

Memo

To: Max Gomberg and Erik Ekdahl, State Water Board staff

From: Heather Cooley, Pacific Institute

Re: Water Waste Prohibitions

Governor Brown's May Executive Order (B-37-16) directed the State Water Board to permanently prohibit practices that waste water. The Executive Order identified a set of practices for prohibition, and we have expanded on that list based on a review of existing water waste ordinances in several California communities. This list was developed in consultation with colleagues at the Natural Resources Defense Council, California Coastkeeper Alliance, Community Water Center, WaterNow Alliance, Climate Resolve, and Environmental Justice Coalition for Water. Based on this review and consultation, we recommend that the state permanently prohibit practices that waste water (in any form), including:

- Application of water to sidewalks, driveways, or other hardscapes, except where required by sanitation or health codes;
- Washing automobiles with a hose not equipped with a shut-off nozzle;
- Operation of a fountain or other decorative water feature without a water recirculation system;
- Application of water to outdoor landscapes, including parkway strips, in a manner that causes runoff or overspray such that water flows or falls onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures;¹
- Irrigation of ornamental turf or water-intensive plants on public street medians;
- Irrigation during or within 48 hours of measurable precipitation;
- Sprinkler irrigation between the hours of 10am and 6pm except by use of a hand-held bucket or similar container, a hand-held hose equipped with a water shut-off nozzle or device, or for very short periods of time for the express purpose of adjusting or repairing an irrigation system;²
- Irrigation of landscapes in excess of 1.0 ET;³

¹ Rainwater would be excluded from this prohibition.

² Adapted from existing prohibition in Pasadena.

³ This would be a quantitative metric distinct from the prohibition against run-off, overspray, etc. Also, more stringent criteria apply to landscapes installed after January 1, 2010.

- Application of water for dust or other pollutant suppression purposes other than by means of a hose fitted with a flow cut-off device or a vehicle fitted with sprinklers;
- Installation of non-recirculating systems in any new commercial in-bay or conveyer car washes;^{4,5}
- Installation of non-recirculating systems in any new commercial laundry systems;^{6,7}
- Installation of single-pass cooling systems in buildings requesting new water service;^{8,9}
- Serving drinking water to customers in restaurants and other food service establishments, unless requested by the customer;¹⁰
- Laundering the towels and bed linens provided to a hotel or motel customer a daily basis, unless requested by that customer;¹¹ and
- Continued use of inefficient plumbing as defined and prohibited by Senate Bill (SB) 407 (2009).

Given that these practices are designed to curb waste, we recommend that they be applied to all forms of water (i.e., potable and non-potable water), except where noted.

Thank you for your consideration,



Heather Cooley
Water and Sustainability Program Director, Pacific Institute

⁴ In a conveyor car wash system, the car moves on a conveyor belt while the exterior of the car is washed. At an in-bay automatic car wash, the vehicle is parked in a bay and remains stationary while a machine moves back and forth over the vehicle to clean it.

⁵ Prohibition in place in San Diego and Pasadena.

⁶ Commercial laundry systems include (1) on-site facilities, or On Premises Laundry (OPL), dedicated to washing fabrics used at the location, such as in hotels, hospitals, nursing homes, prisons, universities, etc.; and (2) centralized contract laundries, or industrial laundries, that launder fabrics from other businesses, such as uniforms, restaurant table cloths, bed linens, etc.

⁷ Prohibition in place in San Diego and Pasadena.

⁸ "Single-pass cooling systems" means equipment where water is circulated only once to cool equipment before being disposed.

⁹ Prohibition in place in San Diego and Pasadena.

¹⁰ Prohibition in place in San Diego and Pasadena.

¹¹ Prohibition in place San Diego and Pasadena.