



## County Administrative Office

**Gregory C. Devereaux**  
Chief Executive Officer

January 6, 2016

Ms. Kathy Frevert  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814  
By email to: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

RE: Comments on Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation

Dear Ms. Frevert:

The County of San Bernardino ("County") appreciates the opportunity to submit comments on the proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation released December 21, 2015 ("Proposed Regulatory Framework").

The County has previously submitted comments on the Mandatory Conservation Proposed Regulatory Framework Released April 7, 2015; the draft Drought Emergency Water Conservation Regulations and Approach released April 18, 2015; and the Proposed Text of Emergency Regulation issued April 28, 2015. These comments are attached for reference.

First, the County would like to thank State Water Resources Control Board ("Water Board") staff for agreeing to recommend a mechanism to adjust urban water supplier conservation standards to account for water efficient growth since 2013, which the County and many urban water suppliers in our county requested. The County also appreciates Water Board staff's recommendation to incorporate a climate adjustment in the Emergency Regulations that reduces the conservation requirement by up to 4 percentage points for water suppliers located in the warmest regions of the State. Many water suppliers in our county had requested consideration for climate and will benefit from a reduction in their conservation targets if the Water Board approves staff's recommendation.

The Proposed Regulatory Framework does not appear, however, to address the County of San Bernardino and County of San Diego's previous technical comments that requested that cities and counties be provided an opportunity to separately account for water conservation

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at their facilities using a credit system. The County of San Diego's November 30, 2015 comment letter for the Urban Water Conservation Workshop is attached for reference.

The County recognizes it is a significant end-user of water and has conserved where it can. The County has complied with the water use restrictions imposed by its numerous water suppliers, which have primarily focused on outdoor water use. Water usage at some County facilities was reduced more than 70 percent during the months of July, August and September 2015 compared to the same period in 2013. While other County facilities with minimal outdoor water usage conserved less than 10 percent.

The proposed credit system would permit the County to apply credits earned for excess conservation at some facilities toward essential facilities, such as our jails and hospital, that may not be able to achieve their water suppliers' conservation targets because the County must comply with specific health, safety, sanitation and hygiene requirements regarding water use. Without the proposed credit system, other customers of the urban water suppliers serving the County's essential facilities may have to conserve more than their fair share.

Please note that the County Board of Supervisors has not adopted an official position on the Proposed Regulatory Framework. However, to assist the State Water Board with its efforts to implement the Governor's Executive Order B-36-15, the County Administrative Office provided the above comments.

We are available to provide any further assistance so that the State Water Board and its staff clearly understands the positions taken by the County. Also, should you wish to discuss the County's comments, I can be reached at (909) 387-4384. Additionally, Josh Candelaria of the County Administrative Office's Legislative Affairs Unit may be reached at (909) 387-4821.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Page".

Bob Page  
Principal Management Analyst, Special Projects  
County Administrative Office  
County of San Bernardino