

Dear Julie,

Please find my comments to the MWELO included in this email. Thank you for the opportunity to provide feedback.

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.

Recommended changes:

- Exclude areas irrigated with graywater (and other non-potable sources) from the definition of “landscape area” so that these areas are not subject to a water budget.

Reason: If landscapes can have a larger water budget it can encourage non-potable alternate water sources.

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.

Even though 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.

Kind regards,

Laura Allen