



March 12, 2015

To: State Water Resources Control Board

From: Andrew Walker, City of Fairfield

Re: Comments on the 48 hour requirement in the newly proposed Emergency Regulations

After reviewing the requirement to cease “the application of potable water to outdoor landscapes during and up to 48 hours after measurable rainfall”, I think it is important to detail the difficulty of this task and the implications of imposing this action. Note that these difficulties only apply to irrigation systems that do not have functioning rain-sensing systems in place. I will break these down between residential customers and large landscapes.

Residential Concerns:

- 1) The first concern of households is that they may not be home in a rain event to turn the water off. Fairfield has a substantial commuter population and is a fairly new community where there are several subdivisions. Most homes have an irrigation system. Just on the basis of 25,000 homes in Fairfield, there could potentially be thousands, or tens of thousands of households which have irrigation systems automatically come on over the course of a rain event and the 48 hours afterward. Not only can city water utility staff not monitor that many households, the selective enforcement elements of penalizing only the ones you catch could quite easily be overturned in court.
- 2) A second concern relates to citizen reports of watering in the rain (or in the 48 hours afterward). Most likely, the policing elements could not arrive on the scene to witness the infraction and issue a warning/citation in a timely manner. The frustration caused by the lack of adequate enforcement would certainly land in the SWRCB phone bank. It is quite feasible that the SWRCB could receive tens of thousands of complaints that cities/water agencies were not enforcing this regulation with adequate vigor or capriciously.

Commercial Concerns:

- 1) Many commercial sites have multiple irrigation controllers that are not tied to a central system. In Fairfield there are 15 landscape maintenance districts, the largest of which has nearly 150 irrigation controllers. With parks and other public landscapes in addition to the maintenance districts, turning the controllers off in anticipation of a rain event could use all of the irrigation staff in our city for a full 2 days. Maintenance functions and leak response would have to fight for time in the crush of turning off systems and then restoring them in an effort to miss a rain event window. Matching the ET requirements over a 2-week irrigation window makes far more sense than trying to miss the rain event and allows for an orderly response to adjust for the natural irrigation.
- 2) In the rainy season we receive complaints every year connected to irrigation valve exercising. Many large valves perform poorly or stick if they are not used periodically. The potential for valves sticking open are dramatically reduced if they are run for a few minutes

every month. This practice saves water and repair resources each year, but would violate the regulation.

General Notes

- 1) Irrigation staff and water conservation staff work 5 days a week. Rain events don't follow our schedule or skip holidays.
- 2) An action by the Board, or affiliated agencies, that encourages automatic rain shutoff sensors would have far more impact to save water than establishing this as a regulatory enforcement action.

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