

MWEO

From: Andy Smith [Andy@irrigation.org]
Sent: Tuesday, December 30, 2008 4:00 PM
To: MWEO
Cc: Frame, Kent
Subject: Model Water Efficient Landscape Ordinance Comment

Department of Water Resources
Office of Water Use Efficiency and Transfers
Attn: Simon Eching
PO Box 942836
Sacramento CA 94236-0001
Re: Model Water Efficient Landscape Ordinance Comments

To Whom It May Concern:

The Irrigation Association (IA) commends the State of California for recognizing the value of efficient irrigation through the vehicle of the model water efficient landscape ordinance (MWEO). The process leading to the current text has been healthy and open. Many of IA's concerns have been addressed by DWR and IA appreciates DWR's flexibility and willingness to work with the irrigation industry. IA is hereby submitting the following comments for DWR's consideration as this process draws to a close.

Certification

Comment 059.1

The demonstration of individual competence through academic or professional certification is a critical component to the success of this program. IA has been an industry leader in developing professional irrigation certification programs. The current text offers little guidance in discerning credible programs that will assure consumers of the service provider's competence. IA suggests DWR develop a process by which certification programs would be recognized by state and local governments, complimented by a renewal process that would ensure the program maintains pace with industry advancements and new technologies.

Special Landscape Area ETAF

Comment 059.2

IA commends and supports DWR for developing this special allowance and making additional considerations for these areas in the new text.

Technology Mandates

Comment 059.3

The revised text specifically prescribes technologies in several places. IA believes the ordinance text should avoid such reference and instead insert performance criteria leading to the desired outcome. For example, the current text states "*Long, narrow, or irregularly shaped areas including turf less than eight (8) feet in width in any direction shall be irrigated with subsurface irrigation or low volume irrigation technology.*" Instead, the text could clearly state a desired outcome of limiting runoff and overspray by choosing appropriate application rates, methods and technologies. This will allow the irrigation industry to continue to develop and apply innovative solutions that meet current and future needs.

Effective Precipitation

Comment 059.4

The current text offers local governments guidance that suggests a static effective precipitation of 25% of annual precipitation, if effective precipitation is to be considered locally. Timing and amounts of rainfall vary drastically by region and by event. IA feels if effective precipitation is to be considered, it should be done so locally, with relevant scientific data to support any ordinance language.

Respectfully,

12/30/2008

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