



Thriving Regions. Thriving State.

(12/7/15) Public Workshop
Urban Water Conservation
Deadline: 12/2/15 by 12:00 noon



CSN Members

November 24, 2015

Chico Stewardship Network
Rory Rottschalk

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

Fresno Business Council
Deb Nankivell, CSN Secretary

Inland Empire Economic Partnership
Paul Granillo

Dear Ms. Townsend:

Los Angeles County Economic Development Corp
Bill Allen

On behalf of the **California Stewardship Network**, which represents 13 regions across the state committed to solving challenges such as the drought, through triple bottom line solutions, we thank you for the opportunity to submit comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board.

Monterey Bay Economic Partnership
Bud Colligan

Redwood Coast Rural Action
Kathleen Moxon, Vice Chair

We appreciate the Board's efforts to achieve increased water conservation during drought conditions through the current Emergency Regulation. We encourage the board to adopt a more balanced and sustainable approach that recognizes ratepayer investments in reliability and protects California's economy, environment and provides incentive-based solutions – specifically related to the state water supply the 2015 California Economic Summit, held in Ontario earlier this month. caeconomy.org

Valley Vision-Sacramento
Bill Mueller

San Diego Regional Economic Development Corp
Lauree Sahba, CSN Chair

Regions that have made investments in sustainable local supply should get credit. Future plans to invest in sustainable supply should get credit when those programs are implemented. The current approach undermines support for such investments thus, threatening to stunt California's ability to meet the needs of its growing population amid a changing and more challenging climate.

San Luis Obispo Economic Vitality Corp
Michael Manchak

Sierra Business Council
Steve Frisch

Silicon Valley Leadership Group
Carl Guardino

Furthermore, the imposition of demand reduction targets as the state's primary drought response places California at a competitive disadvantage in terms of business attraction and business expansion. Businesses are unlikely to relocate to, or expand their businesses in California under prolonged water use reduction mandates that ignore the availability of sustainable water supplies to meet our state's economic needs. These businesses and industries need to be convinced that the state is doing everything in its power to develop new and drought-resilient water supplies to serve their businesses. One of the things the state can do now is amend the regulation to provide credits for new supply development.

Sonoma County Economic Development Board
Ben Stone

Ventura County Economic Development Collaborative
Bruce Stenslie



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The emergency regulation has also contributed to rising water rates for residents and businesses, as local water agencies are forced to meet their revenue requirements on lower sales. It also enhances the level of frustration of all ratepayers who are upset by the concept of “paying more for using less,” which undermines public support for ongoing conservation and continued investment in sustainable water supplies and infrastructure.

Finally, the regulations are threatening efforts to re-landscape with water-smart plants, which require irrigation to establish even though they reduce overall water use in the long term and also provide aesthetic and environmental benefits. Without healthy landscapes, soil erosion and storm water runoff will increase, wildlife habitat will decrease and the urban heat island effect will intensify.

It is critical to maximize the water reliability benefits of drought-resilient and sustainable water supplies during drought conditions to help support California’s economy and quality of life. That is why we strongly support modifications to the Emergency Regulation to allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies, such as potable reuse and long-term transfers of conserved water. It’s a fair system and rewards regional efforts that reduce reliance on imported water.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauree Sahba".

Lauree Sahba, Chair
California Stewardship Network