January 26, 2018

VIA EMAIL AND U.S. MAIL.

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Email: commentletters@waterboards.ca.gov

Re: Comment Letter Regarding Prohibiting Wasteful Water Use Practices

Dear Ms. Townsend,

Patterson Irrigation District (PID) has reviewed the State Water Resources Control Board proposed regulation Title 23, Diversion 3, Chapter 3.5 on Conservation and the Prevention of Waste and Unreasonable Use. While PID agrees that water conservation is important, it also believes it should be practiced in accordance with current law. As such, PID agrees and supports the comment letter provided by the San Joaquin Tributary Authority dated December 21, 2017 such that the Proposed Regulation mischaracterize water conservation, the Proposed Regulations are outside the authority of the State Water Board, the Proposed Regulations cannot be used to achieve conservation, and the Proposed Regulations fail to achieve their intended purpose. As such, PID requests the State Water Board to revise the Proposed Regulations to be consistent with established law and water conservation policies.

Kindest Regards,

Vince Lucchesi, PE
General Manager
Patterson Irrigation District