December 1, 2015

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: “Comment Letter – Urban Water Conservation Workshop”

Dear Ms. Townsend:

On behalf of The Maritime Alliance, thank you for the opportunity to express our concern with the current Emergency Regulation for Statewide Urban Water Conservation and offer an alternative solution that we think is consistent with Governor Brown’s Water Action Plan and achieves sustainable water reliability without draconian water reduction mandates.

The Maritime Alliance is a non-profit industry association – organizer of the San Diego ocean and water technology community (the largest BlueTech cluster in the U.S.). We focus on economic development, ecosystem development, and national/international outreach. Our sister organization, TMA Foundation is an educational non-profit that focuses on workforce development, research, and community outreach. Their common mission is to promote sustainable, science-based ocean and water industries.

The San Diego BlueTech cluster includes approximately 200 firms active across a wide array of sectors including biomedicine, defense, desalination & clean water technology, marine recreation, maritime robotics, ocean observation and more. With many companies growing at 15-35% per annum, this fast growing economy sector is receiving considerable attention. For example, as part of a first ever BlueTech Vision for the region, San Diego Mayor Faulconer and County Supervisor Greg Cox announced a major initiative that was unanimously approved in March 2015 by the San Diego City Council and the San Diego County Board of Supervisors to give San Diego’s Blue Economy a boost by creating a BlueTech incubator and multiple centers of excellence, including water technology.

California is home to some of the world’s brightest individuals and most successful innovators. When faced with a challenge, we have it in our DNA to find solutions through technology. That’s why NASA turned to General Atomics in San Diego to develop a cost-effective and lightweight water solution for astronauts in space. The reverse osmosis membrane that General Atomics patented in 1967 spawned a new water industry. The reverse osmosis and many other technologies have been developed can help us address California’s water challenges.

Water agencies in San Diego County have invested billions of dollars in developing a water reliability strategy that starts with conservation and includes a diverse portfolio of local water resources like desalination, potable reuse and long-term water transfers to meet the needs of residents and businesses in our region. This pragmatic approach enables our regional economy to thrive and maintains our quality of life without having to pull additional water from sensitive habitats in northern California. These investments come at a prudent cost and an assumption that the benefits will accrue to ratepayers over the life of critical infrastructure. However, the mandated reductions in water use have arbitrarily put a cap on the water supply in San Diego, despite local investments, and driven prices up when ratepayers are using less. This approach threatens to discourage ratepayers from supporting future water supply investments and has the potential of stunting California’s growth and prosperity.
Instead of punishing water agencies for prudent investments in water infrastructure, we should be using the San Diego model of deploying all available assets to solve our water needs. California needs a diverse portfolio of water resources that includes conservation, desalination, and potable reuse of wastewater.

It is critical to maximize the water reliability benefits of drought-resilient and sustainable water supplies, such as the Carlsbad Desalination Project, during drought conditions to help support California’s economy and quality of life. That’s why we support modifications to the Emergency Regulation to allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies. This is a balanced, more flexible approach to drought management that will best serve current and future water users in California.

Please let us know if you have any questions.

Sincerely,

Michael B. Jones  
President

Greg Murphy  
Executive Director