



September 24, 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

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**MANAGER/SECRETARY
Chris Dahlstrom**

**HATCH & PARENT
A Law Corporation
General Counsel**

Subject: Proposed Urban Water Conservation Regulatory Program

Dear Ms Townsend:

On behalf of the Santa Ynez River Water Conservation District, Improvement District No.1 ("ID No. 1"), we are both appreciative of the current water conservation administrative process conducted by the California Urban Water Conservation Council (CUWCC) and concerned that this process if made mandatory will cause inequities and ineffective conservation. The proposed State Water Resources Control Board (State Water Board) development of the urban water conservation regulatory program as it is understood would unfairly regulate all agencies that are signatories to the MOU, both large and small, as one thus creating one-size-fits-all mandate. By mandating the 14 Best Management Practices (BMPs) identified in the California Urban Water Conservation Council (CUWCC) Memorandum of Understanding, would have significant financial and resource impacts on this small rural public water district that has 2,454 domestic customers but is still required to implement the BMPs because of its contract with the United States Bureau of Reclamation.

Should the State Water Board mandate BMPs through a regulatory program, this will apply uniformly that all "urban" water suppliers implement certain practices or meet specific performance standards. This defeats the purpose of the small rural communities, incorrectly defined as "urban", to implement the BMPs that are attainable, cost feasible and practical. This proposal also unjustly penalizes water district's, such as ID No. 1, for sound water planning and fiscal responsibility while providing for water conservation that is tailored to be effective for the community.

ID No. 1 urges that the State Water Board reconsider this proposal, and not enact a program that would create unfunded mandates, cause fiscal impacts and undermine local control of conservation efforts.

The State need not regulate a program that is currently useful and effective. Thank you for consideration of our comments.

Regards,

Chris Dahlstrom
General Manager