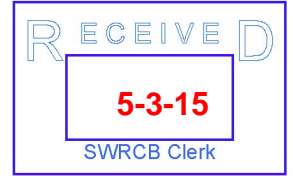


## commentletters

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**From:** markcalhoon@comcast.net  
**Sent:** Sunday, May 03, 2015 9:35 PM  
**To:** commentletters  
**Subject:** "Comment Letter – Emergency Conservation Regulation."



In passing the Sustainable Groundwater Management Act of 2014 the legislature wisely recognized the diversity in California’s water resources geographically and the importance of managing and responding to water resource issues at a local level. The California Water Resource Control Board proposed regulations being dictated by a State Agency without regard to local conditions seems contrary to the wisdom exhibited by the legislature. It appears to represent an attempt to insert jurisdiction where none exists and can only be termed arbitrary and capricious as it is not based on any scientifically derived findings. It also is ill founded in that it appears directed at water users who account for only 20% of total water use. Already the courts have begun to weigh in on some of the measures previously advanced such as using tiered pricing solely intended to affect water use without reflecting cost to deliver. One would expect even more litigation to follow if these measures are adopted, much of it borne by utilities. In the end, the proposal is a distraction that does little to promote discussion and responsible management of our water resources.