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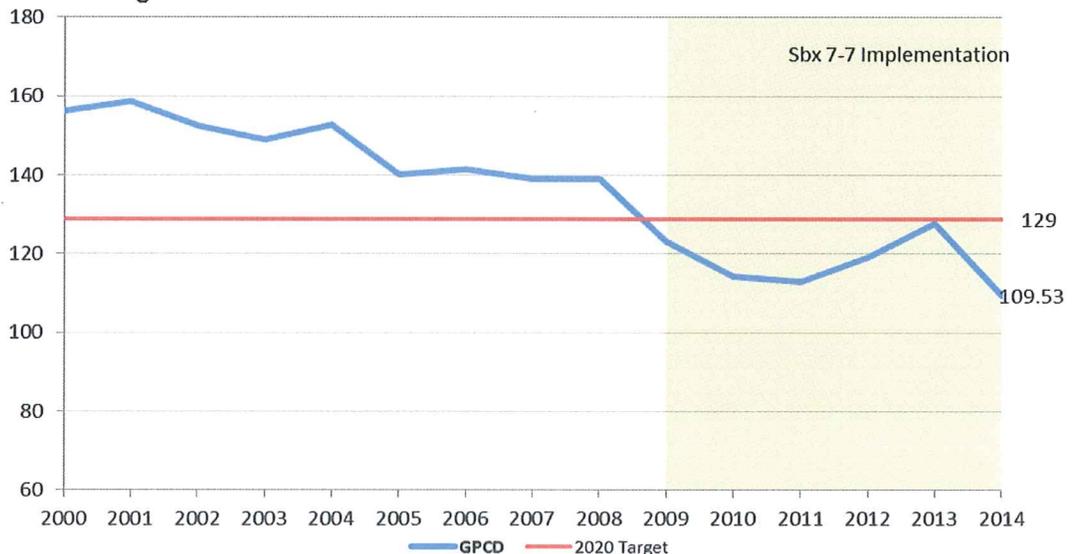
Re: Draft Emergency Regulation for Urban Water Conservation

Dear Chair Marcus and Members of the State Board:

I am writing on behalf of the Sonoma Marin Saving Water Partnership (SMSWP) requesting to meet a collective conservation standard under the subject Draft Regulation. The SMSWP, established in 2010, maintains a regional commitment to work collaboratively on the implementation of appropriate water use efficiency programs in Sonoma and Marin counties. A regional alliance of SMSWP signatories (the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, Petaluma, Town of Windsor, North Marin, Marin Municipal and Valley of the Moon Water District's) was formed to comply with SBx7-7 the Water Conservation Act of 2009. SBx7-7 calls for a 20% reduction in water use by the year 2020. The regional alliance was formed pursuant to the Department of Water Resources Methodology for Calculating Baseline and Compliance Urban Per Capita Water Use because the parties receive water from a common water wholesale supplier, the Sonoma County Water Agency (SCWA), also a SMSWP signatory.

The graph below demonstrates the long term progress of our region and the SMSWP has made towards incorporating water use efficiency in Sonoma and Marin Counties. Since 2000, there has been a 30% reduction in per capita water use while experiencing a 10% increase in population.

Annual Regional GPCD 2000-2014



Page 3 of the fact sheet on DRAFT REGULATIONS IMPLEMENTING 25% CONSERVATION STANDARDS states: "An open question is whether the draft regulation should allow multiple suppliers to join together to meet a collective conservation standard." SMSWP encourages the State Board to allow multiple jurisdictions to join together to form regional alliances that are assigned a collective conservation standard. SMSWP recommends that the State Board consider modeling the formation of regions based on the methodology developed by DWR for forming regional alliances to comply with SBx7-7. Regional alliances will allow for multiple jurisdictions to leverage resources to develop common messaging and water conservation programs in response to the drought.

Based on the current Draft Regulation, SMSWP proposes to meet an annual collective conservation standard of 20% to achieve the same amount of water savings as would individual SMSWP signatories in the aggregate. In summer 2014, (July through September) the SMSWP collective Residential GPCD averaged 101.14 gallons per person per day (see table below) equivalent to a Tier 5, 20% Conservation Standard as now proposed under the Draft Regulation.

Summer 2014 Sonoma Marin Saving Water Partnership Residential GPCD			
	Residential Production	Population	R-GPCD
Jul	2,015,985,157	594,651	109.36
Aug	1,772,531,369	594,091	96.25
Sep	1,743,217,426	593,984	97.83
	5,531,733,952		101.14

We request Draft Regulation Section 865.(c)(2) also recognize conjunctive use of local and regional surface and groundwater supplies as long as a region is meeting the collective conservation standard. In Sonoma and Marin counties, the 2014-15 water year has been better than last. Lake Sonoma, the major surface water supply reservoir supplying SMSWP members is at 87% capacity. Lake Sonoma holds 214,000 acre feet on this date which is equivalent to over three years water supply for consumptive and environmental needs. Additionally, local surface water reservoirs in Marin County are at approximately 90% capacity.

To comply with reporting requirements under the Draft Regulation, we propose that individual SMSWP signatories continue to report performance on the State Board website using the Urban Water Supplier Reporting Tool. Additionally, SCWA has previously reported to the State Board on regional water conservation performance as part of Temporary Urgency Change Order requirements and can continue to do so under this proposal.

On behalf of the SMSWP members I appreciate the opportunity to comment on this all important item and request that the State Board recognize the existing SMSWP organizational structure designed to promote water conservation in Sonoma and Marin counties. We believe the SMSWP can meet the State Board's mandatory restrictions on a regional basis.

Sincerely,

Chris DeGabriele
 General Manager, NMWD
 Chair, Technical Advisory Committee to
 SCWA