



March 27, 2024

Courtney Tyler, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100,  
Sacramento, CA, 95812-0100

Re: Comments on Changes to Proposed Regulation Regarding Making Conservation a California Way of Life

Dear Ms. Tyler,

Thank you for the opportunity to submit these comments about the changes to proposed regulation for Making Conservation a California Way of Life, as described in the “Updated Text of Proposed Regulation,” dated March 12, 2024. Friends of the Inyo (FOI) is a grassroots non-profit organization based in Bishop, California, that represents over 1,000 members. Our mission is to protect and care for the land and water of the Eastern Sierra. Over our 38-year history, we have cared for lands and waterways that suffer the destructive effects of prolonged water extraction by the Los Angeles Department of Water and Power (LADWP). Conservation efforts in Southern California will directly affect the health of our landscapes and watershed, as well as the quality of life for the people that live here. **We ask that the Water Board return to its previously proposed outdoor efficiency standards and earlier deadlines for water suppliers to reach their reduction targets.**

A key goal of conservation in California is to reduce the reliance of urban centers on imported water. As an organization in the Eastern Sierra, we have experienced the immense damage that water extraction inflicts on environments very far away from these urban hubs. By pushing back the deadline for water suppliers to meet reduction targets by five years, the state will miss the chance to conserve 180,000 acre-feet (af) of water by 2030, compared to the previous version of these regulations. That is an absolutely enormous amount of water, and **even a small fraction of these water savings would**

**make a noticeable difference to the health of our aquifers and broader watershed.** Saving this water is far more important than convenience for urban water suppliers.

Beyond the water wasted by making these regulations more flexible, California must prepare for the ongoing climate emergency as quickly as it possibly can. We do not have the luxury of a five year delay or weakened regulations. In the Eastern Sierra, Los Angeles has forced us to conserve for generations, especially during dry years when LADWP pumps what little runoff water we have to L.A. **It is time for the rest of California to take up the mantle of conservation, even if it may be costly or inconvenient.**

That being said, building climate resilience is in fact the most cost-effective strategy for urban planning over the long run. Conservation creates change more cheaply and quickly than water infrastructure projects, such as desalination plants and water recycling facilities. Conservation is something that we can focus on right now, while water districts build up their capacity for these time- and money-intensive infrastructure efforts. **Moreover, efficient water usage in urban areas is a key method for protecting the regions where much of this water originates, like the Eastern Sierra.**

We appreciate your effort to balance the needs of water suppliers with these goals of increased conservation. However, we hope that you recognize that the consequences of climate change demand urgency. Especially from our position in the Eastern Sierra, we know that **we cannot afford to weaken these new conservation measures.**

Thank you for considering these comments. Please contact Lauren Kelly at [lauren@friendsoftheinyo.org](mailto:lauren@friendsoftheinyo.org) with any questions.

Sincerely,

A handwritten signature in black ink that reads "Wendy Schneider". The signature is written in a cursive, flowing style.

Wendy Schneider  
Executive Director