



SHARON HEIGHTS GOLF & COUNTRY CLUB

Email to SWRCB: commentletters@waterboards.ca.gov.

Date: 3/16/15

Subject: **"3/17-18/15 BOARD MEETING Item #7,**

CONSIDERATION OF A PROPOSED RESOLUTION AMENDING AND READOPTING DROUGHT-RELATED EMERGENCY REGULATIONS FOR URBAN WATER CONSERVATION

Attn: Felicia Marcus, Chair

Madame Chair,

Thank you and the members of your committee for the effort you've put forth on managing our state's water supply. Sharon Heights Golf and Country Club has been very proactive in developing its own Drought Response Plan and is a strong supporter of water conservation efforts. Unfortunately, we do not support the proposed resolution as currently written.

The proposed mandate, with its 2-day restriction on outdoor irrigation, may be suitable for enhancing residential conservation measures but it is ill-designed for use by a commercial enterprise such as ours. A simple modification to the mandate would allow local urban water suppliers to determine if their large water dependent commercial customers have Drought Response Plans which provide for water conservation that is comparable to the proposed mandate and, if so, allow those plans to continue in lieu of the 2-day restriction. Our current Drought Response Plan is much more effective in conserving water than the proposed 2-day limit and does so while preventing substantial and unnecessary loss of private property and the subsequent loss of local jobs.

Sharon Heights has been and will continue to be a good steward of this precious resource. We have been successful in substantially reducing potable water consumption since our base year and endorse further conservation efforts. Our professional staff believes the section of the resolution that imposes a 2-day maximum is not an effective, practical or efficient solution for commercial water users and is in fact detrimental to our continuing internal water conservation plan. Point #12 of the "Whereas" section of the resolution states that:

"In many areas, 50 percent or more of daily water use is for lawns and outdoor landscaping. Outdoor water use is generally discretionary, and many irrigated landscapes would not suffer greatly from receiving a decreased amount of water;".

That assumption may be true for the residential community but it is grossly inaccurate for commercial enterprises such as ours and many others like us throughout the state.

Our enterprise has worked closely with the Menlo Park Water District to develop a Drought Response Plan consistent with the water districts Water Shortage Contingency Plan (WSCP). Our plan has accelerating stages of water conservation that parallel the efforts of the city's plan. By following our

plan, we have the capacity to reduce water consumption by 50% over our base year while still protecting our major asset. The adoption of the proposed resolution would explode our existing Drought Response Plan and force us into a watering cycle that would effectively cause the loss of our golf course. Further, if implemented, the new 2-day watering cycle would consume more water than would our existing plan of watering more regularly but in much smaller amounts. The loss of the golf course would not only impact the \$150,000,000 investment of its local owner-members, it may lead to a substantial loss of our employee population. All due to a “one-size-fits –all” regulation designed for residential application but ill-conceived for a business enterprise such as ours.

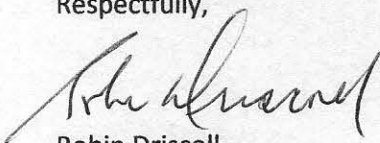
In addition to making all the changes recommended in Point #9 in the “Whereas” section of your resolution Sharon Heights is currently working with our public partner—West Bay Sanitary District—to build an onsite reclamation plant on the club’s property. This new plant will allow us to convert all course irrigation to recycled water within the next 18 months as well as provide any excess recycled water to our surrounding community. Mandating a 2-day watering cycle jeopardizes that project by diverting funds to replacement of the golf course and away from investment in a reclamation plant. This is an unnecessary redirection of limited resources.

In consideration of the aforementioned, we are requesting that your committee modify the subject resolution to allow urban water suppliers to implement Section 865 (e) for their commercial customers that are water dependent for their survival:

- (e) To promote water conservation, each distributor of a public water supply, as defined in Water Code section 350, that is not an urban water supplier, or urban water suppliers which have commercial customers that are water dependent, shall within thirty (30) days, take one or more of the following actions:
- (1) Limit outdoor irrigation of ornamental landscapes or turf with potable water by the persons it serves to no more than two days per week; or
 - (2) Implement another mandatory conservation measure or measures intended to achieve a comparable reduction in water consumption by the persons it serves relative to the amount consumed in 2013.

We hope your committee will recognize the significant conservation efforts many of us have put forth thus far and modify the subject resolution to allow for a more equitable , efficient and effective process to achieve our mutual water conservation objectives.

Respectfully,



Robin Driscoll
Chairman, Water Committee
Sharon Heights Golf and Country Club

cc:

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