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May 4, 2015

Ms. Felicia Marcus
Chair, State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comment Letter – Emergency Conservation Regulation

Dear Chairwoman Marcus:

On behalf of the more than 1,800 members of the Irrigation Association, thank you for your leadership over the past few weeks as the Board implements Governor Brown's Executive Order, which was released on April 1, 2015. As the national association representing the full irrigation industry, with significant membership and operations throughout California, we understand the severity of the current drought and recommit our efforts to partner with you, the Department of Water Resources and any other agencies looking to use less water through better technologies, and smart practices.

Below are our comments regarding the proposed emergency conservation regulatory language.

Section 864. End-User Requirements in Promotion of Water Conservation.

Current Language:

(7) The irrigation with potable water of ornamental turf on public street medians; and

The IA understands the need to limit potable water use for irrigation on public street medians. However, we also agree with the statement of the Board in section "I.f." of the "Frequently Asked Questions" document regarding the proposed emergency regulations to achieve 25 percent urban water conservation. In this section, the board states, referring to the irrigation of medians, "...we are focused only on ornamental turf and encourage the irrigation and preservation of trees."

The IA thanks the Board for the clarification in the FAQ document.

Current Language:

(8) The irrigation with potable water of landscapes outside of newly constructed homes and buildings that is not delivered by drip or microspray systems in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission.

The IA supports the changes made to this section thus far, in striving to eliminate confusion about what standards builders have to comply with regarding this prohibition. However, the IA supports the inclusion of the word "ornamental" before "landscapes," to remain consistent with

the rest of the regulatory language. The IA also supports ensuring all irrigation technologies used meet nationally recognized standards.

Proposed Language:

(8) The irrigation with potable water of ornamental landscapes outside of newly constructed homes and buildings that is not delivered by drip or microspray systems in a manner inconsistent with regulations or other requirements established by the California Building Standards Commission and the ANSI National Standard, ASABE/ICC 802-2014.

Current Language:

(c) Immediately upon this subdivision taking effect, all commercial, industrial and institutional properties that use a water supply any portion of which is from a source other than not served by a water supplier meeting the requirements of Water Code section 10617 or section 350 subject to section 865 shall either:

(1) Limit outdoor irrigation of ornamental landscapes or turf with potable water to no more than two days per week; or

(2) Reduce potable water usage by 25 percent for the months of June 2015 through February 2016 as compared to the amount used for the same months in 2013.

The IA supports the Board's decision to give CII users the option to reduce water usage by 25 percent (based on 2013 numbers) or limit irrigation to just two days a week. The only concern of IA members is the unintentional punishment of those users who implemented very efficient irrigation technologies and practices prior to 2013. In these cases, those CII users who invested in weather- or soil moisture-based irrigation controllers in 2012, will have to further reduce water use at the same percentage as those users who use very inefficient irrigation technologies.

With that said, the IA understands the goal of the language and supports it as written.

If you have any questions regarding these comments, or need any additional information, please contact me at johnfarner@irrigation.org or 703.536.7080.

Thank you, again, for your time, leadership and consideration of these comments.

Sincerely,



John R. Farner
Government and Public Affairs Director