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December 26, 2017

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Ms. Townsend:

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The Los Angeles Department of Water and Power (LADWP) would like to thank the State Water Resources Control Board for the opportunity to comment on the proposed regulations for prohibiting wasteful water use practices.

LADWP is the largest municipally-owned utility in the nation, which serves a 473 square-mile area in Los Angeles with approximately four million residents. Our mission is to provide essential community services (water and power) for public health and safety in an efficient and environmentally responsible manner. Water conservation efforts have been an important part of the Department's water plan for many years and continue to be a central focus in providing a sustainable water future for the City of Los Angeles.

LADWP supports policies and regulations that protect the environment, and believes that regulating wasteful water use practices is a necessary and important component of environmental compliance and stewardship. LADWP has only a couple of comments below regarding the proposed regulations concerning wasteful water use practices being proposed for the California Code of Regulations, Title 23.

Article 2. Wasteful and Unreasonable Water Use Practices, Section 963 (b)(1)(A)

This section indicates that the application of water to outdoor landscapes in a manner that causes runoff such that water flows onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures is prohibited.

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LADWP recommends the section be amended to clearly state that watering of outdoor landscapes in a manner that causes **excess or continuous** runoff is prohibited. While LADWP encourages our customers to install and use efficient irrigation systems, we recognize that even in the best irrigation systems, some small amount of irrigation may unintentionally spray onto sidewalks or other adjacent hardscapes. By adding this clarification, we will be able to provide a measured response to this type of activity while continuing to encourage efficiency upgrades for landscape areas that are experiencing irrigation issues.

Article 2. Wasteful and Unreasonable Water Use Practices, Section 963 (b)(1)(G)

This section prohibits the irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk (parkways), except where the turf serves a community or neighborhood function.

LADWP recommends the removal of parkways from the proposed prohibition of turf irrigation. These landscaped areas are often maintained by private businesses or homeowners even though the property is owned by the City of Los Angeles. Furthermore, these landscapes are often irrigated on the same system as the landscaping in front of the businesses or residences. As parkways provide community and neighborhood function uses, it is crucial that we allow our customers to maintain their parkways through irrigation while continuing to encourage conversion to California-friendly landscaping.

LADWP appreciates the opportunity to provide comments on the proposed wasteful water use practices regulations. Should you have any questions regarding this letter, please contact Penny Falcon, Manager of Water Resources Policy, at (213) 367-4647.

Sincerely,



David R. Pettijohn
Director of Water Resources

SM:mk

c: Mr. Richard Harasick
Ms. Katherine Rubin
Ms. Penny Falcon