



Good Day:

The proposed regulations to create a State-Wide Mandatory Conservation plan are simply an action of inverse condemnation of individual property owners. These regulations fail to recognize the variety of water supply conditions throughout the state and fail to analyze the impacts of the current El Nino event that climatologists predict may be equivalent to the one in 1982. Many areas already practice conservation and the impact of limiting outdoor irrigation further has not been fully discussed. Many farmers are already at the limits of conservation with respect to irrigation of their orchards and other crops. The economic impact of stressing trees and other plants has not been evaluated as a part of this rulemaking process.

If commercial orchards suffer a loss in production as a result of compliance with the proposed regulations, who is financially liable for the loss in revenue?

If orchards and other outdoor landscaping is stressed and killed due to this action, who is financially responsible?

What is the total economic impact of killing outdoor landscaping as a result of this action?

What is the impact to housing values and subsequent revenue reductions to State and local government as a result of reduced assessed valuations due to this action?

What are the increased risks for catastrophic fires if the urban landscape is allowed to die or become extremely stressed due to these actions?

The proposed regulation recognizes that water agencies will be impacted by nearly 439 million dollars in lost revenue. How are those agencies supposed to make up those losses in the immediate future? What are the economic impacts to low and fixed income customers who will ultimately see an increase in rates as a result of this proposed action? Increasing rates requires a significant investment and cannot simply be performed by the governing board without following the process under Proposition 218.

The proposed action by the SWRCB is simply over-reaching and has not been fully evaluated in terms of economic impacts to local communities. Not all agencies are impacted the same by the current drought conditions. Using a broad based approach that fails to recognize local conditions is bad policy.

I urge the members of the Board to reconsider taking action on this item until the true economic impacts can be fully understood.

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