

March 16, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: 3/17-18/15 Board Meeting—Item 7

Dear Ms. Townsend:

The California Landscape Contractors Association applauds the State Water Resources Control Board for readopting and expanding its drought-related emergency regulations for urban water conservation. Given that virtually the entire state is experiencing severe to exceptional drought conditions, the necessity of extending Resolution 2014-0038 seems clear. Given that the state apparently has not been meeting the goal of reducing urban water use by 20 percent, additional action also seems appropriate.

The prohibition on irrigation of turf or ornamental landscapes during and 48 hours following measurable precipitation addresses an all-too-common sight on rainy days and one that is extremely annoying to landscape professionals as well as people who are trying to be conscientious about their water use. We believe this prohibition will encourage public discussion about this problem, causing property owners to think about the connection between the weather and the water needs of their landscape plants. We also like the recommendation because it gives property owners several compliance choices. They can install a rain sensor or weather-based controller, or they can simply keep a close eye on the weather and manually shut off their controller or use the rain delay option when necessary.

We have some questions about how this prohibition will be enforced, however. The prohibition forbids irrigation during measurable precipitation, but most rain sensors and weather-based controller technology would not always be able to shut off the irrigation system at the very beginning of a rainfall event. Many of the lower-end rain sensors currently in use would not shut off the irrigation system for a full 48 hours. Property owners without rain sensors or weather-based controllers could shut off their irrigation controllers manually, but there would be times when they are out of town, at work, or asleep during a rainfall event that wasn't foreseen.

We suggest that at a minimum, the regulation define what is meant by "measurable precipitation." We suggest that it be defined as one-fourth of an inch of precipitation. Anything less than that probably would not be of much benefit to the plant and would be difficult to measure with most rain sensor technology.

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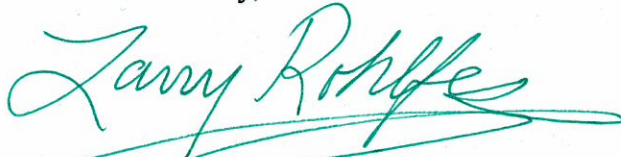
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Hopefully, water agencies and local governments would enforce this regulation with flexibility and provide warnings and education before resorting to fines.

CLCA also supports the proposed requirement for urban water suppliers that do not already have a limit on the number of days that outdoor irrigation is allowed, to limit such irrigation to no more than two days a week. On the one hand, we do not believe that day-of-the-week restrictions are the best way to conserve water. We much prefer water budgeting in combination with a sound landscape water conservation, allocation-based rate structure. However, we recognize that the emergency regulation allows water agencies to submit for approval an alternate plan that includes an allocation-based rate structure. We also believe this two-day-per-week restriction is primarily aimed at water agencies that have not imposed mandatory restrictions on outdoor irrigation. Drastic measures may be necessary in a severe emergency.

CLCA is a nonprofit trade association of licensed landscape and landscape-related contractors. Also included among our approximately 2000 members are landscape suppliers, landscape architects and designers, public officials, educators, and students. We want to be part of the water conservation solution.

Yours sincerely,



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Assistant Executive Director

cc: Governor Edmund G. Brown, Jr.
Senator Fran Pavley
Assemblymember Marc Levine
CLCA Executive Director Sandra Giarde, CAE
CLCA Board of Directors
CLCA Legislation Committee
CLCA Resource Management Committee