

April 22, 2015

Jessica Bean, Engineering Geologist  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**RE: Draft Emergency Water Regulations—Feedback**

Dear Ms. Bean:

On behalf of the City of Fowler, we have provided feedback on ways in which the State Water Resources Control Board may clarify some of the concepts released in the draft emergency water regulations.

The City of Fowler appreciates the State Water Board's time and commitment to the achievement of an aggregate statewide 25 percent reduction in potable urban water use through February 2016. Many of the concepts outlined in the draft regulations prove helpful to the City as it considers how to adhere to the Governor's Executive Order and how to best serve the residents of Fowler. The City is a small water supplier with fewer than 3,000 service connections and is thus prepared to either limit outdoor irrigation to no more than two times per week or to institute measures that achieve a 25 percent reduction in use.

Due to the size and gradual growth rate of Fowler, the City respectfully requests clarification on two specific points prior to the State Water Board's formal notice of proposed rulemaking on April 28, 2015.

First, the City is a small agency that serves approximately 6,000 residents. The City has a fiscally conservative budget and therefore does not have any supplemental funds for the enforcement of water reduction regulations. The City understands that the State Water Board has tools available for enforcement, such as informal enforcement and formal enforcement. However, for a City the size of Fowler, those tools require manpower and time. Prior to the formal notice of proposed rulemaking, the City would appreciate further clarification on how small water suppliers may ensure compliance and enforcement.

Second, the City is gradually growing at a rate of 2 percent per year. The City would appreciate if the proposed regulations would further clarify how growing cities will be taken into account when stipulating certain water reduction tiers and requirements.

Thank you for considering our view on this important matter. If you have any questions or if there is any other information the City of Fowler can provide you, please do not hesitate to contact me.

Sincerely,

David Elias, City of Fowler  
128 S. 5<sup>TH</sup> Street  
Fowler, CA 93625