

Urban Water Conservation Regulatory Program
State Water Resources Control Board Public Workshop
October 1, 2008
Comments of Jonas Minton, Planning and Conservation League

Why the SWRCB Needs to Act Now

Governor's 20/20 program is off to a slow start and may never come to fruition.
AB 2175 failure highlights some of the difficulties

Urban Water Conservation BMP MOU is voluntary

- Self exemptions (or not)
- Self reporting (or not)
- No penalties for non-compliance

CUWCC/CALFED's own report shows high rates of non-implementation

Under AB 1420 (grants tied to implementation of cost effective BMP's) there is no indication that DWR has the staffing or expertise to conduct these complex economic reviews in the 120 days provided in that law

The Delta ecosystem is collapsing and diversions for upstream, in Delta and south of Delta uses are one of the major causes

Climate is changing and drier conditions are the "new normal"

Five Things the SWRCB Should Do

Performance standards require good water use data that does not currently exist.

1. SWRCB needs to require annual, quality-controlled reporting of all surface and groundwater use by urban water agencies

Most urban water conservation has been accomplished by prescriptive standards (e.g. flow requirements for toilets and showerheads). The SWRCB should require proven prescriptive standards including:

2. Tiered water rates with lifeline provisions
3. Retrofit on resale
4. Require new urban developments to incorporate state-of-the-art conservation and mitigate any remaining water use
5. Include urban conservation requirements on agriculture to urban water transfers/drought water banks