



State Water Resources Control Board
Clerk to the Board

Sirs:

I support the Board in its efforts to adopt statewide emergency regulations for water conservation. I believe we all agree that reducing waste in outdoor irrigation is a significant opportunity for saving water.

With regard to proposed regulation X.2(e)(1), I believe limiting outdoor irrigation to two days per week may be counter-productive. I use a watering time calculator, <http://runtime.hunterindustries.com/>, to set irrigation timing. According to that calculator, the recommended schedule for turf areas on my property is 3 days per week. If the schedule is limited to two times per week, the run times are increased by 50%. In other words, that calculator applies the same amount of water per week whether it is applied on two or three days. However, if the water is applied on two days rather than three the watering continues into the midday, the length of watering will be more prone to producing run-off, and the water will soak deeper into the soil, potentially irrigating below the roots that most effectively use the soil water. Thus a two day per week schedule is likely to be less efficient than a three day per week schedule. While I appreciate that it is necessary to provide a simple regulation that will result in a reduction of water use by those who give little thought to how their irrigation water is applied, e.g. those who run their sprinklers every day, I think it is important that the regulations also allow for the most efficient use of irrigation water.

I would suggest that X.2(e)(1) be amended to read:

(1) Limit outdoor irrigation by the persons it serves to no more than two days per week unless the outdoor irrigation is controlled by an automatic timer that has been programmed to a schedule determined by an irrigation schedule calculator approved by the State Water Resources Control Board;

If that is considered too complex, then I would suggest permitting outdoor irrigation of "no more than three days per week".

With regard to proposed regulations X.1(a)(1) and (3), I am concerned that the prohibition of run-off and application of water to a hard surfaces may lead to over zealous enforcement for sprinkler usages that will be difficult for the average homeowner to control. I have been replacing existing sprinklers with high efficiency rotator type sprinklers for some time in an effort to reduce run-off. While I have reduced run-off, I have not yet been able to eliminate it despite hours of testing and adjustment. Residential landscaping is often too small and irregularly shaped to allow sprinklers to be adjusted to completely avoid applying water to hard surfaces and creating run-off.

I would suggest that X.1(a) be amended to read:

(1) The application of water to outdoor landscapes in a manner that causes reasonably avoidable runoff ...

(3) The application of water to any hard surface not incidental to an action that is otherwise the subject of this subdivision, ...

Thank you for your consideration of these comments and suggestions and for your efforts to conserve water in California.

James Henry,
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