

April 13, 2016

Delivered via e-mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

The Honorable Felicia Marcus, Chair  
and Members of the State Water Resources Control Board  
c/o Jeanine 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 Board:

Thank you for the opportunity to provide input to the State Water Resources Control Board (State Water Board) on potential adjustments to the February 2016 Emergency Regulation (Emergency Regulation). The City of Santa Rosa is a retail water supplier serving approximately 173,000 residents in Sonoma County and receives its water supply from the Sonoma County Water Agency. Water supply for the Sonoma County Water Agency is derived from local surface water reservoirs – Lake Sonoma and Lake Mendocino. As of April 11, 2016, these local reservoirs are full, with Lake Sonoma at 100.1% water supply capacity and Lake Mendocino at 104.2% capacity. In addition, Santa Rosa has a long-standing commitment to water use efficiency and is fully committed to providing a reliable and resilient water supply for our community, recognizing the vital role that water conservation implementation provides. The City has been proactive in our response to previous water shortages through implementation of our Urban Water Shortage Contingency Plan, exceeding the requested reduction in water supply from our customers, and preserving water supply to meet all needs. In response to the current Emergency Regulation, the City was assigned a 16% conservation standard and through March 2016, we have reduced our water use by 24% compared to the 2013 baseline.

The City is a member of the Water Advisory Committee (WAC) to the Sonoma County Water Agency, which consists of the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, Petaluma, Town of Windsor, North Marin, and Valley of the Moon Water Districts (Water Contractors). Due to the current capacity of our local reservoirs and above average rainfall received to date, our region is not currently experiencing a drought emergency. In recognition of our current conditions, the WAC adopted the attached Resolution on April 4, 2016, requesting the State Water Board rescind the application of the Emergency Regulation to the retail water agencies in Sonoma and Marin counties.

The State Water Board solicited input on three questions related to the potential adjustments to the Emergency Regulation. Below, please find our input:

1) **What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?**

To account for the differing hydrologic conditions and water supply conditions that exist throughout the State, Santa Rosa suggests the following changes to Section 865 (c)(2) as follows:

(c)(2) Each urban water supplier whose sources of supply are adequate to meet normal demand shall be exempt from the requirements of Section 865 of these regulations. Each water supplier who is eligible for this exemption shall provide a statement to the Board by June 1, 2016 which provides data describing the normal potable water demand in its service area, and data describing the amount of supply available to the supplier to meet this demand.

In addition, Santa Rosa supports the continued implementation of water waste restrictions and recommends modification of the current Emergency Regulation to determine any needed Conservation Standard based on water supply deficiency as identified by individual urban water suppliers.

2) **How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?**

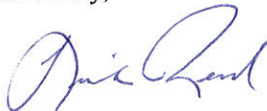
By making the change to Section 865 (c) (2) recommended above and requiring individual urban water suppliers to submit information on water supply deficiency, information on regional differences in hydrologic conditions would be provided by individual urban water suppliers or regional groups of water suppliers that share supplies from a watershed or reservoir, such as the Water Contractors. The State Water Board should rely on the information provided by individual urban water agencies or regional groups of water suppliers and can verify the information provided by reviewing precipitation, runoff and reservoir storage data from the California Data Exchange Center, as well as water supply contract allocations from the Department of Water Resources or the Bureau of Reclamation and other sources.

3) **To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?**

Urban water suppliers are required to provide a reliable water supply for their ratepayers and required to do an extensive reliability analysis as part of the Urban Water Management Planning Act. The State Water Board should rely on the reliability information developed by the individual urban water suppliers as included in their Urban Water Management Plans.

Thank you for the opportunity to provide input on the potential adjustments to the Emergency Regulation. We look forward to continuing to work with the State Water Board on future water conservation efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Reed".

Linda Reed  
Acting Director – Santa Rosa Water

Enclosure(s): Resolution of the Water Advisory Committee to Sonoma County Water Agency  
Concerning the State Water Resources Control Board Drought Emergency Urban Water  
Conservation Regulations

**RESOLUTION OF THE WATER ADVISORY COMMITTEE TO  
SONOMA COUNTY WATER AGENCY**

*RESOLUTION OF THE WATER ADVISORY COMMITTEE TO SONOMA COUNTY WATER AGENCY  
CONCERNING THE STATE WATER RESOURCES CONTROL BOARD DROUGHT EMERGENCY URBAN  
WATER CONSERVATION REGULATIONS*

WHEREAS, the Water Advisory Committee (WAC) is advisory to Sonoma County Water Agency (SCWA) and holds certain powers and responsibilities enumerated in the Restructured Agreement for Water Supply between SCWA and its Water Contractors (Cities of Cotati, Petaluma, Rohnert Park, Santa Rosa, Sonoma, Town of Windsor and the Forestville, North Marin and Valley of the Moon Water Districts) including acting as collective spokesperson for the Water Contractors; and

WHEREAS, on April 1, 2015, Governor Jerry Brown issued Executive Order B-29-15, which required in part that the State Water Resources Control Board impose restrictions to achieve a 25% reduction in urban potable water use by February 29, 2016, compared to usage in 2013; and

WHEREAS, on May 5, the State Water Resources Control Board adopted drought emergency water conservation regulations to implement the Governor's mandate, including a range of conservation standards to reduce potable water production by urban water suppliers; and

WHEREAS, the emergency water conservation regulations required the Water Contractors to reduce potable water production ranging from 16% to 28% and required smaller public water suppliers to achieve a 25% reduction or limit outdoor irrigation to no more than two days per week; and

WHEREAS, the Water Contractors and Marin Municipal Water District receive Russian River Water supply from Sonoma County Water Agency and are members of the Sonoma-Marin Saving Water Partnership which members have collectively reduced water production by 23% from June 1, 2015 through February 29, 2016 compared to a collective water conservation standard of 19%; and

WHEREAS, the smaller public water suppliers in the Sonoma-Marin region have also complied with the State emergency water conservation regulations; and

WHEREAS, the Sonoma-Marin Saving Water Partnership members are committed to continued water conservation and have agreed to expend \$15 million dollars on water conservation implementation from July 2008 through July 2018 and have agreed to maintain membership in good standing with the California Urban Water Conservation Council (CUWCC) and implement the Best Management Practices as outlined by the CUWCC; and

WHEREAS, the Sonoma-Marin Saving Water Partnership members commitment to water conservation has resulted in a 37% reduction in per capita water use since 2000; and

WHEREAS, on November 13, 2015, Governor Brown issued Executive Order B-36-15, which specified in part that, should drought conditions persist through January, 2016, the State Water Resources Control Board would continue restrictions through October 31, 2016 to achieve statewide reductions in potable water usage, including modifications to address potable and non-potable water, and to incorporate insights gained from existing restrictions; and

WHEREAS, on February 2, 2016, the State Water Resources Control Board adopted an extension of the conservation regulations until October 31, 2016, which contained no changes in the provisions relevant to WAC agencies, although the regulations did provide reductions in conservation requirements for water agencies in warmer and drier parts of the state, for those that recently implemented potable recycled water or desalination projects, and for those that had experienced population growth since 2013; and

WHEREAS, on April 20, 2016, the State Water Resources Control Board will conduct a public workshop on potential modifications to the emergency water conservation regulations to address hydrologic conditions through March, and will consider changes to the regulations at a subsequent meeting in May, 2016; and

WHEREAS, the Sonoma-Marin region has received above average rainfall to-date this water year and surface water reservoirs in Marin County, filled to capacity and over topped spillways on March 11, 2016 and the water supply pools in Russian River surface water reservoirs filled on March 6, 2016 and now encroach into the flood control pools, all resulting in normal water year conditions, and;

WHEREAS, the U.S. Department of Agriculture Drought Monitor currently classifies Marin County and Sonoma County as having no drought conditions; and

WHEREAS, there are no physical facilities in place to move available water supplies from the Sonoma-Marin region to other areas of California which may or may not have insufficient water supplies.

NOW THEREFORE, BE IT RESOLVED by the WAC that, due to adequate water supplies and the lack of any drought conditions, the WAC requests that the State Water Resources Control Board rescind the application of emergency drought water conservation regulations to the Water Contractors and small water suppliers in the Sonoma-Marin region; and

BE IT FURTHER RESOLVED that this resolution shall take effect upon its adoption.

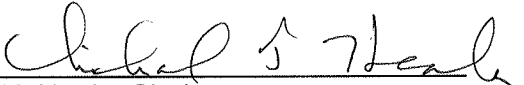
PASSED AND ADOPTED by the WAC on this 4<sup>th</sup> day of April, 2016.

AYES: Moved Joseph Callinan (City of Rohnert Park), Second Mark Millan (Town of Windsor), Laurie Gallian (City of Sonoma), Tom Schwedhelm (City of Santa Rosa), Susan Harvey (City of Cotati), Mike Healy (City of Petaluma), Mark Heneveld (Valley of the Moon Water District), Rick Fraites (North Marin Water District)

NOES: None

ABSTAIN: None

ABSENT: None

  
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Michael T. Healy, Chairman  
Water Advisory Committee to Sonoma County Water  
Agency