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January 27, 2016

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



RE: Proposed Extension of the Emergency Water Conservation Regulation

Despite the fact that the Sierra Nevada snowpack currently stands at a promising 115 percent of normal, the League of California Cities continues to share both Governor Brown's concern about the likelihood of a fifth consecutive year of historic drought and his desire to conserve potable water.

The League supports the vast majority of the incentive-based water-conservation directives and commonsense water-use restrictions contained in the Governor's Executive Orders and in the proposed, 270-day extension of the emergency water conservation regulation. These steps include: turf removal, consumer rebates, increasing the use of drip irrigation and shutoff nozzles, prohibiting runoff when potable water is used for irrigation, and barring irrigation for 48 hours after a measurable rainfall.

The League is pleased to see that following significant input by many stakeholders -- including cities and other water suppliers -- the proposed extension of the water conservation regulation now includes some relief from the strict urban water conservation standard. Most notably, the League appreciates that urban water suppliers will be granted up to an 8 percent reduction in the conservation standard in consideration of: local climate conditions; growth experienced by urban areas; and investments that cities have made towards creating new, local drought-resilient sources of potable water supply.

Even though the League welcomes this much-needed flexibility, it believes that the proposed extension of the water conservation regulation does not yet go far enough to address many of the challenges cities face in meeting this historic water conservation standard. In particular, the proposal still fails to provide a reprieve for communities that are home to businesses that require large quantities of water to operate. The League hopes that the State Water Resources Control Board will partner with cities, and the businesses vital to their economies, in order to accomplish the shared goal of conserving water without resorting to fines that unduly penalize cities and their residents.

The League understands that the State Water Resources Control Board is looking further ahead, as well. We urge the Board to continue listening to stakeholders and to possibly make changes to the emergency water conservation regulation in April as water supplies and drought conditions will be more apparent.

The League appreciates the opportunity to provide input on the extension of the emergency water conservation regulation. If you have any questions regarding these comments, please contact me at (916) 658-8264.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Rhine".

Jason Rhine
Legislative Representative
cc: Members, State Water Resources Control Board