



Dear Ms. Townsend:

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

The Southern California Golf Association (SCGA) is a 115-year old non-profit organization composed of 1,200 golf clubs, 435 golf courses, and 155,000 individual members. The following comments regarding the "Emergency Water Conservation Regulations" on the July 15, 2014 agenda of the State Water Resources Control Board are submitted on their behalf.

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Section X.2 (e) of the "Proposed Text of Emergency Regulations" requires each distributor of a public water supply to (1) limit outdoor irrigation by persons it serves to no more than two days per week or (2) implement another mandatory conservation measure or measures intended to serve a comparable reduction in water consumption by the persons it serves relative to the amount consumed in 2013.

Allow us to point out that the City of Los Angeles' Emergency Water Conservation Ordinance and the City of San Diego's Drought Restrictions Ordinance apply both alternatives – day of week/time of day restrictions to residences and businesses that are not turf specific and "another mandatory conservation measure" to turf specific or "large landscape" entities such as golf courses, cemeteries, parks, and sports stadia, all of which have one overarching reality in common: They are not amenable to day of week/time of day restrictions but are amenable to alternative mechanisms capable of accomplishing measurable water conservation – in the cases of both of these two largest California cities "measurable conservation" that exceeds by an Ordinance mandated 5% the conservation goal of the day of week/time of day restrictions applied to non "large landscape" properties.

Los Angeles Water & Power and San Diego Public Utilities assign water budgets to golf courses per the formula embedded in AB 1881 and then require that each irrigate at no more than an amount prescribed in each "phase" or "level" of their drought ordinances plus an additional 5% reduction. For example, in Los Angeles, which has remained in a "Phase II" situation continuously since the Emergency Water Conservation Ordinance was adopted in 2009, each golf course is required to irrigate at no more than 80% of its LADWP assigned annual water budget – the 15% goal of Phase II reductions plus 5%. The penalty for failing to comply is withdrawal of the alternative privilege, leaving the golf property subject to the day of week/time of day restrictions applied to non-large landscapes. The drought "Levels" in San Diego's Ordinance are not number specific; the goal of each is called by the Mayor's Office depending upon the circumstances of the moment. For the city's golf courses that means the Mayor's declared number (it was 8% during the last drought) plus that additional 5%.

Los Angeles Water & Power reports that the golf courses it services have averaged a 23% reduction per those AB 1881 assigned budgets, putting both the provider and its golf courses in position to up that particular ante should conditions merit the calling of Phase III or Phase IV under the Ordinance's provisions. The same holds true for San Diego and the smaller jurisdictions/providers that have begun to emulate these two large cities.

These alternative protocols allow water suppliers to accomplish measurable savings in a manner conducive of good business and agronomic practices for large landscape entities such as golf courses. The golf industry is capable of coping with percentage reductions; it cannot thrive under day of week/time of day restrictions. The goal here is water conservation, not slavish adherence to specific means for accomplishing this agreed upon end.

The language in the Regulations before you today certainly enables the continued practice of these alternative protocols and their adoption as part of a supplier's drought contingency plan. However, many small overworked and overburdened small suppliers in the state have no knowledge of this better practice and upon reading the simple day of week prescriptions contained in these proposed regulations, may forgo this more complicated better practice in favor of what they may perceive as this Board's preferred alternative. Their specificity in conjunction with their placement as the first alternative makes this a reasonable assumption, albeit one that we do not believe is the intention of Board or Staff.

Thus, we would ask Board and Staff to consider the insertion of the smallest of specific references to these Los Angeles and San Diego "alternative mechanisms" in the language of X.2 (c) (2) of the proposed regulations.

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On behalf of the Southern California Golf Association's member clubs, courses and individuals I want to thank you for considering our comments.

Respectfully Submitted,

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