

October 17, 2016

California Department of Water Resources
Attn: Marty Berbach, Senior Environmental Scientist
Water Use Efficiency
901 P Street
Sacramento, CA 95814

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

VIA EMAIL: wue@water.ca.gov; commentletters@waterboards.ca.gov

**Re: Comment Letter in Advance of the Urban Advisory Group Meeting on October 20th
Regarding Implementation of the Executive Order through Long-Term Water Use
Efficiency**

Dear Mr. Berbach and Ms. Townsend,

As the Urban Advisory Group (UAG) prepares to convene for the third time later this week, the undersigned Southern California water and wastewater agencies wish to express our concern over hastily establishing permanent regulations. If not done right, these regulations have the potential to threaten California's quality of life, stifle the state's economy, and drastically increase water rates throughout the state.

Urban water agencies were active throughout the process of drafting SB X7-7 and we believe that current efforts should also follow a legislative process similar to SB X7-7 to ensure that they are fully vetted and satisfy statewide objectives in a fair and reasonable manner.

The current timeline does not provide the general public adequate opportunity to review the public draft report and provide comment outside of a short 10-day window in November. The release of the draft report on Friday, November 4th with comments due on Monday, November 14th allows only four business days for comments to be developed and submitted on regulations which will permanently change water use in California.

Additionally, it is unclear as to how the public is expected to learn about the public review draft which will be released on November 4th. To date, water agencies and NGOs have been relied upon for input. We are concerned that the public at large, including businesses which will be affected, are not aware of this process, the reasoning behind it, nor the financial long-term impacts these regulations will have on California. Any regulations that place restrictions on commercial and industrial customers should carefully consider the statewide economic ramifications and allow an opportunity for all voices to be heard.

Water agencies across the state have expressed concerns and have made recommendations throughout the process to date and are hopeful that they will be incorporated into the draft report. For example, a specific concern that has yet to be adequately addressed is whether recycled water must meet a mandated reduction target. Inclusion of recycled water in mandated reductions is counterproductive and contrary to the governor's California Water Action Plan. We also feel strongly that if water budgets are determined to be necessary, outdoor budgets should reflect irrigable acres and not irrigated acres. While these examples are not all inclusive of concerns we hold, they are common interest issues that we are hopeful can be addressed during the UAG's October 20th meeting.

Our agencies also strongly suggest that you consider issuing the framework by January 2017, but extend the deadline for the development of these permanent requirements to allow for adequate feedback and adjustments to the framework that will affect how water is used throughout California for years to come.

Finally, it is imperative that the state not remove the ability and authority of local water agencies to manage water in their respective service areas; these agencies are best suited to determine and respond to actual supply and demand conditions, understand customer water use patterns, and determine the appropriateness and effectiveness of contingency plans and efficiency programs in their respective service areas. In a state as large as California, one size will not fit all when it comes to drought response or measures to achieve water reductions.

Thank you for your consideration of our concerns in advance of the UAG October 20th, 2016 meeting.

Regards,



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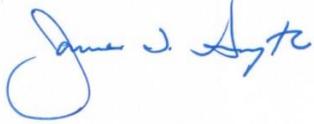
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CC: Wade Crowfoot, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr.
Assemblyman Brian Jones
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Assemblyman Rocky Chavez
Assemblyman Brian Maienschein
Assemblywoman Toni Atkins
Assemblywoman Shirley Weber
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Senator Pat Bates
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