



May 23, 2019

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento CA 95814

Subject: Comment Letter – June 18, 2019 Board Meeting – SFY 2019-20 (FFY 2019) CWSRF IUP

Dear Ms. Townsend:

The resolution adopted by the Board on February 5, 2019, that amended the Policy for Implementing the Drinking Water State Revolving Fund eliminated a requirement that loan recipients be compliant with water conservation.

Under the past guidelines, loan recipients had to report that they were implementing the Best Management Practices (BMPs) listed in the 1991 Memorandum of Understanding Regarding Urban Water Conservation in California as adopted by the California Urban Water Conservation Council (CUWCC).

Water utilities who were signatory to the MOU reported implementation of the BMPs using the CUWCC reporting database.

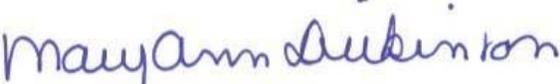
In December 2016 CUWCC members voted to allow the organization to sunset so that a refocused and restructured organization could emerge on January 1, 2017. The name of the organization is now the California Water Efficiency Partnership, or CalWEP. Part of this restructure and refocus included no longer requiring utility members implement the 25-year-old MOU (and by extension the BMPs) to other, relevant activities designed to advance water efficiency in California.

By agreeing to remove the legacy reference to the CUWCC and the BMPs in February, the Board inadvertently eliminated the water conservation requirement altogether from the requirements for loan recipients. The substitution requiring recipients to follow the Urban Water Management Planning Act requirements instead is just requiring planning for water conservation rather than providing proof of implementation.

CalWEP urges the Board to instead work with its staff to require that SRF loan recipients provide the same per capita consumption reports that they already file monthly with the Board. Once an applicant's conservation objectives have been developed under SB 606 and AB 1668, we recommend that the Board require compliance with those objectives as a condition for continued SRF loan funding.

Thank you for your attention to this matter. Please contact me if I can be of any assistance as you move forward.

Sincerely,

A handwritten signature in blue ink that reads "Mary Ann Dickinson". The signature is written in a cursive style with a blue ink color.

Mary Ann Dickinson
Executive Director

cc: Charlotte Ely