



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

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December 21, 2017

Delivered by e-mail to: [commentletters@waterboards.ca.gov](mailto: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 Ms. Townsend:



The Carmichael Water District (CWD) has reviewed the Notice of Proposed Regulatory Action regarding Prohibiting Wasteful Water Use Practices dated November 1, 2017. CWD appreciates the opportunity to comment, and hopes that our comments will assist the State Water Resources Control Board (State Water Board).

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 and our customers have demonstrated this water efficiency mindset through a cumulative water saving of 28% since June of 2015 and has exceeded existing requirements in State law to reduce urban water use by 20 percent by 2020.

CWD is supportive of the Proposed Regulatory Action's goals of increasing water use efficiency awareness throughout California. In fact several of the prohibitions set forth in the State Water Board's Proposed Regulatory Action, such as requiring an automatic shut-off nozzle on hoses and requiring that fountains utilize a recirculating system, have been key aspects of CWD's water conservation program for decades. However, there are certain prohibitions in the Proposed Regulatory Action that CWD feels that the State Water Board should further refine or reevaluate such as:

- The prohibition on serving drinking water other than upon request in eating or drinking establishments seems arbitrary and out of place in the frame of a permanent prohibition. Socialized rules such as this are often difficult to regulate and enforce. This action is better suited to be deployed as a public awareness tool during water shortage conditions.
- 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 Draft Regulation.

Sincerely,

Steve Nugent  
General Manager