November 23, 2015

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


Dear Ms. Townsend:

I am respectfully submitting these comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board.

Unfortunately, the current regulations focus on achieving the state’s water reduction standards only by conservation, and do not allow regional or local water agencies to realize the benefits of their investments in water supply reliability – investments in self-reliance that are consistent with Governor Brown’s Water Action Plan.

As you are aware, our San Diego County water agencies have made billions of dollars in investments in developing a portfolio of sustainable water supplies specifically designed to make our region less vulnerable to droughts and devastating water supply cutbacks. However, the current regulations strip away the drought protections these supplies provide by not allowing the region to benefit from these investments. This approach threatens to discourage ratepayers from supporting future water supply investments, stunting California’s ability to meet the needs of its growing population amid a changing and more challenging climate. In other words, our ratepayers have been conserving and conserving, yet paying higher and higher costs, while our investments have reaped benefits that you do not recognize. In addition, reliable water supplies and a dynamic infrastructure are necessary to meet the capacity requirements for fire suppression and preparedness in this desert region.

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.
Water reliability is a vital economic engine to maintain and grow our business economy. Businesses and industries need to see that the state is doing everything in its power to develop new and drought-resilient water supplies. **One of the things the state can do now is amend the regulations to provide credits for new supply development.**

Finally, the regulations are threatening property values by inhibiting efforts to re-landscape dead lawns 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 stormwater 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, such as the Carlsbad Desalination Project, during drought conditions to help support California’s economy and quality of life. That’s why I 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 desalination, potable reuse, storage, and long-term transfers of conserved water. This is a more balanced, more flexible approach to drought management that will help save water now given our current supply challenges and better prepare California for future droughts.

Sincerely,

Marie Waldron
Assemblywoman, 75th District