



July 14, 2014

The Honorable Felicia Marcus
State Water Resources Control Board
P.O. Box 100
Sacramento, CA. 95812-0100

**COMMENTS ON POTENTIAL STATE WATER RESOURCE CONTROL BOARD
EMERGENCY REGULATIONS**

Thank you for the opportunity to review and comment on the proposed emergency regulations to be considered by the State Water Resources Control Board on July,15, 2014.

The Elk Grove Water District opposes adoption of the emergency regulations as proposed.

Many agencies have already attained appreciable water use reductions in furtherance of the objective of the proposed regulations. As a case in point, the Elk Grove Water District's water usage between the months of March through June dropped by 19.04% from 2013 to 2014. This reduction readily complies with the stated objective of the regulations to reduce water use this year compared to last year.

Furthermore, the enforcement provisions mandated by these rules are ambiguous and impracticable. As currently written, the term "outdoor irrigation" is not defined; the agency or agencies responsible for carrying out the enforcement is unclear; the enforcement procedure is unexplained; and even the disposition of fines collected is not specified.

The proposed regulations are overbroad, unnecessarily stringent, vague and ambiguous. For these reasons, they should not be adopted by the State Water Resources Control Board in their current form.

Please call me at (916) 685-3556 if you have any questions or require additional information.

MARK J. MADISON
GENERAL MANAGER

MJM/mcn.