December 15, 2017

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 applauds your efforts and supports the Water Board rulemaking that would prohibit certain wasteful urban water use practices. We do, however, request a few points of expansion and clarification as follows:

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).

(G) The irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk, except where the turf serves a community or neighborhood function;
   • Please consider further clarification.
     o Does the regulation apply 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.
     o Is there a minimum or maximum width for which this applies?

Lastly, we recommend a permanent prohibition against water waste as a result of water leaks. 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 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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