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Santa Margarita Water District



February 14, 2018

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

VIA E-MAIL
commentletters@waterboards.ca.gov

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

The efficient use of water is important to ensure that current and future California residents and businesses continue to have access to water. To that end, the Santa Margarita Water District (“District”) has implemented a conservation-focused, budget-based rate structure, developed innovative landscape design assistance programs and, as a part of our Water Conservation Ordinance, prohibited wasteful water use practices. The District has implemented an incentive and resource-based approach to achieving efficiency as it promotes partnerships between a utility and its retail users.

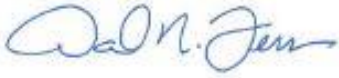
The District appreciates the State Water Board’s acceptance of many of the comments we and the remainder of the wide spectrum of agencies within the water utility community provided regarding the proposed prohibitions on wasteful water use practices. An important change is the addition of an exemption for the use of recycled water for the irrigation of turf on public street medians and parkways. The District and the local municipalities to which we provide service have made significant investments in the development, distribution, and use of recycled water to irrigate landscapes, some of which are public turf medians and parkways.

It is good public policy to encourage the expansion and use of recycled water. The District strongly believes that the State Water Board should *not* include recycled water in any regulations that would limit how recycled water is used. Doing so is redundant as Title 17 and Title 22 already regulate how recycled water is to be used and not wasted. Moreover, the State’s Model Water Efficient Landscape Ordinance (“MWELO”) is another effective land use planning tool that ensures new and rehabilitated landscapes meet high efficiency standards.

The correct application and use of turf does serve purposes beyond recreation. As an example, in new developments within the District’s service area, turf parkways irrigated with recycled water via drip tubing help mitigate tripping hazards, while still complying with MWELO standards. We request the State Water Board withdraw the proposed regulation prohibiting irrigation of turf on *existing* public street medians and rely on MWELO efficiency standards that already result in efficient and practical landscapes.

The District appreciates the opportunity to provide the State Water Board with comments to further refine the proposed regulations to prohibit wasteful water uses. Should you have questions or need additional information, please contact Nate Adams at (949) 459-6533.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel R. Ferons". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel R. Ferons
General Manager