



February 14, 2018



Via email to: commentletters@waterboards.ca.gov

Jeanie Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter-Prohibiting Wasteful Water Use Practices

Honorable Board Members:

Eastern Municipal Water District (EMWD) appreciates the opportunity to comment on the State Water Resource Control Board's proposed regulation regarding Water Conservation and the Prevention of Waste and Unreasonable Use. EMWD has a demonstrated commitment to increasing water use efficiency and prohibiting water waste and supports efforts to implement the "Making Conservation a California Way of Life" Framework.

We have reviewed the proposed regulatory text and appreciate the revisions made in response to public comments. The revisions to the restrictions on the irrigation of turf will allow public agencies to retrofit landscape over time and preserve trees in medians and parkways. The revisions also recognize efficiency and the investment made by public agencies that utilize recycled water.

Under Article 2, Section 963, (b) (1) (E) we appreciate the revised quantification of measurable rainfall from one tenth to one fourth of one inch, but request again that determination of measurable rainfall should be left to the discernment of the local jurisdiction. Especially during warmer months, one fourth of one inch of rain in 48 hours may still not be sufficient to keep plants healthy.

Board of Directors

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We would also support a stakeholder effort to address the concerns raised in other comment letters about the legal issues surrounding these proposed regulations. We support prohibitions on wasteful water use but do not believe these restrictions should diminish water rights.

Thank you again for considering our comments and for the revisions already made to the regulations. Please contact Elizabeth Lovsted at (951) 928-3777 extension 4307 or lovstede@emwd.org if you need additional information. We look forward to working with you to implement the components of the "Making Conservation a California Way of Life" Framework in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lovsted", with a long horizontal flourish extending to the right.

Elizabeth Lovsted
Director of Water Supply Planning

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Attachment(s)/Enclosure(s):