



915 L Street., Suite 1460
Sacramento, CA 95814
(916) 326-5800
CMUA.org

February 14, 2018



Sent via ELECTRONIC MAIL to: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Changes to Proposed Regulation Prohibiting Wasteful Water Uses Practices

Dear Ms. Townsend,

The California Municipal Utilities Association (CMUA), representing 43 public water agencies that serve over 70 percent of Californians, appreciates the opportunity to comment on the most recent draft of this regulation. While the new draft is a step in the right direction, CMUA has several additional recommendations.

The Final Regulation Must Explicitly Recognize Environmental Uses of Turf

CMUA reiterates our recommendation of adding the term “environmental” to subsection (b)(1)(G)(i). This change recognizes the important role turf plays in providing an environmental benefit. As currently constructed, the draft language does not limit the regulation to solely apply to recreational and civic purposes, however, the absence of the term environmental in the regulation and accompanying language in the Fact Sheet, implies the State Water Resources Control Board (Board) does not recognize the environmental benefit turf provides.

The Draft Regulation Does Not Recognize Long Range Planning of Projects

CMUA understands the draft regulation’s attempt to exempt existing spaces where turf is irrigated with recycled water, however, CMUA is concerned that the proposed date of January 1, 2018 in subsection (G)(iii) does not recognize that when creating or altering these spaces, public water agencies and municipalities engage in long term planning efforts. These projects routinely range from 5 to 10 years from concept to approval to completion. Requiring agencies to shift projects mid-stream or to abandon projects all together will result in increased costs and limit agencies’ desire to utilize recycled water. CMUA recommends removal of subsection (G)(iii) to encourage agencies to continue investing in recycled water systems.

Economic Feasibility Should Be Considered

CMUA appreciates the draft regulation allowing agencies up to January 1, 2025 to cease irrigation of turf-only medians and parkways. CMUA requests the regulation allow for additional time beyond 2025 when the conversion/alteration or replacement of turf and irrigation systems in parkways and medians would not be economically feasible for a public entity.

The Fact Sheet Does Not Reflect Regulatory Intent

As currently constructed, Question 9 of the Fact Sheet is unclear. CMUA recommends revising the answer to:

*“Yes, provided these landscapes are not **exclusively** turf and are...”*

Adding the word exclusively makes it clear that turf may be used as a component of a rain garden or bio-swale.

CMUA appreciates the opportunity to comment on the draft regulation and looks forward to working with the Board on this important issue. Please do not hesitate to contact me at 916-326-5806 or jyoung@cmua.org should you have any questions or need additional information.

Sincerely,



Jonathan Young
Regulatory Advocate
California Municipal Utilities Association

Cc: Honorable Members of the State Water Resources Control Board
Eileen Sobeck, Executive Director, State Water Resources Control Board
Max Gomberg, Climate and Conservation Program Manager, State Water Resources Control Board