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Delivered by e-mail to: commentletters@waterboards.ca.gov

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 Jeanine Townsend:

The Carmichael Water District (CWD) has reviewed the revised draft regarding Permanent Prohibitions Against Wasteful and Unreasonable Water Uses dated January 31, 2018. CWD appreciates the opportunity to comment, and hopes that our comments will assist the State Water Resources Control Board (State Water Board).

As noted in our December 21, 2017 letter on the initial Draft Regulation, CWD has long been a proponent of promoting the efficient use of water and has demonstrated this commitment through numerous outreach, regulatory, and incentive programs. CWD is supportive of the Proposed Regulatory Action's goals of increasing water use efficiency awareness throughout California; however, there are certain prohibitions and language in the Proposed Regulatory Action that CWD feels that the State Water Board should further refine or reevaluate such as:

- Under section 955(a) of the revised Draft Regulation, reclaimed water has been replaced with recycled water in regard to the State Board giving particular consideration in investigating any uses of water and making the determinations of "misuse of water". Numerous water suppliers and their ratepayers have invested heavily in responsible methods of water reuse other than recycled water, including the remediation of groundwater. In an effort to not overlook these additional and vital approaches to reuse, CWD suggest that section 955(a) be edited to read:
 - *In investigating any uses of water and making the determinations required by this article, the Board shall give particular consideration to the reasonableness of use of reclaimed, recycled, remediated water or reuse of water.*
- CWD again asserts that clarifying language should be added to the prohibition on the application of water directly to driveways and sidewalks to exempt "cleaning or maintenance that cannot be readily accomplished by another method." While CWD does support the currently proposed exemption for "cleaning necessary to maintain health and safety", this provision should be modified to also recognize an exemption for the efficient use of water to clean and maintain paved areas in cases where there are no other readily-available effective methods to address conditions that may not pose a health or safety risk but which impact a community interest, such as the removal of stains and grime for the purpose of maintenance and aesthetics.

CWD remains ready to assist the State Water Board in seeking a workable approach to long term water-use efficiency and appreciates your consideration of these comments regarding the revised Draft Regulation.

Sincerely,

A handwritten signature in black ink that reads "Steve Nugent".

Steve Nugent
General Manager