

Recommendation 6-1 – MWELO Revisions

While there was a mixture of support and opposition, some proposals drew very lopsided opposition.

Comment: Some comments on applicability seemed to interpret the threshold (500 sf) as applying to all renovations, not just alterations associated with a building project valued at \$200 K or more.

Response: No change.

Comment: Panel member recommended adding a revision of the current definition of recycled water to track the current language in the Water Code.

Response: Included.

Comment: More opposition than support expressed for reducing the ETAF for SLAs to 0.8. Some appeared to be concerned about the challenges of irrigating existing SLAs, rather than newly installed SLAs. Others noted that alternative waters, such as recycled water and graywater, may require the use of leaching applications.

Response: Add clarifying language that the revision applies to newly installed Special Landscaped Areas, and does not apply to areas fully irrigated with recycled water.

Comment: The addition of graywater and harvested rainwater to the definition of SLA was generally supported, although some wanted to go further (well water, etc.). Some were supportive of the resulting effect of having the same ETAFs for recycled and potable water, citing the need to use recycled water efficiently. Others object to exactly that, citing the need to incentivize recycled water use, and also the need for leaching application of water. One comment suggested adding rain gardens and infiltration areas. However, such areas may or may not require supplemental irrigation.

Response: No change.

Comment: Nearly all comments that specifically addressed turfgrass slope limit of 10% were negative.

Response – Agree. Further research might justify some reduction below the current 25%, but there is little basis to support a change to 10% now..

Comment: The requirement for pool and spa covers were supported by some, including the California Pool and Spa Association, but other raised safety concerns.

Response: No change. Any new pool needs to be appropriately protected for safety reasons, when covered or uncovered. This provision simply requires a cover to be present at the time of inspection of a new pool; it does not regulate the use of the cover. However, a cover that is not present can NEVER be used.

Comment: Irrigation and hydrozone maps were generally supported.

Response: No change.

Comment: Irrigation efficiency certification: few comments directly addressed this issue. Irrigation consultants object to the proposal but also object to the existing requirement for a third party audit.

Response: No change.

Comment: Few comments directly addressed the recommendation for clarification of audit sampling procedures. Some objections appeared to believe this involved an additional sampling burden.

Response: No change.

Comment: Both support and opposition for rainwater retention. Opposition was most often raised about site limitations. HCD suggested clarification of terminology.

Response – Agree that waiver can be provided to the extent that site conditions cannot accommodate the capture and infiltration of the volume of rainwater in the standard as stated.

Comment: Public education drew a small number of recommendations for changes, some proposing more detail, some less.

Response: Clarifying edits. No substantive change except for adding “landscape managers” to the list of professionals.