

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of David D. Pagano [ddpic@pacbell.net]
Sent: Wednesday, March 26, 2008 7:27 PM
To: mweo@water.ca.gov
Subject: [MWEO] Model Water Efficient Landscape Ordinance
Attachments: dd Pagano Model Ordinance Comment 3-26-08.pdf

Dear Ms. Judy Colvin

Attached are my comments to the proposed Model Water Efficient Landscape Ordinance.

Dave Pagano
d.d. Pagano, Inc.
Irrigation Consultants
4705 East Chapman Avenue
Orange, CA 92869
Office: (714) 771-9200
Fax: (714) 771-9202



d. d. Pagano, inc.
IRRIGATION CONSULTANTS

March 26, 2008

State of California
Department of Water Resources
Office of Water Use Efficiency and Transfers
Attention: Judy Colvin
901 P Street, Room 313A
Sacramento, CA 95814

Submitted via e-mail to: mweo@water.ca.gov

Re: Comments on Water Efficient Model Landscape Ordinance

Dear Ms. Colvin:

I have thoroughly reviewed the final draft of Model Water Efficient Landscape Ordinance prepared by DWR. Also, I have worked closely with the American Society of Irrigation Consultants (ASIC) in offering my comments and reviewing the ASIC's comments. This letter is to advise DWR that I and fully support those comments submitted by ASIC and request that their comments be given your full consideration.

While we all agree that there is a need to conserve water use in the landscape, I feel that the Model Ordinance as currently written is very complex, very costly, very time consuming and is doomed to crash under its own weight. Nobody wants to see this happen.

In many cases, the current draft of the Model Ordinance conflicts with many of the local agency ordinances that are already in place. These conflicts create a duplication of work the designer's work effort.

What I believe needs to happen is for the Model Ordinance to be rewritten to provide an end result in terms of maximum applied water application (MAWA) and not how to reach MAWA. Of course, information on estimated water use (EWU) will also need to be provided by the designer. There could be some simple rules like no water run-off, use Smart controllers, develop and identify hydrozones, etc. The designer should determine the best approach to reach the end goal to ensure the EWU is less than the MAWA. This can be accomplished without direction from the Model Ordinance on how the results should be achieved. I realize that my previous comments are an over simplification of a big issue, but not much more is needed to achieve the results desired.

I would also suggest that DWR consider as a compromise to the ETAF of 0.7, the ET adjustment factor could be 0.75 for domestic water systems and use an ET adjustment factor of say 0.9 as an incentive for using recycled water in the landscape and ET adjustment factor of 1.0 for recreational passive and non-passive turf.

In view of the many comments that DWR has received and the common thread that runs through the most of the comments, it is imperative that DWR make the changes necessary for the new Model Ordinance to succeed.

Respectfully Submitted,

d.d. Pagano, Inc.
Irrigation Consultants

David D. Pagano, FASIC