

**Colvin, Judith**

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**From:** mweo-bounces@water.ca.gov on behalf of Tom Penning [tomp@irrometer.com]  
**Sent:** Wednesday, March 26, 2008 2:05 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWE0] Draft Model Water Efficient Landscape Ordinance comments

I wish to submit the comments below regarding the Draft Model Water Efficient Landscape Ordinance. Also, myself and Brian Lennon, will be attending the meeting on March 27th in Chino.

Regards,  
 Tom Penning  
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*Section 491, #10:*

*We propose:*

*"Controller" means an automatic timing device or assemblage of components used to remotely control valves or sprinklers to set an irrigation schedule. Such a "controller" or "assemblage of components" could use evapotranspiration, weather or soil moisture sensor data to automatically adjust the irrigation schedule. (490 #10 proposed).*

*The proposed definition eliminates confusion that is created by using only the word controller, which infers a single device.*

*Section 492.9, #1 (a) (2)*

*Utilize the same definition as proposed (491, #10 proposed).*

*Section 492.9, #1 (a) (5)*

*We propose:*

*Sensors, either integral or auxiliary, that suspend irrigation during periods of weather conditions that would affect the need for irrigation shall be required where deemed appropriate for local conditions (i.e. rain, freeze, moisture, wind, etc.) as shall be defined by the local agency upon adoption of this ordinance.*

*Issue:*

*The term "unfavorable" implies the weather events must be severe in order to be applicable*

*and this is not the case. Even a mild rain or wind can significantly affect the need for irrigation. The term "as appropriate for local climatic conditions" is too vague and needs to have the defining limits clarified or referred to the local agency to set.*

*Section 492.9, #1 (a) (6)*

*We propose:*

*Manual shut off valves, (ball, gate, butterfly, etc.) shall be required...*

*Issue:*

*Ball valve is one specific type. The point is to require a manual shut off valve of any sort.*

*Section 492.9, #1 (b) (3)*

*We propose:*

*Sprinkler heads shall have matched precipitation rates...*

*Issue:*

*The term "matched application" is not common in the industry. Most of these products are referred to as matched precipitation.*