

## Colvin, Judith

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**From:** mweo-bounces@water.ca.gov on behalf of Dave Giddens [dave@giddensdesign.com]  
**Sent:** Thursday, March 27, 2008 4:19 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEO] AB 1881 Public Comment  
**Importance:** High

Hello Ms. Judy Colvin,

I'm the current President of the ASIC Southern California chapter, and I wanted to thank you and DWR for creating an ambitious document. I do however have some issue with the current draft. I don't support all the comments that ASIC national had sent in, but most points are valid.

The following is my comments:

1. Provide separate water meter(s) per each site for irrigation only.
2. Add more CIMIS stations throughout the state, and provide more modified station locations to get the increased amount of  
micro-climates within developed areas within City and Counties.
3. All non private residence's property should be permitted, and all private residence's estate over 5,000 sq. ft. should be required to  
obtain permits, but not held to the mawa & ewu calculations.
4. A post inspection of the operation of each irrigation system is vital every 2-5 years, but not irrigation audits. I'm a CLIA auditor,  
and a CGIA from the IA. I feel that auditing should only be performed on large turf systems with over 43,560 sq. ft. of irrigated  
turf. The post inspection would include maintenance review of it remote control valve on it's meter, it would also include pressure  
regulator review to see if site is conformance of the original design plans, review of nozzles, screens, backflow device & said  
screens, basket strainer review to see if the strainer is being kept clean, basic maintenance of the irrigation, i.e. straighten &  
alignment of each spray head, rotor, and/or bubbler, also if heads are lower than the surrounding grade to be raised, etc.
5. A place where individual approved landscape and irrigation plans are kept for records in a regional area. Try to find plans after  
10years after a project has been turned over and more than likely no one has a copy of them.
6. Make recycled water for irrigation mandatory.
7. A great need of long term studies on Crop Coefficients for landscape to better understand the change in the Crop Coefficients over  
a year growing cycle.
8. Long term research needs to be performed on recycled water and landscape plant material & soil problems due to the higher salts  
in the water.
9. Don't lower the .8 to .7 in MAWA, but make it mandatory all water rate structures will be tier rate, and let the free market lower  
consumption due to penalties due to over watering.

Respectfully,  
Dave Giddens

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9/3/2008

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