



WATER DEPARTMENT

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



December 22, 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

Dear Ms. Townsend:

This letter is in regard to the proposed urban water conservation regulations that seek to make permanent prohibitions on certain wasteful water practices. The City of Santa Cruz supports most of the proposed regulations. The City itself adopted a number of the proposed prohibitions within its municipal code many years ago and actively educates the public and enforces violations of our water waste regulations year in and year out.

One difference involves the proposed statewide prohibition again applying of water to driveways and sidewalks. Like washing a motor vehicle, the City requires a shutoff nozzle, but does not outright prohibit washing down hard surfaces except when our supplies begin to dwindle. We use a temporary ban on washing down hard surfaces, along with other short-term restrictions, as a means of alerting the public to a possible or imminent water shortage. Putting a ban on washing down hard surfaces every year – which we don't see many people doing much anymore – would take away an important public information tool in our toolkit when it is most needed.

Prohibiting restaurants and other food service establishments from serving drinking water other than upon request is another tool we use in every stage of our five stage water shortage plan. It plays an important public information and education role when circumstances warrants, particularly in a tourist destination like Santa Cruz. However, even in drought conditions, enforcing this provision on restaurants is quite challenging. Without the ability to police a statewide permanent ban on serving drinking water unless it is requested, does it make sense to outlaw what is such a negligible use of water for most urban suppliers? We think this restriction should be reserved for times when it is most needed.

Finally, we support the statewide ban on irrigation runoff. Runoff is a common urban water waste problem when four conditions are present, namely overhead spray irrigation watering turf grass on a sloping surface adjacent to hardscape. Most of the time the underlying cause of water waste in these situations is that the sprinkler output of most overhead spray irrigation equipment on the market is far greater than the capacity of local soils to absorb it. We respectfully suggest that, in addition to creating a permanent ban on water waster from irrigation runoff, that the State Board separately pursue setting a statewide equipment standard that limits the precipitation rate of sprinkler nozzles available for sale in California to one inch per hour, or less. This standard would allow more water applied to urban landscapes to soak into the soil, help prevent runoff, and improve irrigation efficiency.

Thank you for the opportunity to comment on this matter.



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Sincerely,

A handwritten signature in blue ink, appearing to read "Toby Goddard", is written over the typed name.

Toby Goddard
Water Conservation Manager
City of Santa Cruz