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December 1, 2017

Delivered by email to:
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(11/21/17) Public Workshop
Prohibiting Wasteful Water Use Practices
Deadline: 12/26/17 by 12 noon

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Chair Marcus and Members of the Board:

The Contra Costa Water District (District) shares the State Water Resources Control Board's (State Water Board) commitment to making conservation a California way of life. Improvements in water use efficiency, combined with adequate storage, will allow the District to reliably meet its long term demands. The District adopted its own water use prohibitions in 2016 based on the state's original list of prohibitions.

Below are the District's comments on the proposed water use prohibitions:

Apply potable water directly to driveways and sidewalks.

- The District recommends revising the text to read that it is prohibited to: "*Apply water directly to driveways, sidewalks, and other paved surfaces unless necessary for health or safety reasons.*" The key reason for this change is to clarify upfront that a health and safety exemption exists.

Apply water to irrigate turf and ornamental landscapes during and within 48 hours after measurable rainfall of at least one-tenth of one inch of rain.

- The District recommends removing "*at least one-tenth of one inch of rain.*" It is impractical for customers to measure and will only undermine the credibility and the intent of the prohibition. Allowing local communities to interpret what is *measurable* will still meet the intent of this prohibition, which is to educate.

Irrigate 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.

From a water agency perspective, the District encourages not irrigating turf on public street medians; however, we have the following suggestions:

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- Remove the reference to the “landscaped area between the street and sidewalk.” These landscaped areas are often maintained by private businesses or homeowners even though the property is owned by the local municipality. Further complicating the issue, these landscape areas are often irrigated on the same system as the landscaping in front of the business or residence.
- Given that this permanent regulation will impact most cities and counties in the state of California, the State Water Board should incorporate input from land use planning agencies, such as California State Association of Counties and League of California Cities, and directly with cities and counties to solicit their input.

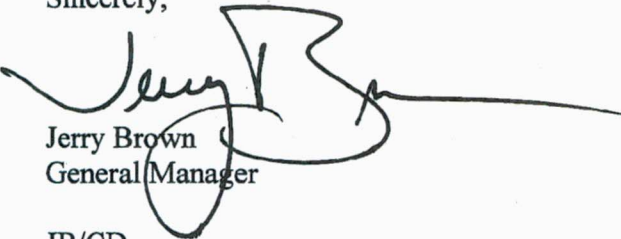
Serve drinking water other than upon request in eating or drinking establishments.

- The District recommends removing this prohibition. This will allow local communities to add this requirement during a drought period, which will assist in “ratcheting up” the conservation messaging. Furthermore, serving water at eating establishments is not a waste of water, but rather a beneficial use; and serving water supports water agency messaging to drink tap water rather than soda or bottled water.

In addition to the above recommendations, the District also supports the California Urban Water Agencies’ comment letter.

Thank you for your time and consideration.

Sincerely,



Jerry Brown
General Manager

JB/CD