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February 14, 2018

VIA ELECTRONIC AND U.S. MAIL

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000
commentletters@waterboards.ca.gov

Re: Comment Letter - Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices.

Dear Ms. Townsend:

The following Downey Brand LLP clients: Carter Mutual Water Company; El Dorado Irrigation District; El Dorado Water & Power Authority; Howald Farms, Inc.; Maxwell Irrigation District; Natomas Central Mutual Water Company; Meridian Farms Water Company; Oji Brothers Farm, Inc.; Oji Family Partnership; Pelger Mutual Water Company; Pleasant-Grove Verona Mutual Water Co.; Princeton-Codora-Glenn Irrigation District; Provident Irrigation District; Reclamation District No. 108; Sacramento Municipal Utility District; Henry D. Richter, et al.; River Garden Farms Company; South Sutter Water District; Sutter Extension Water District; Sutter Mutual Water Company; Tisdale Irrigation and Drainage Company; Windswept Land and Livestock Company; North Delta Water Agency; Reclamation District No. 999; Reclamation District No. 2060; Reclamation District No. 2068; Brannan-Andrus Levee Maintenance District; Reclamation District No. 407; Reclamation District No. 317; Reclamation District No. 551; Reclamation District No. 105; Reclamation District No. 563; Reclamation District No. 2067; and Reclamation District No. 2098, stand to be affected by the State Water Resources Control Board's ("SWRCB") proposed "Wasteful and Unreasonable Water Use Practices" regulation ("Regulation").

The entities identified above hereby join and incorporate by reference the February 14, 2018 comment letter submitted by the Association of California Water Agencies, Northern California Water Agency, and numerous water districts, irrigation districts, contractors, and public agencies.

Thank you for your consideration. We look forward to assisting the SWRCB in any way that we can.

Very truly yours,

DOWNEY BRAND LLP

A handwritten signature in blue ink that reads "Kevin M. O'Brien". The signature is written in a cursive style with a horizontal line underlining the first name.

Kevin M. O'Brien

KMO