



# City of Santa Barbara

Public Works Department

10/1/08 Board Workshop  
Urban Water Conservation  
Deadline: 9/23/08 by 12 noon

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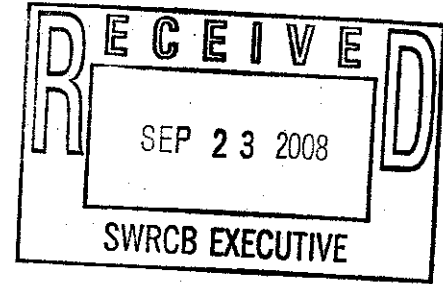
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September 23, 2008

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



**SUBJECT: COMMENT LETTER – PROPOSED URBAN WATER CONSERVATION REGULATORY PROGRAM**

Dear Ms. Townsend:


On behalf of the City of Santa Barbara, we salute the State's recognition of the importance of water conservation and appreciate the opportunity to provide input on the proposed Urban Water Conservation Regulatory Program (UWCRP). The following points address the issues identified by State Water Board staff:

- Given the critical importance of water conservation for short- and long-term water supply reliability in California, the City supports adoption of a UWCRP. Equally important, we support a regulatory program that looks to the experience and successes of the California Urban Water Conservation Council (CUWCC).
- To be equitable and to maximize efficiency savings, the regulatory program should apply to all areas of the State. Bringing all urban water suppliers together with State agencies and the CUWCC would create a strong, effective water conservation strategy. We look forward to a unified public information message resulting from such a strategy, much as the Statewide "Flex Your Power" message has promoted energy conservation.
- The City signed the Memorandum of Understanding Regarding Urban Water Conservation and joined the CUWCC in January 1992. Since that time, we have been actively carrying out the 14 Best Management Practices (BMPs). Based on our involvement and experience with the CUWCC in the last 16 years, we recommend the State Water Board adopt the CUWCC's 14 BMPs as the proposed UWCRP. The development, administration, and improvement of BMPs to define feasible and effective urban conservation measures is what the CUWCC is all about, and they have done a commendable job. The structure of the organization ensures that various viewpoints are considered by incorporating the major stakeholders. Current efforts to thoroughly review, debate, and update the BMPs demonstrate CUWCC's commitment to this important role, based on years of experience with implementing BMPs.

- Regarding the issue of prescriptive versus performance based requirements, we note that the CUWCC has worked extensively with this issue and is providing for performance based alternatives to the prescriptive requirements of the BMPs as a way of increasing flexibility. This is another reason why the CUWCC's BMP process is the most effective vehicle for setting Statewide urban conservation standards.
- For the proposed regulatory program to be equitable, it is imperative that requirements be set in a way that does not penalize agencies that have had an active and long standing commitment to reducing water demand.
- On the very important subject of water pricing, BMP #4 is another example of how the CUWCC is addressing the key issues. The requirement to meter all water and charge a commodity rate illustrates the application of an effective measure in a consistent manner across the State. Furthermore, metering and commodity billing are the tools that allow other BMPs to be effective. The combination of BMP #4 and BMP #11, regarding minimum requirements for volumetric rates, sets a reasonable and effective standard for managing a resource of such importance.

Thank you for your consideration of our comments. We look forward to ongoing involvement in the effort to increase the State's water use efficiency.

Sincerely,

  
Rebecca Bjork  
Acting Water Resources Manager

BF/AJ/spm

cc: Christine F. Andersen, Public Works Director