

DEPARTMENT OF WATER



February 9, 2018

Service, Quality, Community

commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000 (by mail)
1001 I Street, 24th Floor, Sacramento, CA 95814 (by hand delivery)

Regarding: Comment Letter – Prohibiting Wasteful Water Use Practices

Ms. Townsend,

The City of Big Bear Lake Department of Water takes this opportunity to lend our support for those actions which prohibit certain wasteful urban water use practices. There are a few items that we recommended in our previous comments that were not addressed, and regulations that actually became more lenient rather than more stringent. We ask that the Board consider the following:

Article 2. Wasteful and Unreasonable Water Uses

§ 963. Wasteful and Unreasonable Water Use Practices.

(b)(1) The use of water is prohibited as identified in this subdivision for any of the following actions:

(C) The application of potable water directly to driveways and sidewalks;

- ***Please consider the addition of hardscape and structures to include decks, pavers, paths, exterior walls, and non-irrigable areas (decomposed granite, flagstone, dirt, concrete etc). Using potable water to clean these surfaces is just as wasteful as using water to clean a sidewalk or driveway.***

(F) The serving of drinking water other than upon request in eating or drinking establishments, including but not limited to restaurants, hotels, cafes, cafeterias, bars, or other public places where food or drink are served and/or purchased, during a period for which the Governor has issued a proclamation of a state of emergency under the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2 of the Government Code) based on drought conditions;

- ***By limiting this to a period in which a declaration of drought has been declared the State may be unintentionally sending a message that it's okay to waste water the rest of the time. If customers do not request water, then serving it is unnecessary. For every glass served it takes 2 to 3 times that amount to wash the glass. According to the National Restaurant Association, if one out of four restaurant guests in the U.S. declined a glass of water, the foodservice industry would save 25 million gallons of water annually.***

(G) As of January 1, 2025, the irrigation of turf on public street medians or publicly owned or and maintained landscaped areas between the street and sidewalk, except where:

- (i) the turf serves a community or neighborhood function, including, but not limited to, recreational uses and civic or community events;

Department of Water, City of Big Bear Lake

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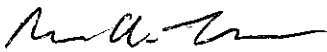
- (ii) the turf is irrigated incidentally by an irrigation system, the primary purpose of which is the irrigation of trees; or
- (iii) the turf is irrigated with recycled water through an irrigation system installed prior to January 1, 2018
- ***In addition to our initial concerns, this regulation seems to have lost its objective, possibly due to public pressure.***
 - ***Stalling implementation until 2025, six years into the future, again potentially creates a public perception that it's okay to waste water in the interim. This also shackles the Board to this date, even if the state experiences multiple years of severe drought before that time.***
 - ***(ii) "primary purpose" can be re-interpreted to fit the current situation. If a tree requires irrigation where turf once was, the irrigation system can be repurposed with drip irrigation to meet the needs of the tree. The current language provides a work-around for anyone wanting to plant, or continue to water, turf in a street median by simply planting a tree in it and saying that was the primary purpose all along.***
 - ***(iii) By limiting this to recycled water systems already installed, the Board may be stifling the use of innovative and water efficient technology. If an agency wants to use reclaimed water for turf in unessential areas such as street medians this should be an acceptable solution as the state looks to be the model of water efficiency in the west.***
 - ***Additional clarification is still needed to determine if the regulation applies to any publicly maintained street side turf, or only that which is flanked by a sidewalk. For example, an area of landscaping that has a dirt lot, privately owned business or parking along the other side or a center median.***
 - ***Is there a minimum or maximum width for which this applies?***

Lastly, we reiterate our recommendation that the Board consider a permanent prohibition against water waste as a result of water leaks. Of all wasteful practices, any resistance toward fixing leaks may be the most egregious. Our agency requires both commercial and residential customers to repair leaks upon detection.

According to the U.S. Environmental Protection Agency, "The average household's leaks can account for more than 10,000 gallons of water wasted every year and ten percent of homes have leaks that waste 90 gallons or more per day. Household leaks can waste more than 1 trillion gallons of water annually nationwide." Once aware of a leak, property owners should be made responsible for fixing their leak in a timely manner to minimize water loss.

Thank you again for the opportunity to comment on the proposed regulation. We look forward to working with the State in "Making Water Conservation a California Way of Life."

Sincerely,



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