



January 28, 2016

(2/2/16) Board Meeting- Item 7
Conservation Extended Emergency Reg
Deadline: 1/28/16 by 12:00 noon



Felicia Marcus, Chair
State Water Resources Control Board
And Members
c/o Kathy Frevert
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Update for Emergency Regulation for Urban Water Conservation

Dear Chair Marcus:

On behalf of Sierra Club California, I write to express our disappointment in the recent staff changes to the proposed update to the emergency water conservation regulations. As our previous letter noted, we felt staff went too far in the previous draft in letting up on the state's emergency conservation needs, particularly in dealing with the climate adjustments and drought resilient sources of supply.

Despite welcome El Nino rains, California still faces a crisis. Species are threatened with extinction and people are without drinking water. The Bureau of Reclamation and the Department of Water Resources are planning smaller deliveries this year than last year from the Central Valley Project and State Water Project. We cannot weaken our resolve in the urban sector.

Coming out of an El Nino year, with rains and potential flooding, will already make it more difficult for the public to consider building on the choices to conserve that they have already made. People of this state have responded wonderfully in this crisis, and many are willing to do more. By telling people they can conserve 8% *less* than their targets sends the wrong signal. It suggests that the drought is nearly over and conservation does not need to be a part of our everyday water practices.

We do not see reason to reduce efforts in conservation, especially given the lack of need for the credits. As we noted in our previous letter, there is no evidence that warmer areas of the state cannot do more and no evidence that conservation hurts the development of water recycling. Supply increases and demand reduction are not an either/or proposition. Employing alternative sources of supply to support unsustainable levels of consumption is unreasonable and should be considered waste.

We propose that the Board continue with the regulations that were adopted last year. The emergency setting is very real and we cannot send the message that the drought is still not a serious issue. We also must use this opportunity to help a growing state population develop practices that

emphasize water efficiency and conservation in a resource constrained state. Even with the end of this drought, all evidence suggests that the old patterns of wasteful water use are not sustainable for the environment or the human population.

We propose that the Board develop a permanent regulation, as it has often proposed, that can take into account the issues we face. This regulation can feature workshops and presentations on the various issues presented so that we can be sure that we are moving forward responsibly with our conservation mandates.

We thank the Board for its continued efforts to address the needs of the state through emergency conservation. We hope the Board can continue these efforts and this conversation in a manner that produces a fairest, effective and sustainable drought response.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KJ', is positioned above the typed name.

Kyle Jones
Policy Advocate