

Hi Jessica,

I wanted to comment on the proposal to reduce urban potable water use in CA by 25%. I am a research scientist with a background in biology and watershed science in California.

1) I think there is a key distinction to be made between watersheds which are currently having their groundwater overdrafted and those which are not currently being overdrafted.

Because it's well known that groundwater overdraft can cause irreparable damage to future potential groundwater storage, as well as infrastructure damage via land subsidence, current groundwater overdraft status should be weighed carefully in determining which communities will have to conserve the most.

Perhaps those communities with the highest overdraft should face progressive (higher) mandated conservation targets.

2) I agree with the point in the factsheet which asks whether per-capita use should be considered, with the caveat that though some urban areas may be quite efficient on a per-capita basis, they are also the places both best equipped to educate the public and enforce conservation projects, and are therefore also important targets for special conservation. Further, a marginally higher percentage decrease in water usage for the largest urban users would also yield the greatest volumetric savings in terms of acre-ft or millions of gallons/day.

3) I would also ask that you carefully consider the implications of setting 2013 as a standard starting point for all communities conservation targets. Selected communities, including the central coast (Monterey County) where I live, have made concerted, long-term efforts to keep per-capita water use down for citizens, which may make the 25% decrease from 2013 particularly onerous.

Setting a threshold per-capita use for CA citizens may lead to a fairer assessment of how much further water savings can be expected from a given community without causing undue hardships.

4) Lastly, I would ask that you consider the economic and climate change implications of these regulations. Desalination technology in California does not currently have a strong mandate for use of renewable energies. Given the CARB initiative, California's commitment to reducing greenhouse gases to mitigate climate change, and the exacerbation of drought via warming in California, it should be recognized that desalination will play an increased role in California's carbon emissions with water regulations.

I'd ask that there be incentives or research funds in place to mitigate for the probable increase in use of fossil fuels in energy-intensive desalination operations as a result of the historic drought and regulatory measures.

Thank you for your time, and feel free to contact me if you have any questions or would like clarification or citations on any of these points.

Regards,
Scott Blanco

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