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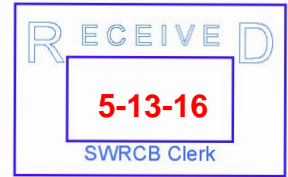
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May 13, 2016



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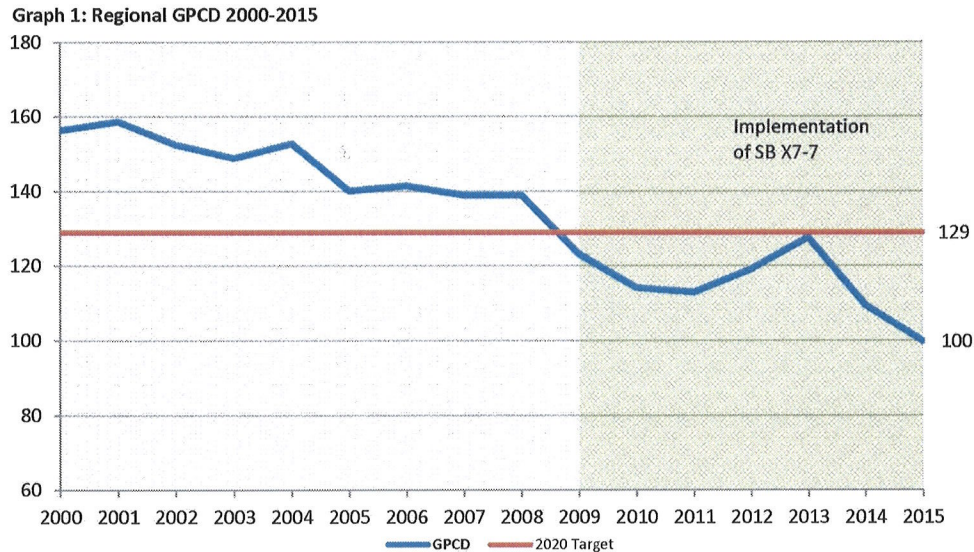
Re: **May 18, 2016 BOARD MEETING (Conservation Extended Emergency Regulation)**

Dear Chair Marcus and Members of the State Board:

Thank you for the opportunity to comment on the staff proposal for Extended Emergency Regulation for Urban Water Conservation (Regulation). The North Marin Water District (NMWD) provides water service to approximately 61,000 people in the Novato California water service area and another approximately 1,700 people in the completely separate Point Reyes water system serving rural communities at the base of Tomales Bay in West Marin County California. Additionally, NMWD is a member of the Sonoma Marin Saving Water Partnership which consists of the urban retail water agencies serving approximately 600,000 residents and receiving wholesale water supply from Sonoma County Water Agency's Russian River System (The Water Contractors: Town of Windsor, Cities of Santa Rosa, Rohnert Park, Cotati, Sonoma, Petaluma, and Valley of the Moon, Marin Municipal, and North Marin Water Districts).

NMWD and the Sonoma Marin Saving Water Partnership members have continuously remained in compliance with the Regulation as modified by the State Water Resources Control Board (State Board) from time to time. From June 2015 through March 2016 NMWD has reduced the Novato service area potable water production by 32% and in West Marin by 26%, wherein the Conservation Standard set by the Regulation is 24% and 25% respectively. The Sonoma Marin Saving Water Partnership members collectively have reduced water production by 23% compared to a collective Conservation Standard of 19% during the same period. The Sonoma Marin Saving Water Partnership was created in 2010 to work collaboratively on implementation of appropriate water use efficiency programs on a regional basis. These parties also established a regional alliance to comply with the SBx7-7 Legislation enacted to reduce per capita water use by 20% by the year 2020. The attached chart shows the Sonoma Marin Saving Water Partnership performance through 2015, identifying that the collaborative process has worked in our region as per capita consumption has been

reduced to by 37% since 2000, nearly double the SBx7-7 target.



Additionally, recycled water development in our region by Marin Municipal Water District, the Cities of Santa Rosa, Rohnert Park, Petaluma, Town of Windsor, and participants in the North Bay Water Reuse Authority, including NMWD, have been effective at expanding the use of recycled water to offset potable water demand.

Water supply conditions in the Sonoma Marin region have improved. Currently, local and regional surface water reservoirs are nearly full and normal year water supply conditions prevail on the Russian River and Lagunitas Creek pursuant to criteria stipulated in State Board decision D1610 and order WR95-17 respectively. The Water Advisory Committee to the Sonoma County Water Agency, whose members also comprise the Sonoma-Marin Saving Water Partnership, and the NMWD Board of Directors adopted Resolutions which reflect these current water supply conditions, recaps past performance and compliance with the Regulation, restates an ongoing commitment to furthering water conservation, and requests that the State Board rescind application of the emergency drought water conservation regulations to the Sonoma Marin Saving Water Partnership members and small water suppliers in the Sonoma Marin region.

We appreciate that the Regulation proposed now includes sec. 864.5 Self-Certification of Supply Reliability for Three Additional Years of Drought. We also appreciate that the Regulation proposed removes Sec. 865 (g) (A) & (B) for small water systems. These provisions should result in NMWD and other Sonoma Marin Saving

Water Partnership members providing realistic conservation standards to the customers we serve. We are working with Sonoma County Water Agency to determine the volume of water expected to be delivered in each of the next three years using the Regulation Sec 864.5(b) criteria and are hopeful that mandatory reductions in water use can be avoided.

Even with the proposed revisions to the Regulation NMWD expects that water demand will not rebound fully to 2013 & 2014 levels. Customer water use patterns and practices have been modified, leaks repaired and water rates raised, all of which results in less elastic water demand.

NMWD is ready, willing and able to assist the State Board in addressing the orders issued by the Governor in his E.O. B-37-16 to USE WATER MORE WISELY and ELIMINATE WATER WASTE.

Sincerely,



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