



PUBLIC WORKS DEPARTMENT
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December 20, 2017

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

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Ms. Jeanine Townsend:

City of Davis staff appreciates the opportunity to provide input on the proposed permanent prohibitions on wasteful water use practices. City staff share the concerns of the League of California Cities related to the restriction on the use of non-potable water for turf irrigation in medians and the expansion of the prohibition to include not only turf in medians but in the areas between the street and the sidewalk. Clarification is needed on whether cities are responsible for publicly owned areas between the sidewalk and street that are maintained by property owners.

In addition, City staff had comments on the quantification of a rainfall event and on the enforcement prohibitions. In the draft regulation text, measurable rainfall is defined as “rainfall of at least one-tenth of one inch of rain”. The majority of residential rain sensors can only be set to turn off irrigation systems after one-eighth of one inch of rain or more. Modifying this requirement to define measureable rainfall as one-eighth of one inch of rain would better reflect the current technology available. It would also ensure that properties that have been proactive in installing rain sensors and/or weather stations would not be penalized.

The City of Davis currently follows an administrative citation process to enforce water waste violations and promotes education in lieu of violations and/or fines for a first offense. Allowing cities that already have an established process for handling complaints and violations to use our current enforcement measures prior to the state’s enforcement prohibitions would be preferable.

Please contact us with any questions regarding our written comments.

Sincerely,

Stan Gryczko
Assistant Public Works Director