



December 21, 2017

1100 K Street  
Suite 101  
Sacramento  
California  
95814

Telephone  
916.327.7500

Facsimile  
916.441.5507

Jeanine Townsend, Clerk Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000



**RE: Comment Letter – Prohibiting Wasteful Water Use Practices**

Ms. Townsend:

The California State Association of Counties (CSAC) is pleased to offer the following comments on the proposed rule-making regarding Chapter 3.5 on Conservation and the Prevention of Waste and Unreasonable Use, a matter related to prohibiting wasteful water use practices. CSAC is the Association that represents county government before the California Legislature, administrative agencies and the federal government. Representing all 58 of California's Counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy communities.

Counties recognize the need for local programs and policies that promote water conservation and support an approach to water conservation that promotes a permanent "conservation ethic" in California. The U.S. Drought Monitor recently reclassified 44 percent of California as "abnormally dry"— up from 22 percent three months ago. As California faces another dry year, we support the use a variety of different tools and methods to conserve as much water as we can. We also recognize that our changing climate requires us to continue to conserve water and move towards a more permanent standard of conservation.

However, we have concerns with the proposed text of the regulation, included in Article 2, Section 963 (b)(1)(G) that prohibits the use of water for the irrigation of turf on public street medians or publically owned or maintained landscape areas between the street and the sidewalk. Parts of the publically owned right- of- way are landscaped with trees and/ or shrubbery that provide shade, traffic calming features, reduce stormwater runoff, and beautify neighborhoods. Trees and other shrubbery clean the air by absorbing gaseous pollutants (carbon dioxide, sulphur dioxide, and nitrous oxide) and by capturing airborne particulate matter on leaf surfaces. Dry soil conditions can significantly reduce the life span of valuable landscape trees. In addition, California is in a tree mortality crisis with a total number of 129 million trees on 8.9 million acres that have died in the state due to drought.

We are concerned that the proposed rule-making will negatively impact local government's ability to care for and adequately irrigate valuable trees that serve multiple purposes within our communities. We request that this section be revised to take these issues into consideration.

Thank you for the opportunity to comment on the proposed rule-making related to prohibiting wasteful water use practices. Should you have any questions or comments, please feel free to contact me at [cmartinson@counites.org](mailto:cmartinson@counites.org), or 916-327-7500, ext. 504.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cara B. Martinson', written in a cursive style.

Cara B. Martinson  
CSAC Senior Legislative Representative & Federal Affairs Manager

Cc: Members and Executive Director, State Water Resources Control Board