

MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

May 22, 2009

Ms. Gwen Huff
Office of Water Use Efficiency and Transfers
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Huff:

Comments on the Modifications to the Proposed Model Water Efficient Landscape Ordinance

Thank you for the opportunity to comment on the current draft of the California's Model Water Efficient Landscape Ordinance (Model Ordinance). The Metropolitan Water District of Southern California (Metropolitan) supports the Department of Water Resources' (Department) efforts to update the Model Ordinance as this regulation will be an important tool for managing water resources in the future.

Metropolitan is working with counties, cities, and wholesale and retail water agencies within a six-county service area to promote landscape water efficiency in new and existing landscapes. This includes region-wide efforts to adopt and enforce local ordinances for water conservation and water efficient landscapes. Many of the local agencies within our service area are collaborating on regional landscape ordinances that will improve coordination and implementation. As required by statute these draft ordinances are designed to be at least as effective in conserving water as the Model Ordinance.

General Support:

Metropolitan supports the adoption of the Model Ordinance with one minor change noted below. As described above, many agencies have drafted water efficient landscape ordinances but must wait until the state finalizes the Model Ordinance before adopting the local ordinance. We support the state's efforts to complete the process so that local agencies may move forward to adopt either a local ordinance or the state's Model Ordinance and begin implementation.

Suggested Change:

Metropolitan requests that the Department consider the following change:

Ms. Gwen Huff
Page 2
May 22, 2009

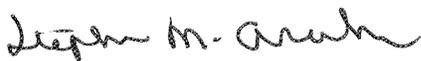
The proposed language in Section 493.1(a)(1) for existing landscapes with meters states that local agencies shall administer programs, such as water use analyses and irrigation water surveys and audits, that verify that landscape water use does not exceed the Maximum Applied Water Allowance (MAWA). For older landscapes, landscape water use commonly exceeds the MAWA and recommendations to improve efficiency are needed. As written, this section could be interpreted that existing irrigation systems must be improved in order to complete the verification. To clarify implementation of this section, we request that the language be changed as follows:

...the local agency shall administer programs that may include, but not be limited to, irrigation water use analyses, irrigation surveys, and irrigation audits *to evaluate water use and provide recommendations as necessary to reduce landscape water use to a level that* does not exceed the Maximum Applied Water Allowance for existing landscapes.

Metropolitan would like to acknowledge the significant effort of the Department in updating the Model Ordinance. We understand the Department will be preparing an implementation guide in the coming months. We would like to offer our assistance on technical issues and reviewing the guide to ensure timely implementation by local agencies.

Again, thank you for the opportunity to comment. If you have any questions, please feel free to contact Ms. Carolyn Schaffer of my staff at (213) 217-6244.

Sincerely,



Stephen N. Arakawa
Manager, Water Resource Management

CS:jc

o:\a\s\c\2009\CS_Comment Letter.Model WE Landscape Ord May 7 2009.DRAFT.doc