



June 5, 2021

City of Santa Rosa  
City Council  
69 Stony Circle  
Santa Rosa, CA 95401

*Submitted via email to: [UWMP@srcity.org](mailto:UWMP@srcity.org)*

**RE: City of Santa Rosa's Draft 2020 Urban Water Management Plan**

Mr. Mayor Rogers and City Council Members,

On behalf of Russian Riverkeeper (RRK), I welcome the opportunity to submit these comments for the "Draft 2020 Urban Water Management Plan." The Russian Riverkeeper is a local nonprofit that has been successfully protecting the Russian River watershed since 1993. Through public education, scientific research and expert advocacy, RRK has actively pursued conservation and protection for the River's mainstem, tributaries and watershed. Our mission is to inspire the community to protect their River home, and to provide them with the tools and guiding framework necessary to do so. For that reason, we submit the following comments.

**I. Current Hydrological Situation in the Russian River Watershed**

Historically, California has been known for its Mediterranean climate with drier summers and mild, wet winters. On occasion there would be a short period of drought conditions as La Niña passed through, or stronger wet years with El Niño. Climate change has caused this once reliable climate pattern to abruptly change in more recent years. Instead, we are now seeing longer hot, dry periods with fewer intense precipitation events during our winter months. Our water infrastructure, water use, and entire mindset around water are not prepared to deal with this new normal. Society must be willing to adapt and take significant steps forward now to effect necessary changes.

Lake Mendocino is currently projected to be dry by October 1, 2021—that is less than five months away. Both Lake Mendocino and Lake Sonoma are the lowest in their history. The Russian River Watershed has averaged less than 14 inches of rain this water year, and is less than 40% of the annual average for the past 30 years. That is only second to the 1976/1977 drought period, and two years into our current dry period we are now dealing with more frequent and hotter temperatures than we did back then. These hotter temperatures increase soil moisture deficits, evapotranspiration rates, and overall demand, while simultaneously reducing groundwater recharge rates and the overall amount of water available to our local ecosystem. Not to mention the increased fire risk and subsequent impacts we regularly face when water is in low supply. This all means that we are in a much worse off place than prior dry years, and we do not know how long this current period will go on—it could be another six months, or more likely than not, another 2-5 years.



To date, local efforts to reduce demand have been largely inadequate in light of the seriousness of this dry period. As these dry periods continue to grow in length and intensity our local policies must be proactive in planning for the worst type of water years; they must have adaptive measures in place so that protective action can be taken as needed; and they must provide clear and concise protective triggers so that discretion is removed from the equation.

## **II. Primary Concerns**

Urban Water Management Plans (UWMP) are an important tool that helps ensure the effectiveness of long-term resource planning so that adequate water supplies are available to meet existing and future water needs. To have an effective plan, UWMPs must be based on accurate information, have clear-cut triggers, and must have some reasonable indication of ability to satisfy purpose. Some ways that the City of Santa Rosa can incorporate these needs into their 2020 UWMP are below.

### **a. Sufficient Supply Determinations**

#### **Projected Water Supplies**

To establish an accurate picture of our future water supplies, the historic climatic patterns and associated hydrology cannot be the primary basis for any future supply determinations. This is because droughts and dry periods are becoming more common, so they must be accounted for sufficiently in projections so as to avoid any unnecessary risks. For example, the fact that 60% of this past decade has been classified as serious drought years is not adequately portrayed when looking at drought classifications for the last century. Thus, if proper consideration is not given, information can be skewed against our own benefit. As such, using the past 100 years to plan for the next 25 years of water supply is no longer reasonable.

Preparing for drought impacts that are only expected to occur 10% of the time is much different than preparing for impacts expected to occur 60% of the time. A higher rate of drought years means our ecosystem and local water cycles are put under growing strain each year with no relief. Groundwater recharge rates decrease with less water in the system. Rates of evapotranspiration increase. Water quality decreases. All of these impacts to our environment continue to cumulate as the drought continues on, and exasperates the local water system to its brink. Resiliency is lost and water supply is lost. We have to prepare for that future reality so that we can extend our local resiliency for as long as possible.

Thus, when making water supply determinations it would be prudent to base UWMP actions on a worst-case scenario. It is unrealistic to believe that the full amount of all relevant water rights will get delivered each year without reduction. Believing otherwise only results in actual water supplies being lower than the projected and planned for amount, which adds pressure to decision makers and creates unnecessary risk. Past UWMPs have utilized some of these practices to varying degrees, but the 2020 UWMP needs to go even further in these calculations. Especially in regards to multiple dry years where supply will be reduced even further with each new subsequent dry year, unlike the current projections used.



For example, consider the current dry period we are in. In April, SCWA contractors agreed to a 20% reduction in all water deliveries. SCWA is reinforcing this reduction with a Temporary Urgency Change Petition now that will also implement a 20% reduction in all diversions from the Russian River. That means 20% less than the expected amount of supply is available to Santa Rosa, not the full guaranteed amount that is routinely stated as always being available in this draft UWMP—for normal or dry years. Thus, situations like this year where 20% or maybe even a greater reduction in deliveries are likely to occur must be given further consideration in this UWMP.

Without some proactive consideration in place for worst case scenarios, we end up in positions like the one now where Lake Mendocino and Lake Sonoma are at a historical low and there is no new inflow coming for at least another six months, if not longer.

### **Recycled Water**

The current 2020 draft notes that there is no intention to expand use of recycled water for outdoor irrigation. With only one percent currently being put to such uses and potable water supply becoming more scarce, it would be prudent to reconsider this position. Expanding use of recycled water would help alleviate pressures to conserve water and ensure that potable water is going towards human health and other beneficial uses. Efforts to expand this program would be a good way to further reduce risk to water supply loss.

#### **b. Use and Reliance on Surcharges**

Santa Rosa currently uses rate surcharges to help compensate for revenue lost due to reduced water use. These surcharges are in addition to normal rates and are equally applied to all users, even those that are taking all steps to reduce water use. Yes, those that are not as efficient in use will have a higher bill than those doing everything they can; however, those that working to reduce demand are still having to pay more than the normal rate. Thus, this “incentive” to reduce water use still results in higher costs. This especially impacts community members and lower income residents. Instead, the City should consider looking into getting a conservation tier rate program onto a local ballot for residents to vote on. Conservation tiers would ensure that those implementing strong conservation measures are not required to pay even more money for doing so. Those that want to continue higher water use would be in higher tiers and have to pay more as a result, similar to tax rate structures. A conservation tier rate system would still provide revenue to the City for water maintenance and also encourage reduced demand.

#### **c. Need for Clear and Discrete Language for Stages of Action**

### **Use of Percents**

This is a comment more about ease of use and understanding for the average person when looking at a UWMP. There is frequently use of and reference to various percents, comparisons of those percents, and baselines in both oral and written communications with no real context for the statement trying to be conveyed. For example, a 15% use reduction in Q1 of 2021 compared

to use for the same period in 2020 sounds great, but what does it actually mean? Was 2020 use above average so really 2021 is just back to average use levels? Or was it cooler in 2021 so less irrigation occurred? Does a 15% use reduction equate to 120GPCD now being used or 65GPCD? Where is the public supposed to reasonably find the information that allows for full understanding of the 15% use reduction statement? Or what if the next person you speak to says current use is 18% below the 2013 baseline compared to 2020? A whole lot of outside information is required to figure out what that means, and it does not easily correlate, if at all, to the comparison. Thus, taking the time to be consistent and clear in communications regarding water uses would be very helpful. Use information should be straightforward and easily understood for all persons.

### **Determining Water Shortage Levels**

There is currently a lack of transparency and clarity in determining water shortage levels and the information that goes into making those determinations.

- There is no clear information on how supply reductions are determined, and thus no clear way to identify which Stage of water shortage should be activated. Instead, this draft continually states in varying ways “as determined by the City.” What does that mean?
  - Clear and concise elements need identified in advance so that the triggering of a stage is not unnecessarily delayed or left to discretion
  - Supply reduction determinations should consider the likelihood of multiple dry years in a row so that supplies are adequately supplied for the following years.
  - Determinations should also consider longer term impacts of dry years like reduced groundwater supplies which can increase the amount of time the Russian River is a losing river, and thus reduced availability of surface waters.
  - Shortage determinations should not be solely reliant on the actions of another agency like SCWA.

### **Demand Reduction Actions**

To strengthen these actions, below are some other uses that should be considered.

- Starting with Stage 1, require leaks be repaired. As Stages progress, implement more stringent enforcement and shorten repair timeframes.
- Starting at Stage 2 or 3, hotels and other visitor accommodations should be required to post signage about ongoing drought conditions and steps being taken to reduce water use i.e. washing of towels and sheets on a request basis only.
- Excess use penalties should start with Stage 3 so that they are more in line with mandatory stages and measures.
- Starting with Stage 3, additional landscape restrictions should start to be implemented.
  - Limit irrigation to every other day, then continue to reduce the amount of irrigation days available as Stages progress. For example, 2 days a week at Stage 4, 1 day a week at Stage 5, and only for home grown food at Stage 6 and beyond.



- Restrictions on filling pools except to prevent pump damage should start at Stage 3. Pools and spas should also require pool covers from Stage 3 on, if not a basic requirement starting at Stage 1. Filling of new pools should also be prohibited starting with Stage 4 at minimum.
- Prohibition of all new landscape installation should start sooner at Stage 5.
- Starting with Stage 6, new development should be prohibited.

#### **d. Other Concerns and Things to Think About**

Other impacts that will impact future water demand and supply that need to be considered are below:

- Due to the disastrous fires that have hit the area the past few years, many homes were burned down and are still awaiting a rebuild. As homes are rebuilt, there is a great opportunity to ensure that the most water efficient materials are used, in both construction and landscaping. This will help ensure that future demand remains lower than it was previously.
- Water use and energy use are positively related, so the more water use decreases the more energy efficient our region will become. This will help benefit the region's climate change goals.
- Adding new infrastructure without first reducing demand is not conducive to ensuring water costs remain low and within the financial means of all community members. The addition of infrastructure increases water rates in order to cover construction costs—demand reduction does not increase water rates in the same way. Only when conservation gains are no longer feasible to meet demand needs should infrastructure be considered.

### **III. Conclusion**

We appreciate the opportunity to provide comment and welcome any questions that you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Jaime Neary".

Jaime Neary  
Staff Attorney  
Russian Riverkeeper

A handwritten signature in black ink, appearing to read "Don McEnhill".

Don McEnhill  
Executive Director  
Russian Riverkeeper