

Making Water Conservation a Way of Life

TOP TAKEAWAYS

1	Join the Cal Cities Water Work Group by emailing: msparkskranz@calcities.org	2	Attend March 20, 2024 State Water Board Public Workshop to provide oral public comment	3	Use Sample Letter and submit comments during the 15-day comment period, due March 27, 2024	4	Engage with the Media with responses, Letters to Editors, Op-Eds, and articles
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CAL CITIES ENCOURAGES MEMBERS TO ENGAGE IN THE WATER CONSERVATION RULEMAKING THIS WEEK!

What to Include in Your Public Comments:

The second [draft of the Long-Term Water Conservation regulations](#) and [notice](#) of the formal rulemaking are now available for a 15-day comment period closing **March 27, 2024** and a Public Workshop will be held **March 20**. For more information about the draft regulations, please visit the State Water Board [webpage](#). Your public comments should include:

- Express appreciation for the additional time the Board included for water suppliers to implement these regulations but that comes with a difficult lift because they are complex and technical and it will take time to change the behavior of customers
- Mention your expected percentage of reduced water use by 2025, 2030, 2035 or 2040 under the proposed regulation
- Recognize compliance with this regulation will continue to take significant effort
- Share specific concerns with feasibility challenges and cost of implementing the proposed water use standards and CII performance measures, and reporting
- Highlight how your agency's is advancing water use efficiency, including reductions in water use, population served, dollars investment, time to achieve savings, and diverse programs
- Highlight additional challenges such as the increasing affordability if you serves a disadvantaged community
- Express concerns about other unintended impacts, including those related to heat islands, shade trees, and enforcement

Please contact Environmental Quality Lobbyist Melissa Sparks-Kranz for public comment instructions and talking points at: msparkskranz@calcities.org or (916) 658-8232.

How to Make Oral Comments at the March 20, 2024 Workshop:

The State Water Board will conduct a public workshop on **March 20, 2024, starting at 9:00am**. Cal Cities is encouraging its members to make oral comments relevant to the changes to the proposed regulation text. Board staff will provide an overview of the changes to the proposed regulation and updates to key provisions, followed by an opportunity for the public to comment. The meeting will be held at the **Joe Serna Jr. CalEPA Building, 1001 I Street, Sacramento, CA 95814, with the option to participate remotely.**

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To address the State Water Board remotely during the meeting, you will need to obtain a password by completing a speaker card – whether you will be commenting in person or virtually.

BEFORE OR ON THE DAY OF THE BOARD MEETING

- Fill out a virtual speaker card using our [online form](#)
- Elected officials will speak first!
- If you are virtual, the Clerk will respond to your form with the password for the meeting. Should you have any questions or problems please send an email to: Board.Clerk@waterboards.ca.gov
- Direct link to join the meeting from a web browser or Zoom client (you will need the passcode to join the zoom. Passcodes will be shared after you complete the online form: <https://waterboards.zoom.us/j/95449727056>

How to Submit Written Comment by the March 27, 2024 Deadline:

Cal Cities encourages its members to submit written comments on the changes to the proposed regulation to the Clerk to the State Water Board. Any written comments pertaining to the changes to the proposed regulation must be received by the Clerk by **March 27, 2024**, which is hereby designated as the close of the written comment period. Written comments should be submitted following the steps below:

- By email to: commentletters@waterboards.ca.gov
- The State Water Board requests the email transmission of comments contain the regulation package identifier “Comment Letter—Proposed Making Conservation a California Way of Life Regulation” in the subject line to facilitate timely identification and review of the comment.
- Please see the key message points above on what to emphasize in your public comments. Cal Cities will also share a sample letter with its members.

How to Engage with the Media:

The media has been very active in responding to this rulemaking. If your city has the ability to engage with the media, Cal Cities encourages you to do so. Recent articles are critical of water suppliers needing more time to implement the regulations: [LA Times](#), [CalMatters](#), and [SF Chronicle](#). This is your city’s opportunity to change the narrative. Cal Cities encourages you to:

- Respond to media inquiries if reached out to by your local media, re-enforcing that these regulations are complex and will take time to implement.
- Engage your city councilmembers to publish letters to the editors or op-ed in your local media outlets, sharing how this will impact your community.
- Publish your own articles or newsletters, reporting out how your city is investing in conservation and it will take more investments to achieve these regulations.

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Understanding the Proposed Water Conservation Regulations: On Aug. 18, the State Water Resources Control Board released **long-term water regulations for "Making Conservation a California Way of Life"** from the original legislation SB 606 and AB 1668 (2018). The second draft of the regulations were released on **March 12 for a 15-day comment period ending March 27, 2024.** The draft regulations will set water use objectives for urban retail water suppliers, starting in January 1, 2025. The **Urban Water Use Objective** is a total water budget, in gallons per capita per day (GPCD), that is the sum of efficiency budgets for a subset of urban water uses that include the following:



The State Water Board draft regulations will consider adoption of the long-term statewide efficiency standards for outdoor residential water use, Commercial, Industrial, and Institutional (CII) landscapes with dedicated irrigation meters (DIMs), variances, and bonuses.

Why This Regulation Matters: California faces ongoing water challenges, and this regulation seeks to set long-term water efficiency standards. **It is crucial that cities provide input to ensure these standards are cost-effective, promote true water savings, and support locals in working with their residents and customers to transition to a more water resilient future.** Annual Reporting requirements start January 1, 2024 on their urban water use objectives, actual use, and progress toward objectives to the State Water Board and compliance starts January 1, 2025. If you would like to participate in **Cal Cities Water Work Group** to attend our city coalition meetings, provide input to the State Water Board, and receive email updates on this rulemaking, please contact Environmental Quality Lobbyist Melissa Sparks-Kranz at msparkskranz@calcities.org or (916) 658-8232.

