



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

December 20, 2017

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 water provider, the City of Beverly Hills supports water conservation efforts and supports our customers in meeting or exceeding State standards. In an effort to achieve those goals, the City is requesting further clarification and suggestions to the State's proposal.

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

Bullet point 6 - Serve drinking water other than by request: More clarification is needed. Some restaurants still bring water when guests arrive without asking. 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 the required table tents: the local water supplier, the State or the restaurant? To better ensure success, a formalized training for food service staff would be beneficial.

Will this prohibition also apply to large banquet facilities where time is of the essence and serving water upon request is not realistic?

Bullet point 7 – Irrigate turf on public street medians or parkways: More clarification is needed. Is this only applicable to no irrigation for turf on street medians and parkways? What if there are also trees that need to be watered in these locations? What is acceptable? What if minimal water is used to keep the plant material alive and has no run off, or the location contains bioswales for stormwater capture? Changing out the landscape to water wise plants is not conducive in some high-traffic parkways. In addition, drip irrigation is not beneficial (or feasible) in parkways where there is a lot of foot traffic. Eliminating all irrigation to these areas will be long-term counterproductive. Plant material cleans the air, reduces dust pollution, cools the environment, keeps soil alive and increases rainwater infiltration.

Furthermore, many water wise landscapes are not watered wisely and use as much water as cool season turf. Many water wise landscapes use rock as a mulch cover which heats the environment and can harden the soil beneath reducing effective groundwater infiltration. Turf grass is not water intensive if watered and maintained properly. Cities need to lead the way for proper turf grass watering for the many homeowners that still want turf for their homes as play areas for their kids and dogs. If changes need to be made, proper, long-term solutions and educational opportunities detailing how to irrigate and plant wisely are needed to allow cities time to change their practices and to budget for these expensive changes. These positive upgrades will also need time to trickle up to the cities' residents and businesses.

Penalties for Particular Entities:

Clarification is needed for homeowners associations, community service organizations and government agencies. 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. How would it deal with entities that are mutual water providers, schools or other special circumstances?

The Requirement for Hotels and Motels:

Please clarify what the "notice of this option" will be (printed material or information on the hotel's website or TV station). Also, clarify what the message should include, i.e.: a minimum message, what languages. Provide a mechanism for printing and distributing the notices 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 helpful, but it is frequently noted that regardless of what the guest indicates, the linens are replaced daily. Like food service training, hotel staff training can be quickly and inexpensively implemented with a positive impact. For instance, staff could be instructed on how to evaluation guests' choices via a video, with minimum time commitment from the hotel/motel.

Again, the City of Beverly Hills supports and encourages water efficiency as a way of life. 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 contact my office.

Sincerely,



Shana Epstein
Public Works Director

cc: Debby Figoni, Water Conservation Administrator