

Colvin, Judith

From: David Zoldoske [david_zoldoske@csufresno.edu]
Sent: Thursday, March 27, 2008 8:58 AM
To: Frame, Kent; Saare-Edmonds, Julie Ann; mweo@water.ca.gov; Huff, Gwen
Cc: 'Deborah Hamlin'; 'Doug York'; 'James Brown'; 'Robert Wade'; 'Joel Lipsitch'; 'David_Zoldoske@csufresno.edu'; 'Warren Gorowitz'; 'LARRY ROHLFES'; 'Andy Smith'
Subject: MODEL WATER EFFICIENT LANDSCAPE ORDINANCE COMMENTS-CIT
Attachments: Model Ordinance memo (CIT).pdf

Please find attached my comments addressing Revisions to the Model Water Efficient Landscape Ordinance. Text is also shown below.

Regards
 David Zoldoske, Director
 Center for Irrigation Technology
 California State University, Fresno

Date: March 25, 2008

To: 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

From: Dr. David F. Zoldoske, Director
 Center for Irrigation Technology

Re: Revisions to Water Efficient Model Landscape Ordinance

By way of background, I have worked as a researcher focusing on water use efficiency in irrigation for the past 25 years at California State University, Fresno. Furthermore, I served as vice-chair for the AB2717 Landscape Task Force, past president of the Irrigation Association and past president for the American Society of Agronomy, California Chapter.

First I want to acknowledge the Department of Water Resources for its tireless work to promote ever higher standards of water use efficiency in California Landscapes. I believe the essence and spirit of change offered in the revisions put forth in the Water Efficient Model Landscape Ordinance are appropriate and will move urban water use efficiency significantly forward in the coming years and decades.

However, I am troubled by the process recently used by the DWR to establish a revised ET Adjustment Factor (ETAF). In the draft whitepaper developed on Evapotranspiration Adjustment



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However, I am troubled by the process recently used by the DWR to establish a revised ET Adjustment Factor (ETAF). In the draft whitepaper developed on Evapotranspiration Adjustment Factor by the DWR and dated December 18, 2007, it attempts to outline justification for moving the ETAF to 0.7. I believe the paper fails to provide the necessary scientific foundation to establish the effects of the proposed change on the irrigation method, management and associated plant material.

I have spent my professional career promoting and advocating improvements in water use efficiency. However, I want to go on record as stating that any changes to the landscape water budget should be based on "good science." Science, at least in my mind requires an appropriate research design and statistical validation. Unfortunately the current basis for

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the proposed change in the model ordinance put forth in the “whitepaper” is largely derived from demonstrations and anecdotal information. I don’t believe this adequately provides a basis for informed decision making.

I would urge the DWR to place any future ETAF review on a strong scientific base, rather than a somewhat emotional and arbitrary process. I want to suggest that a comprehensive scientific study be conducted in projected population growth areas of the state to fully understand the effects of the proposed change on irrigation technology requirements, training needs and other external factors associated with lowering the current water budget.

In closing, I totally agree we should seek ever improving landscape water use efficiency and I support changes to reducing water budgets that are reasonable and based on “Good Science”.

I know this goal is easily within our reach and trust my comments presented in this review are seen solely as advocating improvements to the knowledge base and process used in the decision making process.

Thank you for your time and consideration in this important matter.

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