



CALIFORNIA URBAN WATER AGENCIES

February 13, 2018

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The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter – Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices

Dear Chair Marcus and Members of the Board:

The California Urban Water Agencies (CUWA) appreciates the opportunity to provide input on changes to the proposed regulation prohibiting wasteful water use practices. We also appreciate that the State Water Board revised the proposed regulation, acknowledging some of the comments CUWA and others previously submitted.

Our 11 member agencies provide drinking water to the vast proportion of urban communities in the Bay Area, Southern California, and metropolitan Fresno affected by this regulation. Given this reach, we are obliged to support the State Water Board by sharing insights and offering suggested further refinements to the proposed regulation, such that Californians understand and embrace this important policy milestone in Making *Efficient Water Use* a California Way of Life.

This regulation has tremendous potential to establish a new cultural norm by demonstrating statewide that “water-wise” can be beautiful through conversions of non-functional turf grass to well-maintained California-friendly landscaping. On the other hand, if this regulation results in parkways (i.e., “landscaped area between the street and sidewalk”) with dead turf grass, it will likely have the opposite effect.

- CUWA suggests removing parkways from the proposed prohibition of turf irrigation. Some communities have invested in turfed areas separating modes of travel (e.g., multi-purpose trails). Many other communities are on the other end of the financial spectrum, and those lacking financial means to convert their turf parkways to drought-resilient landscape will simply cap their irrigation systems, leaving parkways susceptible to being paved (which can degrade stormwater quality and contribute to heat island effects) or reduced functional value to the community and environment.

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Our agencies' collective experience in conservation and public outreach programs lends a unique perspective on approaches to effectively reach the public and motivate response.

- Given this experience, we support a general guideline for measurable rainfall—a benchmark that the public can readily understand. Instead of specifying one fourth of one inch of rain, we suggest that the prohibition on irrigation of turf and ornamental landscapes be in place “during and within 48 hours after measurable rainfall.” This approach would provide a clear, easy-to-follow guideline for the public.

Thank you again for your time and consideration. We hope our comments are helpful. Please contact Jenny Gain at 925.210.2225 with any questions, for further detail related to our comments, or additional assistance from CUWA in any way.

Sincerely,



Cindy Paulson, Ph.D.
CUWA Executive Director



Jenny Gain, PE, QSD
CUWA Staff Engineer