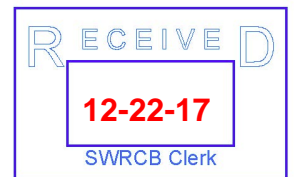


Office of the City Council



December 21, 2017

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Subject: Proposed Regulation - Conservation and the Prevention of Waste and Unreasonable Use

The City of Tustin appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the proposed regulation to permanently prohibit certain wasteful water uses.

The City is supportive of several of the proposals that would prohibit Californians from engaging in wasteful practices. In fact, our adopted Water Management Plan requires the following:

- Water Days: November 1 – March 31, 3 days/wk (Tues, Thurs, Sat); April 1 – October 31, 4 days/wk (Sun, Tues, Thurs, Sat);
- High Efficiency Sprinklers/Drip Systems: Maximum 15 min/station/watering day;
- All other Sprinklers/Irrigation: Maximum 5 min/station/watering day;
- Watering or irrigating lawns, landscaping, and all other vegetated areas is PROHIBITED between 6AM and 6PM;
- Watering or irrigating lawn or landscape while it is raining or for a period of 48 hours after measureable rainfall is PROHIBITED;
- No excessive water flow or runoff: causing or allowing excessive water flow or runoff onto sidewalk, driveway, the street, alley, or gutter is PROHIBITED;
- Fix leaks, breaks, or malfunctions IMMEDIATELY;
- Do not hose or wash down hard or paved surfaces such as sidewalks, gutters, driveways, patios, pool decks, parking area, tennis courts, or alleys, except to alleviate immediate fire or sanitation hazards;

- Wash down your vehicles with a bucket and/or hose with a positive shut off nozzle.
- All decorative fountains and water features must use re-circulated water;
- Restaurants/Cafes/Hotels serve water ONLY upon request; and
- Hotels prominently display, in each guest room, a notice providing guests the option of NOT having towels and linens laundered daily.

Furthermore, we have a dedicated code enforcement officer for water management plan enforcement.

We are doing our part; we expect the state to be fair and reasonable when it comes to utilizing recycled water in a prudent and sustainable manner for irrigation of existing turf medians and parkways. Our beautifully, fully developed, open space landscape areas of Tustin Ranch have all been methodically and carefully designed with the use of recycled water and includes a blend of trees, shrubs, and turf. They are mature and well maintained. All these areas have displayed signs identifying them as being irrigated by recycled water for decades. Signage is key – not only as a requirement for non-potable reuse regulations, it is a prominent display for the public to grasp, understand, and see the beneficial use of recycled water in action.

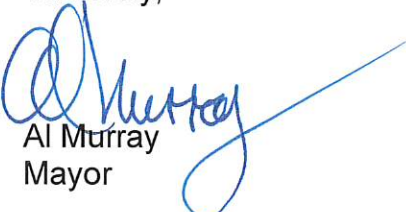
Although we no longer install turf median or parkways, our newly developed medians, parkways and open space within our Tustin Legacy (Marine Corp Air Station Base Reuse Plan) all utilize recycled water and drought tolerant landscaping.

Our recycled water provider, the Irvine Ranch Water District, began investing and developing recycled water technology well before it was fashionable to do so. They began this effort as good stewards of the environment back in the late 1960s and have been refining, expanding, and reinvesting in new technologies ever since.

We are not supportive of the draft regulations prohibiting the use of recycled water for existing turf medians. We urge the Water Board to reconsider and allow for the grandfathering of existing turf medians and parkways being irrigated by recycled water.

Thank you for your consideration.

Sincerely,



Al Murray
Mayor