



Via email: commentletters@waterboards.ca.gov

Jeanne Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Water Resources Control Board:

The North Marin Water District (NMWD or District) offers the below comments on the Urban Water Conservation Workshop to be held Wednesday, January 18, 2017. NMWD provides retail water service to 20,579 accounts principally to the community of Novato and the surrounding unincorporated area of northern Marin County. The water supply for this service area is from our local Stafford Lake (Novato Creek) and the Russian River, supplemented with Recycled water from both Novato Sanitary District and Las Gallinas Valley Sanitary District. NMWD also provides retail water service to the small coastal communities at the base of Tomales Bay in West Marin County (780 accounts), via a separate small water system using the underflow from Lagunitas Creek as the source of supply.

In June 2016 NMWD conducted a self-certification analysis in response to the extended Emergency Regulation resulting in a Conservation Standard of 0%. To-date, NMWD's aggregate June 2015 through November 2016 conservation savings is 25% relative to the same period in 2013. In light of the current hydrologic conditions in our region and conservation performance since June 2015, NMWD respectfully requests the Emergency Regulation be rescinded or be allowed to expire on its sunset date of February 28, 2017.

In response to specific questions posed by the State Water Board in the Notice of Public Workshop, we offer the following:

1. The hydrology for the current water year in NMWD's service area is known because all surface water reservoirs providing water supply for NMWD are full, and the Russian River, Lagunitas Creek and other local rivers and creeks are at flood stage as a result of recent storms. We ask that no elements of the existing May 2016 Emergency Regulation be modified, and that the Emergency Regulation be rescinded or expire on February 28, 2017. Should the existing regulation be extended or modified, NMWD requests previously submitted self-certification remain an acceptable compliance mechanism so that previous analysis and reported water conservation savings remain valid and the duplicate effort which re-submittal would require can be avoided.
2. The State Water Board should account for regional hydrologic differences and for those areas experiencing above average precipitation and full surface water reservoirs, such as NMWD, the Emergency Regulation should be rescinded or left to expire on February 28, 2017.

3. The State Water Board should act now to rescind the Emergency Regulation or let expire on February 28, 2017 for NMWD. The State Water Board should not revert to a conservation standard structure like the one the Board adopted in February 2016 which does not take local water supply conditions into consideration nor should the State Water Board set a conservation floor.

Thank you for the opportunity to comment.

Sincerely,



Chris DeGabriele
General Manager
North Marin Water District