



March 11, 2015

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STATE WATER RESOURCES CONTROL BOARD
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**Subject: 3/17-18/15 BOARD MEETING, ITEM NO. 7,
CONSIDERATION OF A PROPOSED RESOLUTION
AMENDING AND READOPTING DROUGHT-RELATED
EMERGENCY REGULATIONS FOR URBAN WATER
CONSERVATION - COMMENTS**

Dear Chair Felicia, Vice Chair Spivy-Weber and Board Members:

The Rancho California Water District (RCWD/District) appreciates the opportunity to provide comments on Item 7 of the 3/17/15 State Water Resources Control Board (State Water Board) Agenda. We respectfully submit the following comments on the *Proposed Text of Emergency Regulation*:

1. A statewide prohibition to "limit outdoor irrigation of ornamental landscapes or turf with potable water...to no more than two days per week" (Sec. 865 (c)) is a wholesale prohibition that fails to deliver equity to each of the many climate regions throughout the state. While such a prohibition would not require an efficient irrigator caring for an irrigated landscape in some of the northern portions of the state to make any significant changes to their water use behaviors, and thereby see little to no adverse impacts to their irrigated landscapes in terms of plant health and overall landscape value, an irrigator managing irrigated landscapes in the warmer southern parts of the state would be required to drastically change their water use behavior, and in doing so, would likely lose a large portion of their irrigated landscapes to permanent plant wilt. Therefore, the inequities resulting from the proposed prohibition would include greater impacts and economic loss (i.e., property values) for those living in the warmer parts of the state.

Since RCWD is eager to do its fair share in helping to accomplish the water demand reduction goals of Governor Brown and the State Water Board, the District recommends that the proposed prohibition be modified using a more in-depth analysis that looks at plant water requirements, soil types, and regional weather factors to develop customized and equitable prohibitions for each of the state's climate regions.

2. The “Proposed Text of Emergency Regulations” (Sec. 865(B)(2)) includes specific language that allows an urban water supplier to submit a request for approval of an alternate plan to the restrictions on the number of days of outdoor irrigation. However, none of the other supporting documents – “*Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation*”, “*Notice of Proposed Rulemaking*”, or the “*Emergency Regulations Digest*” – mention or explain that this alternative is available to urban water suppliers.

The District recommends that State Water Board staff includes and provides in their reports to the Board Members a more in depth review of an acceptable and expected level of analysis for an alternative plan. As discussed in item 1 above, each state has unique climate regions with varying irrigation needs, which will greatly the analysis.

Further, since the Emergency Regulation currently includes “mandatory restrictions on the number of days that outdoor irrigation...is allowed”, which provides the urban water supplier the ability to choose the number of irrigation days up to six days, which is considered reduced watering days. Therefore, the District recommends, in this case, the request for approval of an alternative plan should not be compared to two days per week, but rather six days per week, which appears to be the maximum allowed under the proposed Emergency Regulation to meet the “mandatory restrictions on the number of days...outdoor irrigation...is allowed.”

Thank you for the consideration of our comments and recommendations. You may contact me at landstedtd@ranchowater.com or (951) 296-6916 or with any questions.

Sincerely,
On behalf of the

RANCHO CALIFORNIA WATER DISTRICT



Denise Landstedt
Senior Water Resources Planner

