May 1, 2015

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: COMMENTS ON PROPOSED EMERGENCY RULEMAKING ON GOVERNOR JERRY BROWN’S EXECUTIVE ORDER ON SEVERE DROUGHT

Dear Clerk of the Board:

Thank you for allowing us the opportunity to comment on the proposed water usage regulations. Valley-Wide Recreation and Park District is located in southwest Riverside County where our average local precipitation is only about 10 inches. Our residents, community partners, and local governing agencies have worked hard to manage our region’s water supply. We realize that conservation is an important tool during this drought; and, I would like to take this opportunity to express our concerns.

Our agency delivers for the recreational needs of our community by providing parks that allow our residents a place to congregate and play. Over the past 42 years, our park system has been established through local community efforts, and state grant funding, which have allowed us to develop over 900 acres of active park space for our residents. Valley-Wide Recreation operates 83 parks and provides service to a population of over 230,000 people in our 800 square mile district. On any given day, over 10,000 people visit a Valley-Wide facility. We have established a commitment to provide an increased sense of lifelong enjoyment, and enhance the quality of life in our community.

Under the current restrictions, Valley-Wide would only be allowed to water twice a week in the evening hours. We are unable to complete the minimum necessary irrigation at many of our facilities in the allotted timeframe, and our extensive experience is that water savings is realized by applying the right amount of water, at the right time, to maintain plant health and avoid wasteful practices such as unneeded deep watering and/or run off. The purpose of the irrigation system is to support the health and viability of the managed landscape by delivering the correct amount of supplemental water in the absence of natural precipitation. Our irrigation and horticultural expertise comes from our extensive training, experience and micro-climate monitoring of our landscape system. Yes, this is a science to us, and our team of professionals demonstrates responsible stewardship of water resources. This is built into our design features of our irrigation systems. Significant investment has been made to incorporate these “Best Management Practices” to irrigate only the amount of water required for sustainable plant life.

We are requesting that turf used for public recreational spaces, such as our parks, be made exempt from the watering requirement, based on our proven track record and implemented conservation measures in-place. Without this provision much of our existing recreation turf would become stressed and damaged to the point requiring replacement, exacting a heavy financial cost to our agency. In addition, one can only imagine the potential detriment to the health and well-being of the children and adults in our community if the turfed
areas of our parks are lost. It would be years before our agency would be able to replace these turfed areas, if at all, when taking into consideration that newly installed turf requires even more water than established turf.

We are in support of our residents’ continued conservation. Since we live in a desert, many of our residents have already reduced their landscaping to the point that our facilities are the community’s backyard or access to turf. With as many parks, facilities, and landscape streetscapes as we operate, our fiscal responsibility is to already be water conscious; consequently, we take water conservation seriously. This is reflected in our agency’s development of strict specifications and standards and our commitment to conservation by:

- Using Calsense irrigation controllers, state of the art “smart” irrigation controllers that auto-adjust irrigation schedules based on factors such as: rainfall events, seasonal weather patterns, water flows sensors, ground moisture condition, and usage including alerts to excessive water use (which allows rapid response to leaks). This is the heart of determining and delivering the correct amount of water to preserve plant health and maximize efficiency and effectiveness.
- Increased irrigation inspections to look for inefficient water use/leaks, thereby eliminating irrigation runoff or wasteful activities, as well as carefully examining activities that will affect water use efficiency.
- Implementation of low-water-use plants and landscaping.
- Retrofitting existing potable water systems to recycled water as recycled water infrastructure becomes available. An example of our commitment to water conservation is the recent recycled water retrofit project at Wheatfield Park in Menifee. This 25-Acre Sports complex was converted to recycled water last year and has already saved more than 26 million of gallons of potable water.

Through our water use stewardship, we have been able to reduce our potable water usage, and our commitment has been to apply the least amount of water to meet the minimum plant requirements. Further reductions will most certainly be devastating to our facilities.

As mentioned earlier, each day over 10,000 residents use our facilities and programs throughout our District. Please remember the impact parks and recreational facilities have had on each of you, your families and communities. Parks are a vital service to communities throughout California and every effort should be taken to preserve them for the betterment of all Californians.

Valley-Wide Recreation and Park District respectfully requests that you keep these facts in mind as you consider your decisions may impact communities throughout the state.

Sincerely,

VALLEY-WIDE RECREATION AND PARK DISTRICT

Dean Wetter
General Manager

cc: Board of Directors
    Mike Morrell, Senator 23rd District
    Jeff Stone, Senator 28th District
    Chad Mayes, Assemblyman 42nd District
    Melissa Melendez, Assemblymember 67th District
    Brian Jones, Assemblyman 71st District
    Marie Waldron, Assemblymember 75th District
    Paul Jones, GM Eastern Municipal Water District