

# LAGUNA BEACH COUNTY WATER DISTRICT

(11/21/17) Public Workshop  
Prohibiting Wasteful Water Use Practices  
Deadline: 12/26/17 by 12 noon

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GERALD D. SHOAF



INCORPORATED 1925



December 22, 2017

Ms. Jeanine Townsend  
Clerk of the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The Laguna Beach County Water District (LBCWD) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the proposed regulation to permanently prohibit certain wasteful water uses. We support several of the proposed regulations and have concerns with others.

The LBCWD adopted its Water Shortage Contingency plan in April 2009 that includes permanent mandatory water waste prohibitions that are in effect at all time and which mirror the prohibitions proposed during the November 21, 2017 State Water Board Public Workshop. They include:

- The application of water to outdoor landscapes in a manner that causes runoff
- The use of a hose to wash an automobile except where the hose is equipped with a shut-off nozzle
- The application of potable water to hardscapes
- The use of potable water in non-recirculating ornamental fountains or other decorative water features
- Hotels & motels must provide guests with the option of not having towels & linens laundered daily
- Restaurants & other food service establishments can only serve water to customers on request

The majority of these practices are already prohibited by water providers across the state and have become part of daily life for Californians. Making these regulations permanent throughout California will continue to promote water conservation and prevent the waste and unreasonable use of water.

The LBCWD has two areas of concern regarding two of the proposed regulations:

1. Application of water to irrigate turf and ornamental landscapes during and within 48 hours after measurable rainfall of at least one-tenth of one inch of rainfall - Specifically, the LBCWD has concerns with the State Water Board's definition of "measurable rainfall" defined as "at least one-tenth of one inch of rainfall". We understand that providing a definition of what is "measurable rainfall" is intended to be helpful for water agencies as they implement this

provision. However, LBCWD, has concerns about the variability of rainfall within our given service area. Due to our topography, our service area experiences differences in rainfall depending on location; meaning some areas within our boundaries will be subject to the restriction, while others not, which will create a messaging challenge with customers.

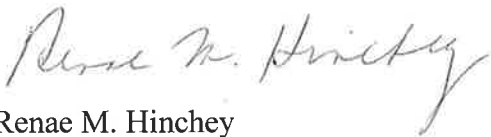
Additionally, a tenth of an inch of rain may not be sufficient to meet irrigation needs of certain landscapes within a 48-hour period. A number of factors can influence the appropriate amount of rainfall resulting in unneeded irrigation, such as climate, soil texture and structure, and root zone depth. We request that the reference of “at least one-tenth of one inch” be removed and that agencies be granted the flexibility to make a local determination of what is measurable rainfall for their locality.

2. Irrigation of Turf on Public Street Medians - The prohibition of irrigation of turf on public street medians, unless the turf serves a community or neighborhood function, is unnecessary, as these new medians are subject to the Water Conservation in the Landscape Act which requires cities and counties to adopt local ordinances that are “at least as effective as” the State’s Model Water Efficient Landscape Ordinance. According to the ordinance, these areas would be considered commercial landscape and assigned a Maximum Applied Water Allowance (MAWA) of 0.45 of the local evapotranspiration. Even with the most efficient irrigation technologies, landscapes assigned a MAWA of 0.45 could not include turf grass and be in compliance with the regulation.

Cities and Counties currently have sufficient incentive to implement the landscape ordinance. Per Executive Order B-29-15 action No. 11: *“The Department shall update the State Model Water Efficient Landscape Ordinance through expedited regulation. This updated Ordinance shall increase water efficiency standards for new and existing landscapes through more efficient irrigation systems, gray-water usage, onsite storm water capture, and by limiting the portion of landscapes that can be covered in turf. It will also require reporting on the implementation and enforcement of local ordinances. The Department shall provide information on local compliance to the Water Board, which shall consider adopting regulations or taking appropriate enforcement actions to promote compliance. The Department shall provide technical assistance and give priority in grant funding to public agencies for actions necessary to comply with local ordinances.”*

Again, we appreciate the opportunity to provide comments and feedback regarding the proposed regulation to permanently prohibit certain wasteful water uses.

Sincerely,



Renae M. Hinchey  
General Manager

Submitted via e-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)