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Richard W. Hansen, P.E.

December 11, 2017

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



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

Ms. Jeanine Townsend:

Thank you for the opportunity to provide input to the proposed regulatory action on TITLE 23. WATERS, DIVISION 3. STATE WATER RESOURCES CONTROL BOARD AND REGIONAL WATER QUALITY CONTROL BOARDS, CHAPTER 3.5 Conservation and the Prevention of Waste and Unreasonable Use.

As a wholesale water provider, Three Valleys Municipal Water District (TVMWD), supports water conservation efforts, supports our member agencies to meet or exceed State standards and we make the following comments to the proposed changes as suggestions to clarify and standardize some of the items proposed.

The Prohibitions (i.e. Californians shall not...):

Bullet point 6 – clarification is needed in this area. Restaurants frequently have tables set with water even before guests arrive. Providing clear, concise guidance on the language for replicable “table tents” for the tables will greatly assist restaurants in training their staff. Who will supply this item? Will the required table tents come from the local water supplier, the State or the restaurant? Food service staff are trained in handling food in a specific manner, and changing the habit of setting water on tables could be added to the training with minimal time/cost, but formalizing it will ensure greater success.

Bullet point 7 – clarification is needed in this area. The areas described, also known as, “easements”, “parkways” or “medians” are primarily owned by the municipal entity in which the land is located, either the city or the county. However, that area can also be owned and managed by other entities, like homeowners’ associations, universities or special districts. This strip often contains not just turf, but also trees. Please clarify that irrigation to trees must be maintained in those areas, if they exist. Eliminating all irrigation to those areas will be counterproductive in the long-term.

Clarify. If the State would like these areas to contain NO turf, except in cases where that turf is used for public benefit, then state that. Not irrigating turf in those areas will create eyesores and essentially eliminates turf, but will also lead to tree die offs. If the State is seeking to eliminate the turf in these limited areas, then state that clearly.

Penalties for Particular Entities:

Both need some clarification. Can the violations be applied to any public agency that owns the property and violates the respective Section? The penalties seem to omit public agencies that may own/maintain public spaces. These entities could also be mutual water providers, universities or other special districts.

The Requirement for Hotels and Motels:


Please clarify what those placards should include – a minimum message/languages, sizes. Provide a mechanism for printing and distributing those placards to the hotels/motels. Is it the responsibility of the water agency, State or other agency to ensure that the hotels/motels receive and understand these items? Who will inspect the sites to ensure that the placards/stickers/clings are in the rooms and in readable condition?

Providing a requirement for training for hotel/motel staff on whether or not linens are to be laundered daily would greatly improve the success of this program. Notification to the guest is a beginning, but it is frequently noted that regardless of what the guest indicates, the linens are replaced daily. Like food service, training can be implemented that would cost little, take little time and be beneficial. If staff were instructed via a video indicating how to evaluate guests' choices on this, the time commitment from the hotel/motel would be minimum.

Again, Three Valleys Municipal Water District supports and encourages commonsense water conservation. We appreciate this opportunity to provide input in to your proposed regulatory action.

If you have any questions or need any further clarification, please feel free to give my office a call.

Sincerely,



Richard W. Hansen,  
General Manager