



Hello, my name is Michael Smith. I am a District Sales Manager for the Toro Company. As many of you may know, Toro is a leading worldwide provider of innovative solutions for the outdoor environment – focused on the turf, irrigation and outdoor lighting markets. Through constant innovation and caring relationships, Toro has built a legacy of excellence by helping customers care for golf courses, landscapes, sports fields, public green spaces, commercial and residential properties and agricultural fields.

On behalf of Toro, I want to thank you for the opportunity to provide input to the MWELo update process. In the time allotted, I would like to focus on 3 points.

- 1. Toro Irrigation recognizes the severity of the current drought and is working to support the current emergency regulations that are designed to reduce California's urban per capita consumption of water by 25%.
 - Statewide, the R-GPCD was reduced 13.5% in April. Given what we see in a multitude of communities throughout the state, we fully expect the May reduction to be even greater.
 - Water agency implementation of water conservation rate structures that communicate to end users the real value of water and penalize water waste are starting to have their intended effects.
 - By some estimates, California's water utilities have already succeeded in achieving the 20 x 2020 reduction targets set back in February of 2010 of 154 GPCD. While insufficient during the 4th year of the drought, this reduction from 192 GPCD is noteworthy.
 - Turf removal is at an all-time high.
 - While California reservoir levels are now, in the aggregate, approaching the all-time low levels of 1977, it is remarkable to note that the population in California has increased from 22 million to over 38 million during that same period. A good reason to commend our California Water Agencies and a good reason to continue the progress in reducing GPCD.

Taken together, this means many Californians understand the drought's severity and the need to reduce water use. Progress toward the statewide, drought emergency reduction goal is being made.

- 2. This backdrop of progress in reducing water consumption is important to note because of the expedited time frame of the proposed regulatory changes. These proposed changes have not received the same vetting as what preceded the 2010 MWELo regulation. While understandable because of the drought emergency, there is nothing in the proposed MWELo that returns us either to a pre-emergency MWELo regulation nor to a more thorough vetting process.
- WE are most concerned about the unintended consequences of the regulatory changes that are being proposed. Specifically the changes to the ET Factors, Plant Factors, Irrigation Efficiencies and the imposition of Turf limitations. There is concern that in the manifold quest for water use reduction, there will be economic losses that in some cases are long term when they are really not necessary given the progress and trends we are seeing.



- 3. The final point. Section 492.11 of MWEL0 is titled: Landscape and Irrigation Maintenance Schedule. Item (a) states: Landscapes shall be maintained to ensure water use efficiency. It is Toro's position that the best way to ensure water use efficiency on an ongoing basis is by the use of a water budget – and comparing actual water use through a dedicated landscape water meter to the budget which has previously been specified by MWEL0 for new landscapes. It is Toro's position that this would do more to reduce outdoor water waste than by constricting the choices of landscape architects and irrigation designers at the front end of the process. The ongoing water savings is dictated by the weakest link in the integrated and interdependent processes of design, installation, maintenance and management of an irrigation system.

Thank you.