



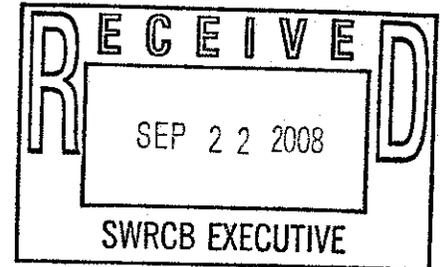
10/1/08 Board Workshop  
Urban Water Conservation  
Deadline: 9/23/08 by 12 noon

*A Nonprofit Housing and Community Development Organization*

September 19, 2008

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

Re: Development of an Urban Water Conservation Regulatory Program



Dear Ms. Townsend and members of the Board:

Self-Help Enterprises (SHE) sincerely appreciates the opportunity to comment on the development of an urban water conservation regulatory program by the State Water Resources Control Board (Board). SHE is a non-profit affordable housing and community development organization that works to improve the lives of residents of the San Joaquin Valley. Part of SHE's mission involves the improvement of drinking water and sewer infrastructure in impoverished rural communities around the Valley. This endeavor centers around working with community members and local utility boards to identify needs, develop improvement projects, and assist in accessing state, local, and federal funding to bring the projects to fruition. SHE acts as a liaison between local communities and a variety of government agencies, the State Water Resources Control Board among them.

SHE supports water conservation and efficient use as a viable long-term water supply option, as well as a measure of responsible stewardship of an invaluable resource. In California and around the world, it is important to cost-effectively stretch existing water supplies. To this end, our organization has assisted a number of rural water systems to apply for Water Use Efficiency funds through the State Department of Water Resources to install water meters and implement other conservation projects. However, it is our belief that requiring rural water providers to comply with water conservation regulations would have unintended negative consequences on the neediest communities in our State.

As a technical assistance provider to small utilities, SHE has first-hand knowledge of the challenges faced by rural water boards, which often have few or no paid staff. Rising energy costs for pumping and distribution, and pollution caused by runoff are two examples of challenges that can be addressed by conserving the use of water and discouraging water waste by consumers. Drought-induced dropping of water tables can be slowed by reducing water pumped from underground aquifers, extending the life of existing wells. Similarly, aging pumps and equipment can sometimes be coaxed into a few more years of useful life if pumping is reduced. Water conservation is a valuable tool to reduce the costs of water delivery in disadvantaged areas where water providers are operating on shoestring budgets.



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Unfortunately, however, the challenges to rural water providers don't end there. Health and safety regulations have grown increasingly stringent in recent years, forcing many water providers of every size to move to expensive treatment options or to seek new sources of safe drinking water. Many existing water systems date back to the early or mid twentieth century, and are in need of major overhaul or total replacement. Competition for scarce water resources continues to mount, especially between domestic and agricultural water users in the thirsty San Joaquin Valley.

In disadvantaged rural communities where even paying the electricity bill or hiring a certified operator can be a hardship to a small water system, summoning the financial resources to meet these challenges is all but impossible. Fortunately, numerous government agencies, including the Board, provide grant and loan funds to help bridge that gap. However, it is our experience that the availability of such resources does not keep pace with the ever-expanding regulation of water systems.

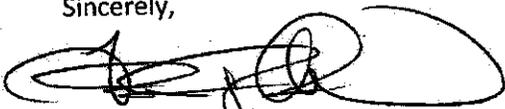
Regulating water conservation practices for small water systems would increase the burden of compliance. Requiring the use of water meters, for example, not only requires the capital outlay for the purchase and installation of the meters, but also increases operation and maintenance costs on an ongoing and permanent basis.

We support a carrot-rather-than-the-stick approach. A widespread, intensive campaign to raise awareness about the current state of our water resources and the ways that rural communities can do their part to reduce water waste could encourage voluntary compliance with the Best Management Practices laid out in California Urban Water Conservation Council's MOU. It could empower communities to make good choices about water stewardship. If state funding and materials could incentivize the implementation of such campaigns at the local level, we believe that a more positive outcome will be achieved.

Current state law limits existing water conservation regulations (the use of water meters) to urban water providers, those providing water service to more than 3000 customers. We support the continued use of this definition and its application. Systems smaller than 3000 connections already have enough challenges on their regulatory plates; we ask that you not burden them further with more requirements. At the same time, we request that funding be made available to encourage all water suppliers both large and small to conserve.

We appreciate the opportunity to participate in this important conversation and look forward to attending the workshop on October 1.

Sincerely,



Thomas J. Collishaw  
Vice President