

Dear Ms. Saare-Edmonds:

I am a Conservation Specialist for the San Dieguito Water District, a small retail water agency, supplying potable water to approximately 38,000 people through over 11,600 connections. We have a strong interest in ensuring efficient water use and thank you for the opportunity to comment on the proposed update to the State's Model Water Efficient Landscape Ordinance (MWELO).

I support changes that will allow for a more holistic approach to water and watershed management, reducing the amount of turf used in landscaping and reducing the water budgets for new development. I am writing in support of San Diego County Water Authority's comments and would like to add the following:

- Section 490.1: *Requiring soil management report, grading design plan, irrigation audit and landscape design plan bearing the signature of a licensed landscape architect will be excessive and impractical for a single-family home or small commercial project. The financial burden, availability of licensed landscape architects and the documentation process through municipal and county land planning departments will make this too cumbersome, expensive and lengthy of a process. The ordinance should allow for small scale projects to waive these requirements and require them, instead, just to meet the site's water budget requirements.*
- Section 492.6 (b) (4): *"identify areas permanently and solely dedicated to edible plants." This may not follow a change in property ownership or changes in property management, maintenance staff and HOA boards. I recommend that the ordinance address the long term maintenance of the property.*
- Section 496.2 (b) (14) *"...bear the signature of a licensed landscape architect, licensed landscape contractor, landscape designer or any other person authorized to design a landscape." One webinar caller brought attention to the potential issue of not having enough authorized professionals available. There are also many workshops, both agency and non-agency sponsored, that offer training in self-designed landscapes, including permaculture, that may surpass the understanding of trained professionals, who may or may not have training in water conserving methodology. I recommend that the ordinance allow for design criteria that the property owners can address without the expense of a designer, or contractor who may or may not have an understanding of water conserving landscape principles.*
- 492.7 (a) (1) (M) *"The irrigation system must be designed and installed in such a manner that a precipitation rate of 1.0 inches per hour is not exceeded in any portion of the landscape." I concur with the manufacturer, Rainbird, "By limiting precipitation rates, some of the most efficient products available will be eliminated from use, including many rotor models used in schools, parks and sports fields, the industry's most efficient spray models and even some drip applications."*
- Section 492.13. Irrigation Efficiency  
(a) *"For the purpose of determining Maximum Applied Water Allowance, average irrigation efficiency is assumed to be 0.8571 for residential areas and 0.92 for non-residential areas. Irrigation systems shall be designed, maintained, and managed to meet or exceed a site-widen average landscape irrigation efficiency of 0.8571 for residential areas and 0.92 for non-residential areas." I concur with Rainbird's comments, "We all strive to use the most efficient technologies on the market. Unfortunately, because Irrigation Efficiency is based on Distribution Uniformity, there may be no combination of irrigation products available on the market today that will achieve the requirements proposed in the draft ordinance. This also results in ET Adjustment Factors that are likely to be unattainable."*

- 492.17 (a) “local agency or water supplier/purveyor shall provide information to owners of permitted renovations and new single-family residential homes regarding the design, installation, management, and maintenance of water efficient landscapes based on a water budget.”

*Will the state be funding this mandate or providing actual guidelines?*

#### General comments

- Will growers and nurseries be able to turn around stock quickly enough for the proposed start date?
- Although installation may be done to a budget, it’s the long term maintenance that is an issue. Frequently, property owners and maintenance staff are not making the adjustments needed to properly care for a maturing landscape and an aging irrigation system. System adjustments, scheduling adjustments and plant pruning and care are all important components to water use efficiency.
- The evapotranspiration rate used for both ETWU and MAWA formulas: I recommend that the ordinance address the importance of assigning the correct ET factor from the appropriate CIMIS station. Planning Departments are not trained to handle this. For instance, coastal CIMIS stations have a much lower evapotranspiration rate than inland CIMIS stations. Should an inappropriate ET be applied, this could actually create a budget that is either larger or smaller than intended by the ordinance.
- Large and small landscape owners have invested significantly in good quality efficient irrigation equipment that would be outdated by this ordinance. Many are in the process of replacing equipment in phases, using existing incentive programs. Being consistent helps to ensure replacement equipment will keep stations on the same precipitation rate. I recommend that the ordinance allow for existing efficient irrigation technologies to continue to be used, updated and installed.
- It is unrealistic to have property owners other than professionals at a 95% irrigation efficiency rating. Even factory testing doesn’t maintain this. I recommend that the State consult with industry experts to determine a more realistic figure.
- Even drip irrigation systems have leaks. At least with larger service lines, flow sensors can capture the leaks. Allow property owners to choose best way to comply. Drip is not the best answer in all situations. There is a higher risk of damage by invasive animals near wilderness areas
- Finally, will planning and land use agencies be the default agencies to implement and report on this? And, how often are audits required? How is this to be enforced?

Thank you for allowing a comment period on these proposed changes to the MWELO. If you have any questions, please feel free to contact me.

Sincerely,

Felice Tackill  
Water Conservation Specialist  
San Dieguito Water District