

Marin Conservation League - RE: Comment letter Marin Water Draft 2025 Urban Water Management Plan

From MCL <mcl@marinconservationleague.org>
Date Thu 6/11/2026 4:56 PM
To Board Comment <BoardComment@MarinWater.org>
Cc MCL <mcl@marinconservationleague.org>

 1 attachment (337 KB)

Marin Water 2025 UWMP Comments.pdf;

Good afternoon, President Smith and Board of Directors—

Attached is a comment letter on behalf of Marin Conservation League regarding the Marin Water Draft 2025 Urban Water Management Plan.

Please feel free to reach out with any further questions or concerns.

We appreciate your time and consideration.

Kind regards,

Rae Peres (she/ they)
Operations Manager

Marin Conservation League

175 N. Redwood Dr. Suite 135
San Rafael, CA 94903
415-485-6257



Protecting Marin Since 1934

June 11, 2026

President Jed Smith and Board of Directors
Marin Water
220 Nellen Drive
Corte Madera, CA 94925

Email: BoardComment@MarinWater.org

Subject: Marin Water Draft 2025 Urban Water Management Plan

Dear President Smith and Members of the Board,

Marin Conservation League (MCL) would like to thank Marin Water for the opportunity to comment on the Draft 2025 Urban Water Management Plan (UWMP). MCL has been a longstanding supporter of Marin Water's efforts in preparing and adopting its UWMP. MCL recognizes the importance of the UWMP as a long-range planning document that guides future infrastructure investments, water supply planning, conservation programs, and financial decisions.

As an environmental organization, MCL follows its mission, which is, *"To preserve, protect and enhance the natural assets of Marin in a changing environment."* Further, in our advocacy, we rely on and consider our adopted policy positions. As part of the review of the draft 2025 UWMP, MCL has considered its policy positions on, among others; a) water supply and infrastructure, which includes strong support of Marin Water's water conservation practices and regulations; and b) housing. Regarding housing, MCL closely tracked and commented on the State-mandated Housing Elements (2023-2031) and supportive EIRs prepared by Marin municipalities to address the Regional Housing Needs Allocation (RHNA). This effort included reviewing housing opportunity sites and tracking how water supply was addressed and analyzed to accommodate the RHNA projections.

Members of our Land Use, Transportation and Water Committee have reviewed segments of this draft 2025 UWMP. In response, we present several observations regarding document assumptions that appear to substantially influence projected future water demand, which raise questions regarding the following:

- the projected mix and water demand characteristics of future RHNA-related residential development. A majority of the new housing that has been planned by the Marin municipalities is multi-family residential units, which is much more water efficient than traditional single-family homes;
- the extent to which future housing production is assumed to resemble historic single-family development patterns versus more compact and water-efficient infill development. Fifty percent of current water use during the summer months is dedicated to outdoor use (e.g., landscape irrigation) with single-family residential development being the greatest consumer;
- the use of historical residential demand factors from earlier periods rather than more recent development-specific estimates and current building efficiency standards;

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- the assumption that districtwide water demand will rebound toward pre-drought levels despite several years of persistently lower consumption trends; and
- the treatment of both active and passive conservation savings beyond 2030, including the long-term impacts of AMI implementation, fixture efficiency improvements, landscape changes, and evolving state conservation requirements.

We strongly believe these issues warrant additional clarification and supporting analysis. In addition, we believe it would be helpful for the final UWMP to more clearly explain how redevelopment of developed sites for new housing and infill housing projects are accounted for in net demand projections, particularly where new construction replaces existing development and its associated water use.

MCL supports prudent long-term water supply planning and recognizes the need to prepare for climate uncertainty and future housing demands and obligations. At the same time, accurate demand forecasting is essential because projected future demand can materially affect the scale, timing, and cost of future capital investments. Accordingly, we respectfully request that staff provide additional explanation and supporting analysis regarding these assumptions prior to final adoption of the 2025 UWMP. Based on the findings of this additional analysis, we request that your Board determine and consider whether refinements to the demand model may be appropriate based on current development patterns, conservation trends, and available data. Given the significance of these projections, we believe it is important that the assumptions underlying future demand forecasts be clearly explained and supported by current data.

From MCL's perspective, accurate accounting of both existing and future conservation measures is particularly important. Marin residents, local governments, and the District itself have invested substantial effort over many years in reducing water demand through conservation programs, improved building standards, landscape changes, water-efficient fixtures, and related sustainability measures. We want to ensure that the long-term benefits of these efforts are neither underestimated nor prematurely capped in future demand projections.

Thank you for your consideration.

Sincerely,



Mike Swezy
President



Larry Minikes
Land Use, Transportation and Water Committee




Comments on Draft 2025 UWMP for June 16 Public Hearing

From martha davis <mlcmarthadavis@gmail.com>

Date Fri 6/12/2026 12:49 PM

To Jed Smith <jsmith@marinwater.org>; Diana Maier <diana@maierlawgroup.com>; Larry Russell <Llr100@aol.com>; Ranjiv Khush <RKhush@marinwater.org>; msamson@marinwaterboard.org <msamson@marinwaterboard.org>

Cc Ben Horenstein <bhorenstein@marinwater.org>; Paul Sellier <psellier@marinwater.org>; Terrie Gillen <tgillen@marinwater.org>; Ruth Dawson <ruthsd@gmail.com>; Jeffrey Brody <btrain1949@gmail.com>; Bob Schiro <bob@fwcm.com>

 1 attachment (42 KB)

NLOA UWMP Comments 6-12-26-2-1 copy.pdf;

Thank for your consideration of NLOA's comments on the MMWD draft 2025 UWMP
Martha

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mlcmarthadavis@gmail.com

"Adjust to changing times while staying true to your principles."

Jimmy Carter

"The opposite of love is not hate, it's indifference."

Elie Wiesel

June 12, 2026

Re: Comments on Draft 2025 Urban Water Management Plan

Dear President Smith and Members of the Board,

The Nicasio Landowners Association is writing to provide comments on MMWD's draft 2025 Urban Water Management Plan (UWMP). The draft plan was released on June 2 and will be considered by your Board for approval on June 16th.

The Urban Water Management Plan is a foundational planning document that guides MMWD's future water conservation, drought preparedness, sustainable water supply planning and related financial decisions. It is also the primary reference document for the public to understand the District's assumptions for how MMWD is planning Marin Water's future.

California requires water agencies to update and adopt an UWMP every five years so that changing local conditions are addressed. Once adopted, the State also requires the plan be filed with the California Department of Water Resources (DWR) as the data is used to inform the State's water and drought planning processes.

Because the UWMP is MMWD's primary legal reference for baseline water supply modeling and related financial planning assumptions, it is essential that the information underlying future demand forecasts is clearly explained and supported by current data.

Our review of the draft plan raises serious questions regarding several key assumptions that appear to substantially inflate the MMWD's projected future water demands. These include:

- 1. The projected mix of future RHNA-related residential development.**
The draft UWMP assumes that almost 12,000 new single-family homes will be constructed in MMWD's service area by 2050. Yet, based on a review of the County's Housing Element, the number of sites that can accommodate

conventional single-family housing construction, with front and back yards, is roughly 200 – maybe 500 with lot splits – not 12,000.

Staff need to clarify the type and density of future single-family assumed to be built along with the projected densities for multi-family housing as these are the foundational estimates on which MMWD's future water demands are based. For example, out of the 13 sites in Fairfax currently slated for RHNA development, 7 will have densities of 75 units per acre and 6 will have densities of 45 units per acre.

2. The extent to which future single-family housing construction is assumed to resemble historic, single-family development patterns versus more compact and water-efficient infill development.

An online review of current development proposals within MMWD's service area shows that the vast majority of "single-family house" construction will be townhouses, condominiums, row houses, and ADUs. All of these single-family housing "types" use about half the amount water than historic single-family homes due to limited areas for outdoor irrigation, the State's ban on non-functional turf, and local green construction and sustainability codes including the MMWD's own Model Water Efficient Landscaping Ordinance.

3. The use of historical residential water demand factors from pre-2020-2021 drought years rather than more recent development-specific demand estimates that reflect current building efficiency standards.

The UWMP estimates future water demands for new single-family housing using an obsolete water demand factor for single-family housing (228 gallons per unit per day). In contrast, an online review of recent development applications in MMWD's service area shows that builders expect their new water efficient single-family housing to use roughly 110-140 gallons per unit per day – a substantial reduction from the water use factor assumed by the UWMP. Builder's water use estimates are also conservative because these applications were filled prior to the most recent state-adopted building code changes.

Water demand factors for both single-family and multi-family are more likely to align with MMWD's highly efficient indoor water use for the reasons described above: significantly increased housing density, minimal outdoor irrigated areas, and highly efficient water code requirements. The District's indoor Flume data provides a more appropriate water demand factor for estimating expected indoor water use from new development;

- 4. The assumption that district-wide water demand will rebound toward pre-drought levels despite several years of persistently lower water consumption trends.**

Four years have passed since the 2020-2021 drought and MMWD's water demand has not rebounded to pre-drought water use levels. Most California water agencies report that they have experienced the same trend. The UWMP should use the existing 2025 level of demand as the baseline for the UWMP projections.

- 5. The minimization of active conservation beyond 2030 (including the treatment of AMI implementation, fixture efficiency improvements, landscape changes and evolving state conservation requirements) and placing a cap on expected passive water conservation savings.**

Active water conservation is a cornerstone of MMWD's planned future investments and the Board is implementing programs today that will deliver cumulative water savings far beyond 2030. Continuation of these conservation programs and the related water savings are not accounted for in the UWMP demand projections. Of note, the AMI program recently adopted by the Board and its associated expected water savings are not included in the UWMP.

The UWMP also discounts future estimated "passive" water savings that occur because of existing customer voluntary actions (not funded by MMWD) to improve water efficiency. The UWMP estimates future passive water savings using the Alliance for Water Efficiency model, but then applies an adjustment factor capping projected water savings at 76%; and,

- 6. The need to revise estimated future RHNA water demands to reflect "net" water use increases when new construction replaces existing development and water use entitlements.**

An online review of current development proposals within MMWD's service area shows that the vast majority of new RHNA development will replace existing buildings on sites that currently receive District water. Appropriately, the builder's construction applications estimate "net" water demands for their proposed projects, subtracting the current volume of MMWD water use or entitlement from estimated water needs. Staff need to incorporate these offsets into its future water demand projections.

Accurate demand forecasting in the UWMP is essential because future water needs materially affect the scale, timing and cost of future capital investments. The amount of water potentially impacted by MMWD's assumptions is significant. When the draft

UWMP demands are adjusted for the above issues, **the UWMP overestimates MMWDS's 2050 water needs by more than 5,000 acre-feet per year.**

Accordingly, we respectfully request that staff provide additional explanation and supporting analyses of these assumptions prior to the final adoption of the UWMP and that the demand model be updated based on expected development patterns, appropriate water use factors, and MMWD's conservation commitments.

However, we also understand that staff will be anxious to meet California's July 1st regulatory deadline for adopting the 2025 UWMP. We wish that staff had followed the DWR UWMP guidelines and held a public workshop on the draft UWMP last month so that these questions could have been raised earlier.

A prudent solution to this dilemma is for the Board to provisionally adopt the 2025 UWMP as written AND direct staff to provide explanations and make needed changes by early July. The Board could then approve the revised 2025 UWMP and submit the Plan digitally to DWR by the end of July as required by law.

Thank you for your consideration of our comments.

//Martha Davis//

Martha Davis,
Board Member,
Nicasio Landowners Association

Sierra Club Comments on 2025 Draft UWMP

From Mark Shahinian <mark.shahinian@gmail.com>

Date Fri 6/12/2026 4:23 PM

To Matthew Samson <MSamson@marinwater.org>; Diana Maier <Diana.Maier@marinwater.org>; Ranjiv Khush <RKhush@marinwater.org>; Jed Smith <JSmith@marinwater.org>; Larry Russell <LRussell@marinwater.org>

Cc Terrie Gillen <tgillen@marinwater.org>; Heinrich Albert <heinrich.albert@outlook.com>; Ben Horenstein <bhorenstein@marinwater.org>; Frank Egger <fegger@pacbell.net>

 1 attachment (108 KB)

Sierra Club comment on MMWD 2025 UWMP.pdf;

Dear President Smith and Members of the Board,

Please find attached the Sierra Club's comments on the 2025 Draft UWMP.

Thank you,

Mark Shahinian



June 12, 2026

Re: Sierra Club comment on 2025 Urban Water Management Plan draft

Dear President Smith and Marin Municipal Water District Directors,

The Sierra Club has been a long-standing supporter of watershed protection in Marin County. Our advocacy dates back at least 100 years, when we supported the purchase of land to form Mt. Tamalpais State Park.

We are concerned about the quality of the information presented in MMWD's 2025 Draft Urban Water Management Plan. This is a critical document which estimates future MMWD water needs through 2050 and provides the foundational assumptions that support the District's water planning initiatives. We believe that the key water use assumptions on which the document is based should be rooted in fact. We find that, largely, they are not.

Relying on unrealistic assumptions risks harm to Marin's ratepayers and the environment. For example, current water demand is not rebounding to pre-drought levels. This affects the District's annual budget. Similarly, the District uses demand projections to justify expensive new water supply projects like the ARC Project.

As shown below, Marin's past plans have significantly missed the mark. We believe the following issues need to be addressed:

Demand-side concerns:

The UWMP's demand projections appear out of line with reality and we can find little evidence to support three critical assumptions:

- 1) **Baseline Water Use**

The assumption that the baseline water demand will go back to the 2017-2019 era appears flawed and not based in fact. Since the 2020-2021 drought, water use in

MMWD's service area has cratered, and there is no substantial evidence that it will recover to previous levels.

Using the pre-2020-2021 drought years as a baseline ignores the hard work Marin residents have done to reduce their water use and paints a picture of current and future demand out of line with facts and reality. The District presents no evidence in the UWMP for its assumption that water use, at baseline, is in line with the 2017-2019 demand patterns, but merely asserts and concludes that a baseline water use out of line with more recent post-drought experience is true. For example, changes in conservation have structural and legal underpinning in MMWD ordinances 461 and 466 that were passed well after the 2017-2019 period. The two ordinances made permanent some drought-era measures such as prohibitions against sidewalk washing and also restricted grass installations in new single-family homes.

2) Future Growth and Water Use

The assumption that 50% of future population growth will be in single family homes is similarly not based in fact. The District's projection assumes that between now and 2050, more than 11,000 single-family homes will be built in MMWD's service area. This is hard to reconcile with the Marin County Housing Element, which appears to identify less than 500 single-family homesites available within the District's boundaries. Even accounting for SB-9 lot splits, a generous assumption would be that 1,000 new single family homes will be built in MMWD service area over the next 25 years.

In addition, the UWMP does not discuss Marin's densification trend and how any future single family housing will use significantly less water than the current housing stock. Due to the smaller lots and need to maximize living space, outdoor landscaping is modest which is a significant change from past construction. New single family residences including townhouses, cottage courts and ADU's will have per unit water usage rates that are likely to more align with Marin's highly efficient indoor water use documented by the District's Flume studies.

Of note, MMWD has, in the past, assumed that ADUs consume the same amount of water as single-family homes with their significant outdoor water use. We cannot find evidence to back up this assumption.

3) Water Conservation Savings

The UWMP includes assumptions that minimize both water savings achieved by both active and passive conservation.

The UWMP's assumption that the District's investments in active conservation programs will have no impact on water demand beyond 2030 defies common sense. The District's own 2024 Water Efficiency Master Plan contradicts this assumption. MMWD ratepayers are paying for active water conservation programs – it stands to reason that the district's planning should include the water savings benefits from all of its programs in the

District's water demand projections. Specifically, a full AMI rollout would have significant impact on future water demand.

The draft UWMP also arbitrarily sets a cap on expected passive water savings – conserved water that results from state and local water efficiency regulations and building code changes. Of note, the District relies on an outdated 2020 estimate of expected passive water savings and then inappropriately applies an 76% adjustment factor to further reduce estimated water savings.

By our estimate, if all three of the items above – a correct baseline, proper residential unit mix based on appropriate water use factors and inclusion of active conservation programs – were included in MMWD's demand analysis, the demand in 2050 would sit at 22,337 AFY. This is nearly 5,100 AFY lower than the UWMP's current projection. We are happy to share our modeling work with you.

4) Technical Correction

There appears to be an error in Table 7-11, which uses total water use derived from the 2023 Strategic Water Supply Assessment Study (SWSAS), and does not use the 2025 Draft UWMP demand projection.

Supply-Side Concerns

We have several concerns about the content of the supply information provided in the draft UWMP and attached Water Shortage Contingency Plan (WSCP).

1) UWMP should include all Current Water Supply Planning

The draft UWMP confusingly leaves the ARC project out of Table 6-8. The District says that planning has not been completed for future projects so it has not included them. This appears to conflict with the law governing UWMPs, which states, in relevant part “The urban water supplier shall include a detailed description of expected future projects and programs that the urban water supplier may implement to increase the amount of the water supply available to the urban water supplier...” (Cal. Water Code §10631(f)) Considering the District is currently spending millions of dollars planning the ARC Project, it appears to qualify as an “expected future project”. Similarly, the Department should add its recently approved initiatives including the In-system Maximization of Winter Russian River water use.

2) Explanation of Drought Scenario Planning

There is no articulation of how likely the synthetic drought that simulates a scenario of drought years 2020, 2021, 1976 and 1977 occurring in that sequence is to occur and so how likely the SWSAS scenario in Table 7-11 is to come to pass.

3) Instream Flow Requirements

The treatment of the in-stream flows mandated by WR 95-17 and other requirements should be properly accounted for as a reduction in supply rather than an increase in demand. The difference is not academic: The instream flow requirement is a permanent charge on Lagunitas Creek under the water rights conditions and the public trust interest the Water Board was protecting in WR 95-17; municipal supply is what's left after that charge is satisfied. Booking it as "demand" frustrates the intention of the UWMP legislation to capture customer water use. As the DWR's UWMP guidebook puts it, "Many planning agencies—whether local, regional, or statewide—rely upon Suppliers' water use reports and water-use projections to ascertain water use and supply trends on a larger scale."

Thank you for your hard work and attention to these details. They matter to the future of our ecosystems and to the financial viability of our communities.

Sincerely,

Frank Egger and Heinrich Albert
Co-Chairs, Water Committee
Sierra Club San Francisco Bay Chapter