



Chairperson
Judith A. Wenker

President and CEO
Rudolph A. Johnson, III

Via Electronic Transmittal to: commentletters@waterboards.ca.gov

December 2, 2015

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



Subject: "Comment Letter – Urban Water Conservation Workshop"

Dear Ms. Townsend:

Thank you for the opportunity to submit comments regarding potential changes to the Emergency Regulation for Statewide Urban Water Conservation to the State Water Resources Control Board. The Board's efforts to achieve increased water conservation during drought conditions through the current Emergency Regulation is greatly appreciated.

Achieving the state's water reduction standards solely through conservation does not allow regional or local water agencies to realize the benefits of their investments in water supply reliability in a manner consistent with Governor Brown's Water Action Plan. San Diego County water agencies have made billions of dollars in investments in developing sustainable water supplies specifically designed to make our region less vulnerable to droughts and 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.

Imposing demand reduction targets as the state's primary drought response places California at a competitive disadvantage in terms of business attraction and business expansion. Businesses and industries need to be convinced that the state is doing everything in its power to develop new and drought-resilient water supplies to serve their businesses. One of the things the state can do now is amend the regulation to provide credits for new supply development.

The emergency regulation has contributed to rising local water rates for residents and businesses and increased the level of frustration of ratepayers who feel they are "paying more for using less," which undermines public support for ongoing conservation.

I support modifications to the Emergency Regulation which will allow water agencies to meet reduction targets through a combination of conservation and sustainable drinking water supplies, including such measures as desalination, potable reuse and long-term transfers of conserved water. A more balanced and flexible approach to drought management will help save water now and better prepare California for future droughts.

Sincerely,

Rudolph Johnson
President and CEO