



PASADENA WATER AND POWER

December 21, 2017

Sent via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

**RE: Comment Letter – Prohibiting Wasteful Water Use Practices**

Dear Chair Marcus and Members of the Board,

On behalf of the City of Pasadena, we appreciate the opportunity to comment on the draft regulation on Conservation and the Prevention of Waste and Unreasonable Use. The City supports the State Water Resources Control Board's ("State Board") leadership in increasing water conservation following years of unprecedented drought, and helping implement the Governor's framework for "Making Water Conservation a California Way of Life."

While the proposed regulation includes prohibitions that are the same or similar to the State Board's Emergency Regulations, which expired November 25, 2017, we are concerned about an added provision that unduly restricts the use of non-potable water for irrigating turf on street medians and parkways. Specifically, section §963(b)(1)(G), "The irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk, except where the turf serves a community or neighborhood function."

This language applies to all water, including non-potable water, as indicated in the State Board's list of Frequently Asked Questions: Regulation on Waste and Unreasonable Water Uses. As an early adopter of water conservation measures, the City of Pasadena continues to see great value in the use of non-potable water for turf irrigation to help preserve precious drinking water and to enhance local water supply reliability.

Pasadena's 2011 Water Integrated Resources Plan established a long-term strategy to meet current and future water needs. The plan calls for developing alternative sources, including non-potable water, to meet Pasadena's annual water demands. The City's customer-owned utility, Pasadena Water and Power ("PWP"), plans to enhance local water supply reliability by developing the Non-Potable Water Project. At full buildout, the project will offset up to 10% of the total water consumed by PWP customers by delivering recycled water and other untapped non-potable water sources for landscape irrigation and industrial uses.

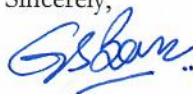
PWP serves approximately 165,000 people, within a 26-square-mile service area in the San Gabriel Valley of Los Angeles County. The City is a leader in promoting environmental stewardship and urban sustainability. In 2008, Pasadena started an aggressive, sustained comprehensive water conservation campaign following its adoption of the Urban Environmental Accords policy. In early 2009, the City Council adopted a Comprehensive Water Conservation Plan that included a Water Waste Prohibitions and Water Shortage Plan ordinance, which contains nearly all the requirements of the State Board's Emergency Regulations and the proposed new regulation to prevent waste and unreasonable use, respectively.

The City recognizes that the use of non-potable water should not be taken for granted. As such, we concur with prohibiting the use of potable or non-potable water within 48 hours of measurable rain, excessive watering or runoff onto pavement.

However, we respectfully ask the State Board to revise section §963(b)(1)(G) of the proposed regulation to only apply to potable water. This revision will allow Pasadena and other local agencies to use non-potable water for irrigating public spaces (including medians), and will provide flexibility to fully implement long-term water supply reliability objectives.

We appreciate your consideration of our recommendations. Please contact me at **626.744.4409** for any questions or further discussions.

Sincerely,



**Gurcharan S. Bawa**  
General Manager

cc: Eileen Sobeck, Executive Director, State Water Resources Control Board  
Jonathan Bishop, Chief Deputy Director, State Water Resources Control Board  
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board  
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