

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Jaddink [jaddink@agsod.com]
Sent: Thursday, March 27, 2008 3:34 PM
To: mweo@water.ca.gov
Subject: [MWE0] Public Comment

Dear DWR,

I agree that the Model Landscape Ordinance is headed in the right direction to save California's water.

The provision requiring ET controllers will save water. Studies done by the Valley of the Moon, Denver, Sonoma, and Santa Barbara water districts have shown that ET controllers save 20% of outside water.

Tiered rate structures are a powerful, market based approach which have proven water savings at districts such as Irvine who have implemented them.

However, the 70% applied water budget is based on bad science due to:

- lack of good ET data for many bush and tree species
- lack of support for the assumptions used by the Task Force to arrive at a 70% ET (Distribution Uniformity and Irrigation Efficiency in particular)
- exclusion of Irvine Ranch Water District's 100% ET water ordinance in the January 25, 2008 white paper. Only San Diego and Coachella Valley were considered in this analysis – two of the driest areas in the state.
- No three year study was conducted as AB 2717 requested. Instead a literature review was done.

Please reconsider the 70% factor. Using the 80% factor from AB 325 and stronger incentives and enforcement will accomplish the water conservation goals the state of California needs.

Joel Addink
Aqua Conserve, Inc.