



Securing Your Water Supply

LATE COMMENT

John V. Rossi
General Manager

Robert Stockton
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Donald D. Galleano
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S.R. "Al" Lopez
Division 5

December 26, 2017

VIA EMAIL: commentletters@waterboards.ca.gov

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 Ms. Townsend:

Western Municipal Water District (Western) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Board) on the proposed draft regulation for the prevention of waste and unreasonable use of water.

Western was formed in 1954 and supplies water on both a wholesale and retail basis to a region stretching 527 square miles in western Riverside County. The regional area includes the cities of Corona, Norco, and Riverside and the water agencies serving Box Spring, Eagle Valley, Lake Elsinore, Temescal Valley, and Temecula. While most of Western's business is in wholesaling of water, the District directly serves approximately 25,000 residential and business customers in portions of Riverside County near the cities of Riverside and Murrieta.

Western has an extensive conservation program and established a Water Conservation and Supply Shortage Program on May 13, 2009. This program, implemented through District Ordinance, already prohibits many of the "wasteful water uses" which were included in the emergency drought response regulation and now proposed for permanent statewide prohibition. For that reason, many of the proposed prohibitions are supported by Western. However, we urge you to consider our brief comments on specific details of the proposal below.

- **"The 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 rain."**

The phrase "of at least one-tenth of one inch of rain" should be removed from the text of the proposed prohibition. There are many water suppliers that have distinct micro-climates within the service boundaries. Local agencies need flexibility to balance rainfall patterns, specific irrigation needs along with the limitations of irrigation controllers. Additionally, in our semi-arid climate we periodically experience "flashy" precipitation in the warm, high-evapotranspiration months of the year. Although a seemingly

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meaningful volume of rain may be reported, delivery is mostly non-uniform and provides little or no benefit for landscaped root zones.

- **“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.”**

The specific cost implications without consideration of the type of water supply, recycled or non-potable, for example, as well as other site-specific considerations associated with landscaping and irrigation of medians and parkways makes a statewide blanket prohibition too prescriptive.

Again, while Western supports many of the proposed prohibitions on wasteful water use practices, we request you consider amending the proposed regulations to address the concerns we have expressed. If you or your staff have any questions, please contact me at (951) 571-7100 or CMiller@wmwd.com.

Very Respectfully,

A handwritten signature in blue ink that reads "Craig D. Miller".

CRAIG D. MILLER, P.E.
General Manager