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





December 20, 2017

Via email: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus and Members of 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:

The City of Calabasas appreciates the opportunity to comment on the proposed prohibitions to address wasteful water use practices. The City is supportive of the Board's efforts to conserve potable water and has been proactive in implementing water conservation initiatives including the extensive use of recycled water. We have invested significant amounts of money to extend recycled water lines to all of our medians, installed smart water meters which reduced our water use by 45%, and reduced turf areas in our medians.

We continue to work in partnership with Las Virgenes Municipal Water District to expand the use of this important local resource. The development of the infrastructure to use recycled water has taken decades to achieve at significant expense to the City and its residents, saving thousands of gallons of imported water each year. The City is proud of our water conservation achievement while continuing to provide aesthetically appealing landscapes for our residents, businesses and visitors.

100 Civic Center Way Calabasas, CA 91302 (818) 224-1600 Fax (818) 225-7324 The Honorable Felicia Marcus and Members of the Board December 20, 2017 Page 2

Calabasas uses a broad variety of plant types in its landscaping to maximize the appeal of city landscaping and minimize maintenance. Included in this mix of plant types is the limited application of turf as a textural and visual contrast to other plant types. As noted above, the City makes every attempt to use recycled water where it is available. When residents and visitors to our community see our purple pipes, they know that we being environmentally responsible.





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It is with all of the above in mind that we strongly object to restricting the use of recycled water and treating it the same fashion as potable water. It is not, and doing so would be counterproductive to our collective efforts to willingly conserve. Conserving recycled water does nothing to conserve the potable water that we all agree should be used judiciously. Why would anyone invest in a recycled water infrastructure if there is no direct benefit to doing so? Additionally, such an action will be very hard to explain to our residents, because there is little rationale to restrict the use of recycled water when it is available in excess of customer demands during portions of the year. Our residents are environmentally conscious and value the investments that we have made over the years. They also understand and that the investment in recycled water positively affects their property values.

Additionally, the City is very concerned about the cost to remove existing turf features and replacing it with an alternative plant type. This drastic U-turn in policy is contrary to the Board's desire to expand the use of recycled water as a conservation measure itself. Rather than prohibiting one plant type, the Board should encourage other jurisdictions to expand the use of recycled water for irrigation as our city has already done.

Again, the City of Calabasas strongly objects to any rule that would limit the use of recycled water on public landscapes. Further, we oppose any irrigation restrictions for the area between the curb and sidewalk, commonly referred to as the parkway, as it would negatively affect street trees and aggravate the State's problem with tree mortality.

Thank you again for the opportunity to comment on the proposed prohibitions.

Sincerely,

Anthony M. Coroalles

City Manager

AMC/am