Ms. Saare-Edmunds,

I am a Landscape Architect and owner of Environs, Incorporated. Our firm is responsible for planting and irrigation design, which allows us to best evaluate the changes you are proposing to the 2010 Model Water Efficient Landscape Ordinance (MWELO). We are involved with both small and large projects (ranging from 1 acre to 600 acre sites). We have seen large savings in water use up to 50% of allowable using the current calculations in the 2010 MWELO. Our projects have no run off, designed according to strict hydrozones (using WULCOLS), and are efficient due to improved technology. This technology includes the use of ET Based Controllers, rain sensors, flow sensors, master valves, pressure regulators, and pressure regulating heads. I have read the changes you are proposing and would encourage the Board to re-consider some of the revisions to the 2010 MWELO. Our concern is with the changes to the Irrigation Efficiency (IE), maximum precipitation rate, and the reduction of the Plant Factor (PF) rate to . 4. Changing the IE to .92 is not acceptable, as it would make irrigating some areas impossible. For example, a WQMP flow through planter that requires sand as a base for infiltration would not be able to be irrigated since nothing we use could meet the new IE or precipitation rate. We saw this recently on a project where the flow through planters were less than 7' wide. We were required to use drip or micro-spray, which caused plant failure because the precipitation rates were too low for the infiltration rate of the soil causing us to over water. We also believe reducing the maximum precipitation rate to 1" is not necessary. We've found that using multiple cycles with less run times eliminates runoff and allows for more flexibility with multiple site conditions. We also feel reducing the plant factor to .4 is too low because it will be difficult to meet in certain situations, such as, large WQMP basins which require plants that can survive in the boggy soil conditions (in certain WULCOL Regions these plants require a .5 plant factor). I would recommend a reduction to .5 or .45 plant factor (which is still a 30-35% reduction from where we currently are), and the elimination of turf in all commercial applications unless used for recreation. I believe the 2010 MWELO requirements for new design has been a great success reducing water significantly. The focus should be more on creating new facilities in the form of reservoirs so that 35% of our water doesn't go out to the ocean. If we don't start taking this seriously, reducing the plant factor to 0 won't even be enough.

Thanks for your consideration,

Brett French

Environs Inc
LANDSCAPE ARCHITECTURE
Creating Sustainable & Water Conserving Solutions