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5/26/09

Dear Ms. Huff,

We respectfully submit the following comments for consideration during the next review of the Model Water Efficient Landscape Ordinance. Netafim USA is proud of its contribution to efficient water use through drip irrigation technology and applauds the development of this document.

#### **490. Purpose.**

##### **490.1 Applicability**

The model ordinance specifies different minimum landscape areas for public or developer provided landscapes versus homeowner supplied projects. We feel this is not in the best long-term interests of the State of California. All landscaping projects should be held to the same standard. We respectfully suggest that the minimum size should be set at a uniform 2,500 square feet.

#### **491. Definitions.**

##### **491 (f)**

The model ordinance defines "check valve" in a manner that implies it is a separate component from sprinklers and emission devices when, in fact, many sprinklers and drip emitters and emitter lines incorporate check valves within their construction. We respectfully suggest that the language be altered as follows:

"check valve" or "anti-drain valve" means a valve or mechanism located within a sprinkler head or emission device or under a sprinkler head, or other location...."

##### **491 (kk)**

The model ordinance suggests that low volume systems also must operate at low pressure. Without specific definition as to what constitutes "low pressure" the definition can be misleading. In fact, many low volume drip emitters are designed to operate at pressures that some experts would consider high (greater than 45 psi). We respectfully recommend that the language be altered as follows:

Exchange "low pressure" to "low flow rates"

#### **492. Provisions for New Construction or Rehabilitated Landscapes.**

##### **492.7 (M)**

The model ordinance specifies that low volume irrigation is required in mulched planting areas. This weakens the ordinance considerably as many planning areas may not use mulch. We respectfully suggest that the language be revised to exclude the word "mulched".

##### **492.13 (a)**

We feel that the irrigation efficiency target specified (0.71) is not in the best interests of the State of California. With the economic and sociological impacts of the drought as severe as they have been this year, the model ordinance should target a more aggressive and conservation-minded value. We believe it sends a poor message for the ordinance to accept that 29% of the irrigation water applied will be wasted if the system is designed to the standards specified herein. There are published studies from the 1960's that reference desirable Irrigation efficiency values for sprinkler use in agriculture of 85-90%. Surely the people of California deserve standards that at least exceed farm irrigation efficiency standards established half a century ago. We respectfully urge that this efficiency target be aggressively reconsidered and established at an absolute minimum value of 0.85.

We thank you for the opportunity to comment on the proposed daft.

Regards, Russell Clark

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