

June 29, 2023

Senator Dave Min  
Chair, Natural Resources and Water Committee  
California State Senate  
1021 O Street, Room 3220  
Sacramento, CA 95814

Senator Kelly Seyarto  
Vice Chair, Natural Resources and Water Committee  
California State Senate  
1021 O Street, Room 3220  
Sacramento, CA 95814

**Re: Assembly Bill 1573 (Oppose, unless amended)**

Dear Senators Min and Seyarto:

On behalf of the approximately 1,300 member companies of the Irrigation Association, many of which are headquartered or have a large employee presence in California, **I write to express our significant concerns with Assembly Bill 1573 and to request modifications to the legislation.**

As stewards of water resources, irrigation professionals and companies recognize the important role we play to ensure water resources are accessible and provide for future generations. Our industry is committed to investing in new product development and contributing expertise to encourage dialogue and successful solutions that have a lasting impact on the sustainability of our water resources.

While we support enhanced water conservation and efficient irrigation in California, Assembly Bill 1573 lacks effectiveness in achieving these goals. In short, it is ill-advised to enact proscriptive product standards in legislation that are not based on solid science and real-world data. Rather, enhanced efficiency should be addressed via existing collaborative mechanisms that bring together experts and stakeholders and that provide processes to continually reevaluate decisions based on new technology. We urge a reconsideration of its provisions and encourage additional consultation with industry experts, water management professionals and stakeholders for a more balanced and successful approach.

We are particularly concerned about how the bill would circumvent the collaborative and cross-sector development of the Model Water Efficient Landscape Ordinance (MWELo) and unilaterally impose unreasonable mandates on local irrigation and landscaping. MWELo has been a successful framework that encourages the responsible use of water in landscaping while considering regional variations. The proposed legislation disregards the collaborative efforts made thus far and imposes rigid mandates without sufficient input from industry experts and stakeholders. This approach risks overlooking critical factors such as microclimates, soil types and plant water requirements, which play a crucial role in

developing effective irrigation strategies across California's diverse geography. Instead, this should be addressed via existing MWELo processes that include relevant experts and stakeholders.

In addition, the legislation's provision to prohibit the use of "traditional overhead sprinklers," which the legislation would define as including "spray sprinkler nozzles with application rate greater than 1.0 inch per hour," in new or rehabilitated landscapes is especially concerning. This language is overly prescriptive, does nothing to ensure water efficiency or conservation, is not based on scientific or real-world data and increases the cost of efficient and effective irrigation solutions. Moreover, this prohibition ignores the fact that many products can be highly efficient when designed and managed properly. We encourage this provision be removed from the legislation and instead utilize the existing MWELo process to foster adoption of more efficient practices across the state.

Finally, we are troubled by the legislation's requirement for the use of "water efficient irrigation devices" in new or rehabilitated landscapes. While we support continual improvements that enhance efficiency, the lack of a clear definition of what constitutes a "water efficient irrigation device" creates confusion and hampers the ability of irrigation professionals to comply with the law effectively. Instead, we recommend alignment with the EPA WaterSense program and existing California Energy Commission pressure regulation requirements.

We appreciate your attention and welcome the opportunity to discuss our concerns in greater detail. Please do not hesitate to reach out to Irrigation Association Advocacy and Public Affairs Vice President Nathan Bowen ([nathanbowen@irrigation.org](mailto:nathanbowen@irrigation.org)) if you require any further information or if we can be of assistance.

Sincerely,

A handwritten signature in cursive script that reads "Natasha L. Rankin". The signature is written in black ink and is positioned above the typed name and title.

Natasha L Rankin, MBA, CAE  
Chief Executive Officer