



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000

February 14, 2018

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

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to comment on your proposed rulemaking regarding conservation and the prevention of waste and unreasonable water use. With a five year historic drought fresh in our minds, and another record-breaking dry winter underway, we believe this regulation deserves renewed attention and revision to encourage improved water stewardship among all California water users and to make conservation a California way of life, as stated in the 2014 California Water Action Plan.

We would like to provide comment on the proposed changes to *Article 2: Wasteful and Unreasonable Water Uses*, specifically § 963. *Wasteful and Unreasonable Water Use Practices*, regarding (b)(1) on prohibited water uses. In your final decision on this rule, we respectfully request that you expand the prohibition of turf irrigation to areas beyond public street medians, and include a similar prohibition for commercial properties. We also request that you include language to ensure that these areas are not converted to impervious pavement as the result of this regulation.

We applaud the prohibition of irrigation of public turf median strips as approved in previous changes to the regulation. However, this proposed change in rulemaking misses the opportunity to expand the prohibition to other existing turf, particularly decorative areas that provide no recreational or civic benefit. A perfect example is this large strip of turf on a commercial property in downtown Oakland, which serves a solely decorative function:

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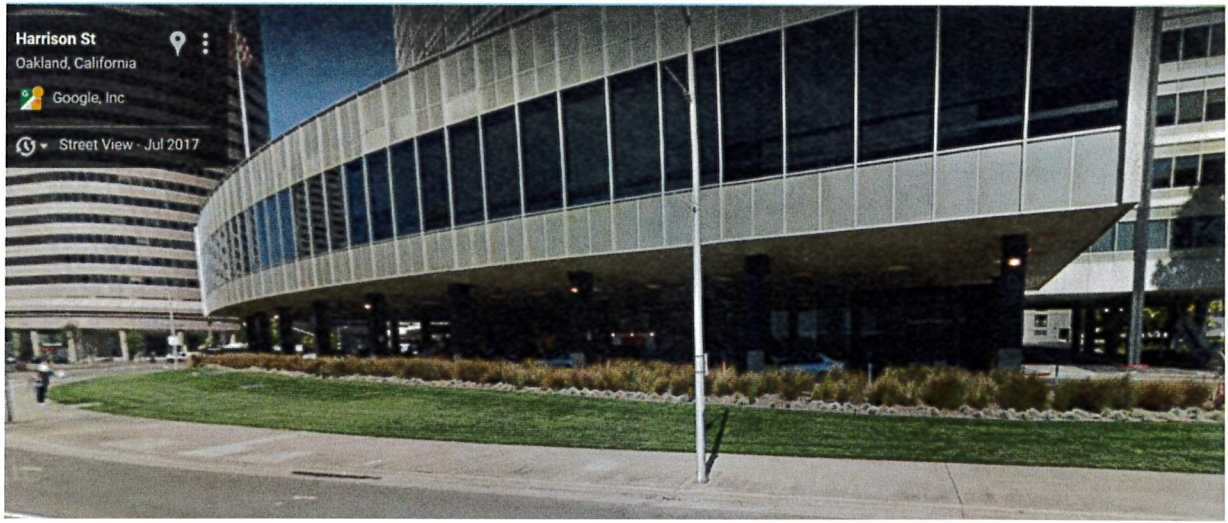
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Turf on public median strips constitutes an extremely small fraction of the overall turf in California. Yet between 3.5 and 5% of total state water use goes to irrigating lawns, which equates to approximately a quarter of overall urban water use. Throughout the recent drought, many cities and businesses chose to convert their decorative lawns to drought-tolerant landscaping; however, plenty of unused and non-essential irrigated turf areas remain on public and commercial properties throughout the state. The State Water Resources Control Board's regulation could spur the conversion of these areas to drought-tolerant landscaping. The proposed rulemaking language should be adjusted to incorporate these existing non-essential turf areas, but should also ensure that existing turf is not converted to impervious pavement as a means of complying with the regulation.

Reducing irrigation of decorative turf areas can reduce water supply demand and provide for greater protection of essential beneficial uses of our upstream rivers and watersheds, such as habitat for coldwater fish and other threatened and endangered species. Other environmental benefits include improved water quality through the reduced delivery of pesticides and herbicides to our waterways, reduced energy usage and costs, and improved air quality through reduced use of lawnmowers to maintain these areas.

We hope you will incorporate these changes into your proposed rulemaking, and again, appreciate the opportunity to comment.

Sincerely,

Mitch Avalon  
Board President

