



VIA EMAIL: commentletters@waterboards.ca.gov

February 14, 2018

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

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

Dear Chair Marcus:

Irvine Ranch Water District (IRWD) would like to express its gratitude for the changes made in the proposed regulations entitled “Conservation and the Prevention of Waste and Unreasonable Use” (Proposed Regulations). We appreciate the State Water Resources Control Board’s (State Board) recognition of water agencies’ commitment to minimizing water waste.

IRWD would like to thank the State Board for the revisions made to the Proposed Regulations that are consistent with our December 2017 comments including:

- ***Adding exclusions to the prohibition of median and parkway irrigation.*** Excluding recycled water irrigation from the prohibition irrigating turf in medians and parkways ensures that the Proposed Regulations recognize existing investments in recycled water, a drought resilient supply. While we would have preferred to see an amendment that excluded recycled water irrigation from the proposed the Proposed Regulations, the grandfathering provisions go a long way to recognizing the substantial and appropriate investments many communities have made in recycled water irrigation. Additionally, the revisions made to the irrigation prohibitions that provide additional time before implementation is required are important. The revisions will provide public agencies the time needed to transition median and parkway landscapes from turf to other plant materials.
- ***Modifying the definition of measurable rainfall.*** By increasing the amount of rainfall defined as “measurable rainfall” from one-tenth to one-fourth of an inch, the Proposed

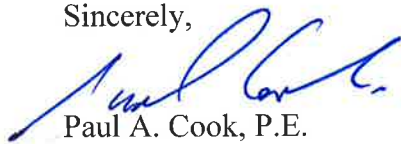
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Regulations have been made more consistent with the level of rainfall recognized by most irrigation systems with automatic rain shut-off features. IRWD supports the revision because it better matches the Proposed Regulations with the features of existing widespread technology used in landscape irrigation management.

- ***Excluding incidental runoff from runoff prohibitions.*** By providing an accurate and detailed definition of incidental runoff, the Proposed Regulations now appropriately address incidental runoff, and acknowledge that incidental runoff is a reality even when landscapes are being irrigated efficiently and responsibly.
- ***Limiting the prohibition on serving non-requested drinking water at eating establishments.*** By limiting this provision to Governor-declared emergencies based on drought conditions, the Proposed Regulations ensure that the state and water providers retain the ability to grab the public's attention in times of drought, while maintaining year-round best practices to reduce wasteful water use.

The revisions to the Proposed Regulations have made great strides in addressing many of the concerns raised by IRWD. Thank you again for addressing many of the concerns listed in the District's December 2017 comments. Please do not hesitate to contact me at (949) 453-5590, or Fiona Sanchez at (949) 453-5325, should you have any questions about our comments, or if we can be of assistance to you or your staff.

Sincerely,



Paul A. Cook, P.E.
General Manager