Yorba Linda Water District

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SWRCB Clerk

December 19, 2017

Ms. Jeanine Townsend (commentletters@waterboards.ca.gov)
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento CA 95814

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The Yorba Linda Water District (YLWD) appreciates the opportunity to provide comments to the State Water Resources Control Board (SWRCB) on the proposed regulation to permanently prohibit certain wasteful water uses. We support several of the proposed regulations and have concerns with others.

BACKGROUND

YLWD is a community located in the northeastern corner of Orange County and encompasses 14,475 acres of land comprising 22.6 square miles. The District serves a population of approximately 78,500 and currently provides water service to approximately 25,000 residential, commercial, irrigation and other connections. Our District has significant wildfire interface zones for which we are required to irrigate by the Orange County Fire Authority.

During the most recent drought emergency, the customers of the YLWD responded admirably and complied with the unilaterally mandated restrictions promulgated by the SWRCB. Our residents, like all Californian's, will pull together in a time of need, as long as it is temporary.

YLWD serves both groundwater and imported water to our customers. Through the Orange County Water District, our customers have made substantial investments in the management of the groundwater basin and in the development and implementation of indirect potable reuse of our treated sewer water through the Groundwater Replenishment System. In addition, through both the Metropolitan Water District of Southern California and the Municipal Water District of Orange County, we have made long term investments in developing long term water supply, above ground storage, and will be making a substantial investment in fixing the Sacramento Bay Delta plumbing through the construction of the Twin Tunnels.

YLWD is a model District as all of our sewer flows are sent through the Groundwater Replenishment System, which pumps the water back up the river to replenish the groundwater basin. All of the runoff from the District ends up in the Santa Ana River, which then percolates into the groundwater basin, which is then pumped, treated and served to our customers once again. The only water that is not reused is what evaporates only to be dropped in other parts of the state through rain and snow.

AREAS OF CONCERN

YLWD customers have utilized many water use efficiency measures in a voluntary manner to the point that they have become routine practices. Mandating common sense is seldom successful and will repel compliance. That said, there are several components which are not significant areas of concern as it pertains to this current rulemaking process and they will be noted.

1) The application of water to outdoor landscapes in a manner that causes runoff.
    CONCERN *– who will be enforcing this measure?*

2) The use of a hose to wash an automobile except where the hose is equipped with a shut-off nozzle.
    NO CONCERN*…common sense.*

3) The application of potable water to hardscapes.
    CONCERN *– who will be enforcing this measure?*

4) The use of potable water in non-recirculating ornamental fountains or other decorative water features.
    NO CONCERN*…common sense.*

5) Apply 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.
    CONCERN *- We understand that providing a definition of what is "measurable" rainfall is intended to be helpful. However, our service area will experience significant differences in rainfall. Some areas within our service area will be subject to the ordinance, while others portions will not. This also creates a messaging challenge with customers.*

    Additionally, a tenth of an inch of rain may not be sufficient to meet irrigation needs of certain landscapes within a 48 hour period. A number of factors can influence the locally appropriate amount of rainfall resulting in unneeded irrigation, such as climate, soil texture and structure, and root zone depth. ***We request that the reference of "at least one-tenth" of one inch be removed and that agencies be granted the flexibility to make a local determination of what is measurable rainfall.***

6) Serve drinking water other than upon request in eating or drinking establishments, including but not limited to restaurants, hotels, cafes, cafeterias, bars, or other public places where food or drink are served and/or purchased.

> **NO CONCERN**…*common sense as it is already the routine practice in hotels and restaurants in our service area.*

7) Irrigate 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.

> **CONCERN** - *If the proposed regulation is approved, cities will incur significant costs by re-landscaping medians and parkways. This unbudgeted expenditure may force cities and counties to cut services or programs in other areas in order to comply. The cost for cities and counties to remove turf in medians and verges represents a significant financial burden that does not appear to be considered in the Economic and Fiscal Impacts of the Proposed Regulation to Permanently Prohibit Certain Wasteful Water Use Practices dated November 1, 2017. The cost to retrofit these landscapes should be considered.*
>
> *This also creates a safety issue as it is an easier transition from the curb to the sidewalk via turf than traipsing through plants, cactus or rocks.*

Should you have any questions, please contact me at 714-701-3022.

Sincerely,

Marc Marcantonio, General Manager
Yorba Linda Water District