Thank you in advance for reviewing my comments. I'd like to make some statements followed by more specific points.

With all due respect, I understand the need to conserve water and the need for ordinances. But tweaking the existing ordinance will not solve the problems around water conservation for a whole variety of reasons which you are probably very familiar with.

Because the ordinance really only addresses new construction, it is squeezing, to the point of undoable, landscape irrigation - - - with constraints on design and equipment that affect only a part of the bigger picture.
We live in a contractual world. There are complex contracts between owners and designers, owners and contractors, General contractors and sub-contractors that are not even considered in the structure of the installation and inspection of the irrigation work.
There is no standard set in this ordinance for the INSTALLATION CONTRACTORS. NO TEST REQUIREMENTS FOR MINIMUM PROFICIENCY LIKE THE ONES GIVEN BY THE IRRIGATION ASSOCIATION. NOTHING. A GENERAL CONTRACTOR CAN UNDER HIS LICENSE, FIND SOME GARDENER FOR CHEAP WHO SAYS HE/SHE KNOWS HOW TO INSTALL IRRIGATION, AND GET LANDSCAPE WORK. WHAT'S WRONG WITH THAT PICTURE? IRRIGATION IS DESIGNED AND INTRICATE. NOT JUST ANYONE SHOULD BE DOING THAT WORK. THE INSTALLATION IS THE MISSING LINK AND HAVING NO QUALIFICATIONS FOR INSTALLERS IS A FAILURE TO ADDRESS A VERY LARGE PROBLEM IF WE'RE REALLY GOING TO CONSERVE WATER. HAVING AN EFFICIENT DESIGN IS ONLY PART OF THE ISSUE.
THIS IS NOT A PROBLEM THAT HAVING THE OWNER OR LANDSCAPE ARCHITECT SIGNING OFF IN BLOOD THAT THE IRRIGATION HAS BEEN INSTALLED PER PLAN.

THE Ordinance doesn't really address the HUGE ISSUE of existing irrigation systems. What's the number of HOA's in California? How qualified do landscape maintenance contractors need to be? AGAIN QUALIFICATIONS.
OUTDATED CONTROLLERS, MIX AND MATCH EQUIPMENT, POOR PROGRAMMING WITH SET IT AND FORGET IT MENTALITY. THE ORDINANCE DOES NOTHING TO HELP THIS OUT. Rebates are great. Incentives are nice, but in the end if the conservation is achieved there is not a corresponding decrease in the water bill. Yes, supply and demand. I know. So where's the real incentive when a ROI (return on investment) study in completed?

What about all the Stormwater management BMPs and Low Impact Development features that RECHARGE THE GROUNDWATER? Where's the incentive to recharge the groundwater rather than putting water into the stormdrains? WHY IS THERE NO SPECIAL LANDSCAPE AREA DESIGNATION FOR VEGETATED SWALES, INFILTRATION BASINS, RETENTION BASINS, CONSTRUCTED WETLANDS, ETC, ETC? It is well known that water is cleaned by plants, many of which are water loving. If we have to hydrozone those as high, or medium, shouldn't those be covered by the SPECIAL LANDSCAPE AREA PROVISIONS? IT'S IS ACTIVE AND FUNCTIONAL. IT HELPS CLEAN WATER AND RESTORE GROUNDWATER. ISN'T RESTORING GROUNDWATER WORTH CREATING INCENTIVES FOR? If there was EVER a use that should be considered as special landscape area, that would be it. Talk to the folks over at the Water Quality Control Board if you want more information on vegetated stormwater management best practices that would certainly qualify for incentives.

Regarding the changes to: Section 491 (q) and (bb), section 492.7 (M) and Section 492.13
Change in Precipitation Rate Limits: Not all landscape irrigation requirements are the same. There is no one-size-fits-all. Slopes, parkways, front and rear yard, commercial and residential, public parks, sports

facilities. . . . the list goes on and on. To propose an infiltration rate of 1in/hr is not reasonable. It may only wind up making it impossible to meet the requirements. And, local ordinances require irrigation and planting in new development landscapes. It appears to me after looking through numerous Manufacturer catalogues even that the most efficient equipment on the market today won't qualify. The list of products that won't qualify may include rotors, new high efficient spray nozzles and maybe even some drip applications. And what does it do to the water windows, run times and water budgeting and restrictions???????? This is huge. Forest for the trees stuff. It will cause a huge ripple throughout the whole industry largely because it can't be done in many (if not most) situations.

ET Adjustment Factor (Decrease): Have you looked realistically at how irrigation really works and is installed and what is required to achieve this? Where in a lab? White papers are excellent sources of information, but their reliance upon should not be such that it forces and impractical (if not impossible) scenario onto the landscape industry. AGAIN, LET'S FOCUS ON A REAL DISTRIBUTION UNIFORMITY, THE ONE INSTALLED IN THE GROUND, BY A QUALIFIED OR LICENSED IRRIGATION INSTALLER AND WATER MANAGER!!!, not on creating new restrictions that look good on paper but can't effectively be met in the real world.

Changes in irrigation efficiency thresholds: Again, this is a design standard. This is a paper chase exercise with a one-size-fits-all mentality. This is unlikely to be achievable on paper and even less likely to be achieved in the field.

Please please please focus on qualifications of installers and take the ability of general contractors with no landscape contractor's license, from being able to legally install irrigation. The continuation of squeezing designers and manufacturer's can only go so far. It may look good on paper, but that's about all. Is that what this ordinance is about? Looking good on paper? I think we need to take it all the way to the end- to proper installation, and your bill does not cover that. You may want to fix that.

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