



**City of  
Arcadia**

**Public Works  
Services  
Department**

Tom Tait  
*Public Works Services Director*

(11/21/17) Public Workshop  
Prohibiting Wasteful Water Use Practices  
Deadline: 12/26/17 by 12 noon

December 18, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000



Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Ms. Townsend:

The City of Arcadia respectfully writes to express strong concern in regards to the proposed regulation under Article 2, section 963, subdivision (b)(1) prohibiting:

(G) The irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk, except where the turf serves a community or neighborhood function;

The latter portion of this proposed regulation prohibiting irrigation on the publicly owned landscaped areas between the street and sidewalk is highly intrusive to many cities, including Arcadia. In most cases, these turf areas of the public right-of-way are small in size and often contain publicly owned trees. Furthermore, Arcadia residents willingly provide landscape maintenance for the publicly-owned turf areas and trees adjacent to their property line, which they consider an extension of their homes. The proposed regulation would effectively encroach on how municipalities and residents manage maintenance of public right-of-ways, thus changing dynamics of shared responsibility and the character of the Arcadia community.

While the City fully supports the State Water Resources Control Board's efforts to prohibit water waste and establish long-term water conservation, we cannot support the latter portion of this proposed regulation. To date, the City has expended and earmarked significant resources to replace 2.5 acres of center median turf grass with drought tolerant plants, mulch, and drip irrigation. An additional 5.7 miles of center median turf replacement is planned and underway, with completion projected in 2020.

For these reasons, the City of Arcadia respectfully requests the rulemaking committee to remove the language in the aforementioned prohibition with respect to how cities manage their public right-of-way in their communities.

Sincerely,

Tom Tait  
Public Works Services Director

cc: Dominic Lazzaretto, City Manager