December 1, 2015

To: commentletters@waterboards.ca.gov

Subject: “Comment Letter – Urban Water Conservation Workshop”

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

Dear Ms. Townsend:

The State Water Resources Control Board (SWRCB) took action in May 2015 to adopt emergency regulations that implemented Governor Brown’s Executive Order for 25% mandatory water use reductions through a conservation-only approach. At the time, the San Diego region raised concerns that this conservation-only approach did not take into consideration new investments in local water supply development. In November, Governor Brown issued a new directive giving the state board authority to extend and also consider possible modifications to the water conservation regulation.

The current emergency regulation focuses on achieving the state’s water reduction standards solely through conservation, and does not allow regional or local water agencies to realize the benefits of their investments in local water supply reliability – investments in self-reliance that are consistent with Governor Brown’s Water Action Plan. Those regions and communities that have invested to insulate their communities from drought, to reduce reliance on the Delta, and to create greater regional self-sufficiency with respect to water supply, should be rewarded.

The San Diego region has been working through the SWRCB’s staff-led water conservation working group process to advance the local water supply crediting issue. The state should support water agencies that have made billions of dollars in investments to ensure that their regional water portfolios are designed so that they are less vulnerable to droughts and devastating water supply cutbacks.

While I strongly believe that conservation is fundamental to the state’s drought strategy, it is my hope that the state board will consider the proposals brought forth by the San Diego region when considering any modifications needed to meet our conservation targets. The proposed modifications to the emergency regulation would allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies. This is a balanced, flexible approach to drought management that will help save water now and better prepare California for future droughts.

Warmly,

TONI G. ATKINS
Speaker of the Assembly