



January 11, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Via email: commentletters@waterboards.ca.gov

Subject: **Comment Letter – Urban Water Conservation Workshop**

Dear Ms. Townsend:

Commenter

The California Alliance for Golf (CAG) is incorporated under the Laws of the State of California for the purpose of congealing the state’s normative golf organizations/associations/businesses into one organization that can credibly purport to speak on behalf of the California golf industry in the public arena. Among the organizations comprising the Alliance are: Northern California Golf Association, Southern California Golf Association, Northern California PGA Section, Southern California PGA Section, California Golf Course Owners Association, California Golf Course Superintendents Association, Golden State Chapter Club Managers Association of America, and the Southern California Municipal Golf Association. The comments that follow are submitted on their behalf.

Comments

The California golf community appreciates the opportunity to provide comments regarding the three (3) specific questions posed by SWRCB in its “Notice of Public Workshop Document” re “extension and potential modification of the Current Emergency Regulation for Statewide Urban Water Conservation.”

In response to SWRCB’s 1st inquiry regarding those elements of the May 2016 Emergency Regulation that should be modified either immediately or subsequent to full knowledge about the hydrology of the current water year, we would endorse maintenance of the extant May 2016 protocols that permit self- certification of conservation standards based upon a supplier’s water supply reliability assessment of its capacity to meet demand should

drought conditions persist through 2019. At any time that a “fuller knowledge” of current precipitation would indicate a need to move with dispatch to achieve savings over and above the more measured savings achieved by the May 2016 protocols, a “need” which is nowhere in sight at the moment, SWRCB has the ability under Executive Order B-37-16 to move with the dispatch necessary to achieve them. There is no need to anticipate that “need,” particularly in light of preliminary precipitation results that are counter-indicative.

The California golf community believes that the May 2016 protocols represented a vast improvement over the first iteration in that they incorporated a heavy measure of local control, local supply and local circumstance therein. Statewide “command and control” may have been necessary to ignite the large and massive conservation response dictated by an acute emergency, but it was at best a necessary evil, not an example of good long-term public policy.

With respect to the 2nd part of SWRCB’s 1st inquiry, we would submit that while wholesale adjustments to suppliers’ initial conservation standard calculations should be discouraged, some allowance therefore ought to be permitted, with that “allowance” limited to rectifications of error and/or significant changes in circumstance. To the extent to which SWRCB would agree with the need to allow for a limited recalibration, the precise methodology to enable the allowance is the proper province of a collaboration between urban providers and SWRCB, not 3rd party stakeholder beneficiaries.

In response to SWRCB’s 2nd inquiry regarding a model that would account for regional differences in drought impact and/or snowpack, we would submit that in directly correlating conservation mandates with local supply, the May 2016 model already provides the differential impact implicit in the question. There is thus no need to make additional tweaks in this regard.

In response to SWRCB’s 3rd inquiry, we would reiterate our belief that the May 2016 protocols represented a vast improvement over the first set of emergency orders in 2015. Statewide command and control may have been necessary to meet the exigencies of the 2015 moment, but it is a flawed model to the degree to which it focuses on standardized means as opposed to standardized results and to which it fails to distinguish between those agencies, regions, stakeholders, etc., that have demonstrated past conservation efficiencies/results and those that have performed poorly in that regard. Good public policy rewards the thrifty while punishing the profligate. In too many instances the first iteration of emergency regulations did the opposite.

To the extent to which SWRCB needs to adopt something over and above the 2016 Emergency Regulations, and we do concur in the wisdom of doing just that, we would implore the Board to incorporate a much larger degree of equity therein as well as a much greater focus on the incentives and disincentives created thereby.

Again, thank you for the opportunity to submit these comments. Should you have need of further clarification please feel free to contact CAG President Chris Thomas at csthomas@pgahq.com or me at ckessler@scga.org.

Respectfully submitted on behalf of the California Alliance for Golf (CAG) by,

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