

April 16, 2015  
State Water Resource Control Board  
Sacramento, CA 95814  
Delivered by email



Re: Item 7 on the Agenda for March 17, 2015, Proposed Emergency Regulations on Urban Water Suppliers

Dear Chairwoman Marcus and Members of the Board,

Congratulations on a proposed update in the regulations on urban suppliers which shows more clearly what the minimum restrictions on outdoor irrigation should be. Press coverage of these proposal has already indicated that you will be hearing, as usual, calls to provide more flexibility in the regulations. This letter is to urge you to hold firm on minimum standards of what is expected.

There are several reasons for doing this which I enumerate here:

1. The current regulations adopted in 2014, with broader language, have failed to meet the desired 20% reduction in water usage that is the purpose of the regulations.
2. Clear regulatory language which sets the same board across the state, with few exceptions will be perceived as fairer than allowing different agencies to apply different rules to their customers.
3. Clear expectations as articulated in sections 864, and 865(c) are easier to understand than the conditional language found in the 2014 regulations and in other parts of this proposal.
4. Irrigation restrictions of two days a week or less can be enforced through visual monitoring, and neighbors can help increase a water agency's ability to monitor violations through observation and reporting of same.

Irrigations restrictions save water and are consistent with natural plant responses to regular shortages of water in non-irrigated landscapes.

The requirements under proposed regulation 865(c) are consistent with agronomic research on the use of water and health of turfgrass species which are adapted to arid and semi-arid climates. In other words, even with high summertime temperatures, turfgrassess which are appropriate for California's Mediterranean climate will not only survive, but will develop stronger longer roots systems if they are watered twice and week and no more.

The turf may show signs of stress at the peak of summertime high temperatures, but research in California, Nevada and Arizona has shown that turfs can survive and recover from these stresses. Not only do the plants survive, but research focused on plant physiology has shown that they adjust t their internal mechanisms for dealing with water shortages, and respond more quickly to future dry periods with the natural mechanisms which preserve plant life until sufficient water is available.

For the reasons stated above, and the fact that plants have the ability (these abilities vary by plant type, age, and circumstances) to respond to water shortages by reducing their water use, thus saving water in the environment, I encourage you to adopt the regulations on urban water suppliers as drafted.

As you well know, this is not only a historic drought we are experiencing now, but in all likelihood, as Jay Famiglietti and other climate scientists have pointed out, we are at the beginning of significant changes in our hydrologic cycle and the challenges to manage water and ensure a healthy environment, for humans, animals and plants, will only become more severe.

We will be engaged in many future steps to change the way we manage water in California over future years. I encourage you to give this process a strong foundation for success in 2015 and the future, by adopting clear and enforceable regulations as stated in paragraphs 864 and 865(c).

Sincerely yours,

*Chris Brown*

Chris Brown

Consultant and Author on Water Conservation and Drought Response