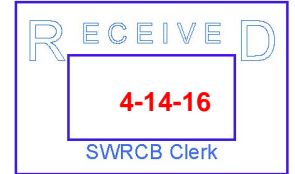


## commentletters

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**Subject:** Comment Letter – Urban Water Conservation Workshop



From: Patrick Porgans, Solutionist, Porgans/Associates  
[porgansinc@sbcglobal.net](mailto:porgansinc@sbcglobal.net)

Sent: Thursday, 14 March 2016

**To: Jeanine Townsend, Clerk of the Board** [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)  
**State Water Resources Control Board**, 1001 "I" Street, 24th Floor,  
Sacramento, CA 95814

**Subject: Submission of Written Comments "Comment Letter - Urban Water Conservation Workshop."**

Date and Time Comments Due: 12 noon on Thursday, 14 April 2016

Members of the State Water Resources Control Board (State Water Board):

**Porgans/Associates** (P/A) are submitting this brief comment letter, and the attached file, in the preparation of the 20 April workshop requesting input from the public on Urban Water Conservation. By the Board imposed deadline this comment letter was submitted before noon Thursday, 20 April 2016.

**NOTICE IS HEREBY GIVEN** that the State Water Resources Control Board (State Water Board or Board) will hold a public workshop to receive input on the potential modification of the current Emergency Regulation for Statewide Urban Water Conservation. This will be an informational workshop only, and the State Water Board will take no formal action.

**WORKSHOP OVERVIEW:** The purpose of this workshop is to solicit input on potential adjustments to the February 2016 Emergency Regulation in response to precipitation amounts and other drought indicators across the state since February 2016, for consideration and possible action by the State Water Board in May 2016.

The attached file contains a FACT SHEET: *Urban Users Targeted by Water Officials Order to extend Drought Regulation Absent Public Input, Russian River Watershed Post-Child of Neglect and Selective Enforcement Tactics*, printed in mid-March 2016; released in mid-April.

**SOURCE OF DATA:** The documentation and data contained in the FACT SHEET are primarily from government sources and main-stream media. The data indicate that this Board is targeting urban water users, exempting agricultural users, exercising selective-enforcement tactics, and, apparently grossly mismanaging the waters of the State. The prevailing conditions of the public's water supply, water quality, and unreliability are a testament to this Board, the California Department of Water Resources and the federal

Bureau of Reclamation failures to perform their legal and public trust mandates.

**Note:** The FACT SHEET went to print in mid-March, just prior to the State Water Board's decision to re-amend the 2 February 2016 Russian River Drought Emergency Regulation urban water cutbacks, which the Board did in mid-March 2016. The Board sent it over to the Office of Law Administration, with an expected approval date of 1 April 2016. Although P/A attended all of the previous drought "workshops" and did sign up to be on the mailing list; we did not receive notice of the 1 March 2016 Re: Item 7 Board Meeting. Div. of Water Rights Consideration of Proposed Resolution to Update and Readopt a Drought related Emergency Regulation...

**REQUEST FOR EVIDENTIARY HEARING:** Property owners, residents, and members of the public have appeared before this Board requesting that it hold "evidentiary hearings." This would provide the public with the opportunity to provide testimony and cross-examine water officials as to the sources of their data; historical pre- and post-drought operation at state and federal water projects, and dumping water from reservoirs during this "Epic" drought. It would also examine factors such as unbridled expansion in the agricultural sector; statewide building permits doubled in the past several years; largest State Budget in history; agricultural revenues at all-time highs; almond markets bottoming out; and the Golden State's GDP was also at a record-breaking level; \$2.31 TRILLION in 2015.

Please see to it that this letter and the attached FACT SHEET is posted under Comment Letters; confirmation of receipt of this communication would be appreciated. Thank you.