

Comments on Draft PG&E HCP

04/25/17

Chapter 3

1. BMP 12- "Erosion control measures shall be implemented if the amount of bare soil exposed in one location exceeds 0.1 acre"- this measure is not appropriate for serpentine habitat and soils which naturally are more sparsely vegetated and contain patches of bare ground. Conducting erosion control activities in serpentine habitat could unnaturally increase the thatch and cover in these areas and preclude re-establishment of native forbs which prefer bare ground. This could also negatively affect Bay Checkerspot butterfly, both the species itself and its host and nectar plants.
2. Plant-08 (pg. 3.3-22) is not sufficient as written to address the threat of Phytophthora plant pathogens to covered species. Not enough detail is given: "PG&E will implement best management practices including vehicle, equipment, and personnel hygiene protocols, procedures for conducting activities in infected areas; and timing restrictions that avoid working when soils are moist..."- shouldn't these BMPs, protocols and procedures be developed in detail and presented as a part of this HCP? And they should apply to all covered species and work in sensitive habitats.

Chapter 4

1. Coyote Ceanothus- "Localized impacts from O&M activities are unlikely to affect the long-term viability of the population..."- not true. O&M activities have the potential to cause extinction of this population if BMPs to prevent Phytophthora pathogens are not put in place. This is true for all populations of Coyote ceanothus and all activities proposed by PG&E that are located in occupied habitat. A Phytophthora BMP to prevent the introduction and spread of pathogens in existing populations and suitable habitat is necessary to protect the species from impacts via introduced pathogens during O&M activities.
2. Santa Clara Valley Dudleya and Metcalf Canyon jewelflower- impact analysis is confusing and number of occurrences and number of individuals to be impacted is unclear. Please clarify and make sure numbers are accurate and consistent across analysis.
3. What about other plant species which are covered under other HCPs but are not mentioned in this draft PG&E HCP? No surveys conducted or impact analysis for these species? This will adversely affect the conservation strategy of other Plans. How do impacts from this HCP affect the cap on impacts, and requirement for preservation, of occurrences of covered plants in the SCV-HP?
4. Assuming an equal density of individuals across an entire CNDDDB occurrence- with no field surveys to verify- is not an accurate way of calculating impacts.

Chapter 5

1. Plant-01, Plant-02, Plant-04, Plant-05, Plant-07: Salvage and replanting Coyote Ceanothus, Metcalf Canyon Jewelflower, and Santa Clara Valley dudleya is not likely to be successful.

Coyote ceanothus (*Ceanothus ferrisiae*) is highly susceptible to *Phytophthora* plant pathogens. Work in habitat where Coyote ceanothus occurs has the potential to introduce pathogens into the habitat and negatively affect persistence of the species if clean equipment and Phytosanitary BMPs aren't employed in these areas. In addition, salvage and transplantation of plants is rarely successful and can cause great harm due to the potential of introducing and spreading *Phytophthora* pathogens. Salvage and transplantation as a form of mitigation is opposed by the California Native Plant Society. Please delete salvage in this draft HCP. Work in sensitive habitats and around rare plant species should not occur without a *Phytophthora* prevention BMP in place.

2. Plant-08 is identified for pallid manzanita, but no specifics are given. Please more clearly develop this AMM. Also it should apply to work within Coyote ceanothus stands and within sensitive serpentine habitat.
3. Pg. 5-23- Restoration- *Phytophthora* BMPs should apply to all restoration actions. This includes nursery grown container plants as well as plant installation practices.

Chapter 6

1. Table 6-3: \$1 million for all plant mitigation: this is far from being enough money adequately fund mitigation for all covered plants. Please increase the amount of money that will be set aside for plant mitigation under this HCP.

Guidance for plant pathogen prevention when working at contaminated restoration sites or sites with rare plants and sensitive habitat

Why follow this guidance? Many plant pathogens, including *Phytophthora* species may be spread by movement of infested soil or plant debris. To help maintain healthy native plant habitat, it is critical to prevent pathogen spread within contaminated (infested) sites and into noninfested sites. Within many contaminated sites, pathogens are not distributed throughout the entire site, so preventing further spread can keep a bad situation from becoming worse. The following measures are designed to minimize the risk of spreading soil-borne plant pathogens in the process of working at contaminated restoration sites, noninfested sensitive habitats, or areas containing or adjacent to rare plant populations.

Definitions

A **contaminated or infested site** is defined as a site that has been tested and confirmed to contain an infestation of *Phytophthora* spp., or a site that is suspected to be contaminated (due to proximity to a contaminated site or from being located directly downstream or downslope of a contaminated site).

A **sensitive site** contains rare or endangered plants or vegetation communities, or is located adjacent to pristine or high-quality wildland habitat. A sensitive site is often designated by a qualified biologist prior to project construction.

1. General protocols

1.1. Cleaning and sanitation required before entering either sensitive or contaminated sites to prevent introduction of contamination from other locations

Phytophthora contamination may be present in agricultural and landscaped areas, on nursery stock, and in some infested native or restored habitat areas. Contamination can be spread via soil, plant material and debris, and water from infested areas. Arriving at the site with clean vehicles, equipment, tools, footwear, and clothes helps prevent unintentional contamination of the site from outside sources. Continual vigilance is needed, even if a site is contaminated with one or more species of *Phytophthora* because introducing additional pathogens can make a bad situation worse.

1.2. Cleaning and sanitation required when leaving a contaminated site to prevent pathogen spread to other locations

The risk of acquiring and spreading *Phytophthora* contamination is much greater when work occurs in areas known to be infested with these pathogens. When leaving contaminated sites, equipment, vehicles, footwear, and clothing should be cleaned to prevent pathogen movement to other sites.

2. Cleaning vehicles, equipment, and tools

- 2.1. Before arrival at the site, equipment, vehicles and tools must be free of soil including debris on tires, wheel wells, vehicle undercarriages, and other surfaces. A high pressure washer and/or compressed air may be used to ensure that soil and debris are completely removed.
- 2.2. Vehicles may be cleaned at a commercial vehicle or appropriate truck washing facility. Vehicles that only travel and park on paved public roads do not require external cleaning.
- 2.3. The interior of vehicles and equipment (cabs, etc.) must be free of mud, soil, gravel and other debris (vacuumed, swept or washed).
- 2.4. Small tools and equipment must be washed to be free of soil or other contamination and sanitized as described in section 5.

3. Cleaning footwear and clothes

- 3.1. Soles and uppers of footwear must be free of debris and soil before arriving at the site. Clean and sanitize footwear as described in section 5.
- 3.2. At the start of work at each new job site, worker clothes should be free of all mud or soil. If clothes are not freshly laundered, remove all debris and adhered soil with a stiff brush.

4. Preventing potential spread of contamination to or within sites

In a partially infested site, the potential for *Phytophthora* to spread within the site needs to be addressed. It is not practical to identify every portion of a site that contains or is free of *Phytophthora*. Because *Phytophthora* contamination is not visible, work practices should minimize unnecessary movement of soil within locations to prevent potential pathogen spread.

Specific portions of a site may be designated as having high or low risk of contamination. Areas with higher risk of contamination include areas adjacent to planted landscaping, areas previously planted with *Phytophthora*-infected stock, areas with existing or recently removed woody vegetation, and riparian areas. Areas with low risk of contamination include upland sites with only grassy vegetation or sites where surface soils have been removed.

4.1. Worker training and site access

- 4.1.1. Before entering the job site, field workers should receive training that includes information on *Phytophthora* diseases and how to prevent the spread of these and other soil-borne pathogens by following approved phytosanitary procedures.
- 4.1.2. Do not bring more vehicles into work sites than absolutely necessary. Within the site, keep vehicles on surfaced or graveled roads whenever possible to minimize soil movement.
- 4.1.3. Travel off roads or on unsurfaced roads should be avoided when such roads are wet enough that soil will stick to vehicle tires and undercarriages. In intermittently wet areas, avoid visits when roads are wet; schedule activities during dry conditions when the risk of moving wet soil is minimal.
- 4.1.4. To minimize the amount of time needed to decontaminate equipment, tools, gloves, and shoes, avoid working at sites under wet conditions or when soils are saturated.

4.2. Minimize unnecessary movement of soil and plant material within the site, especially from higher to lower risk areas

- 4.2.1. Plan work to minimize movement between areas with high and low risk of contamination. Where possible, complete work in low risk areas before moving to higher risk areas. Alternatively, restrict personnel to working in either high or low risk areas exclusively to reduce the need for decontamination.
- 4.2.2. Clean soil and plant debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from higher risk to lower risk areas or when moving between widely separated portions of a site.

5. Procedures for sanitizing tools, surfaces, and footwear

Surfaces and tools should be clean and sanitized before use. Wood handles on tools should be sealed with a waterproof coating to make them easier to sanitize.

Before sanitizing, remove all soil and organic material (roots, sap, etc.) from the surface. If necessary, use a detergent solution and brush to scrub off surface contaminants. The sanitizing agent may also be used as a cleaning fluid. Screwdrivers or similar implements may be needed to clean soil out of crevices or shoe treads. Brushes and other implements used to help remove soil need to be cleaned and sanitized after use.

After surface soil and contamination are removed, treat the surface with one of the following sanitizing agents, allowing the appropriate contact time before use or rinsing. If surfaces are clean and dry, wet surfaces thoroughly and allow for the appropriate contact time. If the sanitizer has been used to help clean the surface, use fresh sanitizer to rinse off any dirty solution and again allow the required contact time. If treated surfaces are wetted with water, the sanitizing solution will become diluted. Apply enough sanitizer to completely displace the water film and then allow the required contact time. Sanitizing agents may be applied by using spray bottles and applied to thoroughly wet the surface. Observe all appropriate safety precautions to prevent contact with eyes or skin when using these agents.

Sanitizing agents

- 70-90% ethyl or isopropyl alcohol - spray to thoroughly wet the surface and allow to air dry before use
- freshly diluted bleach solution (0.525% sodium hypochlorite, Table 1) for a minimum of 1 minute (due to corrosivity, not advised for steel or other materials damaged by bleach)
- 2000 ppm quaternary ammonium disinfectant for 1 min (or according to manufacturer recommendations) - freshly made or tested to ensure target concentrations

Table 1. Dilutions of commonly available bleach products needed to obtain approximately 0.525% sodium hypochlorite concentrations (5000 ppm available chlorine).

Percent sodium	Parts bleach	Parts water	Diluted bleach percent sodium
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Phytophthoras in Native Habitats Work Group. DRAFT June 1, 2016

hypochlorite in bleach			hypochlorite
5.25%	1	9	0.525%
6.0%	1	10.4	0.526%
8.25%	1	14.6	0.529%
8.3%	1	14.8	0.525%

For example, adding 100 ml of 5.25% bleach to 900 ml of water will make 1000 ml of 0.525% NaOCl solution. If using 8.3% bleach, add 100 ml of bleach to 1480 ml of water to make 1490 ml of 0.525% NaOCl.

Guidelines to Minimize *Phytophthora* Contamination in Restoration Projects

These guidelines aim to avoid contamination of restoration sites with exotic pathogenic *Phytophthora* species or other plant pathogens during planting and related activities.

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Definitions:

- **Holding facility or nursery:** A facility where nursery stock is maintained for a short to extended period of time prior to planting. Plant maintenance activities may include irrigation, fertilization or light pruning, as necessary. Nurseries involved in most other activities, including propagation or repotting are considered production nurseries.
- **Job site:** The job site includes areas for planting, soil stockpiling, parking, and access roads within and leading to the site.
- **Nursery stock:** All types of nursery grown plants.
- **Planting area:** Area being planted for habitat restoration, erosion control, or other purposes.
- **Planting site:** An individual planting basin or other spot, typically no larger than one square yard, where an individual plant or several grouped plants will be installed.
- **Sanitize:** Clean and treat with a sanitizing agent or via a lethal heat exposure to kill plant pathogens present as external contamination.
- **Sanitizing agent:** Materials such as bleach (sodium hypochlorite solutions), alcohol, quaternary ammonium compounds, and peroxides that can directly kill exposed propagules of *Phytophthora* or other plant pathogens when used properly. Most sanitizing agents can also kill a wide variety of bacteria and deactivate many viruses. Note that most materials referred to as fungicides are applied to plants to suppress disease but may not kill the pathogens and are not sanitizing agents.

I. Construction projects

In an effort to minimize the spread of plant pathogens the exterior and interior of all equipment and tools must be clean and free of debris, soil and mud (including tires, treads, wheel wells and undercarriage) prior to arrival at a new job site.

General guidance – suggested standard operating procedures:

- a. Vehicles need to stay on established roads unless infeasible.
- b. In general, vehicles and equipment need to be maintained clean – interior and exterior free of mud, debris and soil especially during the wet season.
- c. In general, work shoes need to be kept clean- inspect shoe soles and knock mud, debris and soil off treads before moving to a new job site.
- d. To minimize the potential for spreading potentially contaminated soil and time required for decontamination, if possible, avoid vehicle traffic and field work when soils are wet enough to stick readily to shoes, tools, equipment and tires.

II. Planting at Field Sites

Overview: Three general routes for the spread of *Phytophthora* and other soilborne plant pathogens are addressed in these guidelines. These routes are (1) contamination of planting material, including clean nursery stock, and other materials installed at the site, (2) inadvertent introduction of pathogens to a job site from other outside sources (e.g., via contaminated equipment), and (3) potential movement of undetected contamination within the planting area.

These guidelines assume that all nursery stock was originally grown under phytosanitary conditions and tested as remaining free from disease in the nursery (refer to nursery guidelines). These guidelines address how to protect the planting area from subsequent contamination during the delivery, storage onsite, and installation of planting stock and materials.

1. Prevent contamination of clean nursery stock or other clean plant materials

Planting stock shall be protected from potential contamination from the point that it leaves the production nursery or collection site until planting. Note that nursery stock has a high risk of infection by *Phytophthora* species if exposed to these pathogens. Excluding these pathogens provides the only viable option for maintaining outplanted nursery stock free of *Phytophthora*.

1.1. Maintaining nursery stock in a holding facility

When holding stock for an extended period (after delivery from production nursery and before planting), the following practices need to be followed to prevent contamination of the nursery stock with *Phytophthora*.

- 1.1.1. Delivered nursery plants that will be held before planting shall be transferred to cleaned and sanitized raised benches and maintained as described in “Guidelines to Minimize *Phytophthora* Pathogens for holding (non-production) nurseries at restoration sites, Section 3.”

1.2. Handling and transporting nursery plants at the job site

- 1.2.1. Nursery plants shall be transported on or in vehicles or equipment that have been cleaned before loading the stock. Truck beds, racks, or other surfaces need to be swept, blown with compressed air and/or power washed as needed so they are visibly free of soil and plant detritus. More information on sanitizing surfaces are described in the Appendix.
- 1.2.2. Keep plants in sanitized vehicles or on sanitized carts, trailers, etc. until delivered to their planting sites. (More information may be found in sections 1.3.3. and 1.3.4.)
- 1.2.3. At the job site, plants shall be handled to prevent contamination until delivered to each planting site. Nursery stock shall not be placed on the soil or other potentially contaminated surfaces until they are placed at their specific planting sites.
- 1.2.4. If it is necessary to offload plants at the job site, plants may be placed on clean waterproof plastic tarps or other clean, sanitized surfaces. If tarps are used for holding plants, one surface needs to be dedicated for contact with nursery stock and will be cleaned and sanitized to maintain phytosanitary conditions.

1.3. Other planting site inputs

- 1.3.1. Washing, soaking, or irrigation of plant material shall be conducted using clean water sources as specified in the Appendix below. Untreated surface waters should not be used for these purposes.
- 1.3.2. On-site or off-site collection of plant materials, including seed and cuttings for direct planting, shall be conducted in a phytosanitary manner (see guidelines for collection practices at www.calphytos.org).
- 1.3.3. Prior to delivery to the planting areas, mulch, compost, soil amendments, inoculants, and other organic products need to be examined and determined to be low-risk for pathogen introduction. Acceptable materials are those that are free of contamination by plant pathogens based on their composition or manufacturing conditions, or that have been exposed to an effective heat treatment to eliminate pathogens. Such materials must be handled and stored in a manner that prevents contamination. At the job site, delivered materials shall be handled to prevent contamination until delivered to each planting site in the same manner specified for nursery stock in section 1.2 above.
- 1.3.4. All other materials to be installed at the site shall be of new or sanitized material that has not been stored in contact with soil, untreated surface waters, or other potentially contaminated materials. This includes irrigation supplies (such as pipe, fittings, valves, drip line, emitters, etc.), erosion control fabrics, fencing, stakes, posts, and other planting site inputs.

2. Cleaning and sanitation required before entering planting area to prevent introducing contamination from other locations

Phytophthora contamination can be present in agricultural and landscaped areas, in commercial nursery stock, and in some infested native or restored habitat areas. Contamination can be spread via soil, plant material and debris, and water from infested areas. Arriving at the site with clean vehicles, equipment, tools, footwear, and clothing helps prevent unintentional contamination of the planting site from outside sources.

2.1. Vehicles, equipment, and tools

- 2.1.1. Equipment, vehicles and large tools must be free of soil and debris on tires, wheel wells, vehicle undercarriages, and other surfaces before arriving at the planting area. A high pressure washer and/or compressed air may be used to ensure that soil and debris are completely removed. Vehicles that only travel and park on paved roads do not require external cleaning.
- 2.1.2. The interior of equipment (cabs, etc.) should be free of mud, soil, gravel and other potentially contaminated material. Interiors should be vacuumed, washed, and/or treated with sanitizing agents as needed to eliminate pathogen propagules that could be transferred to the planting area.
- 2.1.3. Small tools and other small equipment (including hoses, quick couplers, hose nozzles, and irrigation wands) need to be washed to be free of soil or other contamination and sanitized (see Appendix).
- 2.1.4. Hoses shall be new or previously used only for clean water sources (see Appendix).

2.2. Footwear and clothing

- 2.2.1. Soles and uppers of footwear need to be visibly free of debris and soil before arriving at the planting area. (See the Appendix for more details.)
- 2.2.2. At the start of work at each new job site, worker clothing shall be free of all mud, soil or detritus. If clothing is not freshly laundered, all debris and adhered soil should be removed by brushing with a stiff brush.
- 2.2.3. Gloves and non-porous knee pads must be new (if disposable) or laundered/sanitized at the start of each work day, and/or clean coveralls must be worn. Non-disposable gloves should be made of or coated with material, such as nitrile, that can be sanitized.

3. Prevent potential spread of contamination within planting areas

Phytophthora can also be spread within plantings areas if some portions of the site are contaminated. However, it is not possible to identify every portion of a planting area that may contain *Phytophthora*. Because *Phytophthora* contamination is not visible, working practices should minimize the movement of soil within the planting area to reduce the likelihood of pathogen spread.

Note that areas with higher risk of *Phytophthora* infestation include areas adjacent to planted landscaping, areas previously planted with *Phytophthora*-infected stock, areas with existing or recently removed woody vegetation, disturbed wetlands, and areas directly along watercourses. Areas with low risk of contamination typically include upland sites with only grassy vegetation or sites where surface soils have been removed.

3.1. Worker training and site access

- 3.1.1. Before entering the job site, field workers need to receive training that includes information on *Phytophthora* pathogens and how to prevent the spread of these and other soilborne organisms by following approved phytosanitary procedures. Workers should also be informed about any site-specific phytosanitary practices before work commences.

- 3.1.2. Do not bring more vehicles into the planting area than necessary and keep vehicles on surfaced or graveled roads whenever possible to minimize potential for soil movement.
- 3.1.3. Travel off roads or on unsurfaced roads should be avoided when soil and road surfaces are wet enough that soil will stick to vehicle tires and undercarriages.
- 3.1.4. To allow for adequate decontamination of equipment, tools, gloves, and shoes, avoid planting under overly wet conditions or when soil is saturated.

3.2. Minimize unnecessary movement of soil and plant material within the planting area, especially from higher to lower risk areas

- 3.2.1 Brush off soil from tools and gloves when moving between successive planting sites to prevent repeated collection and deposition of soil across multiple sites.
- 3.2.2. Avoid contaminating clothing with soil during planting operations. Brush off soil accumulations before moving from one planting site to the next. Use nonporous knee pads that are cleaned between planting sites if kneeling is necessary.
- 3.2.3 When possible, plant nursery stock from a given block in the same local area rather than spreading it widely. If a problem is associated with a given block of plants, it will be easier to detect and deal with it if the plants are spatially grouped.
- 3.2.4. Phase work to minimize movement between areas with high and low risk of contamination. Where possible, complete work in low risk areas before moving to higher risk areas. Alternatively, assign personnel to working in either high or low risk areas exclusively to reduce the need for decontamination.
- 3.2.5. Clean soil and plant debris from large equipment and sanitize hand tools, buckets, gloves, and footwear when moving from higher risk to lower risk areas or when moving between widely separated portions of the planting area.
- 3.2.6. All non-plant materials to be installed at the site (irrigation equipment, erosion control fabric, fencing, etc.) shall be handled to prevent movement of soil within the site, especially movement from higher risk to lower risk areas. Materials should be kept free of soil contamination by maintaining them in clean vehicles or carts, trailers, etc., or stockpiling in elevated dry areas on clean tarps until used.

4. Clean water specifications

Objective: use only uncontaminated, appropriately-treated water for irrigation.

- 4.1.1. Water used for irrigating plants needs to be uncontaminated. See Appendix for specifications.

Appendix

A. Procedures for sanitizing tools, surfaces, and footwear

Surfaces and tools should be clean and sanitized before use. Tools and working surfaces (e.g., plant carts) should be smooth and nonporous to facilitate cleaning and sanitation. Wood handles on tools should be sealed with a waterproof coating to make them easier to sanitize.

Before sanitizing items, remove all soil and organic material (roots, sap, etc.) from their surfaces. If necessary, use a detergent solution and brush to scrub off surface contaminants. The sanitizing agent may also be used as a cleaning solution. Screwdrivers or similar implements may be needed to clean soil out of crevices or shoe treads. Brushes and other implements used to help remove soil must be visibly clean and sanitized after use.

After surface soil and contamination are removed, treat the surface with one of the following sanitizing agents, allowing the appropriate contact time before rinsing. If surfaces are clean and dry, wet surfaces thoroughly and allow for the appropriate contact time listed. If the sanitizer has been used to help clean the surface, use fresh sanitizer to rinse off any dirty solution and then allow the required contact time. If treated surfaces are wetted with water, the sanitizing solution will become diluted. Apply enough sanitizer to completely displace the water film and then allow the required contact time. Sanitizing agents may be applied with spray bottles to thoroughly wet the surface. Observe all appropriate safety precautions to prevent contact with eyes or skin when using these solutions.

- 70-90% ethyl or isopropyl alcohol - spray to thoroughly wet the surface and allow to air dry before use
- freshly diluted bleach solution (0.525% sodium hypochlorite, Table 1) for a minimum of 1 minute (due to corrosivity, not advised for steel or other materials damaged by bleach)
- quaternary ammonium disinfectant - use according to manufacturer recommendations, making sure that the label indicates that the product is suitable for your use situation and has activity against *Phytophthora* when used as directed. Solution should be freshly made or tested to ensure target concentration.

Table 1. Dilutions of commonly available bleach products needed to obtain approximately 0.525% sodium hypochlorite concentrations (5000 ppm available chlorine).

Percent sodium hypochlorite in bleach	Parts bleach	Parts water	Diluted bleach percent sodium hypochlorite
5.25%	1	9	0.525%
6.0%	1	10.4	0.526%
8.25%	1	14.6	0.529%
8.3%	1	14.8	0.525%

For example, adding 100 ml of 5.25% bleach to 900 ml of water will make 1000 ml of 0.525% NaOCl solution. If using 8.3% bleach, add 100 ml of bleach to 1480 ml of water to make 1580 ml of 0.525% NaOCl.

B. Clean water specifications

Surface waters, including untreated water from streams or ponds and nursery runoff, can be sources of *Phytophthora* contamination. Only uncontaminated water or water that has been effectively treated to remove or kill *Phytophthora* should be used for rinsing or irrigating plant material.

5.1. Water used for irrigation shall be from treated municipal water supplies or wells and delivered through intact pipes with backflow prevention devices. Tertiary-treated municipal recycled water is acceptable.

5.2. If well water is used, wellheads shall be protected from contamination by surface water sources.

5.3 Untreated surface waters and recycled nursery runoff shall not be used, and plants shall not be held where potential contamination from such sources is possible via splash, runoff, or inundation.

5.4. Irrigation equipment must be kept free of contamination that could be transferred to irrigation water or plants. All hoses, wands, and nozzles, and hand irrigation equipment must either be new or sanitized before use. Drip irrigation and other sprinkler parts should be new or sanitized. Hose ends, wands, or nozzles that become contaminated with soil or mud during use should be cleaned and sanitized before being used further.