



Mammoth Community Water District
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April 22, 2015

Jessica Bean
State Water Resources Control Board
VIA E-MAIL: Jessica.bean@waterboards.ca.gov

Subject: Comments on draft regulations: Modification of total water use calculation and clarification regarding irrigation of newly constructed houses

The Mammoth Community Water District (MCWD) would like to submit the following comments on the draft emergency conservation regulations. We request that the SWRCB allow water suppliers to modify their population number to include transient population estimates. Homes owned and occupied by non-residents can comprise a significant contribution to a water supplier's usage. More than half of the residential units in our resort town are owned by non-residents and are irrigated regardless of occupancy. Our second-homeowner, transient population more than doubles the number of residents in our town. Not allowing modifications to population count as it relates to total water use calculations places an undue hardship on our community.

The MCWD would also like to request clarification on the Executive Order to limit irrigation on newly constructed homes and buildings to drip or micro-sprayers. If a new building received a town permit allowing spray irrigation and the irrigation system is installed, must the homeowner refrain from any new planting if the irrigation is not converted to drip or micro-sprayers? In addition, we would like to suggest that pop-up rotary nozzles be allowed. These nozzles deliver large drops that are less subject to evaporation and wind drift than spray nozzles. Drip irrigation tubing in our rural community is highly subject to wildlife damage. This problem may be exacerbated during the drought because coyotes, deer, ground squirrels and other animals bite the tubing for water. Leaks caused by wildlife damage may be present for long time before they are detected. Underground, durable irrigation systems may result in less waste and be more appropriate for our location.

The MCWD appreciates the attention to water conservation action for our state and we are fully committed to eliminating water waste in our community. Thank you for the opportunity to provide comments on the draft emergency regulations.

Sincerely,

A handwritten signature in cursive script that reads "Irene Yamashita".

Irene Yamashita
Public Affairs/Environmental Specialist