



May 22, 2009

20x2020 Agency Team
c/o State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comments on April 30, 2009 20x2020 Water Conservation Plan Draft

Dear 20x2020 Agency Team:

The California Landscape Contractors Association appreciates the opportunity to comment on the April 30, 2009 draft of the 20x2020 Water Conservation Plan. However, we must convey our disagreement with the suggestion on page 22 that restricting the number of landscape irrigation days per week can be a useful tool for reducing water use when the state is in a normal rainfall year or when water reservoirs are at normal levels. Likewise, we disagree with the recommendation on page 34 to limit "the irrigation of most landscapes to two days a week or less" as a matter of ongoing policy, drought conditions or not.

Ever since the adoption of the Model Water-Efficient Landscape Ordinance in 1992 and the California Urban Water Conservation Council's update of its BMP 5 in 1998, the state of California and its water agencies have recognized the importance of weather-based water budgeting as perhaps the most important key to reducing landscape water use. Weather-based water budgeting involves setting a water use target, designing and constructing a landscape that is capable of meeting that target, and scheduling the irrigation based on local weather conditions to meet that target.

When this scheduling is done properly, whether it is set manually or automated by a weather-based controller, the plants receive enough water to meet their needs, when they need it, but no more than they need, and there should be no runoff on the site. With weather-based water budgeting, it is the amount of water applied to the landscape over a given period of time that is important, not the number of days in a week that the irrigation system cycles on. In fact, the principles of weather-based water budgeting can conflict with day of the week restrictions.

Furthermore, it is the experience of our members that day of the week restrictions commonly result in over-watering and runoff. Property owners fear that the landscape will not survive during the subsequent nonwatering days, and they respond by "pouring the water" on the days

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they are allowed to irrigate, hoping to build up an adequate reserve to last until the next permissible watering day.

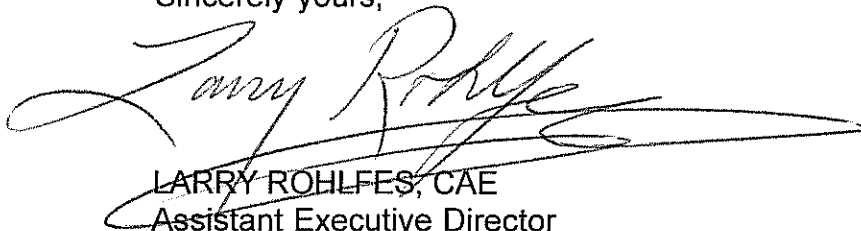
CLCA understands why some water agencies and local communities resort to day of the week irrigation restrictions during times of severe drought, especially for properties that do not have a water meter. These measures can be instituted quickly in an emergency, and they are relatively easy to enforce, especially when compared to other options with unmetered sites. Nevertheless, the Department of Water Resources' *Urban Drought Guidebook: 2008 Updated Edition* is not exactly enthusiastic about their effectiveness as a drought response. On page 63 it states:

"Restrictions on the days when landscape irrigation are [sic] allowed has not always been successful. Some residents water on the designated days regardless of whether the landscape needs it. Others over irrigate their landscapes in the hope the irrigation will last longer. This overuse cannot be controlled by patrols."

Despite these problems, extreme measures must be taken in a drought emergency. But when it comes to planning for a permanent reduction in per capita water use, CLCA believes that California can do better than to adopt such an unsophisticated method of demand reduction, especially since our state pioneered landscape water budgeting and continues to lead the country in that approach.

We respectfully suggest that instead of recommending permanent day of the week restrictions, you emphasize the other recommendations that are mentioned in this draft document as well as in the draft Urban Water Use Efficiency chapter of the *2009 California Water Plan Update*, giving special attention to the promotion of conservation oriented rate structures that would incentivize proper landscape irrigation scheduling. CLCA would be pleased to serve as a resource on this subject should the Agency Team be interested.

Sincerely yours,



LARRY ROHLFES, CAE
Assistant Executive Director

cc: Sharon McGuire, CLCA executive director
CLCA Board of Directors
CLCA Resource Management Committee