



May 1, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
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To the State Water Resources Control Board:

Governor Brown's recent call for mandatory statewide water conservation measures is both necessary and commendable, given the ongoing drought and draw-down of water resources across California. However, CWRCB's proposed Emergency Water Regulations contain a fundamental and harmful flaw.

Residential users represent a small fraction of California's actual water consumption. While it's critical that the state's residential sector reduce water use to a much greater extent than it has done to date, the proposed regulations place the burden of conservation almost entirely on home consumers. The proposed EWR Fact Sheet highlights this flaw. On pp. 3-4, two examples indicate that industry and commercial businesses may be spared mandatory reductions in water use by a disproportionate increase in residential reductions, well above a given water district's required conservation percentage.

We do not believe that industrial and commercial users cannot reduce their use through conservation measures, or that agricultural users cannot increase efficiency in irrigation. They must, like all of us, be required to do so. We understand that many agricultural users have been hit by drastic reductions in water allotments from federal and state water projects, but where is the impetus for industry and commerce to conserve?

As in many sectors of our economy, the water resource budget will be balanced on the backs of consumers to spare businesses from inconvenience. Water is routinely wasted in many industrial and commercial processes from packing and canning to pre-cleaning dishes in restaurants and power-washing buildings. Meanwhile, some of our poorest residents are already paying for bottled water as their local groundwater reserves drop below usable levels.

Together, the signers of this letter urge that the CWRCB require sacrifice from California's industrial and commercial sector as well as the residential sector. We also ask that agricultural water users be required to install drip irrigation systems and that afternoon overhead watering be banned statewide. All businesses must reduce water consumption at an equitable rate and this reduction must be monitored.

Thank you for your attention to these issues.

Sincerely,

Constance Gannon
Executive Director, Greenspace – The Cambria Land Trust