



To: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: "Comment Letter – Urban Water Conservation Workshop"**

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

Dear Ms. Townsend:

Thank you for the opportunity to submit these comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board.

I appreciate the Board's efforts to achieve increased water conservation during drought conditions through the current Emergency Regulation.

I am writing to you on behalf of the Downtown San Diego Partnership which serves as the leading advocate for economic vitality and growth of Downtown San Diego. Downtown San Diego features a vibrant mix of over 35,000 residents, over 130,000 workers, and millions of year-round visitors who come here for business, sporting events and world-famous tourist attractions. Our organization has 350 members, representing a variety of business sectors including real estate, technology, banking, law, defense, insurance, communications and tourism.

Over the next 40 years, the San Diego region is expected to grow significantly. Our region will need to accommodate an additional 1.3 million residents, 400,000 housing units, and 500,000 jobs, plus all of the needed supporting infrastructure, including water supplies and facilities. We envision San Diego's urban core will play a key role in meeting that demand, supporting more jobs and residents through energy-efficient and water-efficient business and living spaces that allow our region to remain competitive in the global economy while offering a high quality of life.

On behalf of our members, I urge you to consider changing the current emergency regulation's focus on achieving the state's water reduction standards solely through conservation. While we support increased water conservation during times of drought, the current Emergency Regulation does not allow regional or local water agencies or their ratepayers to realize the benefits of their investments in water

supply reliability – investments in self-reliance that are consistent with Governor Brown’s Water Action Plan.

For example, here in San Diego County we have supported our water agencies as they have made billions of dollars in investments in developing a portfolio of sustainable water supplies specifically designed to make our region less vulnerable to droughts and devastating water supply cutbacks. However, the current regulations strip away the drought protections these supplies provide by not allowing the region to benefit from these investments. This approach threatens to discourage ratepayers from supporting future water supply investments, stunting the ability of the San Diego region – and the rest of California – to meet the needs of its growing population and economy amid a changing and more challenging climate.

You have the opportunity to craft improved emergency water regulations that not only will help communities save water now, but help ensure that growing communities such as Downtown San Diego will have the water they need to keep California thriving for decades to come. It is critical to maximize the water reliability benefits of drought-resilient and sustainable water supplies, such as the Carlsbad Desalination Project, during drought conditions to help support California’s economy and quality of life. I urge you to make modifications to the Emergency Regulation that allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies, such as desalination, potable reuse and long-term transfers of conserved water.

Sincerely,



Kris Mitchell  
President and CEO  
Downtown San Diego Partnership  
401 B Street, Suite 100  
San Diego, CA 92101