

CALIFORNIA ALLIANCE FOR GOLF
- The United Voice for the Golf Industry -

April 22, 2015

Felicia Marcus, Chair
State Water Resources Control Board
c/o Clerk to the Board
P.O. Box 100
Sacramento, CA 95812-0100

Via email: Jessica.bean@waterboards.ca.gov

Subject: Draft Regulations; implementing 25% Conservation Standard

Dear Ms. Marcus:

Commenter

The California Alliance for Golf (CAG) is incorporated under the Laws of the State of California for the purpose of congealing the state's normative golf organizations/associations/businesses into one organization that can credibly purport to speak on behalf of the California golf industry in the public arena. Among the organizations comprising the Alliance are: Northern California Golf Association, Southern California Golf Association, Northern California PGA Section, Southern California PGA Section, California Golf Course Owners Association, California Golf Course Superintendents Association, Golden State Chapter Club Managers Association of America, and the Southern California Municipal Golf Association. The comments that follow are submitted on their behalf.

Generic Comments

The California Alliance for Golf (CAG) applauds Staff for revising its original draft recommendations to take past conservation accomplishments into consideration when determining individual communities' contribution to the state's aggregate demand for 25% water savings. Implicit in that consideration is an endorsement of the same concept within each individual community now tasked with contributing to that goal in the aggregate, i.e., that it is appropriate for urban water providers to take conservation already achieved into consideration when assigning burdens within their own jurisdictions in pursuit of their SWRCB assigned aggregate savings goals (anywhere from 4% to 36%).

The principles suffusing the revisions are simple. Those with greater capacity to conserve are asked to conserve more than those with lesser capacity. Good public policy creates incentives for thrift while at the same time creating disincentives for profligacy. These principles suit the

golf industry's desire for policies predicated upon recognizing both within its industry and in relation to other industries its own past accomplishments in conservation, which have been achieved through massive investments in weather-based computer controlled irrigation technologies, less water intensive maintenance practices, workforce education, and turf reduction.

These principles in conjunction with the SWRCB's hearty endorsement of reduction paradigms ("Alternative Means of Compliance") suited to the flexibility required by Large Landscapes give the golf industry the tools necessary to achieve these emergency mandates in a manner conducive of equity and sound business practice. But only entirely in those areas of the state where the industry is served by urban water providers and/or recycled supply. And that is the subject of the Alliance's "Specific Comments" in the following section.

Specific Comments

Under these 2nd draft provisions golf courses with an independent source of water supply (not served by a water provider) are required to hew to a limitation of two days per week irrigation or achieve a 25% reduction in water use.

The provision is intended to include golf courses that use groundwater in the mix of mandatory conservation savings. This is a laudable goal, but the one-size-fits-all 25% reduction contradicts both the letter and the spirit of the equity that suffuses the reworking of the mandates on urban water suppliers. It fails to distinguish the thrifty from the profligate, and it fails to allow SWRCB the same discretion it is now imposing on different communities, as well as the discretion those communities are now encouraged to impose upon different sectors within their service areas.

Until such time as there are "Groundwater Management Agencies" fully functioning as envisaged by the 2014 Groundwater Sustainability Act, it is the state (we suppose the SWRCB) that is the agency charged with enforcing this 25% mandate, a tall order for a small agency, a challenge these draft provisions attempt to meet by establishing a by-complaint regulatory structure in which a golf course would have to produce evidence of its 25% savings in order to defend itself.

Many areas have no groundwater reporting requirements at this time, and many that do have requirements only mandate the filing of annual reports. There are no data that can be employed to make "past conservation" assessments or to establish equitable baselines from which to establish 25% savings budgets – none of the information that allows for urban water providers to account for past savings and/or establish a budget allocation scheme capable of equalizing the societal burden on differential performers.

Because we recognize the urgency of the moment, we accept that it is impractical for SWRCB to work through the difficulties posed by such inadequate information to arrive at the same level

of equity for groundwater users as represented by the second draft provisions for urban water providers. **But we would respectfully request that golf and other large landscape communities begin to work with SWRCB Staff on the development of groundwater protocols capable of similar levels of equity and flexibility.** This “emergency” won’t end soon, and as much as we would hope otherwise, this may well not be the last such drought “emergency.”

To the extent that we are able to work with SWRCB Staff on a more flexible and equitable protocol for groundwater reduction, we would also be able to begin to deal with the more complicated question of how the golf industry actually uses groundwater, which is frequently not an either-or proposition, but rather a matter of blending groundwater with potable water, recycled water, and in the case of the golf rich Coachella Valley, non-potable water drawn from the All American Canal. We might also begin to tackle the knotty question of what precisely constitutes potable water for the narrow purposes of short-term emergency restrictions, which should not be confused with the longer term trajectory of considering more and more water sources/types as integral components of the potable grid.

On behalf of the California Alliance for Golf I want to thank you for taking the time to consider our comments and our specific request to begin working with SWRCB on the development of more suitable, equitable, and flexible reduction protocols for the groundwater component of this exercise.

Respectfully Submitted,

Chris Thomas
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