commentletters

From: Bob Hitchner <bob@nexusewater.com>
Sent: Thursday, January 28, 2016 10:43 AM

To: commentletters

Subject: 2/2/16 Board Meeting – Item 7 (Conservation Extended Emergency Regulation).

1-28-16 SWRCB Clerk

TO THE CALIFORNIA STATE WATER BOARD

Re: Comment on 2/2/16 Board Meeting -- Item 7 (Conservation Extended Emergency Regulation) --

Subject: <u>Improving communications to homeowners about how non-potable (alternative) water sources are exempted from most watering restrictions</u>

We commend the Water Board on the effect and success of the emergency drought regulations implemented last May. Through these regulations, California is achieving its goal of reducing urban water use by 25%.

During the first year, California achieved its goals by calling on its residents to learn to cut back and do without water. In many cases, landscapes were converted or allowed to brown out.

As we enter the second year of the regulations, it is especially important that Californians be shown how they can live abundantly while using less potable water other than for drinking or bathing. To help this happen, it is critical that the Water Board place a stronger emphasis on the promotion of alternative water sources to supply thirsty landscapes.

Homeowners need to know more about their option to use non-potable water for residential irrigation. The emergency regulations need to be accurately communicated to homeowners so that it is clear that <u>landscape</u> <u>watering restrictions</u> <u>apply only to the use of **potable water**</u>, and they <u>do not apply to the use of **non-potable water** sources.</u>

As you know, the Emergency Regulations have established a number of restrictions on the use of **potable water** in landscapes. These regulations clearly state that they apply to **potable water**, and not to the use of **non-potable water**. In spite of this, when publishing water restrictions, most local water agencies and jurisdictions fail to draw any distinction between the use of potable and non-potable water.

This gives homeowners the impression that watering restrictions apply equally to both potable and non-potable water sources. This impression works at cross-purposes with the objective of promoting more use of on-site (e.g. non-potable) treated water sources.

In order to achieve your objective to promote the use of on-site water resources, it is important that water agencies make it clear that their restrictions and rules apply only to potable water, and not to non-potable water.

It is also important that water agencies jurisdictions take the extra step of describing and explaining the differences between "potable" and "non-potable" water.

Here are several examples where the announcements to homeowners fail to distinguish between the use of potable and non-potable water:

City of Los Angeles:

https://www.lacity.org/311-directory-online-services/servicedetail/3909



Know Your Watering Days | City of Los Angeles

www.lacity.org

The City of Los Angeles Water Conservation Ordinance limits outdoor watering with sprinklers to three days a week. Based on the last number of your street address ...

"The City of Los Angeles Water Conservation Ordinance limits outdoor watering with sprinklers to three days a week. Based on the last number of your street address, your watering days are as follows ..."

The Elk Grove Irrigation District similarly states:

http://www.egws.org/conservationtips.html

The FRCD/EGWD Board of Directors urges all Elk Grove Water District customers to comply with the Governor's order by reducing their irrigation by 25%. Customers may irrigate a maximum of two days per week as listed below to help meet the Governor's Executive Order.

Jurupa Community Services District:

http://www.jcsd.us/services/conservation-and-efficiency-programs

Outdoor Watering (Irrigation) Restrictions

- No watering on Sundays
- Water only on your authorized days
 - o If your address ends in an ODD number, you may water on Monday, Wednesday, and/or Friday
 - o If your address ends in an EVEN number, you may water on Tuesday, Thursday, an/or Saturday

Even the El Dorado Irrigation District, which supplies recycled water directly to many of its residential customers, has published similar restrictions:

http://www.eid.org/customers/drought-information/mandatory-watering-restrictions

Twice-a-week watering is allowed from April 16 to May 31 and October 1 to November 15 on Wednesdays and Sundays for customers with addresses ending in even numbers and Tuesdays and Saturdays for customers with addresses ending in odd numbers.

When homes and businesses leverage their on-site water resources, they are able to reduce potable water use by each gallon of water that is reused. It is the best means of maintaining Californians' landscape preferences while drastically cutting water use.

To help homeowners address the drought while protecting their lifestyles, we encourage you to amend the Emergency Regulations to make it explicit that these watering restrictions do not apply to the use of non-potable water. Similarly, California's hundreds of water agencies need to make this same distinction in their communications about watering restrictions.

This will help achieve the Water Board's objective of encouraging more use of alternative water sources for residential irrigation.

Sincerely,

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Imagine H2O International Water Prize - 2012 Runner-Up LAUNCH Beyond Waste Challenge - 2012 Semi-Finalist US Cleantech Open - 2012 Semi-Finalist SXSW Startup Showcase - 2012 Semi-Finalist SXSW Eco i2i Awards - 2012 Finalist Member - US Green Building Council