



RRWPC

Russian River Watershed Protection Committee

P.O. Box 501
Guerneville, CA 95446
<http://www.rrwpc.org>



Nov. 25, 2014

Felicia Marcus: Chair
California State Water Resources Control Board
Sent Via Email

Re: Dec. 2, 2014 Agenda Item # 5:
Update on Emergency Water Conservation Regulation

Dear Ms. Marcus and Board Members:

I am writing on behalf of Russian River Watershed Protection Committee (RRWPC). As residents, business, and property owners of the lower Russian River, and with concern for water quality and quantity in our lower river environment, we have been tracking water use and conservation practices by Sonoma County Water Agency (SCWA) prime contractors for many years, including Santa Rosa, Rohnert Park, Cotati, Petaluma, North Marin Water District, Sonoma, Valley of the Moon, and Windsor. In the past, we have spoken to your board regarding irrigated wastewater (Recycled Water Policy) and risks of endocrine disrupting chemicals. More recently, we have added 'drought' and its impact on the river environment, to our priority list of issues to study and discuss.

We have followed and commented locally on the governor's drought declarations made earlier this year. In fact, we were very active on the issue of mandatory conservation since January, 2013, when the Army Corps of Engineers caused about 25,000 Acre Feet (AF) of water to be released from Lake Mendocino, only to be followed by less than 5" of rain in Santa Rosa (average annual rainfall in Santa Rosa is 32") for the remainder of the year. While we realize that Item #5 is only a discussion item on Dec. 2nd agenda, we are hopeful that board members will read and consider our following comments.

SCWA Russian River water sales data....

On their website, SCWA lists monthly water data for all water contractors for the last 20

years ([View Water Deliveries data for FY95-96 through FY14-15](#)) In determining conservation accomplishments, RRWPC has regularly focused on Russian River water purchase data exclusively for the following reasons:

- Contractor's do not release details about local water use, including groundwater, to the public. We assume it is accurately reported to the State, but have no way of actually verifying that. From what we can tell, those who have analyzed the data using State report, approximately 10%-20% of urban water use in our area is generated locally, most or all from groundwater sources.
- Protection of viable water resources is essential. To protect those resources, especially during serious drought, stream flow impacts resulting from summertime contractor water use should address the needs of all beneficial uses reliant on that supply for their survival. (Currently minimum water flows in the lower Russian have been recently limited by your board to 60 cfs, less than half normal levels under a temporary urgency change order. Next year, SCWA will bring an EIR to your board recommending permanent changes to Decision 1610 flows. That document should provide detailed analysis on the impacts of these cutbacks on water quality and fish habitat, although we can only surmise now what they are.)

Throughout 2013, public members regularly urged SCWA at their monthly contractor meetings, to require mandatory conservation requirements, but contractors refused. In the meantime, the reservoirs continued to go down. On Jan. 11, 2013, Lake Mendocino was at 69,860 AF (water supply pool 102% full) By December 29, 2013, Lake Mendocino was at 27,055 (40% of water supply pool) **or a drop of 63% over the course of a year.** While some of the drop was to be expected, the extremely low precipitation that fell that year, should have demanded greater caution on the part of the water users.

- While legislation has been passed requiring cities to meet per person use savings, and while the State is emphasizing per person use for current conservation savings monthly report, nevertheless, this information does not serve to protect rivers and streams from which most water is drawn. *No matter how low per person use may go, that amount can easily be made up and even exceeded by new growth and development and increased population.*

As evidenced by letters to the editor in our local daily newspaper, people who go out of their way to conserve as much as possible are incensed when they see luscious green lawns and new housing developments going up. The city of Rohnert Park has 488 units being constructed now as this letter is being written. The new casino gave the city \$13 million which they are using to build a new sewer pipeline to serve the development. Everyone is asking where the water will come from? (See note below for further information on planned new growth for which water supply is unknown.) Contractors seem to assume (for general plan projections) that their allocated amount will always be there. This is not sustainable.

2013: SCWA conducts major publicity campaign regarding drought....

In fairness to the Sonoma County Water Agency and some of their contractors (especially Santa Rosa), we want to commend these agencies on the effort they expended to educate the public about the need to conserve water. They saturated the media, developed an excellent website, used humor to get people's attention, attended many community events, offered motivational prizes, and all in all put in a yeoman's effort to get the conservation message out there.

But SCWA still did not require mandatory conservation in 2013 and actual water savings were not impressive. (There were many stories statewide indicating the public was not adequately responding to drought messaging.) Some of the contractors now claim they implemented mandatory conservation, but that's only a word. The City of Santa Rosa has four levels of 'mandatory' and they are only in their first tier of requirements. In actuality, most of their mandatory is actually voluntary, since there is really no or little penalty connected to the lack of compliance.

Between July, 2013 through June, 2014, RRWPC tracked Russian River water use including the comparison of month to month water purchases for each contractor. We analyzed individual contractor data, as indicated in enclosed chart and discovered that total savings by all contractors from 2013 to 2014 was only about 3%. SCWA's main conservation goal in 2013 had been to motivate people to cut 20% of their water use voluntarily, but didn't come close.

- Two of the eight prime contractors purchased MORE water in the 2013-2014 water year than in 2012-2013 including Cotati with 26% increase and North Marin with almost 14% increase.
- Santa Rosa and Rohnert Park had decreases of about 9%-10% which were the highest of the group, yet far from 20%.
- In looking at summer data when use is highest (June-September) for 2009, 2012, 2013, water sales were the lowest in 2009, the only year in which **mandatory** conservation occurred. 2013 sales (voluntary conservation) were lower than those in 2012 (no conservation), but not nearly as low as in 2009.

2014: Data reported to State construed to show more conservation....

In studying June through September data (2013 and 2014 comparison) listed in the ***Monthly Urban Water Supplier Report*** for North Marin, Petaluma, Rohnert Park, Santa Rosa, Sonoma, Valley of the Moon, and Windsor, (Cotati not required to submit data) there appear to be only three instances where water use went UP between 2013 and 2014 for each of the four high water use months. Those were June, 2014 in Rohnert Park and June and September, 2014 in Sonoma. **All other districts show water use going down in that period.** (We assume that the amount of water reported included both water purchased from the Sonoma County Water Agency and local ground water sources. It would be helpful to report those sources separately.)

As contractors called attention to their water savings in January, February, and March, 2014, they fail to mention that **in April, May, June, and July of 2014, contractor water sales climbed dramatically upward from one month to the next!** For instance, in March, 2014, sales to all contractors were 2,542 acre feet (AF), and by July up to 4,867 AF. It went down to 3681 AF in August, but then up again in September to 4314 AF. It is

very significant that in drought conditions, not only because of the risk of running out of water for humans, but because of water quality impacts to streams and potential harm to fish and aquatic life, that increased water use over the course of a summer is much more significant than comparing two years with one another. In fact, that is the most critical time that water use should be decreasing.

Sonoma-Marin Water Saving Partnership allows some to not meet goals...

- Sonoma-Marin Water Saving Partnership encourages conservation and helps each of the eight major contractors achieve their water saving goals, **but those entities whose water use is going up rather than down have been taking advantage of the savings of those who do the hard conservation work.**
- Furthermore, tracking savings in context of per person use, doesn't address need for expanded water supplies (and stress to river and reservoirs during water shortages) to serve population increase. Water sales denote how much river water is used by each contractor, while per person demand allows for an unlimited increase in the number of people, as long as calculations state that each person's use is going down. ***In other words, this method of calculation, required by State law, ignores limited capacity of river systems.***
- Approximately 3% should be calculated for leakage allocations. If water shortage allocation for all contractors is 56,250 acre feet, then 3% of that is 1,688 AF. **More emphasis needs to be placed on the elimination of leakage. Infrastructure repair is a critical piece of the conservation picture that is seldom addressed. Incentives and funding opportunities should make this more attractive.**

Recycled water is not the best response to drought.

For the following reasons RRWPC strongly supports conservation over inappropriate and risky uses of recycled water, such as the allowance of 'incidental runoff' during low flow and drought periods. The State has a vigorous campaign to encourage recycled water, but we believe that, because of the lack of knowledge of impacts of endocrine disrupting chemicals, that this is ultimately unwise.

Conservation is cheaper, healthier, & more reliable than urban reuse...

- During drought, much less water is available for reuse and therefore investment in separate reuse infrastructure may have limited value;
- Since with conservation, there is less sewage needing treatment, fewer chemicals, less energy, less hardware, fewer man hours, less administration, etc. are needed to process wastewater generated;
- In our area, local recycled water costs to commercial consumers are same or more than for potable since Santa Rosa charges 95% of potable costs for recycled water and other related expenses probably exceed 5%; the customer saves no money on an inferior product;
- Urban reuse can result in impacts to creeks from irrigation runoff during times when low flows provide no assimilation capacity for toxic and nutrient containing wastewater. This is especially important when recreational use is high. TERTIARY WATER IS NOT POTABLE WATER!

- A relatively new resource on the state of the science of endocrine disruption has been put out by the World Health Organization and is entitled “State of the Science of Endocrine Disrupting Chemicals 2012: Summary for Decision Makers”, Edited by Ake Bergman, Jerrold J. Heindel, Susan Jobling, Karen A. Kidd, and R. Thomas Zoeller. (UNEP job number: DTI/1554/GE) We recommend that the State inform itself of all current information available on this topic and not rely exclusively on the State Panel set up for this purpose.

We hope that this information is helpful to your analysis about water use in Sonoma and Marin Counties. We realize that conditions vary greatly around the state, and you have to balance statewide needs, but we hope you will add our information to your deliberations and future policy development that addresses the drought issue.

Sincerely,



Brenda Adelman

Note on Sonoma County projected growth:

We anticipate that the EIR for the Fish Flow Project (permanent change to D1610), will fully analyze flow scenarios that demonstrate and assure water quality and supply benefits for all life forms. Based on dire drought we are currently experiencing, the entire system may have already reached capacity, and it has not been demonstrated what new development can be accommodated by current and anticipated water supplies.

According to a recent report by the Sonoma County Economic Development Board, the following new development in Sonoma County cities is projected: (EBC Report did not address adequacy of water supply to serve new development, or noted number of units for which permits were obtained.)

Estimated population increases between 2012 (actual) and 2017 (projected):

- Windsor: 27,037 to 27,799 (2.82%)
- Santa Rosa: 169,189 to 173,813 (2.73%)
- Rohnert Park: 41,416 to 42,659 (3%)
- Cotati: 7,271 to 7,378 (1.47%)
- Petaluma: 57,933 to 59,232 (2.24%)
- Sonoma: 10,800 to 11,355 (4.39%)

Values of residential and non-residential building permits in August, 2013:

- Windsor: \$1,176,632 and \$3,037,300 respectively.

- Santa Rosa: \$46,902,514 and \$22,284,007 respectively.
- Rohnert Park: \$2,946,131 and \$4,013,287 respectively. A recent Press Democrat article announced that over 1600 new units had recently begun construction.
- Cotati: \$182,832 and \$3,416,596 respectively.
- Petaluma: \$22,839,081 and \$21,332,757 respectively.
- Sonoma: \$6,627,463 and \$1,750,976 respectively.

Comparison of Water Sales: SCWA Prime Contractors (Water Years 2012-2013 & 2013-2014)

FINAL VERSION

Contractor	2012-13 Water Purchases (in Acre Feet)	2013-14 Water Purchases (in Acre Feet)	Difference (- or +)	% Change
Santa Rosa	20,807.5	19,047.7	- 1,759.8	- 8.46
Petaluma	9,420.8	9,200.9	- 219.9	- 2.334
North Marin	7,433.0	8,455.6	+ 1,022.6	+ 13.76
Rohnert Park	3,839.7	3,449.8	- 389.9	- 10.15
Cotati	548.8	691.1	+ 142.3	+ 25.93
Windsor	3,950.27	3,693.6	- 256.67	- 6.5
Sonoma	2,111.0	2,093.6	- 17.4	- 0.824
VOM	2,589.4	2,533.6	- 55.8	- 2.15
TOTALS:	50,700.47	49,165.9	- 1,534.57	- 3.027

Numbers reflect conservation savings resulting from SCWA's "20 Gallon Challenge", that commenced in spring of 2013.