



December 27, 2017

Jeanine Townsend
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Proposed Regulation: Conservation and the Prevention of Waste and Unreasonable Use

Dear Ms. Townsend:

The California Restaurant Association (CRA) is the definitive voice of the food service industry in the state of California representing over 22,000 members. Our members are often at the forefront of conservationist practices. In fact, it is critical in this modern age for a restaurant to be very judicious with all of its resources to survive. The challenge for restaurants is to implement any new regulation in a way that doesn't impact the business given the strict regulatory environment in which they already operate.

Hospitality is a key feature of the state's restaurant community. Our customers choose to dine out in our members' restaurants because they want an enjoyable dining experience. One of the many ways our members create a hospitable environment is to offer customers water at the table. While we understand the important need for water conservation throughout our state, we do feel that the ability for restaurants to serve customers water is a very small component of the overall water usage issue.

We do object to the suggested permanent regulation that would force restaurant staff to only provide drinking water to patrons upon request. We believe this should be removed from the proposed "Conservation and the Prevention of Waste and Unreasonable Use" regulation. Without data or information to show the amount of water that will be saved from this proposed regulation (or the amount of possible future fee penalty money due to an inadvertent action by a restaurant employee) it is hard to conceptualize the amount of water that will be conserved and/or the financial impact to the restaurant community.

The largest amounts of water will be conserved through regulations to change the outdoor usage of water. The proposed regulations include conservation measures that are appropriate and generate significant water savings such as prohibiting the use of potable water to clean driveways and sidewalks and the irrigation of turf within 24 hours of rainfall.

The California restaurant community is embarking on an unprecedented trajectory for facing new costs and mandates from both the state and local government. The added cost pressures that are underway- and likely to continue- include a historical and aggressive wage increase mandate, increased worker's compensation costs, unemployment insurance tax increases, healthcare compliance, organic waste mandates, and more.

We have concerns regarding the disciplinary proceeding outlined in the proposed regulation. Fining a restaurant \$500 a day for accidentally serving water is excessive. Our members are grappling with adjusting their business models to increasing costs in our state; additional fines for a minor occurrence will increase these financial pressures.

On behalf of our members, we strongly urge the Board to consider excluding the portion of the regulation requiring restaurants to serve water upon request.

Sincerely,



Matt Sutton
Senior Vice President, Government Affairs + Public Policy
California Restaurant Association

cc: State Water Resources Control Board Members

