



June 26, 2015

Ms. Julie Saare-Edmonds
Water Efficiency Unit
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Comments on proposed changes to the Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds,

I have reviewed the proposed changes to the MWELO and have some concerns that I would like to share. I am a very strong supporter of the MWELO and have given several presentations to various organizations on its details and merits over the past five years. However, I have concerns with some of the proposed changes that I would like you to consider.

1. Irrigation Efficiency

The proposed changes to the irrigation efficiency from 0.71 to 0.85 (residential) and 0.92 (commercial) will make the distribution uniformity (DU) requirement virtually impossible to attain for residential landscapes and impossible to attain for commercial landscapes. The calculations for these produce a DU_{LH} requirement of 94% for residential and 102% for commercial. There are no products on the market today that can produce a DU_{LH} of 94% and anything over 100% is unattainable. This will result in no landscape projects being approved. We recommend that the irrigation efficiency remain at 0.71 for all landscapes.

2. Irrigation Precipitation Rate

The proposed changes to require a maximum precipitation rate of 1.0 inch/hour does not take into account several factors that affect water efficiency in landscapes; wind drift and evaporation, distribution uniformity, and soil moisture uniformity. Almost all of the landscapes we design in the Inland Empire are affected by significant winds that dramatically affect the efficiency of the irrigation. Limiting the designs to equipment that is 1.0 inch/hour or less will most likely create less efficient watering and consequently more water use.

3. Flow Sensing

We are a strong proponent of flow sensors and include them in all of our designs for larger landscapes. However, the proposed requirement to have them installed on ALL landscapes will be cost prohibitive for smaller landscapes as the cost for a flow sensor and appropriate controller will exceed \$1,000. Also, the sensors currently on the market will also not detect flow changes from ½" nozzles, making the

sensor ineffective. We recommend flow sensors to be required on all landscapes that have 12 stations or more.

As a professional Landscape Architect I would like to commend the Department of Water Resources for putting forth this effort to make the landscapes in California more water efficient. It is a topic close to the heart of all of us at RHA. My only request is that you consider the comments I have presented along with the others you will receive from industry professionals and postpone changes on those areas of concern until additional studies and discussion can be had. I would welcome the opportunity to be a part of those discussions.

Thank you for the opportunity to provide my comments. If you have any questions, please contact me at dougg@rhala.com or 951-781-1930 ext 121.

Cordially,
RHA LANDSCAPE ARCHITECTS-PLANNERS, INC.

A handwritten signature in black ink, appearing to read 'Doug Grove', with a long horizontal stroke extending to the right.

Doug Grove, RLA #2799, LEED AP
Principal