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April 14, 2016

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



Via email: commentletters@waterboard.ca.gov

Comment Letter – Urban Conservation Workshop

Dear State Water Resources Control Board,

Green Acres Nursery & Supply is a local, family-owned nursery and garden center business which operates five locations in the greater Sacramento area. We employ over 400 people and are active in our community engaging in fundraising, planting of community gardens which benefit food banks, and donating to hundreds of schools, clubs, and organizations annually.

Perhaps most impactful of all of our community involvement is the consumer education we offer on issues such as appropriate pesticide use, invasive plants, pollinator and honeybee health, and how to be a responsible California gardener when it comes to using water. We equip our customers with the knowledge and the tools they need to protect their landscapes and to reduce their water use to protect their communities and their state.

Green Acres Nursery & Supply partners with water providers, cities, counties, and state organizations in an effort to keep our customers abreast of varying watering restrictions and conservation goals. In 2014, we bolstered our water-efficient gardening education for our customers. In 2015, we strongly supported the call to action for extraordinary conservation, despite the fact that it meant our industry would take a severe hit. However, we used the opportunity to educate homeowners about smart landscape watering practices and appropriate plant selection because we believe in doing what’s environmentally right for our state. We recognize the “new normal” for California is marked by greater uncertainty in water supply and precipitation patterns. We strongly urge the State Water Resources Control Board to ease restrictions to reflect the current availability, while still encouraging long-term practices for water efficiency. Promoting appropriate plant selection and efficient water practices will not go away simply because reservoirs are at or above historical averages. That said, failure to reduce watering restrictions to correspond with current water availability could send a confusing and



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counterproductive message to Californians. Rigid restrictions discourage consumers from planting, which harms both the agricultural retail, wholesale and growing businesses, along with and the environment. Regionally appropriate watering restrictions should directly correlate with water availability.

To that end, we are concerned that there is an outsized focus on outdoor water use when conservation measures are discussed. Focusing on outdoor water use at the expense of indoor use sends an incomplete message to consumers that indoor conservation measures are not impactful. With indoor water use conservatively accounting for 35-45% of total use, this is clearly misleading.

While certain indoor water uses are clearly necessary it should be recognized that outdoor uses of water create environmental benefits. Doubling the length of a shower cannot be said to confer a tangible benefit to an individual and certainly not to the environment. Conversely, cutting shower time in half has no negative consequences while reducing outdoor water use by half may harm or kill plants and wildlife causing the forfeiture of numerous ecologic benefits of a responsibly planted landscape. The water conservation conversation must take into account the carbon sequestration, erosion prevention, and heat island effect mitigation provided by planted landscapes. One healthy tree can remove 48 pounds of CO2 from the atmosphere annually. Appropriately planted trees shade homes and can reduce summer electric bills by up to 40%, saving both water and energy. Mature landscapes can enhance a property’s value by up to 15%. In addition to the benefits landscapes confer to humans, they also provide vital urban habitat for wildlife critical to a health ecosystem.

We thank the State Water Resources Control Board for the opportunity to comment on the potential amendment of the February 2016 Emergency Regulation and look forward to continuing the effort to build a more sustainable California.

Respectfully,

Ashley Rossi
 Owner