



March 11, 2016

Julie Saare-Edmonds,
Water Use and Efficiency
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: “Comment Letter – Independent Technical Panel Report on Landscape Water Use Efficiency”

Dear Ms. Saare-Edmonds:

We thank the Department of Water Resources (DWR) for the opportunity to provide comments on the Independent Technical Panel’s (ITP) draft report on Landscape Water Use Efficiency. We, the undersigned, seek to join you and all of the various state and local agencies in California tasked with promoting water conservation, and in doing so, we offer our thoughts in the spirit of successful partnership and outcomes.

As established leaders in the lawn and garden industry, we firmly embrace our leadership roles to help Californians to conserve water in their outdoor spaces. We’re working to provide Californians with the education, tools and technology they need to achieve significant, smart and lasting reductions in outdoor water use.

To better understand how it could help homeowners reduce their outdoor water use, ScottsMiracle-Gro surveyed homeowners throughout California to benchmark their behaviors and attitude. An overwhelming majority, 70 percent, said they are willing to make significant lifestyle adjustments to do their part in addressing the drought. However, the same percentage also said they did not intend to remove or replace turf from their landscapes.

That so many Californians are willing to help solve the problem suggests that the focus should continue to emphasize education and outreach efforts that enable behaviors and practices that can yield even greater water savings by a larger body of willing partners.

As such, it leads us to respectfully disagree with the ITP’s turf replacement tax recommendation as currently proposed. There is no one size fits all approach to achieve water savings, and Californians should be given the opportunity to maintain differing types of landscapes that can save water. Especially since turf replacement is “the most expensive program alternative ... with a cost of \$1,679 per acre/foot of water saved.”¹ To be more specific, we make the following recommendations:

¹ Joe Berg, Metropolitan Water District of Orange County, WaterSmart Innovations Conference 2014

- 1. Expand incentives beyond turf replacement programs that have proven to be ineffective and could be harmful to the environment.**
 - a. In a recent turf replacement program audit by the Los Angeles City Controller's office, it was determined that while turf replacement helped residents reduce their water use by about half a gallon a day, "Angelenos," acting on their own and without incentives, achieved cuts of 22 gallons per day. In effect, voluntary efforts accounted for 88 percent of the overall reduction in daily water use per capita, the auditors said.²
 - b. The same audit also found that every dollar invested in this "Cash in Your Lawn" program over 10 years is estimated to save just 350 gallons of water. Other programs, such as rebates for high-efficiency appliances, yield a savings of closer to 1,700 gallons or more.³
 - c. According to a UC Cooperative Extension report, "Simply irrigating in a judicious manner can save significant amounts of water, and might be sufficient by itself to meet mandatory 25% to 35% water reductions without changing the landscape to so-called "low-water use" or "drought-tolerant" plants."⁴
 - d. Experts have cited the numerous benefits that lawns and green spaces provide: rain capture for dust and erosion control; ability to keep the ground at a cooler temperature, and carbon sequestration to help lessen global warming. If a lawn is fed well, over the course of the year, it will remove twice as much carbon from the air as a tree.
- 2. Include warm season grasses in any future rebate programs because they can achieve 20% water savings. Research shows installing climate appropriate low to moderate water use turf can significantly reduce and even eliminate water use in some months.**
 - a. Research by University of California Cooperative Extension shows that properly managed and irrigated warm season grasses require 20% less water than that needed by tall fescue, proof that considerable water can be saved without removing turf altogether.⁵
- 3. Focus on new water smart technologies that connect homeowners to their yards and reduce water usage at the same time.**
 - a. Consumers can also meet the state mandated conservation target and preserve the type of landscape they chose by utilizing new technologies such as high-tech soil moisture sensors - updated "water smart" irrigation systems that essentially connect the yard to the homeowner via web-based applications and smart devices.
 - b. Weather Based Smart Controllers respond automatically to changes in the local weather based on ET calculations and assure sprinklers off during a rain event and for 48 hours thereafter. This helps to eliminate unnecessary watering.
 - c. When pressure compensating, high efficiency nozzles and/or pressure regulating spray heads replace conventional spray heads and nozzles, 20% - 30% savings are achieved without the need to remove turf.

We respectfully suggest that future guidance be expanded to include landscape alternatives that can

² <http://www.scp.org/news/2015/11/21/55784/ladwp-turf-rebate-program-largely-a-gimmick-audit/>

³ <http://www.scp.org/news/2015/11/21/55784/ladwp-turf-rebate-program-largely-a-gimmick-audit/>

⁴ <http://ucanr.edu/sites/UrbanHort/files/216568.pdf>

⁵ <http://ucanr.edu/sites/HodelPalmsTrees/files/215524.pdf>

maximize water efficiency.

We encourage DWR to reevaluate these recommendations and consider other options beyond turf removal that encourage Californians to have the water-saving landscape of their choice.

Please contact Michael Diamond at (206) 305-1622 or Michael.diamond@Scotts.com, or anyone listed below to be of any additional assistance or provide more information.

Sincerely,

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