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December 20, 2025

Department of Water Resources
Attn: MWELO Review
Water Use Efficiency Branch
P.O. Box 942836-0001
Sacramento, CA 94236-0001

Re: Irrigation Association comments on MWELO review—alignment with “Making Conservation a California Way of Life” and Other Specific Comments

Dear DWR Staff:

Please accept these comments on behalf of the Irrigation Association (IA)—the national trade association representing more than 1,000 companies that manufacture, design, install and manage irrigation systems across public and private landscapes. The irrigation industry is an essential part of improving our quality of life through reliable food supply and vital green spaces in our communities. IA represents the full value chain of irrigation equipment and services in the United States: from R&D and component manufacturing (valves, emitters, pumps, controllers, sensors) to distribution, system design, installation, and after-sales support. Our members range from global manufacturers to small and medium-sized enterprises supplying farms, greenhouses, golf, sports turf, parks, campuses, and commercial/residential landscapes.

The IA appreciates the opportunity to provide comments as DWR reviews the Model Water Efficient Landscape Ordinance (MWELO). Based on these comments and others we’ve heard throughout the engagement process, the IA takes the position that an update to MWELO would be useful for improving landscape water use efficiency and the administration of the ordinance. Here are our comments:

(1) Reduce inconsistencies/tensions with the State Water Board’s “Making Conservation a California Way of Life” framework

With the State Water Board’s “Making Conservation a California Way of Life” regulation (“WC Way of Life”) now effective (January 1, 2025), the landscape community is increasingly navigating two regulatory structures - MWELO at project/permitting time and the WC Way of Life water-use objectives through direct and indirect engagements with the water suppliers. While

we recognize these programs operate at different levels, inconsistencies can create mixed messages for property owners, water suppliers, and contractors, increasing administrative burden and potential confusion without improving water-savings outcomes. Action should be taken to harmonize MWVELO with the WC Way of Life whenever possible.

Here are two concrete examples that illustrate the issue, and a comprehensive review and stakeholder engagement process should be undertaken to harmonize the MWVELO and WC Way of Life approaches.

Example A: Rainfall / effective precipitation is optional in MWVELO but embedded in WC Way of Life

- *MWVELO*: local agencies may consider effective precipitation (Eppt) specified as 25% of annual precipitation and may use it to calculate Maximum Applied Water Allowance (MAWA) as $(ET_0 - Eppt)$. This is explicitly discretionary (“may”).
- *WC Way of Life*: effective precipitation (Peff) is explicitly defined as 25% of total annual precipitation (or a lower CalSIMETAW value) and Net ET_0 is defined as the difference between reference ET_0 and effective precipitation. In other words, precipitation is systematically built into the outdoor budget term.

Why it matters: the same landscape can be “efficient” under one framework and appear misaligned under the other simply due to differing default assumptions and handling of effective precipitation, complicating customer communication and program implementation.

Example B: Water features are treated differently in the two frameworks

- *MWVELO*: “landscape area” expressly includes water features. MWVELO requires recirculating systems, encourages recycled water where available, and directs that the surface area of a water feature be included in the high-water use hydrozone / use the high water use hydrozone plant factor in the water budget calculation.
- *WC Way of Life*: the outdoor residential standard provides a distinct treatment for Residential Special Landscape Areas (RSLA) with a landscape efficiency factor (LEF) of 1.0, and it explicitly addresses pools, spas, and similar water features in the RSLA-related accounting provisions.

Why it matters: This difference creates conflicting accounting signals for the same site feature under two state frameworks that property owners, local plan reviewers, and water suppliers increasingly apply in parallel. The result can be mixed messages (“allowed” in one framework but

“penalized” in the other), more redesigns and documentation to reconcile different assumptions, and a shift in attention from practical, verifiable water savings toward classification debates that don’t necessarily improve real-world outcomes.

(2) Keep MWELO inputs grounded in achievable, real-world performance

IA encourages DWR to continue refining MWELO in ways that promote measurable field performance and durable savings. This includes periodically reviewing default assumptions that drive water budgets—so that compliance pathways reward practices that actually improve outcomes (commissioning/audits, maintenance, improved distribution, and smart scheduling). Field audits show that distribution uniformity and overall irrigation efficiency vary widely and often fall below idealized values, meaning fixed assumptions can unintentionally push designs toward paper compliance rather than reliable water savings.

(3) Specific comments and proposed edits

A) § 493.2.2 (Irrigation Design Plan) - riser protection near hardscape/high-traffic areas

- *Current text:* “Swing joints or other riser-protection components are required on all risers subject to damage that are adjacent to hardscapes or in high traffic areas of turfgrass.”
- *Comment / intent:* IA supports the intent (damage prevention) but recommends clarifying that protection applies to above-grade components commonly subject to damage in these settings.
- *Proposed edit:* “Swing-joints or other protection components are required on all **irrigation components operating above grade** which are subject to damage adjacent to hardscapes or in high traffic areas of turfgrass.”

B) Water feature refill devices and irrigation efficiency in ETWU (Worksheet / IE defaults)

- MWELO defines irrigation efficiency and provides default average IE values of 0.75 (overhead) and 0.81 (drip) for ETWU purposes.
- *Comment:* Water feature refill/make-up devices deliver applied water directly to the water feature. Treating that applied water as if it were sprayed or emitted to a landscaped hydrozone can create a punitive bias in ETWU calculations.
- *Proposal:* Allow an IE value of 1.0 for water feature refill/make-up devices for ETWU purposes (while maintaining existing water feature requirements such as recirculation and recycled water where available).

Thank you for considering IA's comments. We would welcome a discussion with DWR staff on practical ways to improve alignment with the State Water Board's WC Way of Life regulation while keeping MWELo straightforward for local agencies, applicants, and contractors.

Sincerely,

Sincerely,

Andrew D. Morris

Andrew D. Morris
Irrigation Association
Associate Director, Regulatory and Technical Affairs

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