June 24, 2024

The Honorable Bob Archuleta
State Senate
1021 O Street, Suite 6620
Sacramento, CA 95814

Re: Support – SB 1330: Urban Retail Water Supplier – water use (As Amended June 13, 2024)

Dear Senator Archuleta:

NATALIE ROGERS
Mayor

MARK STAPP
Vice Mayor

EDDIE ALVAREZ
VICTORIA FLEMING
DIANNA MACDONALD
JEFF OKREPKIE
CHRIS ROGERS

On behalf of the City of Santa Rosa, I am writing to express our support for your bill, SB 1330, which would provide flexibility for water suppliers to comply with new water use efficiency mandates.

Santa Rosa Water is an urban retail water supplier serving approximately 175,000 residents in Sonoma County. Santa Rosa has a long-standing commitment to drought preparation and water use efficiency, recognizing the vital role that long-term drought preparation and continued improvement in water use efficiency provide in maintaining a resilient water supply. Santa Rosa has been actively engaged in the coordinated effort between state agencies, water utilities, and other interested parties that shaped the Making Conservation a California Way of Life framework that was established in 2018 by AB 1668 and SB 606.

Following enactment of these bills, the Department of Water Resources (DWR) conducted in-depth studies and made recommendations to the State Water Resources Control Board (State Water Board) on various elements of the framework. The State Water Board issued its initial draft regulations in August 2023 and plans to adopt the final rule in August with an effective date of January 2025.

In January 2024, the Legislative Analyst's Office (LAO) released a report evaluating the initial proposed regulations. The LAO report raised concerns that the State Water Board's initial proposed regulations created implementation challenges and went beyond what the Making Water Conservation a California Way of Life legislation requires or DWR recommends. The LAO report further contends that the initial proposed regulations created implementation challenges for water suppliers.

SB 1330 is following the lead of the LAO report, with provisions in the bill taken directly from the issues raised in that report. SB 1330 would provide statutory clarity regarding enforcement deadlines, which may be a helpful tool as the State Water Board works to finalize the regulations. Additionally, the legislation will require DWR to update aged and inaccurate landscape data as well as sync the timing of that update with the planned aerial

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survey for commercial, industrial, and institutional (CII) landscapes, which will be more cost and time efficient for DWR.

This bill also addresses some reporting requirements that will no longer be relevant due to the implementation of the Making Conservation a California Way of Life regulations. The 20x2020 reporting as required by SB 7x7 (2009) was intended to demonstrate a 20 percent reduction in water use by urban water suppliers by 2020. The reporting deadline has passed and further reporting is no longer necessary, and this bill would repeal those requirements.

California must continue to work toward greater water resilience, and water suppliers are committed to water use efficiency as an element of that effort. SB 1330 helps address policy issues that the Association of California Water Agencies has engaged on in the regulatory process to ensure that the final adopted regulations are achievable for water suppliers. The changes proposed in SB 1330 would provide water suppliers with appropriate flexibility for cost-effective implementation of the regulations.

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For the above reasons, the City of Santa Rosa supports adoption of SB 1330. Thank you for your leadership on this important issue and for supporting public water providers. If you, or members of your staff, have any questions please feel free to contact Peter Martin, Deputy Director of Water Resources, at 707-543-4294 or via email at PMartin@srcity.org.

Sincerely,

Natalie Rogers
Mayor

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