



May 1, 2015

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: COMMENTS ON PROPOSED EMERGENCY RULEMAKING ON GOVERNOR JERRY BROWN'S EXECUTIVE ORDER ON SEVERE DROUGHT

Dear Clerk of the Board:

Thank you for allowing us the opportunity to comment on the proposed water usage regulations. THE ARDEN PARK RECREATION AND PARK DISTRICT is located in unincorporated Sacramento County. Our residents, community partners, and local governing agencies have worked hard to manage our region's water supply. We realize that conservation is an important tool during this drought; and, I would like to take this opportunity to express our concerns.

Our agency delivers the recreational needs of our community by providing parks that allow our residents a place to congregate and play. Over the past 60 years, our park system has been established through local community efforts, and state grant funding, which have allowed us to develop active park space for our residents. We have established a commitment to provide an increased sense of lifelong enjoyment, and enhance the quality of life in our community.

Under the current restrictions, THE ARDEN PARK RECREATION AND PARK DISTRICT would only be allowed to water twice a week in the evening hours. We are unable to complete the minimum necessary irrigation at any of our facilities in the allotted timeframe, and our extensive experience is that water savings is realized by applying the right amount of water at the right time to maintain plant health and avoid wasteful practices such as unneeded deep watering and/or run off. The purpose of the irrigation system is to support the health and viability of the managed landscape by delivering the correct amount of supplemental water in the absence of natural precipitation. Our irrigation and horticultural knowledge comes from our extensive training, experience and micro-climate monitoring of our landscape system. Yes, this is a science to us, and our team of professionals demonstrates responsible stewardship of water resources. Significant investment has been made to incorporate these "Best Management Practices" to irrigate only the amount of water required for sustainable plant life.

We are requesting that turf used for public recreational spaces, such as our parks, be made exempt from the two day per week watering requirement. Without this provision much of our existing recreation turf would become stressed and damaged to the point requiring replacement, exacting a heavy financial cost to our agency. In addition, one can only imagine the potential detriment to the health and wellbeing of the children and adults in our community if the turfed areas of our parks are lost. It would be years before our agency would be able to replace these turfed areas, if at all, when taking into consideration that newly installed turf requires even more water than established turf.

We are in support of our residents' continued conservation. With the parks and facilities that we operate, our fiscal responsibility is to already be water conscious; consequently, we take water conservation seriously. Through our water use stewardship, we have been able to reduce our potable water usage, and our commitment has been to apply the least amount of water to meet the minimum plant requirements. Further reductions will most certainly be devastating to our facilities.

As mentioned earlier, each day many residents use our facilities and programs throughout our District. Please remember the impact parks and recreational facilities have had on each of you, your families and communities. **Parks are a vital service to communities throughout California and every effort should be taken to preserve them for the betterment of all Californians.**

THE ARDEN PARK RECREATION AND PARK DISTRICT respectfully requests that you keep these facts in mind as you consider your decisions may impact communities throughout the state.

Sincerely,



Colin Miller
District Administrator