



California Association of Nurseries and Garden Centers

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June 5, 2009

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

IN RE: 20X2020 Water Conservation Plan Draft April 30, 2009

Dear Board Members,

The California Association of Nurseries and Garden Centers appreciates the opportunity to provide added comments on the April 30, 2009 draft of the 20X2020 Water Conservation Plan.

General Comments. We find not including California Department of Food and Agriculture in the 20X2020 working group a very significant breakdown in process in light of Governor Schwarzenegger's request that all relevant departments of the state government be involved and the focus of the group on landscape water use affecting state agriculture's second largest commodity. We ask that an invitation be extended and that CDFA be permitted to comment on the work done to date prior to any further releases of drafts for public comment.

Second, we agree with the oral testimony of numerous participants in the workshops that the budgetary and time constraints imposed on the working group are insufficient cause to omit the development, circulation for comment, and response for two of the five expected technical memoranda. These are perhaps the most significant means of discovery for the framers of the 20X2020 draft to understand implementation strengths and weaknesses as perceived by those who would have to produce results.

Third, we believe that the working group should consider extending the timeframe to complete the draft "up to one year" as voiced during the last workshop, since the current schedule has proven inadequate to accommodate the process established at the beginning of the plan development.

Fourth, we suggest the formation of a technical working group comprising qualified irrigation and water research scientists to evaluate the factual basis of relying on the WUCOLS and evapotranspiration categories and assumptions for ornamental plants, trees, and shrubs. Representatives of academia, irrigation industry, nursery, and water conservation management should be present on such a committee.

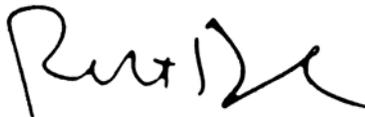
Fifth, Governor Schwarzenegger's vision and scope statement makes it clear that his intention was to enhance the quality and quantity of water available for the Delta. No effort was made to determine the contributory sources and uses of urban water supply as it pertains to the Delta's water sources and quality; rather, hydrologic regions that have no part in the Delta's plumbing have been included as contributors despite that lack of relevance.

In addition to these general comments, we note the following specifics:

1. On page 3, citation is made of AB 2175 in 2008. That legislation was rejected by the legislature at the committee, including the “vitaly important institutional improvement in California’s approach to agricultural water management.” To include it as a core tenet is inappropriate.
2. On page 12, Supply and Demand Data: Although “...no discernable trend was observed...” there are in fact significant differences between a base year of 1995 and 2005 at the water supplier agency level. Some water supply agencies implemented significant water conservation measures and using their baseline data for 2005 incorporates enhancements and BMP adherence not present in the 1995 baseline period. They should not be penalized for their efforts by comparing them to agencies that failed to make such enhancements and efforts.
3. On page 17 and in Table 5: Discussion following the conclusion of the workshop with Andrew Chastain-Howley of the consulting team confirmed our concerns regarding the arbitrary nature of categorization of hydrologic regions 1-4 achievements of BMP targets in setting targets for regions 5-10. These zones (and in particular zones 2 and 4), are clearly being given a pass with respect to potential for the current BMPs to deliver water conservation savings and their present attainment being accepted as the maximum available. This action flies in the face of the statement that “...implementation of BMPs to a level that is regionally cost effective can almost double the impact of efficiency codes in certain hydrologic regions, such as San Francisco Bay and South Coast that account for a large share of the state’s population, thus also water use.” A savings potential we estimate to be 5-10 GPCD for the entire populations of regions 2 and 4 translates to huge overall water savings from the current BMPs that need not be transferred to zones 1, 3, and 5-10 as new action conservation savings via the zero-sum spreadsheet that Mr. Chastain-Howley presented in the Workshop. The science and technical committee that we strongly suggest be formed should sort out these conflicting statements in the draft as a technical memorandum addendum for current BMP impact on efficiency codes and permit public comment prior to conclusion of the 20X2020 drafting process.

The members of the California Association of Nurseries and Garden Centers have strong faith that significant water conservation can be achieved, potentially at rates higher than the governor’s objective of 20% by 2020 if provided a free hand to achieve those savings. The water supply agencies have considerable experience and knowledge of public response to various conservation methods. This toolkit permits flexibility depending on regional needs and costs. We support a bottom-up approach that permits true landscape use (not outdoor water use) conservation of our precious water resources to apply water budget efficiently and with the minimum disruption to the urban habitat and environment. It is the most accommodating approach, and it encompasses but does not mandate the specific measures that we believe will have disastrous consequences for our state’s population, landscapes, and gardens.

Respectfully submitted,



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Executive Vice President
CANGC