

Hello Ms. Saare,

I am writing to you regarding the upcoming proposed changes to the California MWELD. As an Irrigation Designer I must state that I do not see the proposed ordinance as effective at targeting real water waste. Irrigation designers are well aware of the limited supply of water in our state and have been working for decades to limit the amount of water waste by using new technologies and limiting the amount of water which exits planted areas. These regulations severely limit our options in addressing the peculiarities of individual sites such as soil infiltration and does not take into account the new technologies that allow for water savings such as 'cycle / soak' controller programming.

Further, we as designers are required to water the plants that are chosen by landscape architects to ensure survivability, by limiting our choice in products and not limiting the choice of planting material the ordinance creates a situation where as designers we are required to give some plantings less water than required causing a net budgetary loss, increasing the cost of construction in our state. It appears that these regulations are short sighted in that they do not target the real problem in our state, the constant proposed planting of high water use plants.

Even more surprising is that these regulation do not target the largest water wastes in the state, those sites which have existing irrigation that has been installed decades previously using older, less efficient equipment which are often poorly maintained. These existing sites significantly outnumber new construction and constitute the majority of water waste. Further, institutional sites such as state owned highway and freeway irrigation systems as well as educational sites feel that they do not need to follow these rules and continue to waste water through improper irrigation timing and, once again, poor maintenance.

Putting this all together it is easy to see that by limiting the equipment options to irrigation designers, not limiting plant palettes and ignoring the majority of water waste this ordinance does little to actually save California's precious water resources and simply creates undo difficulty in designing new construction. Instead of creating unproven regulations, the state should look at existing ordinances in areas which have even more difficulties with water such as the regulations in Abu Dhabi, the so-called 'Estidama' calculations which have been proven to save water in an environment which is much harsher than our own.

I hope that the state will see through the shortsighted plans and implement an ordinance which actually targets water waste where it is occurring and does not limit the equipment choices to designers.

Thank you for your time,  
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Irrigation Designer  
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