



Catholic Charities
Diocese of Stockton

Help for Today...
Hope for Tomorrow



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January 28, 2016

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The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
10001 I Street, 24th Floor
Sacramento, CA 95814

Via e-mail to: Kathy.Frevert@waterboards.ca.gov

Re: *Comments on Proposed Extended Emergency Conservation Regulation for Urban Water Conservation*

Dear Chair Marcus and Members of the Board:

The Environmental Justice Program at Catholic Charities, Diocese of Stockton applauds the State Water Resources Control Board and this Administration for your handling of the drought emergency over the past two years. Through your Emergency Conservation Regulation, you have achieved an unprecedented level of public awareness of the urgent need to reduce water waste. The result has been a remarkable level of water savings that has achieved Governor Brown's goal of reducing urban water use statewide by at least 25%.

The Environmental Justice Program is writing to support the Board's development and adoption of a permanent conservation regulation and water use reporting requirement for the State that will build upon these achievements. We believe that a permanent regulation is essential to help the State better prepare for the next drought, and is vital to ensuring that the State is eliminating wasteful water practices that reduce the State's ability to cope with climate change.

However, we are aware of the concerns raised by some water agencies and districts about the equity and sustainability of the water savings "percentage target reduction" methodology employed in the current emergency regulation.

The Environmental Justice Program supports the approach outlined by the Inland Empire Utilities Agency, Moulton Nigel Water District, Las Virgines Water District, Southern California Water Committee and others that the permanent regulation be based on ***performance-based water efficiency standards that the State has already adopted*** through SBX7-7 (55 GPCD indoor water use) and the Model Water Efficient Landscape



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Ordinance (as updated by the Department of Water Resources in July 2015), for residential and non-residential irrigation.

The benefits of using the existing State water efficiency standards as the basis for the permanent conservation regulation include:

1. The methodology is fair, simple, and clear. It provides the State with a **single water management tool** where efficiency targets can be ratcheted up or down as needed to respond to future droughts or the impacts of climate change.
2. It ensures that the State's existing water efficiency standards, such as Department of Water Resources' updated model water efficient landscape ordinance, are implemented, not ignored.
3. It also helps to assure that the statewide water efficiency gains that have been achieved under the emergency conservation regulations are not lost.

The Environmental Justice Program believes that State adoption of a permanent conservation regulation is absolutely necessary to prepare California not only for the next drought but also for the impacts of climate change on the State's water supplies. We further believe that use of a methodology that is based on the State's existing water efficiency performance-based standards will result in a meaningful permanent reduction in wasteful water use.

Sincerely,

Katelyn Roedner Sutter
Environmental Justice Program Director



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