



May 1, 2015



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

RE: Comment Letter—Emergency Conservation Regulation

Dear Ms. Townsend:

The California Landscape Contractors Association supports the April 28 draft of the State Water Resources Control Board’s Text of Emergency Regulation.

We recognize that the proposed regulation takes aim at outdoor landscape irrigation and, especially, the irrigation of ornamental turf grass. Judging from the Emergency Regulation Digest and the proposed regulation itself, it appears that the water board views outdoor landscape irrigation as a discretionary use of water and the irrigation of ornamental turf grass as an unreasonable, wasteful use during the current drought.

The typical CLCA member strongly, even viscerally agrees with Section 65593(d) of the Government Code, which states, “Landscapes are essential to quality of life in California by providing areas for active and passive recreation and as an enhancement to the environment by cleaning the air and water, offering fire protection, and replacing ecosystems lost to development.” Nevertheless, we must acknowledge that a reasonable and beneficial use of water in normal times can become a less than beneficial use during a severe drought. We must agree that landscape irrigation is more discretionary than many other uses, such as drinking, bathing, sanitation, and fire protection.

CLCA members have the skills and knowledge to make California’s landscape more sustainable, and we hope to become “heroes” in the coming effort to make our landscapes more water-efficient for the duration of the drought and over the long term after it ends, as well as save as many trees and other valuable plants as possible.

We had a concern about the water board’s earlier proposal to prohibit irrigation with potable water of landscapes outside of newly constructed homes and buildings that is not delivered by drip or microspray systems, which we know was an attempt to implement the seventh directive in Gov. Brown’s April 1 drought order. However, we are pleased to see that the April 28 version of your regulation instead assigns this task to the Building Standards Commission.

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As it was worded prior to April 28, the proposal needed work. The definition of various irrigation emitter types, which should be clearly understood by all, was not addressed. The proposal probably should have included irrigation emitters such as bubblers and mutli-stream, multi-trajectory nozzles as permissible, low-flow technologies. Nor do we want to preclude the development of future technologies that may not fall under the drip or microspray classifications. And finally, the state agencies that oversee building codes such as the California Green Building Standards Code have more experience than the water board in setting building standards.

We look forward to working with building code officials as they set emergency standards in the face of this drought 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.

Yours sincerely,

A handwritten signature in blue ink, reading "Larry Rohlfe", with a long horizontal flourish extending to the right.

LARRY ROHLFES, CAE
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