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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Board:

Thank you for the opportunity to provide input on the potential extension and modification of the current Emergency Regulations for Statewide Urban Water Conservation (Emergency Regulations) if drought conditions persist into 2016. North Marin Water District (NMWD) serves approximately 62,000 people in northern Marin County, principally in the vicinity of Novato California. To date, since June 2015, NMWD customers have reduced water consumption 475 million gallons, resulting in a 31% cumulative savings compared to the same period in 2013, and exceeding the State mandated Conservation Standard of 24%.

In response to questions included in the Notice of Public Workshop NMWD offers the following:

1. What elements of the existing Emergency Regulation, if any, should be modified in an extended Emergency Regulation?
 - a. NMWD asks that the addition of a Regional Compliance Option to the current Emergency Regulation framework be included. NMWD is a member of the Sonoma Marin Saving Water Partnership (SMSWP) which advocated for a regional compliance approach in its' April 22, 2015 letter to the State Board staff. A more expanded Regional Compliance Option proposal has now been forwarded to the State Board staff from a broader coalition of water agencies who currently have formed alliances to comply with SBx7-7 requirements. This recent Regional Compliance Option proposal was presented to State Board staff on October 26, 2015 during an informal workgroup meeting. The Regional Compliance Option will achieve the same water savings as the participating individual water agencies. This

- option does not require any changes to individual water agency Conservation Standards, baselines or reported production figures and relies on voluntary participation from individual water agencies that choose to form a multiagency region to reach compliance with the State Water Resources Control Board's emergency regulation.
- b. NMWD also asks that water production savings exceeding the Conservation Standards for a region or individual agency during the June 2015 through February 2016 period be "rolled over" and credited to the region or individual agency during any extension period. We ask that any proposed extension period, prospectively beginning on March 1, 2016, not restart from a perspective of no conservation savings to-date when a region or individual agency has ended the original measurement period with cumulative savings exceeding its Conservation Standard.
2. What additional data, if any, should the State Water Board be collecting through the Emergency Regulation and how would it be used?
 - a. For future compliance evaluation purposes, NMWD requests State Board staff guidance to help standardize the methods used to account for bimonthly billing cycles and different number of days in each billing cycle. Water production information from water wholesalers are not always consistent between years because the wholesaler billing period does not always coincide with calendar month as now required for reporting. This request will provide more accurate data for comparison between current year and baseline year monthly reporting.
 - b. For future applicability of the Conservation Standard for a region or individual agency, NMWD suggests the State Board collect available water storage information for that region or agency monthly.
 3. How should the State Water Board account for precipitation after January 2016 in its implementation of any extension of the Emergency Regulation?
 - a. NMWD requests that any extension of Emergency Regulation beyond February 2016 include a trigger for regions or individual agencies based on a nexus between the mandated conservation standard and

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current local water supply conditions. One way to do so is by reviewing the available water supply information monthly as suggested in response 2.b. above. The State Board can consider scaling back the applicable Conservation Standard when sufficient water supply as determined by reported water storage levels are sufficient to meet the region or agency needs. We suggest the State Board consider a 4% Conservation Standard when a region or agency has available water storage at or above 90% of the water supply pool for surface water reservoirs, on April 1, 2016. The Conservation Standard for a region or agency could be proportionately higher if water storage levels on April 1 are below 90%.

Once again, thank you for the opportunity to comment.

Sincerely,



Chris DeGabriele
NMWD General Manager