

April 20, 2015

Jessica Bean
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Draft Regulations for 25% Water Conservation

Dear Jessica and Board Members,

I commend the Board on the draft regulations and fully support immediate and enforceable regulations across the state.

Water is a Public Trust resource that the SWRCB has responsibility for protecting, for all Californians and for future generations. You have fiduciary accountability to the public, as do the regional and local water agencies, for public trust protections of our water. As our water shortages continue the Board must exercise greater regulatory oversight to meet these Trust obligations.

Tiering the conservation targets as proposed makes sense. But each water agency/water supplier should be required to clearly and specifically describe their intended conservation actions and the metrics they will use, so the Board can readily measure and monitor performance. Reporting and monitoring should begin July 1, 2015 (calls for "more time" ring hollow in this fourth year of a severe drought). Groundwater uses must be included in the conservation reports, as part of the Board's Public Trust responsibilities. Reporting must be available to the public.

Enforcement must be swift and unequivocal. The public must be moved to real action. Meaningful enforcement is the most effective and efficient messaging available to the state. Fines for under-performance should begin at \$1,000/day.

A collective conservation standard could provide important opportunities for Integrated Water Resources Management and shared capital improvements. However, key criteria for evaluation must include whether the action would benefit (and not harm) the Public Trust; and that the "project" would be fully metered for reporting purposes.

Thank you for your consideration of these points.
Sincerely,

Daniel D. Heagerty/Public Trust Water
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