



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

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

GENERAL MANAGER
Jim Barrett

ASSISTANT GENERAL MANAGER
Robert Cheng

SENT VIA EMAIL:

commentletters@waterboards.ca.gov

December 21, 2017

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comments on Prohibiting Wasteful Water Use Practices

Dear Chair Marcus:

Coachella Valley Water District (CVWD) appreciates the opportunity to comment on the State Water Resources Control Board (State Water Board) proposed regulations relating to permanent prohibitions on wasteful water practices. Over the last few years, CVWD has appreciated the opportunities it has had to engage with the state agencies in the process of developing the proposed regulatory framework to implement Executive Order B-37-16, "Making Water Conservation a California Way of Life." CVWD had a representative on the Urban Advisory Group for that effort. Additionally, CVWD had a representative on the Association of California Water Agencies' Urban Long-Term Conservation Working Group, which worked specifically to draft long-term conservation language.

CVWD remains committed to managing Coachella Valley water supplies in a long-term, sustainable manner and continues to promote conservation in order to ensure sustainable supplies in uncertain times. Additionally, as one of the major local water suppliers, CVWD has, and will continue to work diligently to ensure that it has the supplies to meet demands. CVWD feels logical, reasonable permanent prohibitions on wasteful water use are a tool to help achieve sustainability goals. Within CVWD's Ordinance No. 1422.5 (an Ordinance of the Coachella Valley Water District Imposing Revised Restrictions on Water Use to Comply with Statewide Drought Regulations), CVWD has enacted many of the same prohibitions proposed in the regulations. CVWD generally supports the regulation. However, some suggestions are outlined below.

Rainfall Measurements

Located in a valley, surrounded by a variety of mountain ranges, the Coachella Valley has four distinct microclimate zones. It is extremely common for rain to fall in one area of the valley and not others. It is difficult to measure rainfall to the 1/10-inch level. Further, with the extremely warm temperatures experienced here, plants may be adversely impacted by a regulatory imposed 48-hour dry period after only 1/10 inch of precipitation. CVWD respectfully requests the measurable rainfall amount be increased slightly for warmer climate zones and/or that local agencies are given discretion (formally) in the regulation's enforcement.

CVWD has a smart controller installation program, which assists customers in adjusting watering times appropriately for weather conditions. These controllers turn off during rain events and do not restart watering until the sensors dry out. CVWD encourages the State Water Board, in its continued conservation efforts, to support similar programs statewide.

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The Honorable Felicia Marcus, Chair
State Water Resources Control Board
December 21, 2017
Page 2

Water Efficient Devices

CVWD supports the health and safety exception for washing down hardscape. CVWD believes that is an important consideration and is pleased to see it within the regulations.

CVWD's ordinance allows for residents to use water efficient devices such as water brooms and pressure washers to clean sidewalks and driveways. During times of high wind, many local businesses and elderly residents are burdened by excessive sand covering hardscape. CVWD encourages those customers to use water efficient devices for cleaning hardscape. The State Water Board should consider allowing some of these options to allow people flexibility in cleaning hardscape.

Medians and Parkways

While CVWD generally agrees that removing turf from medians and parkways is a good step toward more efficient water use, it is concerned about the potential cost to public agencies to do so. The State Water Board should allow ample time for public agencies to budget and complete turf removal projects. While CVWD has been successful in enrolling these agencies into its Desert Landscaping Rebate Program, there are substantial costs to the agencies and municipalities. CVWD aims to continue to work with local municipalities to enroll additional local stakeholders. However, it is important that these projects be well done in order to gain public acceptance and allow for the public works processes that municipalities must engage in. Further, we encourage the State Water Board to consider funding opportunities for municipalities and agencies to take advantage of.

Thank you again for the opportunity to provide comments on this issue. If you or your staff has any additional questions, please contact Conservation Manager Katie Evans at (760) 398-2661, extension 3405, or by email at kevans@cvwd.org.

Sincerely,



J. M. Barrett
General Manager

cc: State Water Resources Control Board
The Honorable Steven Moore, Vice Chair
The Honorable Dorene D'Adamo, Member
The Honorable Joaquin Esquivel, Member
The Honorable Tam Doduc, Member
Eileen Sobeck, Executive Director
Eric Oppenheimer, Chief Deputy Director
Department of Water Resources
Gary B. Bardini, Deputy Director, Integrated Water Management
Kamyar Guivetchi, Manager, Statewide Integrated Water Management
Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.

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