

July 14, 2014

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

**RE: July 15, 2014 Board Meeting—Item 10**

Dear Ms. Townsend:

The California Landscape Contractors Association applauds the State Water Resources Control Board for crafting its proposed Prohibitions of Activities and Mandatory Actions During Drought Emergency in response to Gov. Brown's April 25 directive to adopt emergency regulations to limit wasteful water practices during the current drought.

Clearly, it was not easy to propose a regulation that would make sense in every corner of the state, be as fair as possible, and not be prohibitively difficult as well as expensive to enforce.

Requiring urban water suppliers to implement all of the requirements and actions of the stage of their water shortage contingency plan that imposes mandatory restrictions on outdoor irrigation should allow those suppliers to take local conditions and practices into account. Requiring urban water suppliers that do not have a valid water shortage contingency plan to implement more specific conservation measures makes sense as well. Every community should do its part to save water in a severe drought.

The SWRCB proposal appropriately recognizes that individual property owners also should be required to participate in California's emergency conservation effort. Relative to the other methods of accomplishing this goal that the water board considered, prohibiting the application of water to outdoor landscapes in a manner that causes runoff appears to be an excellent way to target water waste. Placing a target on runoff is preferable to limiting outdoor irrigation to no more than two days a week, which would have required several complicated exemptions to be fair to all. CLCA and other landscape industry associations have long stressed the importance of eliminating runoff to save water as well as protect our waterways.

If the runoff prohibition is enforced on the local level, we expect it to result in a multitude of landscape retrofits in the coming months—business opportunities for our members. The water efficient landscapes that result will help the state's long-term conservation efforts—in addition to helping the state deal with a hopefully short-term drought emergency.



As Section 65593(d) of the state's Government Code states, "Landscapes are essential to the 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, preventing erosion, offering fire protection, and replacing ecosystems lost to development." CLCA appreciates the water board's recognition of the many benefits of landscaping by proposing this carefully balanced and, we expect, highly effective emergency drought regulation.

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,



LARRY ROHLFES, CAE  
Assistant Executive Director

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