

July 14, 2014

Jeanine Townsend, Clerk to the Board,
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000



Re: Comments on Proposed Rulemaking on drought restrictions for urban water users
Delivered by Email

This letter is in support of the proposed emergency drought regulations for urban water users and suppliers X.1 and X.2 as proposed.

The proposed regulations in X.1 are simple, straightforward and restrict clear examples of water waste. As such, they are unassailable as steps toward reaching the demand reductions necessary to respond to this drought. As necessary first steps, they are important, but we will only achieve the required water savings and be able to enforce the restrictions if you take the actions in X.2

The call for these restrictions is important also because it puts the entire state population on the same footing. Urban water users are often confused when neighboring suppliers have different drought or water shortage contingency measures, even when they all share the same watershed and the same weather.

What difference will a statewide regulation on urban water users make in the real world, you may ask? This is a very good question, because the State does not have the ability to enforce these regulations, lacking the staff to apply the rules. We will be counting on local municipalities and responsible water users to ensure that these restrictions work. The good news is that studies of previous droughts across the western US, and the Board's initial survey of water users this summer show that mandatory watering restrictions do save water, especially when compared to asking people to voluntarily cut back on their water use. A study¹ of cities in Colorado found that those which imposed mandatory restrictions on irrigation of no more than two days per week in the drought of 2002 saved in the range of 24% to 41% of expected water use. This compares to the same set of cities using voluntary restrictions saving less than 10% on average. The experience in Colorado suggests that the Board is headed in the right direction by imposing mandatory restrictions on irrigation.

I encourage you to resist calls to not apply the irrigation restriction rules; they are important because they save water, despite the difficulty of statewide enforcement. They will be difficult to enforce for smaller communities, those without large numbers of staff. But they can be enforced, by local code enforcers, police, and the observations of volunteers who will see when their neighbors are not complying and call in about the violators. The California Drought Guidebook of 2008, and the American Water Works Drought and Water Shortage manual are two resources with many examples of different ways that communities have successfully implemented and enforced drought regulations.

Despite the fact that we live in a large state with many diverse water suppliers – the proposed regulations are:

- Important for saving water;
- Equitable;

¹ Kenney, D., et. al., *Use and Effectiveness Of Municipal Water Restrictions During Drought In Colorado*, Journal of the American Water Resources Association, Feb., 2004.

- Justifiable based upon past experience;
- Enforceable by various local authorities using a variety of different methods;
- Easy for the public to understand.

By your action you will be reinforcing what many newspapers have been reporting, what science shows, and what leading stewards of our water resources are already doing which is to treat this drought with the seriousness it deserves by taking leadership on a statewide level.

In the past and even this year, Californians have prayed for rain in times like these. But it is not enough to hope for respite from the heavens. With rising temperatures we are potentially entering a much longer period of water supply shortages, and taking action at this time is prudent. The predicted El Nino weather event expected this fall may or may not bring more rain, but it will certainly bring higher temperatures and the increased evaporation and fire danger that come with those temperatures. It is better to take these steps now than to wait until we are in potentially more dire circumstances next year.

Sincerely yours,

A handwritten signature in black ink that reads "Chris Brown". The signature is fluid and cursive, with the first letters of "Chris" and "Brown" being capitalized and prominent.

Chris Brown