



To: California Department of Water Resources - Urban Water Use Efficiency Unit  
ATTN: Julie Saare-Edmonds, Senior Environmental Scientist  
P.O. Box 942836  
Sacramento, CA 94236-0001

RE: Ewing Irrigation & Landscape Supply comments on the proposed updates to the Model Water Efficient Landscape Ordinance (MWELO)

June 26, 2015

Ewing Irrigation & Landscape Supply is a private, family-owned wholesale distributor with more than 190 locations in 22 states—58 of which operate in the State of California. Our roots trace back to 1922, and since then our primary focus has been to provide industry-leading water efficient solutions, residential and commercial irrigation supplies, and landscape products to professional installers, landscape maintenance companies and public agencies. In doing so, we have purposefully aligned ourselves with manufacturers that continue to innovate and develop new water saving technologies that address today's challenge of water scarcity. Some of our proactive vendor partners include Hunter Industries, Rain Bird, Toro, Baseline Systems, and Landscape Products.

The challenge we face is not that the technology or products don't exist to apply water in a much more efficient way, but that there has been a lack of understanding, urgency, necessity and requirement to embrace the many water conservation products that have been available on the market prior to, and during, the drought.

As a leader in education and industry advocacy, Ewing works tirelessly to encourage Best Management Practices with confidence that it will lead to water conservation. Below are a few comments to a couple of the proposed revisions that are subjective in nature.

**Limit Precipitation Rate to 1" Per Hour.** Ewing supports this and feels it's achievable with the current technology available—and is one step closer to applying water at a rate in which some soils in California can better absorb. However, the actual application rate is subject to proper design, installation and system management, including the enforcement thereof. Regardless of the precipitation rate limitations, efficient controller management and/or utilizing a smart controller in combination with proper soil analysis will produce the best opportunity to reduce runoff and save water.

**Irrigation Efficiency.** Ewing opposes the implementation of the proposal to increase the irrigation efficiency requirement of new systems to be designed, maintained and managed to meet or exceed a site wide average of 85 percent efficiency for Residential and 92 percent efficiency for Non-Residential applications. Manufacturers have proven through testing that this cannot be achieved through any technology or combination of products currently available, including drip irrigation. We recommend keeping the current average of 71 percent efficiency as a benchmark, and requiring better management practices.

Ewing Irrigation & Landscape Supply understands the severity of the current water shortage and will continue to drive awareness and educate industry professionals on the most efficient solutions available today. However, we also understand that without proper clarification of the ordinance and enforcement, success will be limited. We are grateful for the opportunity to submit our position on the matter to the Department of Water Resources, and will continue to offer our unbiased support and technical advice to reach the mutual goal.

Respectfully,

A handwritten signature in black ink that reads "Douglas W. York". The signature is written in a cursive style.

Douglas W. York  
Chief Executive Officer, Ewing Irrigation & Landscape Supply  
Irrigation Association Past President (2008)  
3441 E. Harbour Drive | Phoenix AZ 85034  
800.343.9464 | [dyork@ewingirrigation.com](mailto:dyork@ewingirrigation.com)