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**From:** [Maryanne Quincy](#)  
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**Sent:** Friday, May 25, 2009 8:14 PM

**Subject:** Re: Here are our comments on the  
**Updated Model Water Efficient Landscape Ordinance AB 1881**

### **792.6, C 13**

I would like to see 'Landscape Designer' **listed** as one of the groups who can sign for the Landscape Design Plan.

### **492.4 (c) For use of current reference evapotranspiration data, such as CIMIS, other equivalent data, or use of other self-adjusting devices, (soil moisture sensor),**

Question: Are there known “other equivalent data”? (Perhaps this allows for future systems?)

### **492.10(a)(3) Actual Irrigation schedules shall be based on current time reference evapotranspiration data (e.g. CIMIS) or soil moisture sensors)**

We definitely need automatically controlled weather-based timers now, but my experience is that the technology and effective human interface is not there yet. Tech support varies greatly in quality. Manuals do not help the user understand how to get desired results from adjustments to programmed items such as soil type, plant factor, exposure etc. One does not have control of typical elements such as 492.10 5A,B,C,D,E unless one takes the controller off the weather station settings (492.10 5F,G,H,I, J,K,) and puts the controller on manual and uses it as a typical timer, which happens both with and without an experienced professional managing the site. These controllers are too complex for homeowners to understand and adjust successfully, and most do not have the time to dedicate to the learning curve, or the fussy adjustments of the establishment phase and maintenance phase. Homeowners and typical small contractors also do not have the soil, soil food web, water, hydraulics, and horticultural knowledge base to make good basic decisions about their controllers and gardens.

Weather station reception at the controllers have been spotty, requiring added antennas (not easily obtained) to pick up signals in some areas. At the same time fewer weather stations are available. Starting programs have applied too much water, or far too little for establishing plants. The controllers have required many hours of adjusting program factors that do not directly and visibly correlate with the intended water output. To program one effectively, one must “think” like the controller-or the designer of the controller.

Considering these difficulties, I think we can expect a long and steep learning curve for everyone from the permitting departments to the planners and builders of landscapes, to the homeowners as this ordinance is applied to smaller landscapes. Getting the public

media and marketing agents behind this as well as educational organizations will be key as this enters the mainstream population.

**492.11(b):**

Regarding the **dethatching and aerating requirement**, I believe this applies to sports fields, but smaller, lesser used sites can be dethatched with use of grass-cycling and compost or compost teas, which decompose the thatch while gradually aerating and fertilizing the turf, avoiding heavy chemical fertilizer use and pollution of water supplies. Also subsurface inline dripline, now used for lawns and some sports fields, preclude use of mechanical aeration as it could puncture the driplines. Perhaps there is a way to include this reminder. Subsurface driplines are the most efficient method for evenly irrigating turf, and not wasting water.

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