



# LATE COMMENT

## Department of Engineering & Capital Projects



December 26, 2017

File # 0780-85-KY181

*Via Email Submission to:*

[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
**Attention:** Jeanine Townsend, Clerk to the Board

### **SUBJECT: COMMENT LETTER – PROHIBITING WASTEFUL WATER USE PRACTICES**

The City of Chula Vista appreciates the opportunity to provide comments on the State Water Resources Control Board (SWRCB) Proposed Water Conservation Regulations. While the City of Chula Vista supports State Water Board's efforts to conserve water, we have comments on the Proposed Water Conservation Regulations that we believe will improve their overall effectiveness. Our comments are provided in the attachment to this letter.

Also, we would like to express our general support of the comments provided by the California League of Cities.

Thank you for your consideration of our comments. If you have any questions, please contact me at (619) 409-5976 or at [wvalle@chulavistaca.gov](mailto:wvalle@chulavistaca.gov).

WILLIAM S. VALLE  
DIRECTOR OF ENGINEERING AND CAPITAL PROJECTS

cc: Richard A. Hopkins, Director of Public Works  
Iracsema Quilantan, Assistant Director of Public Works  
Nicola Kavanagh, Principal Civil Engineer  
Marisa Soriano, Environmental Health Specialist

Attachment

## ATTACHMENT 1 – Comments on Proposed Water Conservation Regulations

- 1) The proposed regulatory actions are State-wide, and may cause undue burden on areas where the effects of drought are not as severe. The State Board should build in flexibility to implement these regulations at the regional or local level. Not all regions of the State have the same kind of demand for water, and the regulations should account for differences in climate throughout the state.
- 2) The regulations should be aimed at limiting potable water use. The City of Chula Vista uses reclaimed water in many of its parkways and public areas, which offsets the need to use potable water. Parkway that use reclaimed water should be taken into consideration and not be subject to turf removal regulations.
- 3) City of Chula Vista has made significant strides in promoting various water conservation programs via its residential education program, particularly with outdoor potable use. Residents are encouraged to plant drought-tolerant vegetation, install efficient irrigation systems, use greywater for irrigation of landscaping, and to harvest rain water. Additional funding support should be provided to municipalities to promote these types of water capture and reuse programs within their jurisdictions.
- 4) Turf removal and replacement is costly. If irrigation on parkways is prohibited, funding mechanisms need to be available for public agencies to implement turf removal and replacement programs, in addition to weather-based irrigation controllers. The San Diego County Water Authority currently has rebates for residents to remove turf and replace it with drought tolerant vegetation or artificial turf, as well as rebates for weather-based irrigation controllers. Funding for these types of rebate programs should be expanded for public agencies in order to implement the proposed regulations.
- 5) Enforcement of these regulations should not fall solely on municipalities. Since the regulations are aimed at water conservation and the City of Chula Vista is not a water supplier, there needs to be follow through from water purveyors in terms of enforcement, particularly when enforcing on private properties.
- 6) Once the regulations are adopted, sufficient time should be allowed to make conversions, particularly those involving turf removal. A phased approach should be considered to give public agencies the time to complete necessary studies, implement fees as appropriate, apply for applicable rebate or incentive programs, and plan projects for these conversions.