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Martin E. Zvirbulis
Secretary / General Manager/CEO

July 14, 2014

State Water Resources Control Board
P.O. Box 2815
Sacramento, CA 95812-2815



RE: "7/15-16/14 BOARD MEETING (Emergency Regulations for Water Conservation)."

The Cucamonga Valley Water District (CVWD) has a comprehensive water conservation outreach and education program. The District has been reshaping the water use patterns and practices of our customers through the use of a variety of outreach efforts, education programs in schools, rebates, water efficient landscape workshops, and other community programs. In 2009, the CVWD Board of Directors took action and adopted two ordinances to deal with water shortage situations. The ordinances were created to set the minimum standards for water efficiency use for our customers and to encourage conservation while not having a disproportionate impact on customers who had already implemented conservation methods.

One of the ordinances, Water Use Efficiency Ordinance 47, outlines mandatory prohibited water waste practices and includes a list of widely recognized "Best Management" Practices which our customers could easily achieve to conserve water. **"Ordinance 47, Encouraging Water Use Efficiency" remains in effect at all times.** In addition, in April of this year the CVWD Board of Directors adopted a resolution reconfirming our awareness of the drought and the commitment to outreach to our customers. The resolution also encouraged customers to align with Ordinance 47 if they already were not doing so.

CVWD respectfully requests that specific water restrictions in any new regulations only be a framework allowing for similarly worded restrictions to be acceptable. As mentioned, our agency already has restrictions in place with Ordinance 47 that are closely aligned with the proposed rulemaking that accomplish the same goals; however, they do not exactly match the board's proposed language.

We urge that any reporting requirements have flexibility and a common sense approach to them as each agency is different and to avoid any reporting tool or requirement that is overly burdensome. We also have concerns over violations as the proposed regulations do not address how the restrictions would be enforced and who would enforce them. Thank you for your consideration and for the open dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin E. Zvirbulis".

Martin E. Zvirbulis
General Manager/CEO

Cc: Association of California Water Agencies
Metropolitan Water District of Southern California

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