



## City of Westminster

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December 22, 2017

Submitted via e-mail  
commentletters@waterboards.ca.gov

Ms. Jeanine Townsend  
Clerk of the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The City of Westminster appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the proposed regulation to permanently prohibit certain wasteful water uses. We strongly support most of the proposed regulations and have one area of concern.

### **Areas of Support**

The City of Westminster is committed to making conservation a California way of life. In February 2017, the City Council permanently prohibited the following wasteful practices:

- The application of water to outdoor landscapes in a manner that causes runoff
- The use of a hose for any purpose (including to wash an automobile) except where the hose is equipped with a shut-off nozzle
- The application of potable water to hardscapes
- The use of potable water in non-recirculating ornamental fountains or other decorative water features
- Watering landscapes 48 hours after measurable rainfall
- Serving drinking water other than upon request in eating or drinking establishments
- Irrigating turf on public street medians

The City of Westminster also instituted permanent watering days. Seven days per week of watering is unnecessary and as such, Westminster allows 5 assigned watering days in summer months and three assigned watering days in winter months.

We fully agree with the State Water Board that permanent restrictions “increase awareness and a shared sense of responsibility among urban water users.” With permanent restrictions, we are asking residents to be permanently conscious of their water use.

TRI TA  
Mayor

TYLER DIEP  
Vice Mayor

SERGIO CONTRERAS  
Council Member

KIMBERLY HO  
Council Member

MARGIE L. RICE  
Council Member

EDDIE MANFRO  
City Manager

Westminster water customers have saved over 1.7 billion gallons of water since June of 2015. The City is proud of these efforts and will continue with increased conservation activities.

### **Area of Concern**

The following component of the proposed regulation is of concern to us:

1. Prohibiting the irrigation of turf on public street medians and verges unless the turf serves a community or neighborhood function

The prohibition of irrigation of turf on public street medians and verges, unless the turf serves a community or neighborhood function, is superfluous, as these new medians and verges are subject to the Water Conservation in the Landscape Act which requires cities and counties to adopt local ordinances that are "at least as effective as" the State's Model Water Efficient Landscape Ordinance. According to the ordinance, these areas would be considered commercial landscape and assigned a Maximum Applied Water Allowance (MAWA) of 0.45 of the local evapotranspiration. Even with the most efficient irrigation technologies, landscapes assigned a MAWA of 0.45 could not include turf grass and be in compliance with the ordinance.

Cities and Counties currently have sufficient incentive to implement the landscape ordinance. Per Executive Order B-29-15 action No. 11 "The Department shall update the State Model Water Efficient Landscape Ordinance through expedited regulation. This updated Ordinance shall increase water efficiency standards for new and existing landscapes through more efficient irrigation systems, greywater usage, onsite storm water capture, and by limiting the portion of landscapes that can be covered in turf. It will also require reporting on the implementation and enforcement of local ordinances, with required reports due by December 31, 2015. The Department shall provide information on local compliance to the Water Board, which shall consider adopting regulations or taking appropriate enforcement actions to promote compliance. The Department shall provide technical assistance and give priority in grant funding to public agencies for actions necessary to comply with local ordinances."

**For these reasons, we ask that medians and verges prohibitions be removed from the proposed regulation. Cities and counties manage watering of medians and verges by adhering to already implemented State MWEL.**

Again, we appreciate the opportunity to provide comments and feedback regarding the proposed regulation to permanently prohibit certain wasteful water uses. Should you have any questions or need additional information regarding these comments, please contact Scott Miller, Water Superintendent at (714) 548-3693.

Sincerely,



Scott Miller  
Water Superintendent