Since the Staff Proposal for Modifying Emergency Conservation Regulation was only sent out today, which is past the indicated comment period of 1/12/17, I am now submitting comment.

The poor quality and lack of any scientific basis (other than uncertainty and a general desire to regulate where no justification is present) shows how little the State Water Board has to offer in overall water management in California.

The report states that "Drought is a function of impacts, which may be local." "May be(?)" There is no rulebook for declaring or rescinding. Exactly, which only highlights why a one size fits all, statewide regulation is without sound foundation, but so dangerous as there is no clear basis for rescinding regulations once enacted. Finally, staff continues to recommend regulations which have a cost to implement (for both water purveyors and consumers) without identifying those costs and their impact, and in the absence of any clear scientific data to support the regulations.

Truly this is government at its worse. The water resources control boards continue to demonstrate that they have no value to add to the State and local agency approach to water management in California.