

MWEO

From: Chris Dundon [cdundon@ccwater.com]
Sent: Monday, December 01, 2008 10:32 AM
To: MWEO
Subject: Comments on Model Water Efficient Landscape Ordinance

Comments

24" setback Comment 001.1

The 24" setback rule is intended to eliminate overspray onto paving. However, more importantly needs to pass the test of resulting in improving landscape water efficiency and reducing a sites overall landscape water use compared to the current state.

The result of the 24" setback requirement will be mixed success and failure. The successful sites will have substituted non-turf plantings for turf. This is an indirect success, by simply forcing the designer to reduce turf grass, which I agree should be done.

However, many sites will still install lawn adjacent to sidewalks or other paving. Note, the designer will not necessarily be allowed to install pervious paving for sidewalks. The reality of the irrigation industry is that many of these sites will use pop-up spray heads. Now, because of the setback rule, these sites will use adjustable nozzles instead of fixed spray nozzles. It is widely known that adjustable spray nozzles do not work as well and result in lower distribution uniformity and they become out of adjustment easily. As a result of poor distribution uniformity, the maintenance companies will increase the watering times to compensate. This will only result in poorer distribution uniformity and more water use.

Finally, I also think that a 12" set back for shrub areas is adequate to solve the problem and allow the area to be irrigated more uniformly. I suggest the DWR staff consult with several IA certified irrigation designers (who are not currently involved in the review process)

Thanks,

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