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April 14, 2017

The Honorable Laura Friedman
California State Assembly
State Capitol, Room 2137
Sacramento, California 95814

Re: AB-1667 Urban water suppliers: landscape water meters - **OPPOSE**

Dear Assembly Member Friedman,

On behalf of the Mountain Counties Water Resources Association (MCWRA), I write to OPPOSE Assembly Bill 1667.

MCWRA advocates for the water interests of its members in all or a portion of 16 counties from the southern tip of Lassen County down to Fresno County.

The Mountain Counties Area includes ten major watershed areas and accounts for about 25% of all natural runoff in California, over half of all snowmelt runoff in the State, and 40% of the state's developed water supply, more than from any other single source. This increases to more than 60% of the state's developed water supply when combined with other waters from sources within the entire Sierra Nevada. The larger Sierra Nevada Region is the source of water for 23 million Californians.

AB-1667 would require an urban water supplier to install dedicated landscape water meters on commercial, institutional, industrial, and multifamily service connections that are located in its service area on or before January 1, 2020, if the property has greater than 1,000 square feet of irrigated landscape, and on or before January 1, 2025, if the property has greater than 500, but less than 1,001, square feet of irrigated landscape.



AB-1667 would require an urban water supplier to install dedicated landscape water meters on single-family residential service connections that are located in its service area on or before January 1, 2030, if the property has greater than 5,000 square feet of irrigated landscape.

The bill would authorize an urban water supplier to waive these requirements for a ratepayer that, before January 1, 2018, has installed one or more separate sub-meters that exclusively measure all water usage for irrigated landscape and that agrees to provide water consumption data recorded by the sub-meter at least annually to the urban water supplier.

While the goal of the bill may be to improve water-use-efficiency by sub-meter tracking data, there are other alternatives to this cost-prohibitive, burdensome proposal. Typically, a public water purveyor's responsibility ends at the discharge side of the main meter at the property line. A water purveyor has no legal authority to install a sub-meter on private property. A water purveyor has no police powers to force a customer to install a sub-meter and/or inspect for cross-connections or investigate a private party service to verify a suspected invalid sub-meter(s) reading.

Installation of "sub-meters" would come at a significant cost to the ratepayer. The cost to the ratepayer to retrofit landscape, locate a water line and install pipe to accept a sub-meter may be cost prohibitive. This is especially true in the Mountain Counties Overlay Area, which is mostly populated by disadvantaged communities and large parcels (acreage). The customer would also be burdened financially by costs from potential water district billing system changes, customer account changes, data verification, and reporting.

Governor Brown's 2016 executive order makes permanent restrictions on outdoor irrigation in a way to accomplish this goal without this unfunded mandate. Water purveyors in this region have established best management practices for water-use-efficiency and have received statewide awards for their programs. Customers can take full credit for willingly sacrificing landscape and adjusting habits to save water supply for another year. Education and messaging created a high level of public awareness and made consumers more mindful of our finite fresh water supply. Bottom line, consumers have learned to use water wisely without additional costly and burdensome mandates.

Most importantly, please consider the statewide significance and diversity in the rural mountain communities. If AB-1667 becomes law, it will set the stage to rob the environment and wildlife of water classified as "urban water use". Unlike coastal urban areas, all the water in this region, both indoors and outdoors not used by people or for the environmental needs of wildlife, landscape, and soil, moves down into the streams and creeks, provides beneficial uses to the valley floor, and replenishes the ground water aquifers. The people and the environment in this region are knitted together. Water in rural mountain environments, unlike urban environments, account for and promote open space, wildlife habitat, locally grown healthy food crops from small farm agriculture, livestock, carbon-free renewable hydropower energy, provide wildfire buffers, and support significant recreation and tourism not only from California, but from around the world. These are socio-economic drivers that define rural mountain communities and differentiate urban environments from rural environments, which I believe is your focus on with AB-1667.

For the reasons listed above, we have taken a position of oppose on AB-1667 and request your consideration to pull the bill.

If you have any questions or if I can be of assistance, please contact me at (530) 957-7879.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Kingsbury', with a stylized, cursive script.

John Kingsbury, Executive Director
Mountain Counties Water Resources Association

C: Board of Directors, Mountain Counties Water Resources Association

The Honorable:

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Senator Ted Gaines

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