

supply conditions. Statewide regulation of water use is appropriate only if California as a whole remains in a statewide emergency.

As the State Water Board assesses water supply conditions, we appreciate your efforts to clearly articulate the approach used to establish the conservation standards. This will allow agencies to fully understand and align our drought planning efforts with the state's approach.

- **Acknowledge and account for potential unintended consequences of conservation**

We encourage the State Water Board to study, acknowledge, and take into account unintended consequences of unsustainable levels of conservation, such as long-term economic impacts (e.g., California business climate and residential property values), utility revenue stability, water affordability issues, disincentive for future capital investment to improve local reliability, as well as other potential long-term impacts.

- **Continue to use cumulative conservation as an evaluation metric**

We recommend the State Water Board continue to use the cumulative conservation achieved when evaluating an agency's water use against its target. Cumulative reporting has been useful because it buffers the fluctuations of month-to-month variability, provides insightful perspective on an agency's longer-term trend, and recognizes seasonal fluctuations in water use due to California's climate.

- **Consider proposals for modification to the emergency regulation**

We encourage the State Water Board to consider proposals for modification to the emergency regulation that provides for an equitable and sustainable approach to managing California's drought. It is also important to our agencies that modifications not result in redirected impacts to other agencies' targets. Though drought emergencies can spur some lasting increases in water use efficiency, it is also important to note that many current drought responses are short-term sacrifices that may not be sustainable for Californians and could cause lasting, adverse effects.

While we understand the need to move with urgency, the implications of this emergency regulation are far-reaching and impact many California residents and businesses. We appreciate your efforts to make this a transparent process through your established work group and encourage continued engagement of the water providers who will execute the emergency regulation. CUWA agencies are fully committed to continued water use efficiency and conservation, and welcome the opportunity to answer any questions or further discuss our recommendations.

We hope our comments are helpful. In the meantime, we continue to take action on many levels to sustainably manage California's water supplies. Please contact Jenny Gain at 925.210.2225 with any questions, for further detail related to our comments, or additional assistance from CUWA in any way.

Sincerely,



Cindy Paulson, Ph.D.
CUWA Executive Director



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