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# DELTA STEWARDSHIP COUNCIL

*A California State Agency*

March 16, 2015

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c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Executive Officer  
Jessica R. Pearson

## RE: Comment Letter – Emergency Urban Water Conservation Regulations

Dear Chair Marcus:

Thank you for the opportunity to provide comments as the State Water Resources Control Board (SWRCB) considers renewing or modifying its emergency regulations on urban water conservation. As you know, the 2009 legislation that created the Delta Stewardship Council also established California's coequal goals and set new policy for reducing reliance on the Delta in meeting future water supply needs. The SWRCB's emergency regulations provide an opportunity to further California's long term goal of providing a more reliable water supply for California while addressing the more immediate goal of conserving water to stretch our limited water supplies through this drought. As part of the new emergency regulations, we urge the SWRCB to strengthen its data collection requirements and require urban water suppliers to report all sources of water that are produced. In the Public Policy Institute of California's (PPIC) just-released report, *Policy Priorities for Managing Drought*, the PPIC identifies improving water use information as a top priority for drought preparation and response.

I would like to highlight the successful outcomes of the emergency regulations' requirement that urban water suppliers report their monthly water production numbers, and SWRCB's decision to make those reports available to the public. The real time monthly reporting required by the SWRCB is a significant step forward in helping the public understand that its actions make a difference.

Consistent with the California Water Plan and the Delta Plan (which both call for more accurate data to be collected and for greater transparency in order to better manage California's water resources), more can be done to raise awareness and motivate further conservation statewide. Specifically, the Council urges the SWRCB to expand its emergency regulations to include collecting monthly or quarterly data on all *sources* of water the urban water agencies use, so that the public's and water managers' (at all levels) understanding of where their current water supplies are coming from is improved.

Many citizens are not aware of the source of their own water supplies. If simply reporting monthly water use encouraged citizens to conserve more, then it is highly probable that helping the public understand that their own water supplies come from stressed or degraded resources will further motivate them to take action and save water. For example, there has been intense media focus on the rapidly degrading conditions of groundwater basins throughout California. Yet there are many people who don't know that

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*"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."*

– CA Water Code §85054

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their water supplies include groundwater and could be impacted if groundwater levels continue to decline.

From a more positive perspective, recent studies have shown that the public is willing to conserve water to protect the environment from water shortages when they recognize that droughts can have a negative impact on plant and animal species. Tying water use reporting to specific sources of water helps the public better connect their conservation efforts to the protection of identifiable natural resources and ecosystems they care about – such as lakes, streams or the Delta.

In conclusion, we ask that as part of any new emergency water conservation regulations, the SWRCB require urban water suppliers to report all sources of water that are produced in addition to the amount of water they produce. We understand that SWRCB staff have some concerns regarding the collection of source information. Should the SWRCB determine that collecting this additional data is not feasible at this time, we ask that it be considered as part of future regulations. Council staff is willing to work with your staff in developing the format of how the data should be collected and to provide assistance in managing or reporting the data.

If you have any additional questions, please feel free to contact me directly or to contact my staff, Kevan Samsam at [Kevan.samsam@deltacouncil.ca.gov](mailto:Kevan.samsam@deltacouncil.ca.gov) or (916) 445-5011. We look forward to engaging with the SWRCB on matters of interest to both our agencies and further California's coequal goals.

Sincerely,



Cindy Messer  
Deputy Executive Officer

Cc: Eric Oppenheimer, State Water Resources Control Board