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March 8, 2016

Julie Saare-Edmonds  
California Department of Water Resources

*SENT VIA EMAIL TO:* [julie.saare-edmonds@water.ca.gov](mailto:julie.saare-edmonds@water.ca.gov)

**Subject: Comment Letter – Independent Technical Panel Public Draft Report to Legislature on Landscape Water Use Efficiency**

Dear Ms. Saare-Edmonds:

The Contra Costa Water District (CCWD) appreciates the opportunity to provide input and recommendations on the Public Draft Report to the Legislature on Landscape Water Use Efficiency. Below is a list of observations, suggestions, and recommendations:

#### **ALL SECTIONS**

Before any items move forward, CCWD recommends that an independent economics group evaluate all of the recommendations to estimate the one-time and annual costs including:

- Costs to local agencies
- Costs to state agencies
- Costs to residents/businesses

This would be similar to how the state evaluates propositions.

CCWD recommends that this report be specifically sent to permitting agencies for their review as it impacts them considerably.

#### **SECTION 4: VOLUNTARY TURF REPLACEMENT**

##### **RECOMMENDATION #1: Turf Replacement Incentive Program**

Instead of funding a statewide rebate, CCWD suggests using state funding to market the “new norm” in landscaping statewide. This type of marketing would support the local rebate programs and further transform the market. Local programs are doing well, but what is really needed is the continued push to transform the market. This is where the state can help greatly. CCWD suggests the state convene a taskforce of water agencies, nurseries, landscape experts both academic and practical, and develop a five-year marketing campaign. The goal would be to market the benefits of a sustainable, California friendly landscape. Perhaps the state would hire a high-level marketing

firm to implement the campaign. This is an expensive endeavor, but it needs to be done at the state level.

In addition, with all the new landscapes being installed, the knowledge level of how to maintain them needs to improve considerably. This would also be a good place for the state to provide blanket assistance.

## **SECTION 5: IMPROVEMENTS IN EXISTING LANDSCAPES**

### **RECOMMENDATION #1: Require Irrigation System Evaluations as Part of Home Inspections for Single-Family Residential Properties**

This seems on face value, a pretty good idea. However, to conduct the inspection listed, would take 45 to 60 minutes to complete. In addition, currently home inspectors are not qualified to do this work, so they would require training in an area completely outside their core knowledge. Also, note many homeowners “green up” their front lawns by fertilizing and over watering to give the home curb appeal. This may become a factor.

### **RECOMMENDATION #2: Landscapes Over One Acre**

- CCWD suggests that this recommendation be removed completely. This is an enormous burden on the DWR as well as property owners and the cost will be very high. Many of the larger sites are irrigated annually within budget and would therefore, show no savings benefit for the enormous administrative cost.
- CCWD suggests that you do not include any reference to the CUWCC as they are a 501c3, not a governmental organization. Also, the CUWCC has a tentative future in its current form.

### **RECOMMENDATION #3: State Owned Facilities**

On average, most of the public sites in California use considerably less water than commercial sites. In fact, the majority of public sites use less than an annual water budget would provide. This is not to say these sites are always irrigated efficiently. Many city, county, and school district sites are “deficit irrigated” during parts of the year to save on cost. Funding for local government is a primary driver. Therefore, this would not result in actual savings.

With that said, the overall idea of setting an example is a good idea. However, if there is not funding for the maintenance and no funding for the education of the maintenance staff, then the landscapes will end up looking poorly. This in turn will undermine the entire goal.

## **SECTION 6: STATE MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (MWELO) FUTURE REVISIONS & PROCESS UPDATES**

### **RECOMMENDATION #1: MWELO Future Revisions for the Next Review Cycle**

This recommendation puts a large amount of additional work on the local permitting agency. There are some good suggestions here, but the local permitting agencies need to have funding to do it. Below are some specific comments on each item in the table:

- **Applicability:** Does this mean that both the landscape renovation must be 500 sq. ft. or larger AND the building renovation must be \$200K or larger? If so, you will find that the landscape portion will be omitted by the renovation to get around the rule.
- **Revise ETo for special landscape area:** OK.
- **Expand to areas irrigated with non-potable water:** No, we need to use all water efficiently. This undermines efficiency. For example, some people feel it is ok for a park to be overwatered if it is recycled water. This is becoming problematic.
- **Slope:** This is not needed if the designer uses low-precipitation nozzles (rotors, impacts or rotators).
- **Pool/spa covers:** OK.
- **Irrigation schedule/hydro-zone map:** OK.
- **Irrigation efficiency/overspray:** OK.
- **Audit sampling:** What is the expected benefit in sustainable, reliable savings and what is the cost. Also, how will this be paid for and who will enforce it?
- **Rainwater:** Designing properties to retain rainwater onsite to replenish ground water is a good goal. However, before this becomes a regulation, it needs to be vetted and signed off by soil and structural engineers. This is well intended, but it needs to be done properly.
- **Public education:** OK.

### **RECOMMENDATION #2: MWELO Revision: Aligning with the CAL-Green Title 24 Revision Process to Maximize Enforcement**

It is unclear what additional burden would be placed on local agencies and what benefits in water use efficiency would be achieved. This recommendation needs to present how it will improve water use efficiency beyond what it would otherwise without this change. In addition, it needs to present the additional cost to the state and local agencies.

### **RECOMMENDATION #3: State Facility Leadership for New Landscapes**

This recommendation suggests that public buildings will be required to be designed with landscapes that require no additional irrigation water after the first two years. This is a lofty goal that could result in very aesthetically unappealing landscapes. Some sites may lend themselves much more to this type of design, while others would definitely not. For example, long narrow planting strips with adjacent hardscape and buildings are not in a 'natural' setting and to design a

landscape with zero irrigation is a very difficult task, especially if the goal is to have an aesthetically pleasing landscape. We do not want to set into motion a regulation that results in unattractive landscapes which are touted as water conserving. This could result in negatively affecting the movement toward sustainable landscapes. Alternatively, this recommendation could be revised to develop incentives for public buildings to become examples of very low water use landscapes. But it is vital that they are designed, installed and maintained well so they remain good examples.

Item 1: It is unclear if this section will require all landscape designers and practitioners to take a new certification? If so, it is unclear why. The American Society of Landscape Architects licensing board already does this for landscape architects and the Association of Professional Landscape Designers does the same for designers.

Item 4: If you are suggesting that landscape design templates would be used for all new state facilities, then this should not be done. Landscape architects can utilize guidelines and goals for a design, but each site is unique and must be designed uniquely.

## **SECTION 7: COMPLEMENTARY POLICES AND REGULATIONS**

### **RECOMMENDATION #1B: Product Standards for Irrigation Equipment – Sprinkler Bodies**

This recommendation is ok. However, note that a check valve will reduce the operating pressure of the sprinkler and could adversely affect sites with low pressure. Otherwise, this is a good suggestion.

Consider adding a section to address the extremely poor quality sprinkler heads available in big box stores. Big box stores often sell lower quality sprinkler heads than are available through irrigation suppliers. In particular, these heads are constructed in a way that allows the seal to become worn out due to weather and sunlight. As a result, these heads often do not seal properly and result in significant water waste.

Thank you for accepting CCWD's comments.

Sincerely,



Chris Dundon  
Water Conservation Supervisor

CD:dmg