



"Gateway to the Santa Monica Mountains National Recreation Area"



December 20, 2017

Jeannie Townsend, Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Board Members:

Thank you for the opportunity to comment on the proposed regulatory action in connection with the prohibition of wasteful water use practice, as detailed in the *Notice of Proposed Regulatory Action – Title 23. Waters Division 3. State Water Resources Control Board and Regional Water Quality Control Board; Chapter 3.5 – Conservation and the Prevention of Waste and Unreasonable Uses*. The City appreciates the opportunity to provide input.

The City of Agoura Hills has always supported the Board's efforts to conserve potable water and has been proactive in implementing water conservation initiatives including the extensive use of recycled water conservation efforts to eliminate wasteful practices. In review of the proposed actions, the State and Regional Boards look to permanently prohibit the following practices (abbreviated for content):

- Application of water to outdoor landscapes in a manner that causes runoff
- Use of hoses to wash motor vehicles, except where a hose is fitted with a shut-off nozzle
- Application of potable water directly to driveways/sidewalks
- Use of potable water in ornamental or decorative fountains without a recirculating system
- Service drinking water a various establishment unless requested
- Irrigation of turf on public medians or public owned and maintained landscape areas except where it serves a community or neighborhood function

The City continues to work in partnership with Las Virgenes Municipal Water District to expand the use of this important local resource. The development of the infrastructure to use recycled water has taken decades to achieve at significant expense to the City and its residents, saving thousands of gallons of imported water each year. The City takes great pride in the actions taken on this water conservation achievement while continuing to provide aesthetically appealing landscape to the benefit of our citizens, businesses and visitors. The proposed prohibition on the use of recycled water for irrigating turf on public street medians and landscaped areas between the street and sidewalk ignores the investment the many municipalities, including the City, has made.

Prohibiting Wasteful Water Use Practices

December 20, 2017

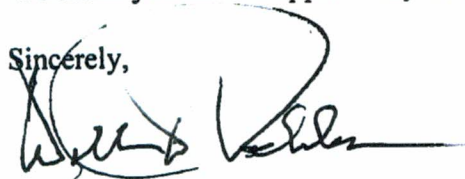
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The City currently uses a broad variety of plant types in its landscaping to maximize the appeal of city landscaping and minimize maintenance. This include many drought tolerant plants to further minimize water use. Also included in this mix of plant types is the limited application of turf as a textural and visual contrast to other plant types. As noted above, the City makes every attempt to use recycled water where it is available and uses only recycled water for irrigation of it public areas. When residents and visitors to our community see the purple landscape irrigation pipes, they know that we being environmentally responsible.

Finally, the City is very concerned about the cost to remove existing turf features and replace with an alternative plant type. This is contrary to the State Water Board's desire to expand the use of recycled water as a conservation measure itself. Rather than prohibiting one plant type, the Board should encourage other jurisdictions to expand the use of recycled water for irrigation as the City has already done. The City is respectfully requesting the Board to consider eliminating this portion of the regulation or to limit it only to potable water.

We thank you for the opportunity to comment on the proposed prohibitions.

Sincerely,

A handwritten signature in black ink, appearing to read 'William D. Koehler', with a large, sweeping flourish at the end.

William D. Koehler
Mayor

cc: Senator Henry Stern, 27th District
Assemblyman Richard Bloom, 50th District