

Hi Julie,

Thank you for the opportunity to provide comments to the revised MWELO document and for the public meetings that were held. I was able to listen to the meeting held on June 19 in Sacramento via telephone.

I would like to provide support for the following:

- The addition of section 490 (c) (1) – (5) encouraging the watershed based approach to landscaping.
- The reduction in MAWA from 70% of ETo to 50% for residential and 40% for non-residential areas.
- The maximum precipitation rate of 1.0 inches per hour in section 492.7 (a) (1) (M).
- Section 492.6 (a) (1) (A) that calls out native plants and climate appropriate plants, (E) that prohibits turf in street medians, and (F) that prohibits turf in parkways less than 10 feet wide.
- Section 492.6 (a) (3) (A) – (D) and (G) regarding soil preparation.
- Section 492.16 (c), (d), and (e) regarding stormwater management and rainwater retention.

I would like to recommend the following amendments/additions:

- Definition of the ‘watershed based approach’ be added to section 491 consistent with the CUWCC 2014 landscape symposia report.
- Section 491 (aa) “irrigation audit” specifies that the audit must be conducted in a manner consistent with the IA’s Landscape Irrigation Auditor Certification program. I would recommend that this be changed to say in a manner consistent with an EPA WaterSense professional certification program in irrigation auditing or something more general. The IA’s CLIA program is just one example.
- Section 492.15. As currently worded it appears that graywater systems are part of the definition of “landscape area” and are subject to the same water budget as areas irrigated with potable water. At a minimum I would recommend that the definition of “Special Landscape Area” (491 (ppp)) be expanded to include all non-potable alternate water sources such as graywater and rainwater. An alternative would be to exclude areas irrigated with graywater from the definition of “landscape area” so that these areas are not subject to a water budget. It is hoped that providing a larger landscape budget for non-potable alternate water sources or excluding these systems from the calculation will provide an incentive for the installation of rainwater harvesting and graywater systems.

Watering to a budget and an irrigation schedule with many simple graywater systems is inherently difficult, e.g. a laundry-to-landscape system simply outputs the graywater directly from the machine into the landscape. There is no storage of unfiltered graywater and irrigation

occurs at the same time as the laundry is done. Emitters are typically ½ - 1 inch open ends so precisely measuring is often not an option.

- While the majority of graywater systems are very simple unfiltered gravity fed or laundry-to-landscape systems there are hi-tech systems that filter the graywater and pump it through specially designed graywater drip tubing. Some systems integrate graywater, rainwater and potable water (as makeup water with the appropriate backflow prevention). The recent CALGreen emergency building standards permit the use of potable water as a back-up water supply for on-site water recycling and/or reuse systems. Such systems should be considered in the MWELo document and captured on the irrigation design plan.

More information is required on:

- Section 491 (q) and (bb), and section 492.13 average irrigation efficiency of 0.85 for residential and 0.92 for non-residential areas. Many comments considered these levels of efficiency to be unobtainable in the real world.
- Rationale for different MAWA calculations for residential and non-residential areas based on comments received at the June 19 meeting.

Sincerely,

Gregory Plumb