



IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Ave., P.O. Box 57000, Irvine, CA 92619-7000 (949) 453-5300

June 26, 2015

Via email to: julie.saare-edmonds@water.ca.gov

Ms. Julie Saare-Edmonds
Department of Water Resources
1416 9th Street
Sacramento, CA 95814

Subject: Input on Draft update to the Model Water Efficient Landscape Ordinance (MWELo) to Implement the Governor's Executive Order B-29-15

Dear Ms. Saare-Edmonds:

The Irvine Ranch Water District appreciates the opportunity to provide input to the Department of Water Resources (DWR) on the *Draft Model Water Efficient Landscape Ordinance 2015(MWELo)*. IRWD supports the Governor's leadership in calling for additional reductions in water use and understand the importance of achieving a statewide 25% reduction in potable urban water use at this time. We are committed to helping the state obtain the necessary reductions, and support updating the MWELo to help maximize outdoor water use efficiency. IRWD offers the following comments for your consideration as the final MWELo is drafted.

§493 – Clarify that the local agency may not designate another agency, such as a water purveyor, to implement the requirements without that agency's express agreement and concurrence. Consider restating to read (a) A local agency may designate another agency, such as a water purveyor, with the other agency's express agreement and consent, to implement some or all of the requirements contained in this ordinance.

§492.15 Add language to the graywater systems section stating that local agencies, developers and landscape contractors should coordinate with the local water purveyor to determine whether there is an extensive recycled water distribution system in place, in which case graywater systems may not be an appropriate choice to enhance the local water efficiency.

§491 (b) and §492.7(a)(1)(B) - The term automatic irrigation controller in itself is more general and includes any type of timer-based systems. The device types with weather and soil moisture based controls are more specifically referred to as "smart" irrigation technologies, a subset of automatic irrigation controllers. Automatic weather based irrigation controllers should be EPA Water Sense certified to maximize water savings. Additionally, Water Sense soil-moisture based control technologies should be required once EPA adopts protocols for their certification.

§492.7 (a) (1) (C) Consider adding the following “All sprinklers and emission devices should comply with the ASABE/ICC 802-2014 Landscape Irrigation Sprinkler and Emitter Standard.”

§492.7 (a) (1) (G) Flow sensing may only be a cost efficient for addition to commercial landscapes or residential landscapes over 5,000 square feet.

§492.7 (a) (1) (G) and (H) We support the requirement for master valves.

§492.7 (a) (1) (M) While the statement “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...” is a good addition. The following caveats should be included to provide a more comprehensive and attainable result “...that is irrigated with spray, micro-spray, or drip emission devices. Larger landscape areas (i.e. sports fields or recreational park spaces) utilizing rotor heads must be designed and installed in such a manner that a precipitation rate of 2.0 inches per hour is not exceeded.

§492.10(a) - Add a requirement that the hydrozone maps be placed and maintained in the appropriate irrigation controller housing to ensure this information is readily accessible for field staff use. These maps should include all information necessary to develop an irrigation schedule or water budget/efficiency target as listed in Sections 492.10(a)(4) and (5).

§492.6(a)(1)(H) - The use of invasive and/or noxious plant species should be prohibited, not strongly discouraged, to protect the broader watershed and avoid expensive and time consuming removal efforts.

Additionally, Irvine Ranch Water District (IRWD) suggests that DWR consider developing a sample performance based landscape contract that local agencies and water purveyors could provide as a resource to property managers and owners who are often responsible for the long-term maintenance of landscape sites. This resource may assist in long-term compliance with the maintenance and performance of the site, and encourage landscape contractors to manage based on meeting established site water budgets. The California Urban Water Conservation Council’s Landscape Committee and the California Landscape Contractors Association may be helpful resources that could assist DWR in this effort.

IRWD also supports the development of a water budget performance based approach that would allow flexibility while establishing efficiency targets for landscapes. IRWD has a water-budget based rate structure in place that has proven to be very effective in reducing outdoor water use. Since 1991, outdoor water use has been reduced by 50%. DWR should consider including a water-budget based performance approach to evaluating ongoing maintenance, which doesn’t necessarily need to be tied to rates, in the updated MWEL0.

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Thank you again for considering IRWD's comments in the development of the final MWELO. Please do not hesitate to contact me at (949) 453-5590 or Fiona Sanchez at (949) 453-5325 if we can be of assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Cook".

Paul Cook
General Manager