

June 8th, 2021



Protecting Marin Since 1934

Members of the Board of Trustees
Marin Municipal Water District
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President Koehler and Members of the Board:

Marin Conservation League supports conservation to reduce water use as the most stable and economical strategy to insure sufficient supply for essential needs during the current drought. Marin Municipal Water District's strong existing conservation program of outreach and rebates, in place before the current drought, paired with newly approved use restrictions triggered by historically low reservoir levels, is a great start. But given the uncertain duration of the current dry period, and a future of volatile rainfall forecast under the new climate paradigm, more is needed.

We recommend specific sanctions and revised pricing to support and encourage increased conservation, including the following:

- Temporary prohibition of new service connections, with a variance process to moderate the impact on the underserved and most vulnerable populations. In this connection, we propose that the exemption threshold for affordable housing levels be set at 80% affordable to allow for water connections to such projects as the proposed Whistlestop Senior Housing project in San Rafael. In addition, the ordinance could address some of the concerns raised by the public by allowing for a 90-day grace period to complete the departmental review with respect to building permit issuance for projects that are in the final stages of planning department approvals.
- Elimination of the Summer Tier 1 enhancement; Tier 1 rates should be the same year-round. This was a recommendation of your Water Rate Advisory Committee several years ago which was never implemented. Now is the time to do so as a permanent adjustment beyond the immediate drought period.
- Revision of the water rate tables to reduce the use quantities qualifying for Tiers 1 and 2, to further encourage conservation, and possibly revise the dollar amounts to more strongly encourage and reward water use conservation. The district's rates are generous for what is expected to be extended drier conditions with permanently unpredictable rainfall.
- Ban on use of potable water on turf areas, including golf courses.
- Temporary ban on filling of new swimming pools until water storage levels return to near normal.

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Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

- Per capita usage allotments, as has been done in past drought situations, if voluntary measures do not meet benchmark reduction quotas.

It is timely to prepare, or revise, long-term plans for supply, storage, water reuse, and pricing recognizing the strong likelihood that the West, including Marin County has in all likelihood entered an extended mega-drought era. The District is currently in the process of updating its Urban Water Management Plan as well as drafting a 10-year Capital Management and Financial Plan which creates the opportunity for deep thinking about the challenges and opportunities ahead in response to our changing climate.

Strategies and programs that were discounted as impractical or technically difficult could become viable as technology advances. And some, such as expensive recycling water systems, that were deemed too costly for the benefit derived, could merit reconsideration as new circumstances justify cost.

The water district is also responsible under a long-standing Court ruling, to provide sufficient flows to support salmon in Lagunitas Creek. We understand that MMWD is in the process of appealing to the Water Resources Board for flexibility in its required water releases into the creek during the current drought conditions.

Marin Conservation League supports MMWD's application to the Water Resources Board for adjustment of its required water releases during this emergency that are fully consistent with scientifically-supported decisions that meet the test of minimum, allowable flows that will protect salmon smolt movement, minimum water temperature requirements, and minimum levels of necessary oxygenation of the Lagunitas Creek stream flows.

Pushback on restrictions and pricing increases is bound to happen from a small but vocal minority, but inconvenience and cost today are outweighed by the grave consequences the County would confront if there is a 3rd, or even 4th, year of extraordinarily low rainfall.

Thank you for this opportunity to comment.

Sincerely,



Robert Miller
President



Susan Stompe
Chair, Land Use, Water and
Transportation