

TO: State Water Resources Control Board

FROM: Council for a Green Environment, a roundtable of nursery, landscape and landscape irrigation professionals.

REGARDING: USEPA Proposed Draft Standards for the Bay-Delta Estuary Economic and Quality of Life Impacts

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Too often decreasing water to urban landscapes is touted as one easy solution to unreliability of supply without thoughtful consideration of the consequences.

Landscape watering is seen as a buffer or slack in the system that can be taken up in times of shortage. But when landscapes suffer temporary or sustained shortages the effects are real, immediate and costly.

According to a study conducted by the Metropolitan Water District of Southern California, the green industry in California **employs 150,000 people** and infuses **\$10 billion** into California's economy. Our industry suffers immediate damages in a shortage when urban water districts take the common first step of asking people to reduce water to their landscapes. During the last drought at least 4,500 people from the industry lost their jobs.

When landscapes die citizens also suffer economic losses. In 1991 in Santa Barbara, for example, citizens suffered more than \$250 million of losses in dead plants, according to a study conducted by Spectrum Economics. But the true cost of the dead landscaping is even greater. Twenty-year-old trees give more shade, house more wildlife, convert more carbon dioxide to oxygen and add more to property values than do the immature replacement trees and shrubs.

These losses can not be made up when the water shortage ends. While some plants are replaced, people don't apply twice as much fertilizer, hire twice as many maintenance workers, or plant twice as many annual flowers in a year following a shortage. Most damaging, as people perceive that they do not have a reliable source of water they become less willing to invest in landscape at all.

Many local governments have decided the answer is to regulate plant material. That is simply too difficult to accomplish fairly and in a way that is

scientifically relevant. Increasing patios and decking, for example, means more water run off into overflowing sewers. When lawn watering is curtailed trees often die because their roots seek water under the lawn. Studies of how much water plants really need to look acceptable, rather than how much they will use if available, have not been done. We strongly believe government should not dictate plant pallets as a way to protect homeowners from the damages of unreliable water supply. People should be given a water allocation and allowed to use it as they see fit.

The green industry and the millions of Californians who love to garden are doing their part to conserve water in the landscape. Landscape water audits, better designed irrigation systems, moisture sensors and better maintenance of existing landscapes are all reducing water waste.

But California must begin to seek a balance between environmental damages to specific species and damage to the **urban human environment**. We urge you to consider the effect of loss of greenery on air cleansing, cooling without fossil fuels, ground water recharge and run off, wildlife habitat, etc., when balancing environmental goals.

You must also consider the human costs of reducing the quality of life in the cities. Organizations such as Common Ground and Tree People in Los Angeles use gardening as a way to bring former gang members back into the community and improve neighborhoods. The people of California must experience nature in the human preserves of parks and backyards and those preserves must have reliable irrigation.

Balancing the costs of unreliability of water to California's urban green environment with the costs of protecting endangered species is a difficult and new process for our state. Nevertheless, these interests must be balanced. The quality of life for the 25 million Californians who live cities and the economic viability of the green industry depend on it.