



February 13, 2018

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000

RE: Comment Letter – Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices

Dear Ms. Townsend:

The City of Santa Cruz has been actively following the State Water Resource Control Board's (SWRCB) proposed regulatory action regarding water conservation and the prevention of waste and unreasonable use. On December 22, 2017, the City submitted a comment letter in which we suggested certain changes be made to the proposed text of the regulation.

The SWRCB recently circulated changes to the proposed regulation. We believe the changes adequately address our previous concerns and wish to go on record in support of the revised language. By adding a definition of "incidental runoff", changing the threshold for when landscape irrigation is prohibited to $\frac{1}{4}$ of one inch of rainfall, and reserving the prohibition on serving drinking water other than upon request for times of drought, the proposed regulation is much more reasonable, and improves the chances that the public will be willing and able to abide by the prohibitions.

We appreciate the responsiveness of your staff in considering all the input received and crafting a very reasonable compromise between the original text and the recommendations made by various water suppliers.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Toby Goddard".

Toby Goddard
Water Conservation Manager
City of Santa Cruz

