

Dear Ms. Bean,

I would like to provide the following comments on the Draft of Article 22.5. Drought Emergency Water Conservation.

General Comments

1. We currently utilize potable water for the collection and conveyance of human waste. The regulation should provide for the reduction or elimination of this wasteful practice. All businesses and state offices should be required to replace urinals that require water with waterless urinals and update all toilets that use in excess of 1.6 gallons per flush. The costs of this effort should be offset with incentives in the form of tax credits and/or rebates funded by fines collected under this regulation and the Water Code. A compliance deadline, with fines for non-compliance, should be set.
2. The regulation should establish a committee to research and recommend a means by which to quickly and economically introduce wide-scale industrial, commercial and domestic use of 'greywater' systems within the state.
3. Several sections make reference to limiting outdoor irrigation with potable water to no more than two days per week. Since there are seven days in the week, this yields an impractical 3.5-day watering cycle. Instead, the regulation should set the frequency to a specific integer of days between watering events for ease of implementation and enforcement. A three-day interval for domestic users and four-day interval for all other users would be reasonable.

Specific Comments

Sec. 864.a.6 – This requirement should be removed unless there is data to demonstrate that significant water will be saved by this provision.

Sec. 864.b – Hotel and motel operators should be required to offer laundering of towels and linens at a frequency no less than three-day intervals. Few, if any, people launder their towels and linens at home on a daily basis, therefore it is unreasonable to expect this outside of the home except in a hospital setting.

Thank you for your consideration of my comments. Please feel free to contact me if you have any questions.

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