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State of California
Department of Water Resources
Office of Water Use Efficiency and Transfers
Attention: Simon Eching
901 P Street, Room 313A
Sacramento, CA 95814
c/o mweo@water.ca.gov

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**RE: Comments of revised draft of Landscape Model Ordinance dated 11/26/08**

Mr. Eching:

I support responsible use of our precious water resources and I am encouraged by the State's attention to this matter. I reviewed the initial draft of the Landscape Model Ordinance in early 2008 and attended the public response meeting in Chino. We have reviewed the revised draft released in November of 2008 and have the following comments for your consideration:

Park areas are not included in the exception list (Section 491.0) Comment 70.1

*Sports park areas will have difficulty irrigating with a 70% ETo limitation on water usage. Due to heavy play time, fertilization programs, overseeding, etc. 'Real' water usage is much greater than will be allowed per this Ordinance. Underwatering the turf playfields will limit turf viability, playability, and increase liability.*

Irrigation Design Directive (Section 491.7, Section M) Comment 70.2

*There should not be a direct requirement on the type of irrigation system if the landscape and irrigation system needs to meet a Maximum Applied Water Allowance. Set a limit on the amount of water to be applied and allow the professional to design the system to meet this requirement. A recommendation is more appropriate.*

*This is comparable to setting limits on car emissions and then telling the automotive industry how to achieve the goal by limiting the technology.*

No irrigation within 24" of a non-permeable surface (Section 492.7, Section R) Comment 70.3

*This is also direct requirement that turf areas cannot be adjacent to hardscape areas without using drip irrigation. Drip irrigation in turf areas is not a common practice and it is impractical and costly to separately valve the system to accommodate differing efficiencies and application rates. A more practical compromise is to set a sprinkler offset distance from hardscape of 6" in turf areas and 12" in shrub areas. This direct requirement should be addressed as a recommendation or a performance standard should be required to eliminate overspray onto hardscape surfaces.*

Drip irrigation shall be used in landscape areas 8' or less (Section 492.7, Section S) Comment 70.4

*This indicates that landscape areas not use turf in narrow spaces of 8' or less. However, most parkways include useable, functional turf to allow pedestrian traffic from the parking along a street to the sidewalk. Many street sections include parkways that are 4-6' wide. Drip irrigation in turf areas is not practical. There are new turf spray devices that can apply water to 4' wide areas with increased uniformity. This direct requirement should be addressed as a recommendation or a performance standard should be required to eliminate overspray onto hardscape surfaces.*

Drip irrigation shall be used on slope areas 25% or greater (Section 492.7, Section T) Comment 70.5

*This is neither practical nor cost effective for the large percentage of landscape areas that include slopes. If a project can meet the Maximum Allowable Water Allowance, then the type of irrigation used is irrelevant. The use of low volume or low precipitation rate emission devises can be effective in minimizing runoff, but so can 'maximum runtime per cycle', 'repeat', and 'cycle and soak' features of the new 'weather based' timers.*

Comment 70.6

Audits are required in order to get Certificates of Completion (Section 492.9, Section 8)

*This is an extremely costly addition to the implementation of this Ordinance. To become certified, a Water Auditor is required to take a small class, pass a test, and is required to submit an audit to the IA for review. The certified auditor will have to audit (including catch can tests in turf areas) each system prior to Certificates of Completion. Many Landscape Architects and Irrigation Consultants already perform irrigation observation reports for their systems, therefore additional audits are redundant. There are not enough certified auditors to perform this requirement in a timely manner.*

Comment 70.7

Dual scheduling required with programming data for each zone (Section 492.10, Section 5)

*The requirement to have an irrigation timing schedule for the landscape is redundant if a weather based controller is required. The timing schedule uses historical data, while the controller or central control system, will use real time weather data. The scheduling requirement adds significant cost to the preparation of the plans, and should be eliminated from the ordinance.*

Comment 70.8

Landscape Irrigation Efficiency is still increased from 62.5% to 71% (Section 492.13)

*This increases the landscape irrigation efficiency parameter in water usage calculations without further study to the effects that will be seen in the landscape. Realistically, most landscapes will need to address this reduction in water allotment by increasing the use of 'lower water use' plant material, or use of more efficient emission devices (i.e. drip and rotator nozzles). Turf areas will be minimal.*

Respectfully,

Steven M. Hohl, ASIC, CID
Principal