



## commentletters@waterboards.ca.gov

July 14, 2014

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

**PHONE** 415.897.4133

FAX 415.892.8043

EMAIL info@nmwd.com

WEB

www.nmwd.com

Felicia Marcus, Chair State Water Resources Control Board PO BOX 100 Sacramento, CA 95812-10100

Re: 7/15-16/14 BOARD MEETING (Emergency Regulations for Water Conservation)

Dear Chair Marcus and State Water Board Members:

On behalf of the Sonoma Marin Saving Water Partnership representing the urban retail water agencies receiving wholesale water supply from Sonoma County Water Agency's Russian River System, serving 600,000 residents (The Water Contractors: Town of Windsor, Cities of Santa Rosa, Rohnert Park, Cotati, Sonoma, Petaluma, and Valley of the Moon, Marin Municipal, and North Marin Water District) we express our support of the objective but request clarification of the proposed regulations prior to adoption.

Over the years, this region has been progressive in response to drought conditions. Lake Sonoma, which now provides the majority of water supply for the Water Contractors, was constructed subsequent to the 1976-77 drought of record in California and is currently at 70% of capacity holding nearly 170,000AF of water supply, sufficient to meet the needs of the region for at least the next two years. In 2010 the Sonoma Marin Saving Water Partnership was created to work collaboratively on implementation of appropriate water use efficiency programs on a regional basis. These parties also established a regional alliance to comply with the SBx7-7 Legislation enacted to reduce per capita water use by 20% by the year 2020. The attached chart shows the Sonoma Marin Saving Water Partnership and each Water Contractor's performance in 2013, identifying that the collaborative process has worked in our region as per capita consumption has been reduced to meet the SBx7-7 goal.

Additionally, recycled water development in our region by Marin Municipal Water District, the Cities of Santa Rosa, Rohnert Park, Petaluma, Town of Windsor, and participants in the North Bay Water Reuse Authority have been effective at expanding the use of recycled water to offset potable water demand.

Currently, all of the Water Contractors have prohibited activities identified in the proposed Emergency Regulation Section X.1 and either have adopted the initial voluntary stage of their respective Water Shortage Contingency Plans or implemented equivalent measures to affect further conservation in this drought year pursuant to the direction by the Governor in January 2014. Sonoma County Water Agency, working with the Water Contractors has implemented an extensive regional public outreach campaign (**There's a Drought On. Turn the Water Off**) which has been effective in heightening the public response to this drought condition.

The Water Contractors urge the State Board to enable a functional equivalent opportunity for voluntary stages, which include mandatory restrictions on outdoor water use, to achieve the same level of savings (20% reduction in overall water use compared to 2013) as identified in the target established by these proposed Emergency Regulations.

The Water Contractors believe the most equitable, consistent and accurate way to monitor water use is to track monthly water production. Tracking per capita consumption for this purpose will not be accurate due to the inaccurate monthly population data (both historical and forecast), service territory alignment and seasonal population variations.

Finally, the Water Contractors urge the State Board to make any fine for infractions an optional measure to be determined by locally elected governing bodies. The Water Contractors have water waste ordinances and associated programs to progressively enforce these ordinances. Allowing these programs to be implemented as defined at the local level will provide for the best use of resources to achieve water conservation savings.

Sincerely,

Chris DeGabriele General Manager

North Marin Water District & Chair Technical Advisory Committee to Sonoma County Water Agency

Roabriele



Enclosure CD/kly To: Chris DeGabriele, Technical Advisory Committee Chair From: Carrie Pollard, Principal Program Specialist, Water Agency Subject: UPDATED 2013 Gallon per Capita per Day (GPCD)

On May 18, 2011 DWR was notified that a regional alliance has been formed between and among the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, Petaluma, Town of Windsor and North Marin, Marin Municipal and Valley of the Moon Water Districts to comply with SBx7-7, the Water Conservation Act of 2009. The regional alliance was formed pursuant to the Department of Water Resources Methodologies 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.

The Sonoma-Marin Saving Water Partnership established a regional commitment to work collaboratively on the implementation of appropriate water use efficiency programs. The Partnership is the mechanism used for tracking each water contractor's individual progress towards SBx7-7 compliance and to track the regional status on an annual basis.

The graph and table below show the reported 2013 GPCD, the 2015 Target and the 2020 Target for each water contractor and the region as whole.

