

May 1, 2015

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State Water Resources Control Board
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I object to the proposed emergency water regulations recently published by the California Water Resources Control Board. While it's critical that the state's residential sector reduce water use to a much greater extent than it has done thus far, the proposed regulations appear to conserve water almost entirely by the savings of residential consumers. These users represent a small fraction of California's water consumption.

Please see the attached CWB Fact Sheet for examples (page 3) indicating that industry and commercial businesses will be spared from mandatory reductions in water use by increasing residential reductions well above a given water district's required conservation percentage.

The pain is not being spread evenly. It's impossible to believe that industrial and agricultural users cannot reduce their use through conservation measures. As in our economy, the water resource budget is now being balanced on the backs of consumers, especially low-income households, to spare industrial and commercial users from inconvenience.

It is incumbent on citizens, environmental and social services organizations to challenge the Water Board's regulatory supposition that water use reduction by manufacturers and businesses is not possible. We are suffering more from a lack of transparency and accurate, detailed information and uneven distribution than we are a lack of water. Who is using the water, how much are they using and why?

Clear and consistent and accurate data on water usage is missing on all levels. All water suppliers should be mandated to immediately post accurate water usage information publicly at their websites, by user group and separate into specific categories such as:

- Single Family Residential
- Multi Family Residential
- Vacation Rental
- Commercial -
 - Lodging
 - Restaurant
 - Retail
- Schools
- Parks
 - Golf Course
 - Playground
 - Swimming Pools
 - Other

Cemeteries

Government Offices

Government use other

Government use internal accounts and be specific - for what purpose;

Agriculture on all levels - BE SPECIFIC

Wineries should not be considered Agriculture. Wine is not food. The Wine Industry has decimated the largest aquifer in the State of California - the Salinas Aquifer.

Data should be very clear as to how much water is being used per gallon, and per acre foot per day, per month, per year. Timing of water data should be posted clearly - is it fiscal year? is it calendar year?

The Governor should not allow the drought's impacts to be felt solely by residential water users, rather than ag, industry, and commercial users.

Finally, Desalination is not the answer to this problem - it only creates unlimited demand for housing in sensitive coastal resource areas, and the high energy use for desalination will exacerbate the climate change that is causing record drought and heat.

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Fact Sheet:

http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/emergency_reg_fact_sheet_20150428.pdf