



GIDDENS
IRRIGATION
DESIGN

To Whom It May Concern:

Date: June 25, 2015

RE: California AB-1881 Proposed Model Water Efficient Landscape Ordinance Changes

Let me first start thanking you for the time to address the proposed changes, and the changes that still need to be addressed in this ordinance. The proposed changes don't adhere to the Governor's Executive Order B-29-15 item #11 as written with the changes to MWELO for several reasons.

While we need to respond to the current drought situation in regards to water waste in existing landscapes, we do not need to change the major factors in the Model Water Efficient Landscape Ordinance (MWELO) for new construction that are required the designed to start with a reduction of 30% of (MAWA). The new MWELO updates only affects the new Landscape/Irrigation design and construction side of our industry, but does nothing to deal with the maintenance side of our industry or even the existing landscapes.

I have almost three decades of experience in this State's Landscape/Irrigation Industry with the last 23 years designing/managing/auditing/plan checking landscape irrigation systems throughout the State. MWELO is making a paradigm shift in the way we plan/design/install our landscape and irrigation systems, but loop holes exist in the ordinance as presently designed to circumvent the ordinance with little to no recourse. Section 495 was a missing piece to the reporting of the ordinance. It is even further flawed by the Agency that adapted different standards to the original AB 1881 ordinance.

Below I address the following issues: the Application Rate (Precipitation Rate) to 1-in./hr., lowering of the ETAF from .7 to .5 and .4, and the raising the irrigation efficiency, among other changes.

For the application rate case study let's use the 1.0 gph with a 12" o.c. spacing between each emitter on the drip tubing, and a 12" row spacing. Using the drip formula to find the application rate (***231.1xgph/ (emitter spacing and row spacing)***), then at ***231.1 x 1gph divide by 144"***, gives us an application rate of 1.61 in./hr. This rate would exceed the .75in./hr. and the 1in./hr. rates in the current mandates/recommendations. But this is what is needed to design in the blow sand soils in Indian Wells in the Coachella Valley in CVWD service area, and have plants survive within their 18" o.c. spacing. But under the new mandate exceed the maximum application rate, and thus be forced to use a lower .6gph or a .4gph rate, and have greater water waste due to deep leaching and no lateral movement in the sand soil. We'll waste more water that it is intended to save.

ETAF as .7 pretty much stops turf irrigation in Resident and most Commercial properties, along with updated planning department limitations. If the intent is to eliminate turf with overhead irrigation from front yards of homes, then simply state this in the ordinance. Even better make it part of the Governor's Executive order, but don't stop Homeowners from having a little turf in their back yard if designed and maintained properly. I've seen through the plan checking that Landscape Architect's and their Irrigation Consultant's are implementing drip subsurface to irrigate the turf in those front yards. I'm concerned that the long term effects without knowledge and understanding by the Homeowner to manage this drip irrigation will result in it is removal, and replacement with something less desirable. Most these turf areas would fall under the 500 square foot requirement for plan review.

The irrigation efficiency are not tested data based upon scientific method, and thus would not get the reproducible results time and time again. Others have stated better reason why this should be changed, and I would defer to them on this subject.

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A major loop hole in the ordinance is the Self-Certification by the installing Contractor on work that they didn't design. When the irrigation design gets changed, during Construction, and as the designer of record we have no recourse to stop the changes implemented by the Installation Contractor. Only to not sign the Certification at the project close out, but at the end of the project the Contractor simply signs off on their work. This is accepted practice by the governing Agencies. This needs to change!

Section 492.7 Irrigation Design Plan with item 1.B. should include in the statement to have two way communications to immediately notify the water manager of a mainline break, and the system notifies them that it shut down the mainline via, page, text message, email, etc.

Rain water collection is a valuable tool, but State and County Health Departments require this stored water to be used within a few days of collection.

There needs to be a new certification added to the list of definitions. **Certified Landscape Water Manager (CLWM)** Overview, see The Irrigation Association web link <http://www.irrigation.org/clwm/>. The CLWM would act similar to that role the Pest Control Advisor does with the Pest Control Applicator. With the CLWM overview of the CLIA to help keep consistence practices and insure that the Audit follows the guidelines developed by the Irrigation Association.

I've only touch on a few key points, and hope that proposed changes mentioned in this letter will be addressed in the ordinance, along with more time be given to make the ordinance better. Rushing this process will have far ranging consequences on our way of live, but do little to change existing landscapes that were installed prior to January 1, 2010.

Thank you for your time,

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