



April 22, 2015

Ms. Jessica Bean
State Water Resources Control Board
Jessica.bean@waterboards.ca.gov

RE: DRAFT MANDATORY REGULATIONS RESTRICTING WATER USE IN CALIFORNIA DATED April 18, 2015

Dear Ms. Bean:

The City of Lakewood appreciates this opportunity to provide comments on the draft mandatory regulations restricting water use in California dated April 18, 2015. The City applauds Water Resources Control Board (State Board) staff in developing a nine tiered water reduction approach to more equitably allocate the conservation savings necessary to reach the statewide 25 percent conservation mandate. To assist in achieving this goal, the City of Lakewood requests that the following comments be considered prior to the release of the final regulations that will be brought before the State Board for adoption early next month.

1. The State Board has tasked water agencies with conserving 25 percent of water statewide without financial assistance in implementing conservation programs.

Discussion: Similar to other water agencies, the City of Lakewood's revenues have been negatively impacted as a result of water conservation. The City forecasts a \$1.5 million drop in revenue for FY 2014/15 and double that for FY 2015/16 should we meet our conservation mandate.

Solution: The City of Lakewood would appreciate it if the State Board would formally acknowledge that in light of water conservation; agencies still have operating, capital, and debt service revenue requirements to meet, along with costs of increased staff time dedicated to enforcement. These issues should be addressed in "Ordering Provision 8". By the State Board formally supporting that these costs can be independent of each other, water customers may be less resistant to water rate increases.

Lakewood

2. The Draft Regulations Implementing 25% Conservation Standard fact sheet End User Requirements states that *"It will be very important as these provisions are implemented to ensure that existing trees remain healthy and do not present a public safety hazard"*.

Discussion: The City of Lakewood, along with many other water suppliers has medians that contain both trees and ornamental turf. In light of the above statement, how would the State Board suggest trees are watered to remain healthy while not irrigating the turf surrounding the tree?

Solution: The City of Lakewood is in the process of developing alternative watering plans to meet the State Board's tree watering standards as well as minimize watering of ornamental turf with potable water. Examples include watering trees using a 1,000-gallon water wagon filled with reclaimed water or deep watering using a spike or watering using a dip valve, etc. However, these plans take time to implement and our tree-lined medians are already under drought stress as a result of the City reducing median watering to the minimum last year. Therefore, we ask that the State Board consider a compromising approach which limits watering of tree-lined medians to twice per week for tree health, public safety, and sediment control.

3. Article 22.5, §863(3) "prohibit irrigation with potable water of ornamental turf in public street medians"

Discussion: An unintended consequence of the above prohibition is the impact to Total Daily Maximum Loads (TMDLs) and/or the listing of priority pollutants for metals in the Los Angeles County National Pollutant Discharge Elimination System (NPDES Permit No. CAS004001). Many Los Angeles Cities have determined that a Total Suspended Solids (TSS) reduction strategy needs to be undertaken involving both non-structural and structural measures in order to help reach the metals TMDL requirements adopted by the State Board. This entails landscaping, erosion, and sediment control of significant sources of exposed dirt. Browned medians results in increased sediment exposure which ultimately leads to increased metals and legacy organics transported to receiving waters by urban runoff and rainfall.

Solution: Limit irrigation with potable water of ornamental turf in public street medians to twice per week for sediment control. This will allow agencies time to mitigate long-term solutions to ensure compliance with TMDL/NPDES while lessening the use of potable water. In the interim, agencies should be required to devise plans for alternatives to potable water use in medians that is based on ratiocinative decisions.

Lastly, the State Board should consider implementing a statewide public outreach campaign to promote the message of conservation. As part of the outreach, water

agencies should be able to order or download marketing materials that fosters the consistent message of working together to meet the Governor's 25 percent conservation goal. Also, by providing advertisements, social media marketing, and print ready publication materials, water agencies can spend more time spreading the message instead of creating it.

We appreciate the opportunity to provide input on implementation of the Draft Mandatory Regulations Restricting Water use in California. Should you have any questions regarding these comments, please contact me at 562.866.9771 ext 2701 or via email at JGlancy@lakewoodcity.org.

Sincerely,



James B. Glancy
Director of Water Resources