



# **Irrigation Association Comments Regarding the Independent Technical Panel on Demand Measures Recommendations Report to the Legislature on Landscape Water Use Efficiency**

**March 13, 2016**

On behalf of the more than 1,500 members of the Irrigation Association, thank you for your work in developing the public draft report and for the opportunity to comment on behalf of the irrigation industry.

With a mission *to promote efficient irrigation*, the Irrigation Association is the leading authority on all aspects of irrigation. Focusing on education, training, certification and advocacy, the IA prides itself on technical and scientific-based solutions to elevate the irrigation industry and sustain water resources for generations to come. The IA believes that employing best management practices with the latest technological advances in irrigation achieves significant water savings, while providing the environmental benefits of managed living landscapes.

Since Governor Brown's April 2015 executive order regarding potable water use, irrigation professionals throughout California have "stepped up to the plate" and brought forth real solutions to help property owners, water providers and local governments conserve as much water as possible through efficiencies in irrigation. The Irrigation Association remains committed to collaborating with California's legislature, the Natural Resources Agency and the Department of Water Resources to ensure California continues to set the bar for embracing new irrigation technology, enforcing best management practices and encouraging all Californians to treat water like the precious resource that it is. Through these comments and recommendations, we believe that California can achieve a significant reduction in potable water use, well surpassing the mandated 25 percent. We look forward to our continued dialogue and appreciate the opportunity to provide these comments.

## **SECTION 3: ITP VISION STATEMENT**

While aggressive, the Irrigation Association welcomes the challenge to reduce potable water use in the landscape by 50 percent over the next 20 years. However, we feel that the vision statement should be more aggressive in addressing the lack of new and efficient technologies,

designs and maintenance currently being used in California's urban landscape irrigation systems.

Plants, whether they are trees, shrubs or turfgrass, have the potential to be overwatered, if inefficient irrigation designs, incorrect installation and/or inefficient technologies are used. Placing more of a focus on the future of irrigation in California, rather than (or even in addition to) landscape plant material, would ensure that the state capitalizes on opportunities to conserve water through the proper irrigation of current and future landscapes.

Our recommendations:

- 1) Highlight the use of efficient irrigation designs, installation, maintenance and technologies as a key change for the future.
- 2) Address irrigation separately from what plants are being irrigated. For example, on page 7, the first two bullets address turfgrass and plants, along with irrigation. The type of irrigation that is used, including how it is designed and managed, is of utmost importance and should be highlighted separately.
- 3) The IA agrees that irrigation should be treated as a supplemental water source for urban landscapes. We also agree that alternative water sources should be used instead of potable water wherever practical. We encourage the legislature, the ITP and the Administration to look at infrastructure improvement opportunities, along with irrigation technologies to make this goal a reality.

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

The Irrigation Association believes that property owners and managers should use the "right plant in the right place" in the managed landscape. The managed landscape should be viewed as a system that provides many functional benefits to society, beyond aesthetic appeal. This includes, but is not limited to, oxygen production, carbon sequestration, cooling, pollution abatement (air, noise, water, etc.), erosion control, wildlife habitat, safety, security and recreation, which are all important to human well-being. No matter what plants are part of the managed landscape, it is up to property owners and managers to ensure that it is irrigated efficiently.

As the DWR, ITP and the legislature consider turf replacement and/or landscape conversions, we recommend that the CUWCC document *Turf Removal & Replacement: Lessons Learned*, be considered when making final recommendations. This document can be found at <http://cuwcc.org/Portals/0/Document%20Library/Resources/Publications/Council%20Reports/Turf%20Removal%20-%20Replacement%20-%20Lessons%20Learned.pdf>.

Our recommendations:

- 1) Before any recommendations are submitted, data or references need to be included and in turn, the report should be opened back up for public comment, Data or references should be included for points made in this section, the vision statement and subsequent sections of the recommendations document.
- 2) In some instances in California, it may make sense to replace turfgrass and in others, no water will be saved (short or long term) through a turf replacement program. The Irrigation Association recommends that California commission a study that looks into the success of turfgrass replacement programs and if alternative water savings programs may be more beneficial to achieve long-term water-savings goals.

- 3) Review the IA/ASIC Best Management Practices document (<http://www.irrigation.org/landscapebmps/>) and collaborate with each organization in producing a simplified document for homeowners and property managers to use when managing irrigation.

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

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

The Irrigation Association supports the concept of making the irrigation system part of the home infrastructure, thus part of the home inspection.

Our recommendations:

- 1) The IA commits to collaborating with the legislature, DWR, ASIC and CLCA in developing a checklist, based on the IA/ASIC Best Management Practices (<http://www.irrigation.org/landscapebmps/>), to use during a home inspection.
- 2) Given the technical nature of irrigation systems and technologies, the IA recommends that home inspectors use an irrigation professional certified by the IA, CLCA and/or a professional member of American Society of Irrigation Consultants in assisting with the irrigation system inspection process, or become trained in such programs.

### Recommendation #2: Landscapes Over One Acre

The Irrigation Association supports the expansion of the MWELo to existing landscapes.

Our recommendations:

- 1) Letter (d): the Irrigation Association and the ASIC should be included to work with CLCA and the CUWCC in creating a template for an irrigation inspection report form.
- 2) The current MWELo has significant problems being enforced on new landscapes. While the IA embraces the inclusion of existing landscapes, we recommend that the current MWELo be enforced before any expansion or modification occurs.

### Recommendation #3: State Owned Facilities

The Irrigation Association supports the concepts outlined in this recommendation.

Our recommendations:

- 1) The educational material developed for state-employed landscape managers should be based on the IA/ASIC BMP document (<http://www.irrigation.org/landscapebmps/>). The DWR should collaborate with the IA and ASIC when developing this educational material.
- 2) IA certifications, along with professional membership within ASIC, should be taken into consideration when state agencies review and give preference to the most qualified professionals bidding on landscape irrigation projects/contracts.

## **SECTION 6: STATE MODEL WATER EFFICIENT LANDSCAPE ORDINANCE FUTURE REVISIONS AND PROCESS UPDATES**

### Recommendation #1: MWELO Future Revisions for the Next Review Cycle

Before any benefits of the current MWELO can be seen, the DWR, the legislature, the ITP and/or the Administration are looking to make significant revisions to the model ordinance. MWELO has taken effect only recently, as noted by the ITP, and because of this reality, the Irrigation Association recommends that the ITP keep the current trigger recommendation in place, while looking at the economic and environmental feasibility of decreasing that trigger amount.

The IA also believes that the Special Landscape Area should be kept at an ETAF of 1.0. These are functional areas that, in many cases, rely on that ET factor.

Our recommendations:

- 1) Keep the 2,500 sq. ft. threshold for current landscapes within the MWELO, while studying the economic and environmental feasibility of decreasing to 500 sq. ft.
- 2) Keep the SLA ETAF at 1.0.
- 3) Remove the recommendation to decrease the turfgrass slope to 10 percent from 25 percent. A 25 percent slope can be efficiently irrigated, if the IA/ASIC BMPs are employed. In many cases, this turf serves a functional purpose that other groundcover cannot. We suggest that there are many new turf varieties with lower water demand to be used. We recommend that the Department of Water Resources work with organizations such as Turfgrass Producers International or Turfgrass Water Conservation Alliance to identify such varieties.
- 4) Public Education – the IA recommends that irrigation professionals be included in the “how to hire trained and licensed...” details.
- 5) We support the rest of the recommendations of the ITP in Section 6.1.

### Recommendation #2: MWELO Revision: Aligning with the CALGreen Title 24 Revision Process to Maximize Enforcement.

The IA supports the recommendations of the ITP.

### Recommendation #3: State Facility Leadership for New Landscapes

The IA supports the concepts behind this recommendation of the ITP. However, we feel that more emphasis should be placed on how the water is used/applied to landscapes.

Our recommendations:

- 1) In addition to the DWR and the SWRCB, the DGS should collaborate with the Irrigation Association in developing an irrigation program for landscape designers, practitioners and irrigation professionals.
- 2) The state should lead by example in employing the latest irrigation technologies and practices, in addition to “California-friendly landscaping.”
- 3) In recommendation 6.3.6.a: please define “maximum practicable.”

- 4) In recommendation 6.3.6.d, IA certifications and professional membership in ASIC should be considered in the final process.

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

### Recommendation #1A: Product Standards for Irrigation Equipment

California is in a unique position to be the leading state on adopting cutting-edge irrigation technologies, showcasing not only water-savings potential, but also the California-based irrigation and technology companies that are leading the national effort on developing technologies that increase irrigation efficiencies. **The ITP’s recommendation that “stand-alone SMS-based controllers ought not to be sold in California” goes against all logical reasoning and should be removed from all recommendations of the ITP and DWR.**

The IA recognizes that a SMS-based irrigation controller standard does not exist; however, as referenced in this recommendation, the Irrigation Association is working with the American Society of Agricultural and Biological Engineers, as well as WaterSense, to develop an ANSI standard and WaterSense label for SMS-based irrigation controllers.

Soil moisture sensor-based technology, though relatively new on the market, is proven in its effectiveness. Going back to the Smart Water Application Technologies (SWAT) protocol on soil moisture sensor-based technology ([http://www.irrigation.org/soil\\_moisture-based\\_controllers/](http://www.irrigation.org/soil_moisture-based_controllers/)), the industry has welcomed developing testing protocols and continues to collaborate on developing the ANSI standard and WaterSense label.

Our recommendations:

- 1) The ITP should recognize the benefits of SMS-based technologies and encourage, rather than ban, the use throughout California.
- 2) Ask the CEC to develop the final rule regarding SMS use once the ANSI standard is complete.
- 3) If necessary, reference the current SWAT testing protocol ([http://www.irrigation.org/soil\\_moisture-based\\_controllers/](http://www.irrigation.org/soil_moisture-based_controllers/)), when looking at developing a temporary requirement while the final ANSI standard is developed.

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

The IA supports the recommendations in this section. The Irrigation Association, along with the DWR and various stakeholders were involved in the development of ASABE-ICC 802-2014. The standard is referenced in the latest version of the MWELo and we encourage the CEC to reference the standard when developing standards and requirements for California.

### Recommendation #2: Permit Required for Irrigation Installation

The IA supports the concept of requiring a permit and “triggering” MWELo compliance for new irrigation system installations.

The IA supports the recommendations of the ITP.

Recommendation #4: Piloting Connection Changes that Promote Landscape Efficiency (*note: there is no recommendation #3 in the document*)

The IA supports the recommendations of the ITP.

#### Recommendation #5: Plant Labeling

The IA recommends that the ITP and the DWR collaborate with AmericanHort and the California Association of Nurseries and Garden Centers when exploring plant labeling.

#### Recommendation #7: Upgrades to the California Irrigation Management Information System (note: there is no recommendation #6 in the document)

The IA supports the efforts to update the CIMIS and looks forward to collaborating with the DWR and others in doing so.

### **SECTION 8: WORKFORCE TO ACCOMPLISH THE TRANSFORMATION**

#### Recommendation #1: Certification of Professionals

The IA fully supports the promotion and use of certified professionals throughout the landscape irrigation industry. We appreciate and support the ITP's recommendation regarding the review of certification programs.

The Irrigation Association's certification program is the largest and only nationally accredited certification in the landscape irrigation field. Focusing on technicians, auditors, contractors and designers, IA's certifications enhance the level of expertise in the marketplace in all aspects of landscape irrigation.

The Irrigation Association was the first organization to support the launch of EPA's WaterSense program and is currently the largest certifying partner of WaterSense.

Our recommendations:

- 1) We encourage the ITP and DWR to collaborate with the Irrigation Association and WaterSense when reviewing and identifying current certification programs that are currently being used throughout California.
- 2) The IA recommends that landscape design, including plant choice, be addressed separately from irrigation design, installation and maintenance. Both skill sets are important to the future of California landscapes; however, both are different and should be treated as such.

#### Recommendation #2: C-27 Examination Questions Covering Water Use Efficiency and Sustainable Practices

The Irrigation Association supports the state licensing of landscape irrigation professionals ([http://www.irrigation.org/Policy/Licensing\\_for\\_Landscape\\_Irrigation\\_Professionals.aspx](http://www.irrigation.org/Policy/Licensing_for_Landscape_Irrigation_Professionals.aspx)). We commend the ITP for addressing the C-27 license for landscape contractors. However, irrigation system design, installation and maintenance is missing from the current license. We believe that these skills are essential for landscape and irrigation professionals to have a) to promote the protection of public health, safety and general welfare, b) to support the environmental, economic and social benefits of cultivated landscapes, and c) to ensure the efficient use of water resources.

Our recommendations:

- 1) The ITP should include in its recommendations the inclusion of questions in the C-27 exam that address irrigation technologies, if that contractor wants to be licensed to work on irrigation systems.
- 2) The IA welcomes the opportunity to collaborate with the CSLB, DWR and other stakeholders to develop educational material and questions for use within the C-27 license. Currently, IA exams/exam questions are used in both New Jersey and North Carolina for their irrigation licensing programs.

## **SECTION 9: PUBLIC PERCEPTIONS & SOCIAL NORMS**

### Recommendation #1: Defining Professionals: Recognition of Examples of Low Water Use Landscapes and a Sustainable Statewide Approach to Outreach and Information

The Irrigation Association fully supports the recommendations outlined by the ITP in this section.

Our recommendations:

- 1) This effort should be completed in coordination with the review of certifications that exist and are being used throughout California.
- 2) The Irrigation Association welcomes the opportunity to collaborate with ACWA and other stakeholders in educating homeowners and property managers on the differences between each professional in the landscaping realm.

## **SECTION 10: RESEARCH AND DOCUMENTATION NEEDS AND SUPPORT**

### Recommendation #1: [title pending]

The Irrigation Association welcomes the opportunity to discuss research needs affecting water conservation methods and practices currently being employed throughout California.

Our recommendations:

- 1) The IA recommends that the ITP not be prescriptive in what potential topics should be addressed by an industry stakeholder committee, but rather identify current and/or potential issues that the committee should address. The example given in the recommendations for potential topics regarding irrigation technology actually stifles innovation and will have the potential to leave water savings on the table. This committee should be embracing new and innovative technologies, not shunning them.
- 2) There seems to be some overlap with the recommendations for topics to study and recommendations of the ITP. This may be an opportunity to have this type of committee review and study many of the recommendations of the ITP before fully embraced by the legislature and/or the DWR.

### Recommendation #2: Water Use Classification of Landscape Species IV (WULCOLS IV) Support

The IA does not have any comments (positive or negative) regarding this recommendation.

## APPENDIX A: Additional Review Materials

### SECTION 7: COMPLEMENTARY POLICIES AND REGULATIONS

#### Recommendation #8: Water Budget Performance Reporting

The Irrigation Association believes that one of the main reasons why Governor Brown called for a review and update of the MWELo in April of 2015 is because the MWELo, as it stood through the first quarter of 2015, was not being properly enforced throughout California, thus not having the intended effect on landscapes and irrigation as originally intended.

While the IA is not going to comment on placing regulations on water providers and utilities for mandatory reporting, we will defer to the Association of California Water Agencies on that topic, we do feel that measures need to be in place during times of non-drought. This will ensure California stays at the cutting edge of water conservation and efficiencies through landscape and irrigation design and maintenance.

The Irrigation Association is happy to collaborate with ACWA, DWR and the SWRCB in developing metrics and BMPs for MWELo enforcement during times of non-drought. We believe that enforcement of MWELo will place California in a much better position during the next drought.

#### CONCLUSION

Again, the Irrigation Association thanks the ITP and the DWR for all of their work and for developing these recommendations. We commend all of those involved.

Big challenges lie ahead for California. We are in a precarious position of mitigating the effects of the current drought, while setting forth permanent solutions to prepare for the next drought when it hits California. We at the Irrigation Association stand with Governor Brown, the legislature and the DWR in ensuring no water is wasted due to irrigation inefficiencies in the landscape. We look forward to our continued partnership to meet our joint goals.

If you have any questions regarding these comments, please contact us at [johnfarner@irrigation.org](mailto:johnfarner@irrigation.org) or [brentmecham@irrigaion.org](mailto:brentmecham@irrigaion.org). Thank you for your consideration of our comments and recommendations.

Sincerely,



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