

LATE COMMENT

December 22, 2017

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comments on Prohibiting Wasteful Water Use Practices

Dear Chair Marcus:

I am responding to the State Water Resources Control Board invitation to comment on wasteful water practices. I understand that our local water agency, Desert Water Agency, has also commented and I want to support their comments fully.

Additionally, I want for you to know that our company manages over 100 common interest developments managed by homeowner associations that may be impacted adversely in regard to penalties that may be imposed for watering median islands within and adjacent to the community. Most homeowner associations are not financially prepared to handle the cost of conversion or mandated penalties when watering to keep median islands green where they have turf or other landscaping the board wants to deem illegal to water.

As you likely noted in Desert Water Agency's comments, your own analysis indicates that less than one percent of statewide water use will be saved as a result of such prohibitions. The cost to benefit ratio doesn't pencil out for our common interest developments.

Please consider these points when making a decision on these important upcoming issues. The Community Associations Institute has already informed and pushed its member communities to comply with water saving measures and we believe that water waste by the communities managed by a homeowners association is already at an absolute minimum.

Please consider modifying your rule or create an exemption for homeowner association managed communities (common interest developments).

Sincerely,

Steven Shuey

Steven Shuey, PCAM, CCAM
Operations Manager