



**Las Virgenes – Triunfo Joint Powers Authority**  
4232 Las Virgenes Road, Calabasas, CA 91302  
818.251.2100

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



**TRIUNFO  
SANITATION  
DISTRICT**  
A PUBLIC AGENCY

December 20, 2017



Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

The Honorable Felicia Marcus and Members of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, California 95814

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

Dear Chair Marcus and Members of the Board:

The Las Virgenes-Triunfo Joint Powers Authority (JPA) appreciates the opportunity to comment on the proposed prohibitions to address wasteful water use practices. The JPA is a partnership between Las Virgenes Municipal Water District, which provides water and wastewater services to 70,000 residents in Los Angeles County, and Triunfo Sanitation District, which provides water and wastewater services to 30,000 residents in Ventura County. The JPA operates the Tapia Water Reclamation Facility, which treats over 6 million gallons of wastewater per day to Title 22 recycled water standards. In addition, the JPA operates an extensive network of backbone recycled water infrastructure, delivering 6,000 acre-feet of recycled water per year to the combined service area of its members.

The JPA is supportive of the Board's efforts to address wasteful and unreasonable uses of water. In fact, many of the proposed prohibitions have already been codified by the JPA's members. However, as an early adopter of water recycling and given the extensive use of recycled water for irrigation purposes in its combined service area, the JPA has significant concerns with the proposed prohibition on irrigating turf on public street medians and landscaped areas between the street and sidewalk (parkways).

State Water Resources Control Board staff indicated during a conference call on October 30th that the proposed irrigation prohibition for turf on street medians and parkways was intended to include the use of both potable and recycled water. The prohibition on the use of recycled water for these landscapes is contrary to the Board's long-standing effort to encourage the use of recycled water as a conservation measure and its Board-adopted Recycled Water Policy. For forty-five years, the JPA has worked closely with local jurisdictions to expand the use of recycled water for irrigation in its service area to reduce demands for imported water. Over the years, significant investments have been made to convert irrigation of the landscape types specified in the proposed prohibition from potable to recycled water, saving thousands of gallons of imported water each year.

**James Wall**

Chair, Las Virgenes-Triunfo  
Joint Powers Authority  
Chair, Triunfo Sanitation District  
Board of Directors

**Glen Peterson**

Vice Chair, Las Virgenes-Triunfo  
Joint Powers Authority  
President, Las Virgenes Municipal Water District  
Board of Directors

Since recycled water is locally sourced and drought-resilient, it has already achieved the positive impacts listed in the Notice of Proposed Regulatory Action. Further, it is categorically inappropriate to deem the beneficial use of recycled water, even for high water using landscapes such as turf, a "waste and unreasonable use" absent over-irrigation that results in runoff. The proposed irrigation restriction appears to be aimed at the removal of turf from center medians and parkways, rather than the stated intent of the regulation to prohibit wasteful water use practices. Policy changes with regard to landscaping decisions would more appropriately be addressed prior to the installation of the landscapes and within the context of the Model Water Efficient Landscape Ordinance, which already prohibits high water use plants in street medians.

Upon review of Executive Order B-37-16, it is clear that the Governor's intent was to conserve potable water supplies. There was no mention of proposed restrictions on the use of recycled water in the Executive Order. In fact, Item No. 4 of the Executive Order was specific in directing the Board to "permanently prohibit practices that waste **potable** water".

Many municipalities, including those in our service area, have made significant investments to shift demands from potable to recycled water for irrigation, complying with the original intent of the Executive Order. As a result, much of the landscaping in center medians is currently irrigated with recycled water. However, parkway landscaping within the JPA's service area is frequently irrigated and maintained by the abutting homeowner, creating a barrier for conversion to recycled water. As such, irrigation restrictions for parkway landscaping, even those limited to potable water, could result in residents leaving these areas unirrigated. This response would negatively affect street trees and aggravate the state's existing challenge with tree mortality.

In conclusion, the JPA urges the Board to clarify that the proposed prohibitions to address wasteful water use practices apply to potable water, consistent with Executive Order B-37-16, and to eliminate the inclusion of any irrigation restrictions for landscaped areas between the street and sidewalk.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Pedersen", with a stylized flourish at the end.

David W. Pedersen, P.E.  
Administrating Agent/General Manager