

State Water Resources Control Board ORDER in the  
Matter of Permits 12947A, 12949, 12950, and 16596  
(Applications 12919A, 15736, 15737, 19351)

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## Term 8 - WSCP Implementation Status



**January 10, 2022**

Prepared by

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## 1 Introduction

The Sonoma County Water Agency (Sonoma Water) prepared this report to fulfill the requirements of Term 8 of the State Water Resources Control Board (State Board) Order in the matter of Permits 12947A, 12949, 12950, and 16596 (Applications 12919A, 15736, 15737, 19351), approving a temporary urgency change to permit conditions (Order) dated December 10, 2021.

Term 8 of the Order directs Sonoma Water to take the following actions:

*Within 30 days of the issuance of this Order, Sonoma Water shall report on the status of implementation of its WSCP and the WSCPs of its contractors and other wholesale customers. The report shall include an explanation of whether the WSCPs' currently implemented water shortage levels and response actions reflect the possibility or likelihood of dry conditions continuing in 2022 and, to the extent they do not, a timeline for when the remaining WSCPs' water shortage levels and response actions will be adjusted and implemented. Sonoma Water shall provide monthly summaries to the State Water Board of reduction in total diversions by Sonoma Water and reduction in monthly deliveries to its water contractors and other customers as compared to the 2013 water use benchmark.*

This report provides information about the implementation status of Sonoma Water's Water Shortage Contingency Plan (WSCP) and the WSCPs of its urban retail water contractors and Marin Water. Additional detail is provided about the implementation of shortage actions of Sonoma Water's other wholesale customers, which either sell water directly to end-users but are too small to meet the technical definition of an urban retail water provider under the Urban Water Management Planning Act (below 3,000 connections and 3,000 ac-ft of water sales annually), or which do not retail water and fall under the category of governmental customers.

These other wholesale customers may have alternate shortage plans outside of what is required for urban water suppliers under the Urban Water Management Planning Act, or default to requirements for addressing shortage conditions as contained in their water sale agreement with Sonoma Water and its WSCP. This report is limited to customers with direct connections to Sonoma Water's water transmission system. The monthly summary of the reduction in total deliveries and reduction in monthly deliveries to its water contractors and other customers as compared to the 2013 water use benchmark will be provided as a separate report.

## 2 Status of Sonoma Water's WSCP

Sonoma Water's Water Shortage Contingency Plan (WSCP) was recently updated and adopted by its Board of Directors on May 11, 2021, as part of the 2020 Urban Water Management Plan update process. As a reference for this report, Sonoma Water's WSCP (2020 UWMP, Appendix C) is available to view or download online

[https://www.sonomawater.org/media/PDF/Water%20Resources/Water%20Supply/UWMP/Sonoma%20Water%202020%20UWMP\\_June%202021-ADA.pdf](https://www.sonomawater.org/media/PDF/Water%20Resources/Water%20Supply/UWMP/Sonoma%20Water%202020%20UWMP_June%202021-ADA.pdf).

Sonoma Water’s WSCP has six shortage levels as displayed in Table 1. Currently, Sonoma Water is implementing Shortage Level 2 consistent with a 20 percent reduction. Although some improvement in water supplies have occurred since mid-October 2021, the current shortage level reflects the continuing uncertainty of a full drought recovery based on current water supply levels in Lakes Sonoma and Mendocino given winter precipitation received to date, and with consideration given to the possibility of another dry year in 2022. Shortage Level 2 reflects consistency with the State Board’s December 13, 2021 extension of the Temporary Suspension of the Russian River Curtailment Orders relating to increased availability of natural flows in the Russian River, and the allowed beneficial use and diversion of these natural flows to allow local groundwater supplies (used conjunctively during drought conditions) to recover.

<b>Table 1. Sonoma Water - Water Shortage Contingency Plan Shortage Levels</b>		
<b>Shortage Level</b>	<b>Percent Shortage Range</b>	<b>Shortage Response Actions</b>
1	Up to 10%	Reduction in Russian River diversions by Sonoma Water of up to 10%. Sonoma Water’s wholesale customers each have voluntary reduction of wholesale water deliveries as determined by shortage allocation.
2	10 - 20%	Reduction in Russian River diversions by Sonoma Water of 10% to 20%. Sonoma Water’s wholesale customers each have voluntary reduction of wholesale water deliveries as determined by shortage allocation.
3	20 - 30%	Reduction in Russian River diversions by Sonoma Water of 20% to 30%. Sonoma Water’s wholesale customers each have mandatory reduction of wholesale water deliveries as determined by shortage allocation.
4	30 - 40%	Reduction in Russian River diversions by Sonoma Water of 30% to 40%. Sonoma Water’s wholesale customers each have mandatory reduction of wholesale water deliveries as determined by shortage allocation.
5	40 - 50%	Reduction in Russian River diversions by Sonoma Water of 40% to 50%. Sonoma Water’s wholesale customers each have mandatory reduction of wholesale water deliveries as determined by shortage allocation.
6	>50%	Reduction in Russian River diversions by Sonoma Water greater than 50%. Sonoma Water’s wholesale customers each have mandatory reduction of wholesale water deliveries as determined by shortage allocation.

Prior to the State Board’s Temporary Curtailment Suspension for the Russian River, and prior to its Amended Order Approving (Sonoma Water’s) Temporary Urgency Change with Modifications Dated October 22, 2021, Sonoma Water was implementing a 20 percent reduction under Shortage Level 3. The implementation of Shortage Level 3 was commensurate with the required 20 percent reduction in Sonoma Water’s Russian River diversions included as Term 11 in the above referenced State Board Order.

### **3 Status of Contractors’ and Other Customers’ WSCPs**

Sonoma Water and its contractors are signatories to the 2006 Restructured Agreement for Water Supply (Restructured Agreement), which includes stipulations for how water is to be apportioned during shortage conditions. Sonoma Water’s contractors include the cities of Cotati, Petaluma, Rohnert Park,

Santa Rosa, and Sonoma, the Town of Windsor, and the North Marin and Valley of the Moon Water Districts. Forestville Water District, a customer but not a prime contractor of Sonoma Water, is also signatory to the Restructured Agreement. Separate agreements govern the sale of water between Sonoma Water and Marin Water, and between Sonoma Water and its other wholesale customers. These agreements include and incorporate by reference the conditions stipulated in the Restructured Agreement for the apportionment of Sonoma Water supplies during shortages.

All of Sonoma Water’s contractors and Marin Water have their own separately adopted WSCPs that are implemented in times of shortage. Implementation of the appropriate water shortage levels for these agencies is determined based on communication from Sonoma Water about any supply shortages of Russian River water, and in consideration of their unique local supplies available to meet projected demands, whether groundwater, recycled water, or other surface water supplies. Table 2 shows the current WSCP implementation status for the contractors and Marin Water. At this time, no actions have been taken by the contractors to lessen mandatory shortage levels implemented in summer 2021 given the uncertainty of continued dry conditions in 2022. As is further explained in Section 5 of this report, Sonoma Water and its contractors are beginning collaborative work to further evaluate water supplies and demands consistent with the requirements of the Annual Water Shortage Assessment Report due to the Department of Water Resources (DWR) by July 1, 2022, and following the methods detailed in Sonoma Water’s and its contractors’ WSCPs.

Table 2. WSCP Implementation Status of Sonoma Water's Contractors and Marin Water				
Agency	WSCP Shortage Levels	Current Shortage Level	% Reduction	Voluntary/Mandatory
City of Cotati	3 <sup>1</sup>	1	20	V
Marin Water	6	4	40	M
North Marin WD	6	2	20	M
City of Petaluma	6	4	30	M
City of Rohnert Park	3 <sup>2</sup>	1	20	M
City of Santa Rosa	8	3	20	M
City of Sonoma	6	2	20	M
Valley of the Moon WD	6	2	20	M
Town of Windsor	6	2	20	M

Notes:

<sup>1</sup> City of Cotati is not subject to the California Water Code provisions of the Urban Water Management Planning Act based on the number of connections and annual volume of water sales.

<sup>2</sup> City of Rohnert Park’s active WSCP consists of three shortage levels and will be updated to six pending final adoption of its updated 2020 UWMP and WSCP.

Sonoma Water’s other wholesale customers include the following retail water providers: Forestville Water District, California American Water Company-Larkfield District, Penngrove Water Company, Kenwood Village Water Company, and Lawndale Mutual Water Company. In addition, Sonoma Water wholesales water to other governmental customers, including: Santa Rosa Junior College Shone Farm,

County of Sonoma Parks Department (Spring Lake), County of Sonoma Probation Department (Shone Farm Camp), California Department of Forestry (Cal Fire), California States Parks (Trione-Annadel), and the State of California Sonoma Developmental Center. As previously mentioned, the agreements and water service rules for each of the above listed Sonoma Water customers includes adherence to the Restructured Agreement in times of shortage. Following communication from Sonoma Water regarding implementation of its WSCP, each of the above listed customers took actions accordingly to achieve the target reduction in water use.

Although none of the other wholesale customers listed above have WSCPs consistent with the Urban Water Management Planning Act, below is a synopsis of the shortage actions taken by the customers that are water providers to end-users. These actions are consistent with Sonoma Water's WSCP Shortage Level 2 and the Governor's Drought Emergency Proclamation and Executive Order N-10-21:

- Forestville Water District
  - Implementing mandatory water restrictions and Phase 1-Voluntary conservation measures of its Ordinance #16, and as amended by Ordinance #18.
- California American Water Company-Larkfield
  - Implementing CPUC Rule and Schedule 14.1 for a Stage 2 shortage and mandatory prohibitions of water waste.
- Kenwood Village Water Company
  - Notice to customers of Sonoma Water 20 percent shortage condition and statewide voluntary 15 percent reduction
- Penngrove Water Company
  - Notice to customers of Sonoma Water 20 percent shortage condition and statewide voluntary 15 percent reduction
- Lawndale Mutual Water Company
  - Notice to customers of Sonoma Water 20 percent shortage condition and statewide voluntary 15 percent reduction

Following outreach by Sonoma Water regarding activation of its WSCP, the remaining governmental customers implemented direct water saving actions to achieve reductions, such as forgoing landscape irrigation or other water saving practices.

## **4 WSCP Response Actions**

Sonoma Water and the other member agencies of the Sonoma-Marin Saving Water Partnership (<https://www.savingwaterpartnership.org/about/>) are continuing to implement a drought outreach campaign. The goal is to maintain regional awareness of ongoing drought conditions in spite of recent beneficial rainfall and improving reservoir storage levels. Paid advertising promoting ways to save indoor water during the winter months continue to run in The Santa Rosa Press Democrat newspaper, the Sonoma County Gazette, and La Prensa Sonoma. Video ads in English and Spanish on Comcast Streaming TV also provide reminders that the drought is not over

(<https://www.youtube.com/watch?v=JPIn6SzQn6Q>), using flyover video to show low water levels at Lakes Sonoma and Mendocino. A weekly social media campaign is also being implemented by the Partnership from January through March, culminating in regional events focused around the EPA WaterSense Fix-A-Leak Week scheduled for March 14 -20, 2022.

## 5 Annual Water Supply and Demand Assessment

As was introduced in Section 3 of this report, Sonoma Water, in collaboration with its contractors and Marin Water, are beginning work on the Annual Water Supply and Demand Assessment (annual assessment) that was made a new yearly requirement by the state beginning in 2022. The following is an excerpt of the California Water Code for this requirement:

### **CWC §10632.1.**

An urban water supplier shall conduct an annual water supply and demand assessment pursuant to subdivision (a) of Section 10632 and, on or before July 1 of each year, submit an annual water shortage assessment report to the department with information for anticipated shortage, triggered shortage response actions, compliance and enforcement actions, and communication actions consistent with the supplier's water shortage contingency plan. An urban water supplier that relies on imported water from the State Water Project or the Bureau of Reclamation shall submit its annual water supply and demand assessment within 14 days of receiving its final allocations, or by July 1 of each year, whichever is later.

Sonoma Water's adopted WSCP includes the procedures, methodologies, and data that will be used by Sonoma Water to conduct the annual assessment. The assessment forecasts near-term water supply conditions to ensure shortage response actions are triggered in a timely manner. The annual assessment will provide a description and quantification of each source of Sonoma Water's water supply compared to water demands for the current calendar year, with consideration of one subsequent dry year. Each of the contractors and Marin Water will also complete their own annual assessments using shared water supply information from Sonoma Water and in consideration of their unique additional local supply options. Table 3 is taken from Sonoma Water's WSCP and shows the timeline for completion. Any changes to currently implemented shortage levels by Sonoma Water and its contractors will be made in the coming weeks and months based on the continued monitoring of water supply conditions leading up to June 2022.

More detailed information about this annual assessment can be found in Sonoma Water's WSCP, accessible using the online link provided in Section 2 of this report.

Table 3. Annual Assessment Timeline							
Task	Dec	Jan	Feb	Mar	Apr	May	Jun
Monitor and forecast water supply conditions	█						
Sonoma Water's customers develop and provide water demand forecast by February 1.		█					
1. Present draft annual assessment to Sonoma Water's customers					█		
2. Receive review comments					█		
3. Present final annual assessment to the TAC						█	
4. Present annual assessment to the Board of Directors							█
5. Submit annual assessment to DWR (due July 1 <sup>st</sup> )							█