

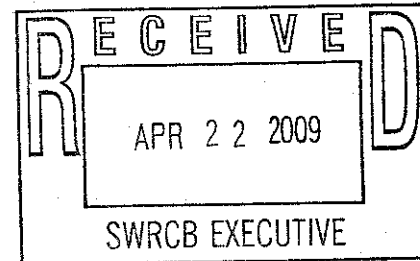


CLCA North Coast Chapter CALIFORNIA LANDSCAPE CONTRACTORS ASSOCIATION

**P.O. Box 1621 Sebastopol, CA 95473 Phone/Fax (707) 829-5487
e-mail: heyconniesalinas@hotmail.com**

April 22, 2009

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814



Mr. Randy Poole
General Manager/Chief Engineer
Sonoma County Water Agency
P.O. Box 11628
Santa Rosa, CA 95406

Members of the Board,

In response to the State Water Resources Control Board recent Order Approving Temporary Urgency Change in Permits 12947A, 12949, 12950 and 16596 to the Sonoma County Water Agency, We the undersigned, object to item #14 of the order – specifically the prohibition of irrigation of commercial turf grass within the SCWA service area. We ask that Item #14 be removed from the Order for reasons stated below and in other similar letters of objection being submitted. If omission is not possible, we then ask that an addendum be added to the end of item #14 asking for limited irrigation of commercial turf grass based upon water budgeting.

This objection is submitted on behalf of fellow professional Landscape Contractors within the SCWA service area and for the North Coast Chapter of the California Landscape Contractors Association (CLCA). While the 25% diversion reduction goal in item #13 is appropriate and responsive to current conditions (including the resultant 25% water consumption reduction goals to support this), the ban on irrigation of commercial turf grass, specifically, is discriminatory and not in keeping with the intent of the order for the following reasons:

- CLCA, California Urban Water Conservation Council (CUWCC) and the Governor's AB 2717 Task Force all advocate water budgets to manage outdoor water use. Water budgets are site specific and are the amount of water the landscape area requires. Water budgets are a CUWCC Best Management Practice and CLCA has an established, performance based water management program that manages landscape water use based on water budgets.

State Water Resources Control Board

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- It specifically targets one segment of water users. The ban on commercial turf irrigation, when added to the mandatory 25% reductions noted in item #15, becomes excessively burdensome to local businesses, the aesthetics of our communities, and our local economies during an already challenging period of history.
- The proposed ban does not honor the water conservation and drought ordinances that have already been developed, reviewed, approved and ready to put in place by SCWA and its' contractors to implement the current drought emergency. It is necessary to understand that plans to reduce consumption by 25% are currently in place, and are ready to implement

We are asking you, the Board to remove item #14 from the order. If this is not possible then we are asking the Board to consider an addendum at the end of item #14 that would state the following:

"...or may allow limited turf grass irrigation to those sites specifically managed to a State of California recognized water budget by a landscape professional or other entity so trained to do so. A water budget shall be established for turf areas using a 25% reduction from Eto using the formula: $(Eto \text{ minus } 25\%) - \text{whereas the } 25\% \text{ would bring Eto to } 75\% \text{ (Plant Factor)} \times \text{(Landscape area)} - \text{as defined by the Water Efficient Landscape Ordinance} \times (.62)$. This formula would prevent over-watering some of which is documented at occurring at 300% above what the landscape actually requires.

Further the order should require that a method of monthly tracking of the water budget as compared to water use be utilized and reported. A site not meeting the criteria on a monthly basis shall then be prohibited from irrigation of turf grass. The following water budgeting capabilities are currently in SCWA's service areas:

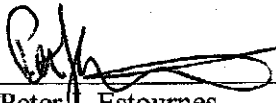
- a) Training is available and ongoing - SCWA has a recognized and EPA Water Sense labeled certification training program (Qualified Water Efficient Landscaper) that focuses on water management including landscape water budgeting. The QWEL program has so far certified 200 individuals.
- b) Water efficient landscape standards for new development are being drafted regionally by Marin and Sonoma County water agencies, local planners, building inspectors, landscape contractors, designers and architects that are more aggressive than what is required in AB 1881.
- c) The California Landscape Contractors Association (CLCA) has created and implemented a performance based certification program using water budgeting as a major component and a verification/feedback process with over 200 sites reporting water use data. Most of these sites are being managed by Sonoma/Marin based Landscape Contractors.

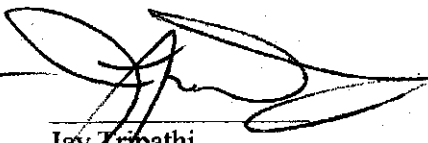
- d) The City of Santa Rosa and City of Petaluma's (SCWA retail water contractors) stage II and stage III drought response utilize landscape water budgeting to help meet conservation goals.

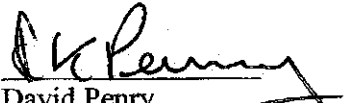
A water budgeting coupled with conservation based tiered rates approach to landscape water use is the appropriate response to the drought emergency situation facing Sonoma County landscapes and its residents. They can reduce the amount of water use. They can be verified. They are equitable for everyone. They can potentially generate interest and passion for further water conservation. Water providers, property owners and landscape professionals can appropriately manage properties on a water budget. In the end, sites not able to meet their water budgets will be banned from irrigating turf grass areas.


Further, the landscape professional contractors of Sonoma and Marin Counties and CLCA would like to commend and offer our support to the letter of objection written and presented by the Water Advisory Committee (WAC) to SCWA. As landscape professionals we appreciate the working relationship we have gained through the contractor members and SCWA's staff. Water conservation in urban landscapes is the new business model and we are committed to a cooperative approach with Sonoma County Water Agency and their contractors.

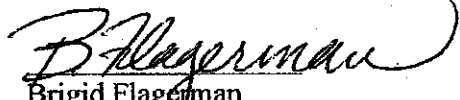
Respectfully Submitted,


Peter J. Estournes
Gardenworks Inc.
CLCA State President 2007

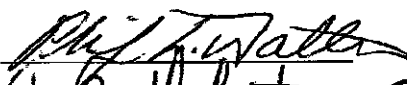
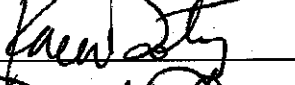
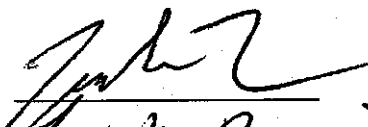
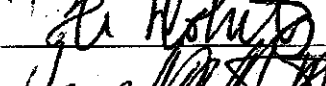
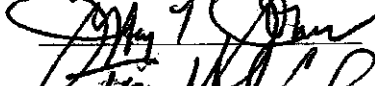

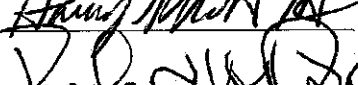

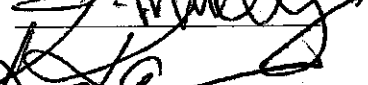
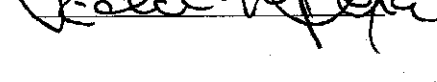
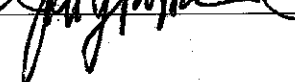


Jay Tripathi
Gardenworks Inc.
CLCA State President 2002


David Penry
Pacific Landscapes Inc.
CLCA State President 1997

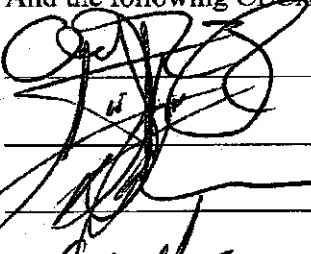
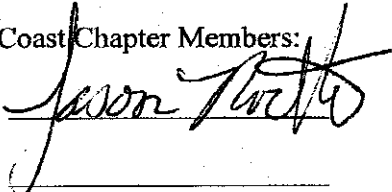

Charlie Thompson
Cagwin and Dorward
CLCA North Coast Chapter
President Elect


Brigid Flanagan
Anthony Bertotti Landscaping Inc
CLCA North Coast Chapter
President

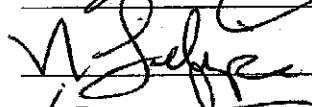
And the following CLCA North Coast Chapter Members:

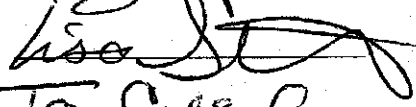













And the following CLCA North Coast Chapter Members:

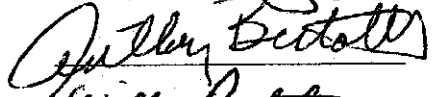
 


Jose Medina

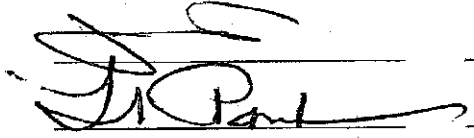

N. Lopez


Lisa St.


Tom Casagran


Quilley Beckett


William Potts


D. Paul