

Comment Letter – Emergency Conservation Regulation April 29, 2015

Sent to: commentletters@waterboards.ca.gov



Climate, population, land use and conservation

The way I see it, there are four basic elements affecting water consumption: climate; population; land use and conservation. Water consumption legislation must address each category with a sense of equity.

Climate: This is pretty straight forward. Hotter, drier climates (inland valleys, deserts) have a higher evaporation/transpiration rates. So for the same population, conservation and land use, these climates have greater challenges than cooler, more moist climates (coastal).

Population: Clearly there has never been any thought put into as to what exactly is the upper limit of the number of consumers of water (population) that the California water sheds can handle. Yes we are in a drought but the severity of the lack of water is related to population demand. Is there an upper limit of population that our watershed can handle? This should be addressed.

Land Use: This is the elephant in the room.

Additional housing/developments continue to be the mandate of land use locally and regionally. Under Grey Davis Senate Bills 610 (Chapter 643, Statutes of 2001) and Senate Bill 221 (Chapter 642, Statutes of 2001) amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. Subdivision developments must show a 20 year water supply. This was never taken seriously and water purveyors rubber stamped those developments creating an ever increasing demand on an already marginal water supply. This must be taken seriously and if necessary, Mella Roos Bonds should be place on those new subdivided parcels for a guarantee of water offset policies in order to create truly a water neutral development.

The Legislative Analyst Office is working against securing our water supply. The LAO is recommending that CA Legislators *increase* the housing supply by hundreds of thousands of units per year, year after year with *no mention* of how the water for those developments will be sourced. Huge disconnect here – on one hand we are being told that we have a crisis of water supply and on the other hand Sacramento is encouraging more and more development demand be created for that same water supply.

Agricultural land use accounts for over 80% of consumption of California's water system. I am not suggesting to convert agricultural land use to residential use or vacated land. But I have not seen any mention of water conservation demands being put on agricultural land use.

Control must go beyond above ground water supplies and include **well water** . Some agricultural businesses are over drafting wells causing land to subside collapsing bridges and roads and losing an untold amount of aquifer capacity – FOREVER! Profits today with no consideration of present taxpayers or future generations.

Residential land use is the 20% in which all of the restrictions/penalties are being placed. And, again, land use makes a huge difference. Some communities have very high density land use so the comparison metric of gallons/day/capita will naturally be lower than a community with less density and larger lots. True comparison should be home to same sized home gallons per day.

Conservation: Percentage reduction targets are inherently unfair to those of us who have been conserving water for years. I have installed just about every water saving device/toilet I can, have a rain barrel, drought tolerant plants, no dishwasher, modern low water use washing machine that is only used when full and fill a bucket of water until the hot water comes to the shower head. Now I am to cut an additional 25%? Where is it going to come from? With this formula the water wasters are rewarded and conservationists are penalized.

Thank you for the opportunity to comment on contemplated water measures and ultimately the future of our State.

Jim Knight

jim_knight@juno.com