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February 12, 2018

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Ms. Townsend:

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The Los Angeles Department of Water and Power (LADWP) supports policies and regulations that protect the environment, and believes that regulating wasteful water use practices is a necessary and important component of making water conservation a California way of life. LADWP would like to thank the State Water Resources Control Board (SWRCB) for considering our recommendations during the prior comment period, and for the additional opportunity to comment on the revised proposed regulations for prohibiting wasteful water use practices.

LADWP appreciates the incorporation of incidental runoff into the regulation so that water users are not unnecessarily penalized for small amounts of unintentional spray from irrigation systems onto sidewalks or other adjacent hardscapes. LADWP has two remaining comments regarding the regulations concerning wasteful water use practices being proposed for the California Code of Regulations, Title 23.

Article 2. Wasteful and Unreasonable Water Use Practices, Section 963 (b)(1)(G)

This section prohibits the irrigation of turf on public street medians or publicly owned and maintained landscaped areas between the street and sidewalk (parkways), with exceptions for community spaces, incidental runoff from tree watering, and recycled water systems installed prior to 2018.

While LADWP supports the prohibition of irrigating turf on medians, we recommend the complete removal of parkways from the list of prohibited uses. Parkways are often irrigated on the same intertwined irrigation system as the rest of the landscaping on the property. When considering the vast size of LADWP's service area, this will be a massive undertaking to investigate parkway responsibility and retrofit all existing irrigation systems connected with parkways.

Additionally, because the sizes of parkways are relatively small, the water savings from this prohibition would be minimal. Therefore, considering the extensive amount of resources it would take to implement the parkway prohibition and the minimal water savings, this is not a cost-effective program.

Overall, prohibiting the watering of turf in parkways would not have the same public-facing benefit as the prohibition on watering turf in medians. Moreover, the parkway prohibition would be much more complicated and difficult to implement and enforce. Therefore, LADWP strongly recommends to remove parkways entirely from the SWRCB's list of prohibited wasteful water uses.

Article 2. Wasteful and Unreasonable Water Use Practices, Section 963 (b)(1)(E)

This section prohibits the irrigation of turf and ornamental landscape during and within 48 hours after a rainfall event of at least "one fourth of one inch of rain".

LADWP has a service area of over 473 square miles, which is composed of many micro climates ranging from cooler coastal regions to hotter inland valleys. Rain events can vary significantly by microclimate, creating difficulty for LADWP to track and enforce prohibited outdoor watering by region. We recommend the "one fourth of one inch of rain" requirement be removed and replaced by the use of the term "measurable rainfall" event with no volumetric threshold.

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Thank you for your consideration of these comments. Should you have any questions regarding this letter, please contact Ms. Penny Falcon, Manager of Water Resources Policy, at (213) 367-4647.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Harasick', with a long horizontal stroke extending to the right.

Richard F. Harasick
Senior Assistant General Manager – Water System

PD:yrq
By e-mail
c: Hassan Rad (LASAN)
Penny Falcon