ECEIVE

commentletters

From:markcalhoon@comcast.net1-24-16Sent:Sunday, January 24, 2016 8:51 AMSWRCB ClerkTo:commentlettersSWRCB ClerkSubject:"2/2/16 Board Meeting – Item 7 (Conservation Extended Emergency Regulation)."

While all Californians should be looking at water use and conservation, I find the "Emergency Rule" to be both ill-founded and ill-advised. Setting an arbitrary and capricious "reduction" number with no consideration to local conditions or prior use pattern is plainly wrong. It is not based in sound science and tramples on water rights and local control, which even the State recognized as essential element of water management in SGMA. Pushing requirements down onto smaller water purveyors who have neither the staff, resources, nor enforcement means is ludicrous and actually acts to undermine "voluntary" compliance in general.

Inclusion of proposals to allow further housing developments and increased population growth when most areas already have a net water shortage in groundwater and surface water supply v. water demands only gives further credence to the lie that the State is serious about California water management in general and highlights the poor science behind the proposed rules.

Finally, the arbitrary and capricious conservation goal number only affects a small % of total water users (estimated at 20% or less of total water use in California.) We are dangerously playing in the margins which will likely have unintended environmental consequences of creating greater "heat sinks" in urban areas through loss of vegetation & trees, and more run-off. Besides the short term effects we can expect this winter with more tree losses during storm events (with resultant loss of life, property, etc.) the long term unintended impacts are likely devastating and irreversible. This is a classic case where "emergency measures" ("never waste a good crises") taken without sound basis and careful consideration have unintended, but foreseeable, consequences.