

Good morning Julie,

Hunter is in strong support of the 1"/hr precipitation rate mandate. Setting prescriptive precipitation rates correctly places the importance on the relationship between the irrigation product and the space that it is irrigating. A precipitation rate of 1"/hr slows the flow of water to the landscape which reduces excessive water and runoff. This prescriptive measure does not exclude any irrigation manufacturer. All rotary type devices fall within this measure. Inline drip products will be allowed as long as they are designed within the prescribed precipitation rate. Rotors will also fall within this mandate as long as the correct nozzle is used. Most pop-up spray heads will not be allowed; these have been the culprit of water waste and inefficient water use for decades. There is also a correlation between precipitation rate and efficiency. The lower the precipitation rate, the higher the efficiency. Setting the 1"/hr precipitation rate is the most accurate measure the state can enforce to reach the goal of saving/reducing water use in the landscape.

Hunter strongly opposes the overall 85% irrigation efficiency rate. In order to reach an 80% to 85% irrigation efficiency the irrigation system would need to attain a distribution uniformity of 90% to 95% respectively. Given the current technology and installation practices this would be extremely hard to achieve. The current irrigation efficiency standard of 71% is much more realistic, and coupled with a 1"/hr precipitation rate, will help achieve our water reduction goals.

Some irrigation manufacturers have voiced that no new irrigation mandates should be set for the revised MWEL. Hunter Industries disagrees. Asking nurseries, landscape architects and designers to figure out how to reach water reduction goals solely through plant selection set by lowered ET adjustment factor rates while excluding any prescriptive irrigation measures is simply imbalanced. The industry as a whole is responsible for reaching water reduction goals, and no single sector should be excluded. That is why Hunter wants to partner with you and the industry as a whole to help bear the weight of the mandates we are facing. The irrigation sector can quickly provide water reduction solutions through products and design techniques. Setting a precipitation rate mandate of 1"/hr for irrigation products in conjunction with reduced water availability through ET Adjustment Factors is a fair and balanced direction for the industry to follow to reach the overall goal of reducing water use on landscapes.

Thank you for your concern with the upcoming revisions to MWEL. I look forward to working with you now and in the future to help reach your water saving goals.

Bryce Carnehl
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Specification Manager