

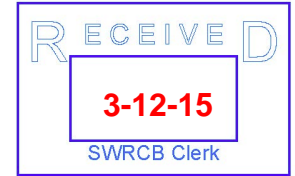


# City of Santa Barbara

Public Works Department

(3/17-18/15) Board Meeting- Item 7  
Urban Water Emergency Regs  
Deadline: 3/16/15 by 12:00 noon

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March 12, 2015

To: State Water Resources Control Board

Re: 3/17-18/15 Board Meeting, Item 7: Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation.

Dear Clerk to the Board,

Thank you for the opportunity to comment on the proposed water use regulations. Your action is timely given the low rainfall experienced this winter, and conservation is a significant tool in dealing with the drought. We call your attention to the following points:

- We are very familiar with drought response, having achieved a 45% reduction in 1990, and retained a 20% long term reduction after that drought, with additional savings of 21% during the current drought. Much of these efforts have focused on educating customers on proper irrigation scheduling to maximize efficiency and maintain proper plant health. Experience shows that restrictions based on days of the week will cause many customers to water on those days whether or not the landscaping needs irrigation. Limiting irrigation to two days a week could cause a loss of water savings and would be a significant setback in the progress we have made in educating customers on appropriate irrigation scheduling, including the use of smart irrigation controllers, and possibly cause an increase in water use and abandonment of smart irrigation techniques in favor of arbitrary twice per week scheduling.
- Many large irrigators, such as parks, schools, and golf courses will be unable to complete all necessary irrigation during the preferred evening hours when limited to two days a week due to pressure and flow limitations. We ask that turf used for recreation and large ornamental landscapes such as parks and public open spaces be made exempt from the two day per week watering requirement.
- Given the above, we ask that the Board consider achieving the State's 20% conservation goal to be an optional method of complying with the new regulations, in particular the two day per week irrigation limit. We understand and share the concerns raised on the phone call with your staff about making the 20% a mandatory target, but believe it can be effectively used as one method to demonstrate that serious conservation efforts are being made. In support of this, we reference Water Code Section 10632.(a) (5) regarding urban water management during droughts:

“Each urban water supplier may use any type of consumption reduction methods in its water shortage contingency analysis that would reduce water usage, are appropriate for its area, and have the ability to achieve a water use reduction consistent with up to a 50 percent reduction in water supply.”

Thank you for your time and consideration of these comments.

Sincerely,

 , on behalf of

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