



December 20, 2017

Felicia Marcus, Chair
c/o Jeanie Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

Submitted via email at commentletters@waterboards.ca.gov

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Chair Marcus,

The City of Sacramento (Sacramento) appreciates the opportunity to provide these comments on the proposed regulation prohibiting wasteful water use practices. The City provides a potable water supply from surface waters and groundwater that serves more than 136,000 customer accounts and approximately 485,000 residents. The City is committed to doing our part in eliminating wasteful water use and urging the efficient use of this precious natural resource, as evidenced by our City Council adopting a permanent maximum two-day a week outdoor watering ordinance this year.

Currently, the Sacramento City Code¹ prohibits allowing water to run-off a property as wastewater; the use of water to wash down sidewalks and driveways, unless for health and safety; the use of a hose without a shut-off nozzle to wash vehicles; the use of potable water in an ornamental fountain without a recirculating system; and, irrigating landscapes during and within 48 hours after measurable rainfall, which we define locally as one-eighth of one inch. Sacramento supports the staff proposal establishing a statewide prohibition on these wasteful water use practices.

Sacramento believes the permanent prohibition of "serving drinking water other than upon request in eating or drinking establishments" and requiring hotels and motels to "provide guests with the option of choosing not to have towels and linens laundered daily," are reasonable and in many cases, have already become standard operation for many establishments.

Sacramento has concerns regarding the proposals to prohibit irrigation after rainfall and irrigation of medians and parkways. The proposal to prohibit watering "*turf and ornamental landscapes during and within 48 hours of one-tenth of rainfall*" is problematic. The proposal does not take into account the current sensing abilities of smart controllers and the regulation may not allow for the appropriate irrigation needs of plants in dry periods. Based on our conversations with some of the manufacturers of smart irrigation controllers, the lowest shut-off setting on rain shut-off devices is set at one-eighth of one inch of rain. Additionally, the prohibition could lead to plant stress and loss for agencies that have adopted limitations on the number of watering days per week, irrespective of a drought; as Sacramento has adopted. We respectfully urge the board to require local agencies to adopt codes and ordinances that curb unnecessary irrigation after rainfall without additional State Water Resources Control Board

¹ Sections 13.04.860 and 13.04.870

(SWRCB) prescriptions. This will allow local agencies the flexibility to develop an enforceable standard that takes into account technical practicalities and plant needs.

Sacramento also understands and appreciates the proposed prohibition of irrigating *"turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk"* (parkways), as an opportunity to conserve water. Moreover, we appreciate the SWRCB staff making attempting to make a distinction between ornamental and non-ornamental turf and that non-ornamental *"serves a community or neighborhood function."* Sacramento's Capitol Mall is an example that SWRCB staff have cited in presentations and discussions of non-ornamental turf that serves a community function. Sacramento has several neighborhoods that use this type of median as gathering areas where activities are held such as parties, weddings, or other events. We agree with SWRCB staff, as they have stated, that the local land use agencies are best suited to determine when turf in medians should remain. We respectfully request that the regulations more clearly reflect that it is the local land use agency who is best able to make those determinations.

Sacramento has concerns with prohibiting the irrigation of turf on parkways. Many of the parkways in Sacramento have irrigation systems that simultaneously water turf and trees. Removing turf will not reduce water demand without rebuilding the parkway irrigation system since trees will still rely on the existing irrigation system. Rebuilding the irrigation system to water trees only is costly and competes with scarce public dollars. The regulation needs to address the impacts this prohibition would potentially have on existing tree health and other services that existing turf may provide in parkways such as stormwater improvement or providing stable landings for people entering and exiting their vehicles. As the draft regulation calls for the elimination of turf in parkways, the economic analysis should be revised to address the costs associated with requiring the local land use agencies to retro-fit or replace irrigation systems and plantings within these areas.

We respectfully request the SWRCB to exempt existing parkways from the regulation on turf prohibitions and require land use agencies to follow the Model Water Efficient Landscape Ordinance for addressing appropriate plantings and irrigation standards for new and renovated parkway landscapes.

Sacramento appreciates the opportunity to submit these comments. If you have any questions or desire additional information, please contact Jim Peifer at (916) 808-1416 or jpeifer@cityofsacramento.org.

Sincerely,



William O. Busath
Director of Utilities
City of Sacramento