

**PUBLIC COMMENT SUBMITTAL**  
**on**  
**Independent Technical Panel on Demand Management Measures**  
Public Draft Report  
Recommendations Report to the Legislature on Landscape Water Use Efficiency  
February 13, 2016

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Rain Bird is grateful for the opportunity to comment on the Recommendations Report of the Independent Technical Panel (ITP). Rain Bird has been very much involved in its development in the last 8 months and has made verbal comments throughout that time at the public meetings. Two comments previously expressed verbally were not adopted in the Recommendations Report. Those comments are repeated here with more detail and support and Rain Bird would appreciate a second consideration from the ITP.

**Topic: Section 6: State Model Water Efficient Landscape Ordinance (MWELo) Future Revisions & Process Updates**

**Recommendation #1: MWELo Future Revisions for the Next Review Cycle**

**Table 1**

**Recommended Change to MWELo §491 (s)**

**Comment:** The definition of ETAF should not be changed to define ETAF for Special Landscaped Areas as 0.8 as opposed to the existing 1.0. The recommendation should be struck from this document.

**Rationale:** The Independent Technical Panel (ITP) recommends that the definition of ETAF in MWELo be changed to define ETAF for Special Landscaped Areas from 1.0 to 0.8. Special Landscaped Areas are currently defined as an area of the landscape dedicated solely to edible plants, recreation areas, areas irrigated with recycled water, or water features using recycled water.

Most of these uses require 100% of ETAF in order to perform as intended.

1. Food crops perform poorly when not irrigated fully and yield is reduced.
2. Recreations areas are typically turf areas with high traffic which requires the full irrigation requirement in order to recover from the abuse of high traffic. (A study was performed by Dr. Vic Gibeault of the University of California, Riverside in the mid-1980's which showed that turf has acceptable appearance when irrigated to 80% of ET, but those turf plots were not subject to any traffic. I happened to have observed this research weekly over a one year period and discussed this study with the researchers as it was being conducted at the South Coast Field Station in El Toro, CA in about 1984.)
3. Areas irrigated with recycled water do not put demands on the potable water supply. Many times those users of recycled water have agreements with treatment plants to act as spreading grounds. They are required to disperse the water available as a means of disposal. Those irrigators are obligated to use all the available recycled water.

4. Areas irrigated with reclaimed water often should be over-irrigated to flush the accumulation of salts in the soil due to their presence in the water. This increases the irrigation requirement.
5. Water features using recycled water that do not replenish the water evaporated from them will eventually run dry. Many water features like fountains are not installed in the ground like the evaporative pans used by scientists as one means of determining ET. This exposes the sides of the fountain to higher temperatures which accelerate the evaporation process. Again, 80% of ET will cause the fountain to eventually run dry.

**Suggested Change (or Language):**

- ~~(ITP) (s) The ETAF for a Special Landscape Area shall not exceed 1.0-0.8.~~

**Topic: 492.6 (a)(1)(D) Turfgrass on Slopes**

**Comment:** The degree of slope on which turf is allowed should not change and the recommended change should be struck from this document.

**Rationale:**

1. Department of Water Resources has publicly stated that the intent of this restriction of turf on slopes in MWELO was to ensure mower safety. The current limitation of 25% slope (1 foot of rise over 4 feet of horizontal run) is more than adequate to address this concern. In fact, it has been a long accepted practical standard that slopes of 33% can be safely mowed with riding mowers.
2. ITP states its rationale for limiting turf to slopes no steeper than 10% (1 foot of rise over 10 feet of horizontal run) is to reduce runoff. ITP states that “irrigating turf with overhead spray on slopes of 25% without generating runoff is difficult”. In fact, the opposite is true. A study<sup>1</sup> conducted by California State Polytechnic University, Pomona has shown that virtually all runoff can be prevented when proper irrigation scheduling is employed. There are controllers on the market today which when installed properly will automatically operate the irrigation system so as to virtually eliminate runoff with no end-user intervention. Therefore, it is easy, not difficult to irrigate turf with overhead spray on slopes of 25%.
3. ITP also states that turf areas with slopes of 25% are “often not ‘functional’” in that they do not support many or most recreational activities. It is not reasonable to eliminate all turf on slopes of 25% because some turf on slopes is not functional. Certainly, there are many cases in public parks and golf courses with turf on slopes of 25% that are very functional. All of these uses should not be banned due to a few applications which are not functional. It does not follow “that turf should not be allowed on such steep slopes” as is asserted by ITP.

**Suggested Change (or Language):**

~~(a)(2)(D) Turf is not allowed on slopes greater than 25% 10% where the toe of the slope is adjacent to an impermeable hardscape and where 25% 10% means 1 foot of vertical elevation change for every 4 feet 10 feet of horizontal length.~~

<sup>1</sup> Appendix A – Effect of Rotary Nozzles and Cycle and Soak Scheduling on Landscape Irrigation Efficiency