

July 14, 2014

The Honorable Felicia Marcus, Board Chair  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Delivered via email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Comment Letter – July 15, 2014 Board Meeting-Item 10: Emergency Water Conservation Regulations**

Dear Ms. Marcus:

We the undersigned wish to make the following observations and recommendations to the California State Water Board.

**Overview**

We believe California's drought represents a critical threat to multiple essential sectors of the state's economy, but we also believe the drought represents a rare opportunity to implement conservation initiatives that not only save water this year but for years to follow.

Specifically we are respectfully requesting that the Water Board:

1. Include in its pending drought response regulations that commercial sites with EPA Water Sense certified Smart Irrigation Controllers installed are exempt from water day restrictions,
2. In order to ensure water savings, the governing water agency has the right to request a water use report for the site and if waste is found and is unable to be addressed in a timely fashion, the governing water agency has the right to rescind the exemption for that site.

Many of the undersigned have adopted smart irrigation systems in their sites across the country and California specifically. These companies have independently verified their savings and improved landscape health. Forcing these sites to adopt watering day restrictions will needlessly place their landscape assets at risk while failing to achieve the desired increase in water savings. Many of the country's most successful companies have implemented smart irrigation on their sites, and that is especially true for companies with California headquarters as you can see from the signatures below. The proposed changes above are similar to ones implemented in other states with great success.

## **The Challenge & The Opportunity**

Historically, one of the greatest challenges to implementing meaningful water conservation initiatives is simply getting people to take action. Except in times of scarcity, the average household or business owner takes water for granted and therefore pays little attention to their water use and areas of waste. The drought has, for now, made water conservation a priority topic and we believe the California Water Board has the opportunity, through this proposed exemption to accelerate adoption of EPA Water Sense certified smart irrigation controllers.

Having a large majority of California landscapes irrigated by smart irrigation controllers would allow not only the ability to eliminate waste but also, if necessary, a 'smart water grid' that would allow the rapid implementation of any new emergency reductions. Furthermore these new reductions could be done with a greater degree of intelligence, specifically reductions that target lower cost landscape assets (turf) while protecting high cost and hard to replace landscape assets (trees).

## **Why Smart Irrigation**

It has been universally accepted that the first step in meaningful conservation of any resource is visibility. We all have heard the simple maxim: if you cannot measure it you cannot manage it. With the 'internet' of things rapidly becoming a reality across a host of applications, we are now able to not only measure "it" but we can now measure "it" in real-time thereby providing property and water managers the ability to quickly respond to waste and leaks before significant loss has occurred.

Of course, this ability to leverage real-time use data to identify waste and leaks is the basis for the broad interest in the smart grid for electricity. Our position is that this drought offers California a unique opportunity to accelerate adoption of EPA certified, proven smart irrigation technologies that essentially provide a smart water grid for the last mile of the water network, the end use sector, where the majority of urban water waste can be eliminated.

The state of California has been investing in smart irrigation adoption for the last decade in the form of rebates and legislation. This is only fitting, as California is where smart irrigation was first tested and developed. Though well documented it is worthwhile to highlight why smart irrigation represents a fundamental conservation 'igniter' for broad scale water conservation success.

1. Smart irrigation creates a site and zone specific water schedule that changes as the weather changes and thereby applies the right amount of water at the right time.
2. Smart controllers have been studied by water agencies and found to reduce urban runoff by 50-71%; [www.mwdoc.com](http://www.mwdoc.com)

3. With cloud-based central control, water managers can efficiently and remotely adjust thousands of controllers from one location thereby providing the ability to respond quickly and at low cost to new irrigation requirements
4. Smart irrigation systems have reporting capabilities that not only allow managers to verify that they are complying with water window restrictions but also to identify irrigation system issues, such as leaks, that need immediate attention.
5. Smart irrigation is not just environmentally sustainable it is economically sustainable with most sites realizing a payback of anywhere from 12 to 24 months.
6. Smart irrigation allows Landscape Contractors the ability to quantify and report on the economic benefits of upgrading the entire irrigation system with drip, high efficiency heads and other upgrades.
7. Smart irrigation ensures native plants are properly irrigated and not 'trained' to be water hungry due to overwatering.

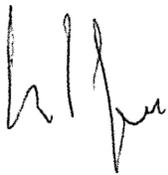
### **Recommendations**

In summary, our respectful suggestion to the Water Board is to consider the following:

1. The drought represents an opportunity to leverage the public's current focus on water to make material long-term change.
2. It is possible to achieve meaningful water conservation goals AND protect our landscape assets - if proven technology and solution providers are used.
3. Allow commercial sites that have an EPA Water Sense certified, smart irrigation controller installed to be exempt from water day restrictions
4. Allow water agencies the right to request a water use report from the system which if water waste is determined to be occurring and is not resolved in thirty days the agency has the right to rescind the watering day exemption for that site.

We appreciate your time considering our suggestions and would look forward to answer any questions you may have. Please contact Chris Spain, CEO HydroPoint Data Systems at [cspain@hydroPoint.com](mailto:cspain@hydroPoint.com) or (707) 338-5699.

Respectfully,



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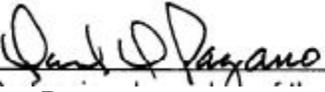
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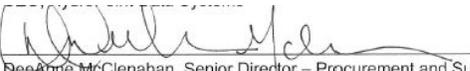
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