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July 11, 2014



State Water Resources Control Board
Attn: Jeanine Townsend, Clerk to the Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Comment Letter – July 15, 2014 Board Meeting - Item 10: Emergency Water Conservation Regulations

Dear Ms. Townsend:

Desert Water Agency (DWA) appreciates the advanced distribution of the Notice of Proposed Emergency Rulemaking as well as the opportunity to comment on the proposed rule. Water conservation is a priority to DWA. Since the Governor's Declaration, we have taken significant steps to increase our conservation efforts. Our 2014/2015 budget has increased conservation funding by more than 300%. Additionally, we passed a conservation resolution asking our customers to join us in the efforts to reduce water consumption throughout our service area. We have also implemented new programs including a revised toilet rebate program, a water waste report smart phone app, and a \$1 million turf buyback program.

DWA is prepared to move into mandatory water conservation measures according to our Water Supply Contingency Plan. However, after reviewing the proposed rule, we are concerned about enforcement. The fact sheet produced by staff states that "any employee of a public agency charged with enforcing laws may write and issue a ticket to the violator." As an independent special district, DWA and its employees are not charged with enforcing laws thus we have no authority to issue tickets to violators. We would appreciate some clarification on how that can best be addressed.

Secondly, in our own ordinances, recycled water users are exempt from mandatory conservation measures. Such an exemption encourages the use of recycled water, which is beneficial to our overall water supply reliability. Does such an exemption exist within the Proposed Emergency Rulemaking?

Again, we appreciate your time and attention to this matter as well as the opportunity to review and comment on the proposed Emergency Rulemaking.

Sincerely,

David K. Luker
General Manager - Chief Engineer

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