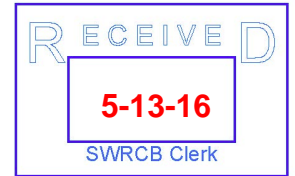


May 13, 2016



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

Hello,

My comment regarding the draft regulation pertains to the possible use of groundwater by water suppliers to effectively eliminate any conservation requirement.

The percentage conservation value proposed in the draft text is based on the relative deficiency of supply compared to demand, where supply is based on the "water sources of supply available to the supplier that could be used for potable drinking water purposes." The majority of suppliers have access to nearly unlimited groundwater supply, through pursuing new or existing drilling operations themselves or through their wholesale providers, given the lack of regulations limiting their access. For this reason, it seems that most water suppliers in the state would have access to unlimited supply.

Is this observation incorrect? Does the draft text impose an indirect limit on groundwater use that is not immediately apparent? If not, doesn't the draft text as written effectively result in required conservation levels of 0% for most suppliers?

With the current regulation in place, the board has mandated conservation levels that do not have such a loophole, as their output is explicitly limited. But the new regulation seems to be creating a significant loophole in its primary intent.

I am raising this point as a concerned California citizen, and would be interested in receiving a response if at all possible.

Regards,  
Matt Kennedy