



Julie Saare-Edmonds  
California Department of Water Resources  
Landscape Irrigation Specialist  
(916) 651-9676  
[julie.saare-edmonds@water.ca.gov](mailto:julie.saare-edmonds@water.ca.gov)

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Dear Ms. Saare- Edmonds

This letter is to voice our concern and objection to the proposed changes in the MWELO legislation. We feel that these changes will be extremely detrimental to the landscape and irrigation industry and will not achieve their intended purpose.

As a leading network of landscape, irrigation and water conservation professionals throughout California AquaSave Inc. represents a large cross- section of water conservation proponents who are active in working on a “hands-on” and daily basis with these requirements.

Without restating the proposed language we would like to make the following recommendations related to these proposed changes:

**1. Recommendation: Irrigation Efficiency (IE):**

- a. *Do not change the value of Irrigation Efficiency in the ETAF calculation. Time constraints in this emergency environment seem to have resulted in an IE - and resulting ETAF recommendation - that is unattainable.*
- b. *Instead, make changes only to the Plant Factor in the ETAF calculation to drive Californians to use lower water use plants.*
- c. *During the process to make long term changes to MWELO, change the Irrigation Efficiency calculation method to include Wind Drift and Evaporation losses. Consider also at that time other possible changes in irrigation technology that may have occurred since the last revision to MWELO in 2010.*

**2. Recommendation: Evapotranspiration Adjustment Factor (ETAF)**

- a. *We recommend not changing Irrigation Efficiency. If IE is maintained at 0.71 as justified and supported in the 2009 White Paper, the recommended ETAF will be more workable and this value should be used in the interim (emergency period).*
- b. *Rain Bird is not expert in ornamental horticulture. Rain Bird is aware, however, that plant palette changes may have a direct impact on human health, safety and welfare, especially as it relates to wild fire protection. While Rain Bird is very concerned about the plant factors being proposed, it will defer to experts in horticulture to comment.*



### 3. **Recommendation: Precipitation Rate**

- a. *Do not introduce a new limit on Precipitation Rates in addition to the existing limit on slopes greater than 3:1.*
- b. *Require Smart Controllers that use Precipitation Rate, soil type, root zone depth, and Plant Factor to eliminate run-off and apply the desired amount of water utilizing the well-established practice of 'cycle and soak'.*

### **Conclusion:**

The existing MWELO has changed the face of landscape and irrigation in California and in many ways has contributed to greatly improved efficiency in irrigation design, but reductions in water use have not uniformly been achieved. Concluding that regulations on new irrigation design should be tightened however, may be false; requirements for reporting of water use post-installation should be reviewed since this is where the most significant savings can be made as highlighted by the City of Lake Forest where water budgets are strictly enforced.

Thank you for taking the time to consider the impact the revised MWELO will have on the landscape and irrigation industry. I would be interested to hear about your intended response / actions.

Sincerely,  
Bob Simpson CWM, CLIA, CLT-I, C-27, ISA,  
President