



Taxpayers watchdog since 1945

November 30, 2015

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



Re: Emergency Regulation for Statewide Urban Water Conservation

Dear Ms. Townsend:

The San Diego County Taxpayers Association is a non-profit, non-partisan organization dedicated to promoting accountable, cost-effective and efficient government and opposing unnecessary taxes and fees. I am writing you on behalf of our members in support of your continued efforts to conserve our water supplies but with reservations regarding the Water Resources Control Board's Emergency Regulation.

The current regulation's focus on achieving the state's water reduction standards solely through conservation does not allow regional or local water agencies to realize the benefits of their investments in water supply reliability. This regulatory framework ends up punishing citizens that are leading the state in important conservation efforts.

Perhaps surprisingly for a Taxpayers Association that opposes many spending increases, we have supported our water agencies as they have made billions of dollars in investments in developing a portfolio of sustainable water supplies, such as the Carlsbad Desalination Project. These investments have made our region significantly less vulnerable to droughts and devastating water supply cutbacks in imported water supplies.

The Taxpayers Association appreciates the Board's efforts to achieve increased water conservation during drought conditions. We understand everyone shares in the responsibility to save more water when shortage conditions exist. Nonetheless, we respectfully urge you to modify the existing Emergency Regulation to make it more consistent with the principles of responsible and accountable government and to avoid unnecessary impacts to water ratepayers.

As with any effort this large, convincing Californians of the importance of conserving water depends on strong and unified messaging. Left unchanged, the Emergency Regulation will discourage ratepayers from supporting future water supply investments and stunt California's ability to prudently prepare to meet the needs of its growing population amid a changing and more challenging climate.

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

We urge you to adopt the 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 and long-term transfers of conserved water. This is a more balanced, more flexible, and more responsible approach by the state to implement drought management measures that will help save water now, better prepare California to withstand future droughts, and minimize unnecessary impacts to water ratepayers.

Now is not the time to impose undue burdens that will punish localities that have invested in a sustainable future. Now is the time to continue our progress—not impose another hurdle on the path to our water future.

We urge you to consider all that has been accomplished so far and adopt modifications to the Emergency Regulation to take into account sustainable water supplies to meet reduction targets. Please contact me at theresa@sdcta.org or 619-234-6423 with any questions you may have regarding our concerns regarding this action.

Sincerely,



Theresa Andrews
Interim President & CEO
San Diego County Taxpayers Association