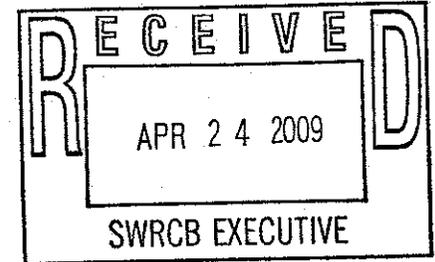


Sonoma County Commercial Business Park Coalition

1400 N. Dutton Avenues
Santa Rosa, CA 95401
(707) 522-2293

April 21, 2009

Mr. Charles R. Hoppin
Board Chair
State Water Resources Control Board
1001 I Street
Sacramento, California 95814



Re: Division of Water Rights Order WR 2009-0027-DWR
Condition #14: **Prohibition on Irrigation of Commercial Turf Grass Within the
Sonoma County Water Agency (SCWA) Service Area for the period of
May 1, 2009 through October 2, 2009**

Dear Mr. Hoppin:

The Sonoma County Commercial Business Park Coalition (Coalition) is a stakeholder group that represents the majority of commercial park ownership in Sonoma County. Coalition goals are specific to addressing the concerns of the State Water Board relative to water conservation in commercial business parks by proposing a program that would replace the need to implement the Board's Water Rights Order (*Order*) dated April 27th, 2009. We propose that within the next six (6) months to reduce water use in Sonoma County commercial business parks by 35% (based upon 2004 usage) by implementing the following actions.

- 1) Work with SCWA and commercial business landscapers to develop a menu of options for water conservation. Such items could include (but, not limited to):
 - a) Retrofitting indoor fixtures (toilets, urinals, and faucet hardware);
 - b) Installation of SWAT tested smart irrigation controllers;
 - c) Conversion of overhead spray to drip irrigation, where appropriate;
 - d) Reduce turf grass in low traffic areas, including medians and narrow strips;
 - e) Ensure that landscapers attend the *Qualified Water Efficient Landscaper Training* program;
 - f) Develop a commercial business park education and outreach program;
 - g) Promote and encourage sheet mulching in low traffic areas;
 - h) Install match precipitation rate sprinklers so that spray patterns and radius deliver water evenly;
 - i) Add polymers to increase soil moisture water retention;
 - j) Ensure adequate pressure regulation at the irrigation water source; and
 - k) Develop a short-term method to monitor and report savings.

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In addition, by April 6, 2010, we will submit a detailed long-term *Commercial Business Water Conservation Program*. This program will further commit the Coalition to retrofit commercial landscapes to achieve a water budget based on **60% ET by 2017**. The program will include, at a minimum, the following components:

- 1) A data base that inventories low traffic areas within the commercial parks for the purposes of reducing water consumption by changing planting schemes and/or irrigation methods;
- 2) A program that targets high water use crops for the purposes of reducing water consumption by changing planting schemes and/or irrigation methods;
- 3) A long-term and user friendly monitoring and reporting program;
- 4) A long-term education and outreach program to encourage all members of the community to participate in a comprehensive water conservation program;
- 5) A delineated, comprehensive menu of conservation measures **including an increased use, where appropriate, of reclaimed or recycled water for commercial turf irrigation**; and
- 6) A funding mechanism for assisting Commercial Business Parks in achieving conservation goals.

We too believe that conservation of water resources requires immediate action. Our proposal exceeds conservation requirements imposed on other segments of the community and also addresses the environmental and economic ramifications associated with implementing the *Order*. A number of the environmental consequences of eliminating/reducing lawns from a regional ecosystem are delineated below.

- 1) Loss of air-condition value: the turf on eight average-sized healthy front lawns has the cooling effect of 70 tons of air conditioning – enough for 16 average homes;
- 2) Loss of erosion control and water retention capabilities: turf intercepts raindrops before they disturb the soil. Turf also promotes water percolation rather than runoff; and
- 3) Loss of green house gas reduction capability: grass plants capture and use greenhouse gases, thereby counteracting climate change. Turf also traps air pollution and generates oxygen. A 50 by 50 foot lawn produces enough oxygen for a family of four to breathe for one year. Turf also acts as a barrier that deters chemical from entering the soils profile. In 2005, Christina Milesi, PhD, a one time NASA researcher concluded (based on satellite imagery) that lawns in the US account for approximately 2% of the landmass yet account for approximately 5% of the carbon dioxide absorbed by plants. *

The economic implications are equally daunting. **Job losses** associated with implementing the *Order* will be in the **hundreds**. Smaller landscape **companies** will be **forced out of business**.

* *Lawn and Turf Benefits*, Landscape Ontario.com

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The loss of real value to private landowners exceeds an estimated \$60,000,000.00!

In closing, it is important to place the current commercial park "turf" situation into context. The Water Board needs to understand that most landscape schematics in Sonoma County commercial business parks are mandated by a local government *Specific Plan*. In the case of one commercial park located in the county, the Design Review Committee required: "Fifty to seventy percent of the landscaped area **shall be lawn** with most located in the area closest to the street...." Given the duality of mandates, the Coalition pledges to work with local governments to **adopt guidelines for future landscape plans that reflect the water supply reality of this region and the conservation policies of the Water Board.**

Mr. Hoppin, we believe that this proposal is a *great* first step in collectively accepting our responsibility in making our business community a leader in conserving water and perhaps redressing the misguided mandates of the past. It is our belief that by working with the Sonoma County Water Agency, the commercial park owners in Sonoma County can achieve the conservation **goals** of the State Water Board and **protect regional environmental resources and economic viability.**

Thank you for consideration of our proposal. We look forward to the Water Board's suggestions on how to improve our proposed program.

Sincerely,

Sonoma County Commercial Business Park Coalition

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|-----------------------------------|--------------------------------------|------------------------------|
| 1. Airport Business Center | 2. Sonoma County Office of Education | 3. Schellinger Brothers |
| 4. Jackson Family Wines | 5. B & O Enterprises, LLC | 6. Huppe Landscape Company |
| 7. Basin Street Properties | 8. Schurter, In. | 9. Conde Associates |
| 10. Hydropoint Data Systems, Inc. | 11. Pacific Landscapes, Inc. | 12. Equity Office Properties |
| 13. Simons & Woodard | 14. Petaluma Marina Business Center | 15. Winzler & Kelley |
| 16. Sonoma County Alliance | 17. RNM Properties | 18. SRC Cables |
| 19. North American Cinemas | 20. Baywood Associates | 21. Blue Fox Partners |