

April 22, 2015

Chair Felicia Marcus and Board Members
c/o Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via electronic mail to: Jessica.bean@waterboards.ca.gov

RE: Comment Letter – Draft Emergency Regulation for Urban Water Conservation

Dear Chair Marcus and Board Members:

Thank you for the opportunity to comment on the Draft Emergency Regulation for Urban Water Conservation (Emergency Regulations). San Diego Coastkeeper (“Coastkeeper”) works to protect and restore our region’s waters, and to develop, support, and advance local conservation measures. Coastkeeper strongly supports the Emergency Regulations framework of actions to achieve a 25% reduction in urban water use during California’s fourth year of unprecedented drought.

Generally, the proposed Emergency Regulations seek to achieve reductions in urban water use in a manner that is fair, equitable, and effective. Coastkeeper strongly supports the use of 2013 as a baseline for conservation goals, as well as the addition of clear language on waste and unreasonable use. We also strongly support the addition of conservation order provisions, as local enforcement in San Diego has largely been nonexistent to date.

Coastkeeper does, however, suggest removing the provision that exempts agricultural water use from conservation accounting among the urban suppliers who serve 20% or more of their water production to commercial agricultural uses. This provision may actually encourage waste in areas where the agricultural use approaches the 20% mark and where suppliers seek to achieve the threshold for exemption.

We look forward to working with State and Regional Water Board members and staff to continue to improve the Emergency Regulations, and in assisting with the implementation of regulations to ensure ecosystems, the economy, and all Californian’s can weather this drought, and the next.

Sincerely,



Matt O'Malley
Legal & Policy Director