



December 22, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000
1001 I Street, 24th Floor, Sacramento, CA 95814

**SUBJECT: Comments to Proposed Water Board Regulations that Restrict Watering Turf
in Street Medians**

Dear Ms. Townsend:

Thank you for the opportunity to provide feedback regarding the proposed Water Board regulations that restrict watering turf in street medians. We have reviewed the proposed regulations and the following are the questions/comments that we have from the City of San Jose's Department of Transportation.

1. The State Water Resources Control Board has proposed to continue and expand emergency regulations that were put in place during the drought. Among the proposed changes is an expanded prohibition on watering turf in most medians and between the sidewalk and street. What about the areas that do not have sidewalks? The picture below is one example from our maintenance districts.

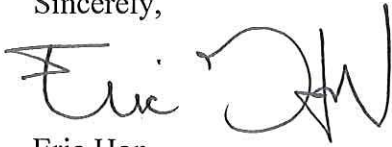


2. Article 2 section 963 (b)(1)(A) – this section refers to prohibition of any runoff and there are potentially situations where our landscape irrigation does have some runoff. It would take time and funding to fix all the irrigation so would there be a phased in compliance date?

3. Article 2 section 963(b)(1)(G) – The irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk, except where the turf serves a community or neighborhood function. We would like clarification on what constitutes “community function.”

If there are any questions, please feel free to reach out to me for further discussion. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Eric Hon". The signature is stylized, with the first name "Eric" written in a cursive script and the last name "Hon" written in a more blocky, cursive style.

Eric Hon

Landscape Services and Traffic Maintenance Division Manager

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