



CALIFORNIA ASSOCIATION OF REALTORS®

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Julie Saare-Edmonds
Senior Environmental Scientist Landscape & Green Building Programs Water Use and Efficiency
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001
Email: Julie.Saare-Edmonds@water.ca.gov

RE: DRAFT ITP Final Report Discussion – Section Review – Item 3: Section 5. Required Improvements in Existing Landscapes - OPPOSE

Dear Ms. Saare-Edmonds :

Thank you for the opportunity to provide comments on the Draft ITP Final Report Section 5: "Required Improvements in Existing Landscapes". The CALIFORNIA ASSOCIATION OF REALTORS® (C.A.R.) seeks to be a valuable contributor in the development policies and recommendations related to improving water efficiency in the existing building stock.

C.A.R. supports voluntary, systematic and market-based programs to encourage landscape water conservation in the existing housing stock. C.A.R. strongly opposes the proposed enforcement mechanism for improving existing landscapes contained in Section 5. a. of the draft Report to the Legislature entitled "California Landscape Water Use – A Framework for the Future". This section of the draft report calls upon the Legislature to require property owners to update landscape features as a condition of completing a sale or transferring service, which are effectively the same trigger mechanism.

Waiting for a home to sell in order to update landscape features will not achieve the department's goals in a timely or comprehensive manner. Moreover, time-of-sale mandates create burdensome and costly transaction delays while negatively impacting housing affordability. Before the Great Recession (2001-2006) housing turned over (or was sold) on average every 16 years. Today, according to our Research and Economics Department, housing turnover now occurs every 22.2 years due to a lack of credit availability and continued instability in the housing market. Any mandatory approach for water conservation should be done as community-wide comprehensive program, and not a random scattering of properties being transferred. In fact, because water conservation is vital, C.A.R. developed an informational piece (see, attached) that REALTORS® provide to their clients on how to do their part.

The CALIFORNIA ASSOCIATION OF REALTORS® looks forward to collaborating with the Department, its staff and other key stakeholders to develop a comprehensive statewide program to improve landscape water efficiency in all California homes and structures, not just those changing ownership.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer C. Svec".

Jennifer C. Svec
Legislative Advocate
California Association of REALTORS®



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