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California State Senate

SENATOR JERRY HILL

THIRTEENTH SENATE DISTRICT

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April 13, 2015

State Water Resources Control Board
Attn: Jessica Bean
Sent via Email to Jessica.Bean@waterboards.ca.gov

Re: Mandatory Conservation – Proposed Regulatory Framework

Dear Ms. Bean,

I greatly appreciate the request of the State Water Board for feedback regarding the concepts contained in the proposed regulatory framework for mandatory conservation, which stems from the Governor's April 1, 2015 Executive Order. I would like to raise two significant issues of concern to water suppliers in my district.

First is the recommendation in the proposal that 2013 be used as the baseline year from which to measure conservation efforts. While this is a reasonable starting point for suppliers that did not initiate conservation efforts prior to that date, it penalizes jurisdictions that undertook demonstrable conservation measures before 2013.

For instance, some jurisdictions in my district began using recycled water and tiered billing for water use prior to 2013. Others significantly reduced consumption by replacing grass athletic fields with synthetic turf.

To address this potential disparate treatment I request that the State Water Board develop a mechanism to account for successful conservation measures implemented prior to 2013.

Second, the proposal looks to each individual water supplier and requires reduction of water consumption by that entity. It has been suggested that significant reductions in water usage can be achieved if suppliers are encouraged to work together, but that the resulting water savings would not necessarily be the same in each jurisdiction.

For instance, certain infrastructure improvements which might be too costly for one water district or supplier to absorb, could be feasible if the cost are spread across multiple jurisdictions. There might also be opportunities for suppliers to contribute funding to an effort but not see a significant reduction in water use in their own jurisdiction as the result of these measures. However, when the full reduction of consumption is measured across all the participating jurisdictions the state target could be reached.

To help address this opportunity I request that the State Water Board develop a mechanism to approve and evaluate water conservation projects jointly undertaken by suppliers.

Thank you for your consideration of this request.

Sincerely,

JERRY HILL
Senator, 13th District