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April 8, 2016

Felicia Marcus, Chair & Members
 State Water Resources Control Board
 1001 I Street, 24th floor
 Sacramento, CA 95814

via email:
commentletters@waterboards.ca.gov

Attention: Jeanine Townsend, Clerk to the Board

Regarding: Urban Water Conservation Workshop and Water Management

Dear Chair Marcus and Board Members D’Adamo, Dudoc, Moore, and Spivy-Weber:

Thank you for scheduling the forthcoming April 20 Public Workshop on the State Water Resources Control Board’s (SWRCB) extended emergency urban water conservation regulation. The Mountain Counties Water Resources Association (MCWRA) also appreciates the SWRCB willingness to revisit the emergency regulations and to consider a possible regional approach applicable to a region’s local water supply conditions.

MCWRA recognizes the significant challenge before the SWRCB for both short-term drought conditions and long-term water management. Currently there are significant flood control releases from major reservoirs (Shasta, Oroville, Folsom) wasting water to the ocean, full and spilling reservoirs in the Mountain Counties and significant snowpack in the northern Sierra Nevada. Conversely, there is a shortage of precipitation in southern California, groundwater basins at a deficit, and meager allocations to exporters and the southern farming communities.

California consumers have become weary from the drought restrictions with a strong desire to have their property back, and there is pressure from water districts to end the drought restrictions and gain back local control of their water supply portfolios.

This is a very complicated and complex problem encased in regulatory constraints based on a “one size fits all” approach. However, as we have learned, one size does not fit all. Now, the SWRCB has the opportunity to make positive

modifications to the emergency regulations in the near term that will have long term benefits.

FIRST, when the SWRCB considers “urban water conservation regulations”, regulations should apply to the urban environment. MCWRA contends, as we have early on, that “rural environments” differ dramatically from urban environments. The “rural environment” varies greatly, as can be seen simply by driving through the rural communities in this region. Rural environments, unlike urban environments, account for and promote “open space”, “wildlife habitat”, “locally grown healthy food from small farm agriculture” and support significant recreation and tourism not only from California, but from around the world. These are socio-economic drivers that define rural communities and differentiate urban environments from rural environments.

The SWRCB should recognize the value of rural environments to California and distinguish this environment in further amendments to the emergency regulations.

SECOND, rural Mountain Counties communities have invested tens of millions of their ratepayer dollars to build reliable water supply systems, wastewater systems, recycled water systems, and hydropower generation facilities. These same water districts have developed Water Management Plans/Water Conservation Plans, and implemented water use efficiency programs to endure growth and extended droughts, as well as, providing regional watershed stewardship that benefits all of California.

Local independence and self-reliance is vital as these water districts generally are geographically separate from one another and lack the resources to interconnect their systems. With no ability to tap the ocean or valley ground water basins, communities must capture the precipitation that drops from the sky.

Unfortunately, the emergency regulation overlooked these investments and geographically isolated parts of the state and required local water districts to impose mandatory reductions in water use on their customers, even where local water supply conditions did not warrant such stringent restrictions. This one-size-fits-all approach didn’t work in the short-term nor should it be the basis for any long-term strategy moving forward.

The SWRCB should consider those regions where local water supply conditions have returned to normal and rescind the drought restrictions in those areas.

As we move forward, there are four key foundational points that the SWRCB should consider relevant to long-term water management decisions as we move beyond this drought.

1. Long-term water management policy is most appropriately developed and administered by the California Department of Water Resources (DWR) as the lead agency in managing the state’s Urban Water Management Plan/Water Shortage Contingency Plan process. Long-term water management solutions are most appropriately developed and administered at the local water district level.
2. California Water Action Plan, Action No. 2 is to “Promote Local Urban Conservation Ordinances and Programs.” Local water districts by design are increasingly conserving water by prohibiting certain types of wasteful water use. Local water districts are also pioneering incentive programs. These actions by local water districts are foundational in Action No. 2, which is to promote local water district programs.

3. The SWRCB should encourage and support investments in drought-resiliency and ongoing water-use efficiency and leave discretion with local water agencies to choose appropriate management strategies.
4. Integrated Regional Water Management (IRWM), administered by DWR enables self-identified regions to integrate and implement water management solutions for their region, which again is a foundation of Action 2 in the California Water Action Plan. The fundamental principle of IRWM is that “regional water managers, who are organized into regional water management groups (RWMGs), are best suited and best positioned to manage water resources to meet regional needs.”

Clearly the intent of these foundation points is to preserve local control over water management decisions.

Respectfully, the SWRCB is encouraged to affirmatively support the long-term water management policies of DWR and affirmatively support and preserve local control over water management decisions.

Thank you this opportunity to provide comments and suggestions for the short-term and long-term water management. if you have any questions, I can be reached at 530.957.7879.

Sincerely,



John Kingsbury, Executive Director
Mountain Counties Water Resources Association

- c: Mark Cowin, Director, Department of Water Resources
Gary Bardini, Deputy Director, Department of Water Resources
Board of Directors, Mountain Counties Water Resources Association

The Honorable:

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