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January 10, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor

Sacramento, CA 95814

Regarding: "Comment Letter – Urban Water Conservation Workshop."

*Transmitted via electronic and USPS
commentletters@waterboards.ca.gov*

Dear Jeanine Townsend,

Thank you for your interest in receiving public comment to questions prior to the State Water Resources Control Board (SWRCB) workshop on January 18, 2017.

Executive Order B-37-16 directed state agencies to develop a framework for using water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning. However, there is latitude in the Executive Order and, respectfully, this would be the time for the SWRCB to exercise that latitude. It would show consumers in this region and across the State that the SWRCB recognizes that the "Emergency" is over and in many parts of the State, including this region, the "Drought" is over.

Education and messaging these past few years has created a high level of public awareness and has made consumers and water purveyors more mindful of our finite fresh water supply. Consumers have learned to use water wisely without additional and continued regulatory mandates.

What elements of the existing May 2016 Emergency Regulation, if any, should be modified?

The State should rescind the Emergency Regulation in its entirety for Northern and Central California regions, and areas in Southern California that have sufficient supplies, many having passed their "stress test".

This is the textbook opportunity to improve consumer trust and credibility. Full and spilling reservoirs again this year, swollen and flooding creeks and rivers, and vast amounts of water heading to the sea sends a clear message to consumers. The drought in this region is over. Rescinding the Emergency Regulations will maintain

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trust and credibility for the next drought emergency when consumers are asked to push aside their water-use efficient habits and practices and ration their water supply.

Should the State Water Board account for regional differences in snowpack, precipitation, and lingering drought impacts differently than under the current emergency regulation, and if so, how?

The state would greatly benefit from relying on local and regional water managers to manage water supply based on their individual business model, which includes snowpack, precipitation, existing supplies, land use, population, etc. These decisions are best managed at the local level.

The Department of Water Resources, when referring to the fundamental principle of Integrated Regional Water Management (IRWM) framed it correctly, "regional water managers, who are organized into regional water management groups, are best suited and best positioned to manage water resources to meet regional needs."

Executive Order B-37-16 requires the Board to develop a proposal to achieve a mandatory reduction in potable water use that builds off the mandatory 25 percent reduction in previous Executive Orders and lessons learned through 2016. The Board, however, is not required to act on this proposal. Should the Board act now, or later if conditions warrant, to a conservation standard structure like the one the Board adopted in February 2016 to achieve a mandatory reduction in water use? Should the Board set a conservation floor, individually or cumulatively?


The State Water Board should not act on this proposal.

The imposition of any sort of "water budget" conservation mandate in the "mountain rural communities", permanent or otherwise, will damage the quality of life and rob the environment and wildlife of water classified as "urban water use". It is important to recognize and acknowledge that that all the water in this region, both indoors and outdoors not used by people or for the environmental needs of wildlife, landscape, and soil, moves down into the streams and creeks, providing beneficial uses to the valley floor, and replenishing the ground water aquifers.

We recognize that the State Water Board members are faced with tough and complex decisions in this diverse state. We would welcome the opportunity to meet with Water Board members and their staff to help them better understand the diversity in the Mountain Counties Area and its significance to the rest of the State.

Thank you for this opportunity.

Sincerely,



John Kingsbury
Executive Director
Mountain Counties Water Resources Association

C: State Water Resources Control Board Members
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