



December 21, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95812-2000



Submitted via email to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Ms. Jeanine Townsend:

The City of Dana Point (City) thanks you for giving us the opportunity to provide input on the State Water Resources Control Board's (State Water Board) proposed regulation to permanently prohibit certain wasteful water uses, dated November 1, 2017. The City supports and practices sustainable water use. However, the City has some concerns in regards to the prohibition of *"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"* as written. The City provides the following comments:

1. Public medians with mixed plantings (eg. trees, shrubs and/or drought tolerant plantings along with areas of turf) should be exempt from this regulation.

The prohibition language is unclear in regards to public medians that have mixed plantings such as trees and shrubs in addition to turf areas. Eliminating or decreasing water in areas with trees and/or shrubs, along with turf in medians, can threaten tree health which can pose public safety hazards. Trees are also proven to be a valuable asset for helping to mitigate climate change, help with stormwater management, and some trees have specific historical value in Dana Point. For these reasons, it is prudent that the City be able to apply a healthy supply of water to trees in medians that may also have turf areas and therefore public medians with mixed plantings which may include areas of turf should be exempt from this regulation.

2. Existing public medians (and verges), using recycled water should be grandfathered (i.e. exempt) from the proposed regulation.

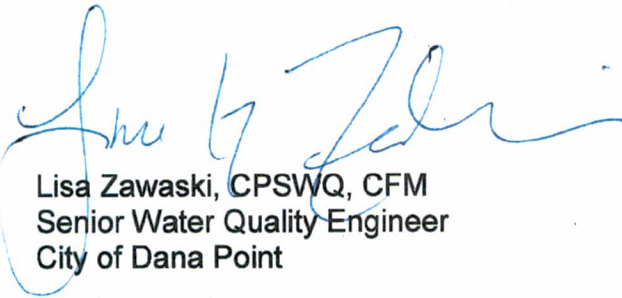
The prohibition language appears to prohibit the irrigation of public medians with both potable and recycled water. Water suppliers and Cities have invested

significant capital in projects to expand recycled water transmission and distribution systems for irrigation purposes (for both turf and other drought tolerant landscaped areas) to comply with the previous regulations. The proposed permanent regulations should allow for these systems to continue to irrigate in a sustainable manner. Please limit the proposed prohibition to "potable water" so that existing recycled water systems can continue to irrigate any turf areas on public street medians.

As we have discussed with State Board Water staff, it is prudent that any intended exemptions or applicable criteria be clearly written into the regulations so that the regulators, the regulated parties and the public can clearly understand the regulations.

If you have any questions, please contact Lisa Zawaski, Senior Water Quality Engineer, at 949-248-3584 or lzawaski@danapoint.org. Thank you.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lisa Zawaski", is written over a circular blue stamp or seal.

Lisa Zawaski, CPSWQ, CFM
Senior Water Quality Engineer
City of Dana Point

cc: Mark Denny, City Manager
Mike Rose, Director of General Services
Jeff Rosaler, Parks Manager
Matt Sinacori, Director of Public Works & Engineering