



Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Subject: Comment Letter Urban Water Conservation Workshop

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

The Sonoma Marin Saving Partnership (SMSWP or Partnership) respectfully submits the following comments on the Urban Water Conservation Workshop to be held Wednesday, January 18, 2017. SMSWP members include the Cities of Cotati, Petaluma, Rohnert Park, Santa Rosa, Sonoma, Town of Windsor and the Marin Municipal, North Marin and Valley of the Moon Water Districts, Cal-American Water (Larkfield-Wikiup) and Sonoma County Water Agency. Together we serve over 600,000 people in the Sonoma-Marín region and we appreciate the opportunity to provide input on the Emergency Regulation for Statewide Urban Water Conservation.

In June 2016 Partnership members conducted self-certification analysis in response to the extended Emergency Regulation resulting in a Conservation Standard of 0% for each member. To-date, the Partnership has continued to perform admirably as the aggregate June 2015 through November 2016 conservation savings is 22% relative to the same period in 2013. In light of the current hydrologic conditions in our region, and conservation performance since June 2015 the Partnership members respectfully request the Emergency Regulation be rescinded or be allowed to expire on its sunset date of February 28, 2017.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 the Sonoma-Marín region is known because all surface water reservoirs providing water supply for the Partnership are full, a deviation with the Army Corps of Engineers to encroach into the Lake Mendocino flood control pool has been requested which may allow for additional water supply in the years to come, and the Russian River and 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We ask that no elements of the existing May 2016 Emergency Regulation be modified, and that the Emergency Regulation be rescinded or expire on February 28, 2017.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, the Partnership 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 Sonoma-Marin, 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 Sonoma Marin Saving Water Partnership members. 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 into consideration local water supply conditions. The State Water Board should not set a conservation floor.

Thank you for the opportunity to comment.

Sincerely,



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