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March 12, 2016

Julie Saare-Edmonds
Water Use and Efficiency
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Dear Ms. Saare-Edmonds:

On behalf of the licensed landscape contractors and others who comprise our membership, the California Landscape Contractors Association appreciates the opportunity to provide input and comments on the Public Draft Report to the Legislature on Landscape Water Use Efficiency as written by the members of the Independent Technical Panel.

CLCA is a nonprofit trade association of licensed landscape and landscape-related contractors. Also included among our approximately 2,000 members are landscape suppliers, landscape architects and designers, public officials, educators, and students.

We know that landscapes are essential to the quality of life in our communities. They produce oxygen; clean our air; cool our buildings; capture, filter, and recharge groundwater; and screen out noise. They beautify and soften harsh settings, provide fire protection, produce locally grown food, and give us opportunities for many kinds of outdoor recreation. They serve as islands of refuge for wildlife as well as people by replacing ecosystems lost to development. For all of these reasons, they represent sizable investments and add tremendous value to properties and communities. Whatever the landscape type or style, CLCA members know that the key to landscape water conservation is water-efficient design, installation, and management. Toward that end, we submit the following input and comments.

SECTION 4: Voluntary Turf Replacement - Recommendation 1: Turf Replacement Incentive Program

CLCA supports the goals of the recommendation establishing a turf replacement incentive program but recommend that it be amended to preclude the use of artificial turf as a replacement option. Prohibition of artificial turf for any possible tax credits would be consistent with a holistic, watershed approach that promotes clean water and healthy communities.

SECTION 5: Improvements in Existing Landscapes - Recommendation 1: Require Irrigation System Evaluations as Part of Home Inspections for Single-Family Residential Properties

CLCA supports the goal of requiring irrigation system evaluations as part of home inspections. However, as irrigation systems have become more advanced, we have concerns about the current level of qualifications and expertise of home inspectors to be able to effectively evaluate irrigation systems. CLCA would like to offer its resources to help develop and train home inspectors to meet the goals of this proposal.

SECTION 5: Improvements in Existing Landscapes - Recommendation 2: Landscapes Over One Acre

Data is imperative to improving water use efficiency and we believe the intent of this recommendation is good. However, based on past experience with local governments as it relates to data of this type, it appears to be beyond their current capabilities and funding to handle this scope of work. Instead, we recommend that this be pursued at the state level with appropriate year-over-year funding. CLCA stands at the ready to assist with the creation of landscape irrigation reporting system.

Additionally, we request that the list of responsible parties be expanded to include those currently certified by EPA recognized certification programs such as CLCA's Water Management Certification Program and the Qualified Water Efficient Landscaper Program (QWEL).

SECTION 5: Improvements in Existing Landscapes - Recommendation 3: State Owned Facilities

CLCA supports this recommendation and feels strongly that the State of California should be leading the way in both word and deed. As it relates to the deadline to comply with Section 493.1 of the Model Efficient Landscape Water Ordinance, we suggest that the date be changed to January, 2017 so as to be in alignment with the deadline applied in Section 5, Recommendation 2 for multi-family residential, commercial, industrial and institutional landscapes.

SECTION 6: State Model Water Efficient Landscape Ordinance (MWELO) Future Revisions & Process Updates - Recommendation 1: MWELO Future Revisions for the Next Review Cycle

CLCA supports the recommendation in general but has concerns with changing the MWELO trigger from landscapes of 2,500 square feet to landscapes of 500 square feet. We feel this reduction is too steep and should be re-evaluated. Also, we oppose the proposed change prohibiting spray irrigation for turf slopes greater than 10% and recommend that this change be removed from the recommendation entirely.

SECTION 6: State Model Water Efficient Landscape Ordinance (MWELo) Future Revisions & Process Updates - Recommendation 2: MWELo Revision: Aligning with the CALGreen Title 24 Revision Process to Maximize Enforcement

CLCA supports this recommendation.

SECTION 6: State Model Water Efficient Landscape Ordinance (MWELo) Future Revisions & Process Updates - Recommendation 3: State Facility Leadership for New Landscape

CLCA supports this recommendation and feels it is a strong complement to Section 5, Recommendation 3 as it relates to landscape water usage at state owned facilities.

SECTION 7: Complementary Policies and Regulations - Recommendation 1A: Product Standards for Irrigation Equipment – Controllers

CLCA supports this recommendation. Equipment and tools are only as good as those who install and operate them and we hope that in the future, this is strengthened further so that only controllers that are weather sensor based and/or soil moisture sensor based will be allowed for sale in California. We notice that this recommendation has no implementation date and suggest establishing a deadline of January 1, 2018.

SECTION 7: Complementary Policies and Regulations - Recommendation 1B: Product Standards for Irrigation Equipment – Sprinkler Bodies

CLCA supports this recommendation. We notice that this recommendation has no implementation date and suggest establishing a deadline of January 1, 2018.

SECTION 7: Complementary Policies and Regulations - Recommendation 2: Permit Required for Irrigation Installation

CLCA supports this recommendation.

SECTION 7: Complementary Policies and Regulations - Recommendation 4: Piloting Connection Charges that Promote Landscape Efficiency

CLCA supports this recommendation.

SECTION 7: Complementary Policies and Regulations - Recommendation 5: Plant Labeling

CLCA supports this recommendation.

SECTION 7: Complementary Policies and Regulations - Recommendation 7: Upgrades to the California Irrigation Management Information System (CIMIS)

CLCA supports this recommendation.

SECTION 8: Workforce to Accomplish the Transformation - Recommendation 1: Certification of Professionals

As a leader in certification of landscape professionals, CLCA supports this recommendation. CLCA's Water Management Certification program, with its performance based requirements, would be an excellent starting point for this recommendation and we offer our full support. More about our CLCA Water Management Certification program can be found at <http://clca.org/water-pro/about.php>.

SECTION 8: Workforce to Accomplish the Transformation - Recommendation 2: C-27 Examination Questions Covering Water Use Efficiency and Sustainable Practices

CLCA supports this recommendation and is currently working collaboratively with CSLB on the evaluation of the next version of the C-27 license exam.

SECTION 9: Public Perceptions and Social Norms - Recommendation 1: Defining Professionals: Recognition of Examples of Low Water Use Landscapes and a Sustainable Statewide Approach to Outreach and Information

CLCA supports this recommendation.

SECTION 10: Research Needs and Support - Recommendation 1: [Title Pending] and Recommendation 2: Water Use Classification of Landscape Species IV (WUCOLS IV) Support

CLCA supports both of these recommendations.

At this time, WUCOLS is the default publication used to assist with MWELO compliance. As such, WUCOLS has not been replaced with other standards or documents. If new standards such as ANSI/ASABE S623 - Determining Landscape Plant Water Demands or similar are found to be a better method to determine plant water demands, we recommend that DWR consider such as a replacement or compliment to the existing WUCOLS. Until that time, we support efforts to ensure WUCOLS is current, accessible, accurate and informative.

APPENDIX - SECTION 7: Complementary Policies and Regulations - Recommendation #8: Water Budget Performance Reporting

CLCA's promotion of water budgeting as a smart landscape water approach that lowers usage while preserving the beauty of our landscapes is well known. We created CLCA's Water Management

Certification program to assist in the expansion of the usage of water budgets and thus, lower landscape water use. We strongly urge that this recommendation be included in the final report as it represents a swift and effective method to reduce landscape water usage.

In conclusion, we commend the members of the Independent Technical Panel for their three years of hard work which resulted in the creation of this draft report, their work on the recent revisions to the Model Water Efficient Landscape Ordinance as well as their first report to the State Legislature. CLCA appreciates the opportunity to provide information and feedback.

Yours sincerely,



Sandra Giarde, CAE
Executive Director

cc: CLCA Board of Directors
CLCA Legislation Committee
CLCA Resource Management Committee