

April 22, 2015

Chair Felicia Marcus and Board Members
c/o Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via electronic mail to: Jessica.bean@waterboards.ca.gov

RE: Comment Letter – Draft Emergency Regulation for Urban Water Conservation

Dear Chair Marcus and Board Members:

Thank you for the opportunity to comment on the Draft Emergency Regulation for Urban Water Conservation (Emergency Regulations). Russian Riverkeeper (RRK) is one of twelve Waterkeeper organizations working to protect and enhance clean waters, and to develop, support, and advance local conservation measures. Developed by the State Water Resources Control Board (State Board) to implement Governor Brown's Executive Order B-29-15, our organization strongly supports the Emergency Regulations framework of actions to achieve a 25% reduction in urban water use during California's fourth year of unprecedented drought.

Generally, the proposed Emergency Regulations seek to achieve reductions in urban water use in a manner that is fair, equitable, and effective. RRK strongly supports the following elements:

- New conservation tiers, as they ensure fairness, equity, and effectiveness;
- The use of 2013 as a baseline for conservation goals;
- The addition of language on waste and unreasonable use;

RRK recommends that the State Board consider the following changes to the Emergency Regulations to ensure their effective implementation:

- Add further, and more effective End-User Requirements, including a prohibition on any potable water uses associated with the power washing of any commercial sidewalks, driveways or parking lots and any potable water uses associated with one-time, community fund raising, multiple vehicle, car washing events.
- Recognize that enforcement by the State Board itself will play a critical role in achieving conservation goals;
- Remove the provision that exempts agricultural water use from conservation accounting among the urban suppliers who serve 20% or more of their water production to commercial agricultural uses.

We look forward to working with State and Regional Water Board members and staff to continue to improve the Emergency Regulations, and in assisting with the implementation of regulations to ensure ecosystems, the economy, and all Californian's can weather this drought, and the next.

Sincerely,

Bob Legge, Science and Policy Coordinator, Russian Riverkeeper, P.O Box 1335, Healdsburg, CA 95448