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SAN GABRIEL VALLEY WATER ASSOCIATION

March 27, 2024

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The Honorable Dave Min
Chair, Senate Natural Resources and Water Committee
1021 O Street, Ste. 6710
Sacramento, CA 95814

RE: SB 1330 (Archuleta): Urban retail water supplier: water use. SUPPORT

Senator Min:

The San Gabriel Valley Water Association (SGVWA) is pleased to join the coalition in support of Senate Bill (SB) 1330 (Archuleta), which addresses outstanding concerns with the State Water Resources Control Board's (State Water Board) proposed long-term urban water use efficiency rules and regulations known as "Making Conservation a California Way of Life."

The initial draft of these regulations raised concerns about their feasibility and costs. The Legislative Analyst's Office (LAO) and an independent analysis from Mesa Water District¹ estimated that the potential costs for water suppliers, wastewater agencies, and their customers could be in the tens of billions of dollars from 2025 through 2040.

The State Water Board has recently released a revised version of the proposed conservation rules following extensive public comment. The new regulations are more manageable, but urban water suppliers still have concerns that this bill could help address. SB 1330 would eliminate the significant thresholds for variances and allow water suppliers to self-certify the amount of water they attribute to each variance. SB 1330 would ensure ongoing oversight from the State Water Board through variance reporting audits.

Additionally, SB 1330 proposes a two-year extension for all deadlines to meet the Water Use Objective requirements. This extension gives suppliers more time to work with the State Water Board to ensure appropriate planning for required water savings. The bill also clarifies landscape reporting issues by allowing reporting every ten years instead of

¹ Link to Mesa Water District independent analysis online: <https://mavensnotebook.com/2023/10/03/feature-state-water-board-to-hold-public-hearing-on-the-making-conservation-a-california-way-of-life-but-does-the-proposed-regulation-make-economic-sense/>

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annually. It also enables water suppliers to report their water use on a fiscal or calendar-year basis.

We appreciate the opportunity to submit this letter in support of SB 1330 and believe that this bill will have a positive impact by ensuring that conservation measures are practical and affordable for water systems and their ratepayers.

Sincerely,



Lynda Noriega
President, Board of Directors
San Gabriel Valley Water Association

cc: Senator Bob Archuleta
Senate Natural Resources and Water Committee