



June 26, 2015

Julie Saare-Edmonds  
Senior Environmental Scientist  
Division of Statewide Integrated Water Management  
Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

**RE: June 12, 2015 Draft of Expedited Model Water Efficient Landscape Ordinance Update**

Dear Julie:

We wish to submit several comments based on research at the **Center for Turf, Irrigation and Landscape Technology** in the Plant Science Department at Cal Poly University, Pomona. The studies were primarily conducted with students in horticulture, irrigation, and landscape architecture. A few general comments regarding some aspects of the proposed changes to the Model Ordinance are listed below:

1. Low precipitation rate sprinklers don't save water, it's the management of the sprinkler system that may conserve water.
2. Drip irrigation systems can have relatively high precipitation rates when installed for turf irrigation. The only way to ensure water conservation with a drip system is by diligent maintenance and proper management of the system.
3. Irrigation efficiencies of a system will change with time because the landscape is a dynamic system. No matter what irrigation efficiency (distribution uniformity and management of the system) for new or rehabilitated systems is mandated, efficiency will change with growth of plant material, change in weather conditions, soil particles that may degrade operation of sprinklers and drip emitters, onsite human and vehicle traffic, plant canopy growth, and root growth (all these factors may decrease system efficiency without routine, skilled maintenance).

(Continued)

In our view, it would be more productive to minimize the prescription of the landscape planting and irrigation system details and better to focus on the following:

1. Have water districts continue to enforce water budgets based on current drought conditions. Let the professional landscape industry figure out how to meet the budget.
2. Have some mechanism at the water district level to ensure proper maintenance of the irrigation system. In reality proper irrigation maintenance and system management is part of the process if water budgets are monitored and enforced; if needed, a similar mechanism could help water districts set up water budgets based on reference evapotranspiration and irrigated square footage. Tiered rates it seems is one way to focus urban water users on efficient operation of their system(s) and a water budget for the long term.

Thank you for your consideration,

Eudell Vis, Ramesh Kumar, and Robert Green  
Professors Emeritus and Adjunct Professor  
Center for Turf, Irrigation and Landscape Technology  
Plant Science Department  
Cal Poly University, Pomona  
3801 West Temple Ave.  
Pomona, CA 91768