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December 1, 2015

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



RE: Urban Water Conservation Workshop – Executive Order B-36-15

Dear Chair Marcus:

The League of California Cities shares both Governor Brown's concern about the likelihood of a fifth-straight year of historic drought and his desire to conserve potable water.

The League also supports the incentive-based water-conservation directives and commonsense water-use restrictions contained in the Governor's Executive Orders issued in response to the drought. These steps include: turf removal; consumer rebates; increasing the use of drip irrigation and shutoff nozzles; prohibiting runoff when potable water is used for irrigation; and barring irrigation for 48 hours after a measurable rainfall.

The League is particularly pleased that among the provisions contained in Executive Order B-36-15, the Governor directs the State Water Resources Control Board and regional water boards to prioritize the issuance of temporary permits to encourage the capture and reuse of stormwater. We appreciate that the Governor both recognizes the costs and challenges presented by capturing and cleaning stormwater, while also seeing the opportunity to use stormwater to combat this and future droughts.

The League does remain concerned about extending the existing Executive Orders for 270 days without providing greater flexibility to local communities. Without that much-needed flexibility, meeting the mandated urban water reductions standard will be difficult for many cities, water suppliers and water customers.

In particular, the League is concerned about smaller, often financially challenged, communities that are home to businesses that require large quantities of water to operate. We hope the State Water Resources Control Board will work alongside such cities and businesses vital to their local economies in order to accomplish the shared goal of conserving water without resorting to fines that unduly penalize cities and their residents.

The League understands that the State Water Resources Control Board is looking further ahead, as well. We urge the Board to continue listening to stakeholders and to take into account local climates, lot sizes and conservation measures taken by cities in top tiers of water use.

The League appreciates the opportunity to provide input. If you have any questions regarding the League's comments, please contact me at (916) 658-8264.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Rhine".

Jason Rhine
Legislative Representative

cc: Members, State Water Resources Control Board