



CITY OF YORBA LINDA

P.O. BOX 87014

CALIFORNIA 92885-8714



February 13, 2018

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 – Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices

Ms. Townsend,

Thank you for providing the proposed regulatory change 15 day notice. The City of Yorba Linda has reviewed the proposed adjustments to the regulations following our letter of 20 December, 2017 and appreciates the proposed changes. That said, we still have two major concerns. We have restated them below in somewhat different language and provided specific language in the hope that our further explanation may be helpful in further adjustments before presentation to the Board.

- 1) In Yorba Linda, all nuisance runoff is collected for Indirect Potable Reuse. Runoff is not reaching recreational use water bodies, but is collected in total in percolation ponds for recharging our local underground aquifer. This has been accomplished in partnership with the Yorba Linda Water District at significant expense. This was done before January 1, 2018. **Similar to the (4)(b)(1)G(iii) exception given to turf irrigated with recycled water, we ask that same exception be given to areas where runoff is recycled by systems such as indirect potable reuse in that sub paragraph, (i.e. "the turf that is irrigated with recycled water, or where turf runoff is completely collected for Indirect Potable Reuse, installed prior to January 1, 2018."**
- 2) As many other cities, we currently have hundreds of irrigation controllers that have timers that currently need to be adjusted by hand. This is impractical to keep sending folks out twice each rain event to hand change all these timers. Although we are working to install controller systems with remote control, group control and/or water sensors or weather activation, without support funding we are probably at least five years away and hundreds of thousands of dollars from completing those infrastructure additions Citywide. Therefore, **similar to the time extension granted in (4)(b)(1)(G) we ask that time, if not time and money, be provided for this mandated change of turning water off during and within 48 hours rain storms in (4)(b)(1) (E)** (e.g. "The application of water to irrigate turf and ornamental landscapes during and within 48 hours after measurable rainfall of at least one fourth of one inch of rain **begin immediately and be completed for all areas prior to January 1, 2023."**)

The City is also in support of the additional comments made by the Yorba Linda Water District and would encourage the Board to work with the District to resolve any outstanding concerns noted in their comment letter of February 14, 2018.

Thank you for your additional consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Pulone". The signature is fluid and cursive, with the first name "Mark" and last name "Pulone" clearly distinguishable.

Mark A. Pulone
City Manager

Cc: Public Works Director

General Manager YLWD