that are not truly "actions" specifically. They are generally located in the near and long term categories. As this is an "Action Plan" these items may better serve if they were removed and assigned appropriately when the true action is known and quantifiable. This would give readers a better feel for the work and relevant timing issues as well as allow for funding planning to occur.	Each category of action has been defined on page 5 of the draft plan. Because an action is not currently being implemented or has specific funded assigned to it doesn't mean that it shouldn't be included in the plan. The action plan is not just an implementation plan, it also has a forward looking component. Actions categorized as near or long term may change or be refined in their scope as we progress into the future and gain more information or as circumstances change.
115	Santa Rosa	General				Upon review, the SRCC recommends the following as the top priorities for the Action Plan: 1. Address impacts on listed salmonid species & Dry Creek summer flows through implementation of biological opinion. 2. Fulfill contractual water supply obligations to the Water Contractors and seek out and identify those using water without water rights. 3. Restore reliability of current water supply and transmission system capacity. 4. Develop financing options as well as a regional analysis of the financial and environmental costs to both the Water Agency and the Water Contractors for full implementation of each of the water supply strategies. 5. Work with the WAC to prioritize the order in which actions will be taken to maximize the Water Agency's and water rate payers' resources to achieve current and future water supply reliability.	Comment noted.

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116	Sonoma	General				<p>The SCWA's ability to fulfill contractual obligations to the water contractors is the single-most important water supply priority facing the City of Sonoma. The way the strategies are written, it is not apparent that this is a priority item that must be addressed. The City relies on water purchased from the SCWA for 95 percent of its demands. While the City does have local groundwater supply to supplement its water demand, the City's practice, for the protection and health of the groundwater basin, is to use those wells during periods of drought. Under normal and wet-year hydrologic conditions, the City uses SCWA water. However, because of recent water shortage conditions, not necessarily due to drought conditions, it appears that the SCWA will continue to focus on calls for mandatory water conservation and rationing instead of focusing on water supply projects that will alleviate the constant calls for such draconian measures. The City of Sonoma's water conservation program is very active and the City is committed to spending the time and resources necessary to continually reduce per capita water demands. However, water conservation takes time and is a long-term solution to permanently reducing water demand.</p>	<p>The Water Agency' obligation to supply water under the Restructured Agreement is subject to several express conditions. In particular, the Restructured Agreement gives the Water Agency "discretion to take appropriate actions in good faith to resolve any issue that may arise under the federal Endangered Species Act or any other federal or state law affecting the Agency's water rights or operation of the Russian River Project." This discretion limits the Water Agency's obligation to deliver the amount of any contractor's "Entitlement Limits" under the Restructured Agreement.</p> <p>Nevertheless, providing the amount of water that contractors reasonably need is a high priority of the Water Agency and is reflected in the action plan. The comment focuses on (1) providing additional Water Agency water for the City's increase in demand due to growth; and (2) the reduced peak summer deliveries common in recent years (and likely in future years) due to State-imposed Russian River diversion reductions and compliance with ESA requirements.</p> <p>Regarding water for future growth, the Water Agency has laid out a plan to address future growth in Strategy 9 and attachment D. For several months, the Water Agency has been waiting for the water contractors' projections of reasonable future water demands, and their identification of how much of that demand (less conservation, reuse, and local supplies) they wish from the Water Agency. Staff</p>

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116 cont.	Sonoma	General					<p>is ready to initiate projects (and develop new projects, such as groundwater banking, etc.) and work with contractors to jointly meet their reasonable demand, as long as they agree such projects are affordable. The Water Agency is ready to assist all water contractors as they plan their water supply portfolio.</p> <p>Regarding the second concern, the best way realize a more stable summer situation is to implement the Biological Opinion. This includes modifying the summer mainstem instream flow requirements in Decision 1610 to flows that meet the requirements of the BO. Until this is accomplished, the Water Agency must apply annually to the SWRCB to modify flow requirements by requesting a Temporary Urgency Change to its water right permits. The SWRCB may continue to impose terms in yearly Temporary Urgency Change Orders, creating continued uncertainty. As discussed in Strategy 1, all water contractor must continue to decrease their peak demand as we implement the BO.</p>
117	Sonoma	General				<p>Because of the contractual relationship between the City and SCWA, it is critical that the SCWA continues to practice transparency and collaboration with its water contractors when making decisions on water supply matters that affect us. We appreciate the efforts the SCWA has made during the development of the Water Supply Strategies. This transparency and collaboration will be most important during the implementation of the action plan as that will affect the amount of water supply will be provided to the City as well as the cost of that supply. We request that a "look ahead" milestone schedule for water supply decisions be provided to the City, in writing, so that we are aware of future actions and meetings that may affect us. We appreciate that SCWA staff has made itself available and always willing to make presentations to our Council whenever requested.</p>	<p>This comment warrants further discussion between respective staff. The Water Agency would also appreciate timely updates regarding future actions by water contractors.</p>

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118	Valley of the Moon Water District	General				Footnote title of Table of Contents "Water Supply Strategy" to indicate as follows: Order of listing does not indicate priority.	Comment noted. Revised action plan includes recommended change.