Dear Ms. Bean,

Thank you to the Governor and Water Board for issuing emergency regulations to conserve water.

It is imperative that the State assume that this past year's rain levels will be the new normal in California and take more immediate steps to reduce water usage more permanently in California. The State needs to determine and publicize the sustainable usage levels for water such that our aquifers and ground water sources are not being depleted due to overuse and our rivers have adequate water to sustain them. The state needs to publicize the sustainable GPCD level that will safeguard our water resources.

My suggestions are as follows:

1. With the new water reality, Californians must plant climate-appropriate landscaping. It does not make sense to have lawns and thirsty plants in desert areas nor in scrub lands that have no natural summer water. Climate zones with no summer water should have severe restrictions (or penalties) on excessive outdoor water use imposed.

2. 45 GPCD should be the current sustainable norm for city dwellers and 65 GPCD should be the sustainable norm for small properties. Large properties should be given a water budget based on their size and location not to exceed 50 GPCD for landscaping. Those wishing to engage in extensive outdoor watering should be required to submit a water budget and provide a justification. Any use over 50 GPCD for landscaping (particularly non-functional ornamental landscaping) should be at increasingly high rates/penalties to encourage conservation. The additional fees/penalties should be used to pay for water conservation and reclamation projects and not be held by the water service provider.

3. Banning ornamental lawns on medians is first step. The real step should be banning all potable watering of non-functional ornamental lawns. In particular the use of potable water to maintain all non-functional ornamental lawns in all corporate and industrial office parks should be banned. I would also recommend banning all front yard lawns in all cities in areas with no natural summer precipitation unless justification of functional need is provided. City and suburb front lawns should be replaced with low water use plants and landscaping.

4. Keeping the minimum reduction requirements across an entire water service and leave it up to the individual water service to determine how to accomplish the reduction with the caveat that it is very important that customers who have already reduced their water use to sustainable levels are not penalized for their efforts. It is critical that unsustainable water users bear the brunt in reducing unsustainable water use.

5. The state should be encouraging the installation and widespread use of greywater systems. Establish greywater rules that eliminate onerous permitting processes for simple, branched – drain greywater subsurface systems that generate less than 400 gallons per day and do not involve pumps, retention vessels or filters. Arizona and Australia have successful programs. Schools and college campuses building new dorms and athletic facilities should be required to

install separate greywater piping for bathroom showers/sinks and use the greywater outside on their landscaping and athletic fields.

6. California should be expanding the use of technological solutions by requiring smart controllers, water sensors, leak detectors, efficient irrigation nozzles, and other solutions. The use of these technological tools should be required for high water users. The reality is that if the state eliminated overwatering and leaks, water use would easily drop by more than 30%.

7. California should regulate the use of ground water and charge the actual economic costs so that our groundwater is not completely depleted.

8. California should require all water users to have water meters on all businesses, homes, properties, agriculture, etc.

9. The regulations should not allow micro sprays for new homes in the current emergency regulations. They are not water efficient and generate more water than can be absorbed by most soil types, leading to runoff and waste.

10. The state should be planning for a 40-year and 80-year drought situations and should be providing residents with more guidance and publicizing sustainable GPCD levels below the 45 and 65 noted above.

11. The state should create more fairness in the system so that water is used sustainably between residential, agricultural and industrial needs while preserving our rivers, aquifers, watersheds, and ground water sources.

Regards,
Rebecca Flynn