



CITY OF EL PASO DE ROBLES
"The Pass of the Oaks"



December 21, 2017

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

SUBMITTED VIA EMAIL

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Mr. Townsend,

Thank you for the opportunity to provide comments on the proposed regulations pertaining to prevention of waste and unreasonable use of water. The City of Paso Robles is committed to limiting wasteful use of water and has made significant improvements over the past decade to increase water use efficiency and reduce water waste in our community. For example, nearly two years prior to the recent drought emergency the City adopted prohibitions that mirror many of those enacted during the drought emergency and that are now proposed to become permanent. While we generally support continuation of the prohibitions that were in place during the drought emergency, we ask that the State Water Board consider modifying the proposed prohibition of irrigating turf in parkways, and we strongly recommend that the State Water Board continue to allow recycled water to be used for irrigation of turf in public parkways and medians. As drafted, the new regulations would result in significant unintended impacts to local agencies, school districts, and the communities we serve.

The proposed regulation would prohibit irrigation of turf in publically owned or maintained parkways. We recognize that the State Water Board's analysis of financial impacts of the proposed regulation was unable to account for impacts this prohibition would have on local agencies and have concern for unintended consequences that will result from the proposed regulations. Local agencies will be faced with either undertaking costly replacement projects for existing turf areas, or allowing turf parkways to deteriorate until sufficient budget can be established for their replacement. Where turf replacements cannot be immediately undertaken, the prohibition would negatively impact stormwater management and water quality, contribute to loss of trees and other non-turf vegetation in existing parkways planted with turf, and diminish community aesthetics and use of these areas.

The City recommends that the State Water Board revise the proposed regulation to exclude the prohibition on irrigation of turf in parkways and instead require that agencies limit use of potable water for turf parkway irrigation using long-term demand management measures. This approach would allow jurisdictions to continue to manage water use in a way that meets long-term water

conservation targets while properly planning and budgeting for replacement or retrofit of existing irrigation systems serving turf in parkways.

The proposed regulation would also prohibit use of recycled water for irrigation of turf in public street medians and parkways. This action would contradict the efforts and investments of public agencies to further the use of recycled water in their communities and would unnecessarily diminish local agencies' ability to manage and benefit from this resource, especially where existing and projected recycled water supplies exceed demands that can be served with recycled water. It is important to consider that the consistent availability of recycled water year-round often necessitates discharging the resource as waste because insufficient demands or other viable uses are available. Additionally, where recycled water is available near existing medians and parkways, retrofitting an irrigation system for recycled water use may be more cost-effective than replacement of turf with an alternative landscaping and associated irrigation system retrofits. The City strongly recommends the State Water Board allow local agencies flexibility in utilizing recycled water as allowed by existing regulations, and with consideration of local conditions and site-specific benefits.

Thank you again for this opportunity to provide comments on the proposed regulations pertaining to wasteful water use. We appreciate the State Water Board's work and look forward to continued efforts to ensure the reliability of our water supplies and make conservation a California way of life.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Gonzalez", is written over a light gray rectangular background.

Kirk Gonzalez, P.E.
Water Conservation & Resources Program Manager
City of Paso Robles