

Hi Jessica,

I'm Kate Wilkins with Valley Water Conservation Advocates - our thoughts on the regulatory framework are below. Thank you!

Valley Water Conservation Advocates support the concept underlying the proposed regulatory framework for enforcing the Governor's executive order which recognizes that various communities have already accomplished significantly different amounts of water conservation, and those who have done less in the past should do more to contribute to cutbacks now and in the future. We are concerned that the framework as proposed continues to use percentage targets in a way which is difficult to understand with relationship to a persons actual water use. We believe the public, businesses and industries are confused about the percentage reduction goals set for their water district and what part they play in meeting those targets. In actual fact, some people have already done much to reduce their water use, and having goals expressed in gpcd would help all understand whether they have already achieved the goal, or need to do more to help out. Much of the pushback that the Board's regulatory approach has received in the press is from people who have conserved in the past and feel they are being asked to cut the same percentage water as others they observe wasting water. By setting goals in gallons per capita, there will be more variation in the percentages needed to achieve the goals, a truer reflection of reducing water waste, and using what we need. percentage
We support requiring urban water suppliers to report on the monthly use in the commercial, industrial, landscaping and institutional sectors. This will help suppliers identify which sectors require greater conservation measures.

We support more specific, enforceable measures that would lead to verified savings. In terms of additional prohibitions and end-user requirements, we believe that the State Water Board should ban the use of potable water on large landscape users. Other additions we would like added to the regulatory framework are:

1. Requiring all water suppliers to offer incentives for water-efficient appliances and turf removal.
2. Increasing public education and outreach efforts -local governments and water suppliers should collaborate with local landscapers, UC Master Gardeners, and Native Plant Society chapters to offer more water education and native landscaping workshops to the public.
3. Increasing groundwater recharge capacity of the current infrastructure – using curb cuts, retention basins, and bioswales to harvest street runoff and irrigate plants.
4. Requiring changes in on farm irrigation practices which lead to greater efficiency, such as drip, center pivot, and other precise application techniques, and ending flood irrigation practices.
5. Requiring all urban water providers to offer commercial, institutional, and industrial conservation programs; and
6. When Commercial, industrial or institutional users are self-supplied, that they submit a drought report to the Board showing how they are reducing demand by 25%.