



October 21, 2016

Ms. Felicia Marcus  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

The Urban Water Institute is a non-profit organization founded in 1993 to further the interest of the water community. The Institute is non-partisan and our mission is to conduct conferences to educate the urban water community on key and current urban water policy issues.

The Mountain Counties Water Resources Association (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.

Long-term water use efficiency in California is a pertinent issue to urban and rural areas alike. At the Urban Water Institute's Annual Conference in August of this year, we held a session with approximately 150 attendees from urban and rural interests from stakeholders across the State. Enclosed for your consideration are recommended policy principles for long-term water use efficiency in California.

Please contact our Executive Director, Jim Noyes at (626) 429-4881 or [jnoyes66@aol.com](mailto:jnoyes66@aol.com), if you have any questions.

Thank you,

A handwritten signature in blue ink that reads "Jim Noyes".

Jim Noyes  
Executive Director  
Urban Water Institute

A handwritten signature in blue ink that reads "John Kingsbury".

John Kingsbury  
Executive Director  
Mountain Counties Water Resources Association

cc: Dorene D'Adamo, Tam Doduc, Steven Moore, Frances Spivy-Weber

Urban Water Institute and  
Mountain Counties Water Resources Association  
Recommended Policy Principles  
For Long-Term Water Use Efficiency in California

October 21, 2016

Unprecedented legal, regulatory and drought impacts continue to jeopardize the water supply of many of the citizens of our state. These impacts have not been uniform; some parts of the state remain in a de facto water supply emergency, while other areas have available supplies on hand. All water utilities have already implemented emergency demand-side reductions. Many of the UWI membership expressed the concern that further institutionalizing state-wide water use constraints without a robust local dialogue may trigger conservation fatigue, business emigration, consumer back-lash and mistrust from rapidly rising rates and lost property value due to loss of landscaping. Because these concerns are not trivial, the legislature should be engaged directly in these important policy discussions, and provide clear and meaningful direction to administrators charged with implementing the law. To this end, we offer the following policy principles for your consideration:

Principle 1 – Take the time to properly engage the appropriate stakeholders to debate what lifestyle we are imposing on the citizens, what costs we are incurring, the tradeoffs of that policy against other approaches, and, ultimately, what we will consider a waste.

Principle 2 – Any long-term State water use efficiency requirements must consider environmental, economic and quality of life considerations.

Principle 3 – Narrative standards are preferable to quantitative allocations/rationing. The water utility community needs flexibility that acknowledges there is no “one size fits all” formula to encourage water use efficiency. People live in California for diverse socioeconomic reasons, sometimes by necessity, and often for a certain quality of life. The ability to customize standards based upon local conditions is essential.

Principle 4 – Water conservation regulations are a value-laden social topic that is more sustainable when developed at the local level.

Principle 5 – Long-term efficiency standards should recognize and credit local water supply development efforts, growth, regulatory requirements and climate.

Principle 6 – The self-certification process currently in place that emphasizes local discretion and drought preparedness history is workable.

Principle 7 - The State should encourage and support investments in drought-resiliency, water-use efficiency technology, and other incentives such as water transfers from this region of conserved water.