

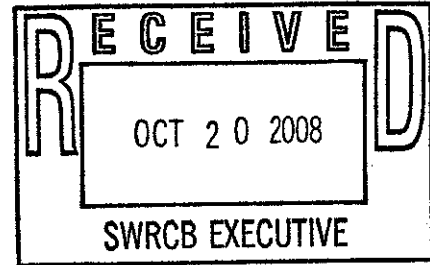


SIERRA CLUB  
CALIFORNIA

10/1/08 Board Workshop  
Urban Water Conservation  
Deadline: 10/20/08 by 12 noon

October 20, 2008

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



**Re: Recommendations for Development of an Urban Water Conservation Regulatory Program**

Dear Chair Doduc and Board members:

On behalf of Sierra Club California, which has 200,000 members and activists in California, I am submitting these comments to the Board as it considers developing an urban water conservation regulatory program. Sierra Club California has long advocated for increased water conservation through both demand management and increased water efficiency measures.

The Board has a clear responsibility under Section 275 of the Water Code to ensure that the waters of the State are used efficiently. Sierra Club California believes that the Board is the appropriate regulatory body to oversee and enforce mandatory water conservation measures.

Sierra Club California recommends that the Board adopt an urban water conservation regulatory program overseen by the Board that includes both prescriptive and performance-based measures.

First, one piece of the program should establish set minimum standards or actions that all water agencies should be required to comply with. Sierra Club California recommends the Board make compliance with the Best Management Practices ("BMPs") that have been developed by the California Urban Water Conservation Council mandatory for all urban water agencies. Water agencies should be required to report on their compliance with the BMPs, and the Board should develop consequences for non-compliance with the BMPs.

Second, the program should include performance-based approaches for measuring water efficiency. One way to do this is to develop per-capita reductions to measuring water use efficiency. Governor Schwarzenegger has set a goal for reducing the state's water usage by 20% by 2020. Through this process, the state will be establishing a baseline and targets for urban water agencies based on a variety of factors. However, in order to do this the state must improve its reporting and data management of water usage information. The Board needs to require annual, quality-controlled reporting of all surface and groundwater use by urban water agencies.

Sierra Club California believes the purpose of increasing water conservation is not to facilitate future development or growth, but to address the unmet environmental and environmental justice needs of the state. A strong regulatory system that addresses the increasingly severe impacts of water diversions on the state's unique and imperiled ecosystems and that returns some portion of water savings to communities currently lacking safe drinking water would reflect a more balanced and sustainable regulatory framework.

We look forward to working with the Board and other stakeholders in developing a verifiable and enforceable regulatory program, and expanding the investigation into the development of similar standards for agricultural water conservation.

Sincerely,

A handwritten signature in black ink that reads "Jim Metropulos". The signature is written in a cursive style with a long, sweeping underline.

Jim Metropulos  
Senior Advocate