



MARK RUTHERFORD  
Mayor

NED E DAVIS  
Mayor Pro Tem

KELLY HONIG  
Councilmember

SUSAN McSWEENEY  
Councilmember

BRAD HALPERN  
Councilmember

December 13, 2017

State Water Resources Control Board  
Attn: Jeanine Townsend, Clerk to the Board  
P.O. Box 100  
Sacramento, CA 95812

Dear Ms. Townsend:

The City Council of the City of Westlake Village wishes to comment on the Notice of Proposed Regulatory Action regarding Conservation and the Prevention of Waste and Unreasonable Use (Title 23. Waters; Division 3. State Water Resources Control Board and Regional Water Quality Control Boards; Chapter 3.5 on Conservation and Prevention of Waste and Unreasonable Use).

While the City Council commends the Water Board for its efforts in reducing the wasteful use of water, we have a concern with the prohibition in the above-referenced Proposed Regulatory Action, which prohibits the irrigation of "turf on public street medians or publicly owned or maintained landscape areas between the street and sidewalk, except where the turf serves a community or neighborhood function".

Under the Executive Order signed by Governor Brown on April 25, 2014, the irrigation of turf using **potable water** was prohibited. The current proposed prohibition does not specify potable water and could be extended to the use of recycled or reclaimed waters, which are currently used to irrigate turf or ornamental turf in our street medians and parkways (an area specifically defined as turf between the street and sidewalk).

Currently our water provider, Las Virgenes Municipal Water District, discharges approximately 4,000 acre-feet of recycled water per year to Malibu Creek because there is not sufficient wintertime demand for the water. While the exact volume is not clear, this prohibition could increase that number by several hundred acre-feet or more per year.

Furthermore, there has been no period of time identified for the installation of revised irrigation and landscaping in the medians and parkways that would be required if this regulation is approved.

Regulating the use of recycled water for turf does not support the benefits that the Water Board has identified in the Notice of Proposed Regulations. The City urges the Water Board to review this prohibition and amend it to allow for the use of recycled and reclaimed waters for the irrigation of turf in medians and parkways.

Thank you for your careful consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Rutherford", with a long horizontal flourish extending to the right.

Mark Rutherford  
Mayor

cc:

- (1) [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)
- (2) file