



CALIFORNIA WATER SERVICE

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



December 26, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor, Sacramento, CA 95814

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Chair Marcus and Members of the Board:

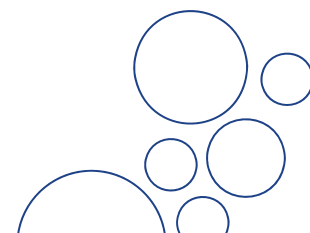
California Water Service (Cal Water) appreciates the opportunity to provide comments regarding the proposed regulation to permanently prohibit wasteful water use practices. We thank the State Water Resources Control Board (State Water Board) and its staff for its continued thoughtful, intelligent leadership on this important issue.

Cal Water has provided safe, reliable, and high-quality water utility service in California since 1926. Today, we are the largest water utility regulated by the California Public Utilities Commission, and serve about two million Californians, from Chico in the north to the Palos Verdes Peninsula in the south. Even before California's recent historic drought, Cal Water developed a comprehensive, customer-first approach to water conservation and water-use efficiency. These efforts provided a solid foundation for us to build upon during the recent drought and enabled us to work with our customers to achieve significant reductions in water use.

With Sierra Nevada snowpack at about 32 percent of its historic average and approximately 57 percent of California currently experiencing abnormally dry or moderate drought conditions, it is clear that, together, we must continue to take steps to establish an ethic of water conservation in California. It is for this reason that we support the proposed regulation, which includes several prohibitions on various uses of water, such as using a hose without a shut-off nozzle to wash a motor vehicle and irrigating outdoor landscapes during or within 48 hours of measureable rainfall.

The proposed prohibited uses of water are common sense measures that should be included as part of the overall plan to "Make Conservation a California Way of Life." We recognize that some of the prohibitions may be more challenging to implement than others, but we believe they are reasonable and necessary as we seek to maximize water-use efficiency.

For instance, the prohibition on outdoor irrigation during and within 48 hours of measurable rainfall of at least one-tenth of an inch does pose somewhat of a challenge. It is possible for some portions of a water supplier's service area to experience more or less rainfall than others, resulting in situations where the entire service area does not meet the one-tenth of an inch threshold.





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Despite its challenges, we view this prohibition as an opportunity for water suppliers to become more innovative in the service they provide. For example, during the recent drought, Cal Water utilized GIS resources and daily precipitation data from the National Weather Service – Advanced Hydrologic Prediction Service to identify the portions of our service areas where rainfall likely exceeded the one-tenth of an inch threshold.

Given the potentially significant impact, we recommend that the State Water Board consider providing a future effective date for the prohibition on the irrigation of turf in medians and parkways if it is ultimately included. This would allow for the retrofit of existing landscapes over a period of time, which may lessen budget impacts.

We would also request that the language in Section 963(b)(2)(A) be modified to replace the term “immediate” with “identified,” as follows: “To the extent necessary to address an *identified* health and safety need. This may include, but is not limited to, street sweeping and pressure washing of public sidewalks and the use of potable water in a fountain or water feature when required by law to be potable.”

The enforcement of the prohibitions will require additional resources, and we recommend that this fact be recognized by the State Water Board and other regulatory entities. We ask that the State Water Board work with suppliers and communities as we seek to implement the prohibitions in a manner that is practical and fair.

Again, Cal Water appreciates the opportunity to provide comments and looks forward to working with the State Water Board and other stakeholders on this and other related issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Dean".

Shannon Dean
Vice President, Corporate Communications and Community Affairs

Cc: The Honorable Members of the State Water Resources Control Board
The Honorable Martha Guzman Aceves, Commissioner, California Public Utilities Commission
Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Eileen Sobeck, Executive Director, State Water Resources Control Board
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
Rami S. Kahlon, Director, Water Division, California Public Utilities Commission
Michael Minkus, Chief of Staff, Commission Guzman Aceves
Erik Ekdahl, Director, Office of Research, Planning & Performance, SWRCB
Max Gomberg, Climate and Conservation Manager, SWRCB
Jamie Ormond, Water & Legal Advisor, California Public Utilities Commission

