

**Good morning Julie,**

At Heaviland Landscape Management we are committed to helping California achieve at least 25% water savings. We are currently removing thousands of square feet of turf and replacing it with drought tolerant California-Friendly plant materials and water efficient irrigation.

We also supports emergency regulations that encourage responsible water management practices. On June 12, the California Department of Water Resources released draft changes to the Model Water Efficient Landscape Ordinance. If approved, many of the proposed changes will directly affect you. Here are a few of the highlights that we are concerned with:

### **Precipitation Rate Limits**

The proposed ordinance changes include a limit on precipitation rates of 1 in./hr.

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.

### **Irrigation Efficiency and ET Adjustment Factor**

In addition to the limitation on precipitation rates, the Department of Water Resources is also recommending significant increases in Irrigation Efficiency and equally large decreases in ET Adjustment Factors.

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.

We are also concerned with how these changes will impact permitted shovel ready projects that are slated to start or are already in progress. We are unclear how the proposed changes will impact project and whether or not they will cause delays and hardship to our clients and business. We appreciate any clarification that can be provided to these matters.

Sincerely,

Raj Brown

**Rajan L. Brown** | Director of Resource Management

MLA, LEED GA, ASLA, CLWM, CLIA