



## City of Manhattan Beach Department of Public Works

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December 15, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



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

Dear Ms. Townsend,

Thank you for the opportunity to comment on the proposed regulations regarding Prohibiting Wasteful Water Use Practices. The City of Manhattan Beach (City) supports the overall prohibitions and appreciates the State Water Resources Control Boards (SWRCB) efforts to strengthen the State's ability to manage water.

The City takes water conservation very seriously and has achieved an average reduction of 18% when compared to 2013 data, and a 32% average reduction when compared to the 2010 Urban Water Management Plan baseline originally set to meet Senate Bill X7-7 (also referred to as the 20 x 2020 Plan). The City continues to collaborate with our recycled water provider to maximize the use of recycled water within our jurisdiction. Water conservation has been and will remain an integral part of our community.

While supportive of the SWRCB's proposal, the City has the following comments on the draft regulatory framework.

- Article 2. 963 (b)(1)(E) – According to the proposed text, “measurable rainfall” is defined as “at least one-tenth of one inch of rain.” The boundaries of consideration should be based on where rain actually falls. Although the City is four square miles, there may be measurable rainfall in one area but not another, leaving plants and vegetation without water for several days based on the new text. Previous text did not define this amount and it was left to the water agency to define. Moreover, many irrigation systems have automatic shutoff systems when rain is detected, preventing irrigation systems from operating during and after a rain event. Currently, the lowest level these devices measure is 1/8<sup>th</sup> inch of rain. Should “measurable rainfall” need defining, it should be set at the current minimum standards of the irrigation systems of one eighth of one inch of rain or be determined by the water agency.
- Article 2. 963 (b)(1)(G) – It is our understanding that there is to be no use of any water, potable or recycled for “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.” Although we agree with the proposed restrictions for potable water, the same standards should NOT apply to recycled water uses. There has been significant investment into recycled water

infrastructure within our City (and throughout the State) to reduce potable water demand and usage in these areas. Prohibiting the broader uses of recycled water now will have significant impacts to the recycled water infrastructure and will likely require its abandonment in many areas. This is not only irrational, but represents a waste of tax payer dollars on investments designed to conserve potable water. Moreover, many agencies that operate recycled water plants require this usage to maintain effective operations and delivery.

Furthermore, prohibiting any type of water usage in the "publicly owned or maintained landscaped areas between the street and sidewalk" will have significant impacts to the tree population where many trees have been planted within our City and others. The removal and/or death of neighborhood parkway trees would significantly impact our community's foliage, commitment to greenhouse gas reductions and urban forest and tree canopy objectives. Whether a tree is planted to the right of left of a property line should not affect how it is watered. We are asking that the use of recycled water continue to be allowed in the above-mentioned areas.

Again, the City thanks you for the opportunity to comment on the proposed regulations. Please do not hesitate to contact me if you have any questions or require further information.

Sincerely,



Stephanie Katsouleas, P.E.  
Public Works Director