



Memorandum

Development Services Department - Landscape Architecture Division

Project name: Model Water Ordinance
Date: 05.26.09
Project File No.: KY808
To: Attention: Judy Colvin
Department of Water Resources
Office of Water Use Efficiency and Transfers
PO Box 942836
Sacramento, CA 94236-0001
From: Mary Radley, Landscape Architect
CC: Gary Halbert, Development Services Director
Rick Hopkins, Director of Engineering & Public Works

**CALIFORNIA CODE OF REGULATIONS TITLE 23, WATERS DIVISION 2.
DEPARTMENT OF WATER RESOURCES CHAPTER 2.7 MODEL WATER
EFFICIENT LANDSCAPE ORDINANCE. (MAY 09 Update)**

Thank you for the continued opportunity to be involved in the development of this legislation, which aims at our common goal, to build water conservation into all California landscapes.

The City of Chula Vista has prepared a list of comments on the draft legislation, released May 11, 2009 that represents a simplification and improvement of the draft legislation since the Dec 08 version was issued.

There are still remaining issues that we would like to draw your attention to. However, per your instructions, these have are limited to the recent round of changes and not to the whole document. Please see the list below.

1. Page 6, (bbb) – Text currently reads “gold courses”. Change to the intended meaning that was probably “golf courses”.
2. Page 7, (ddd) – Text currently reads, “ETO means is a standard measurement...” Change to the intended meaning that was probably, “ETO means a standard measurement...”
3. Page 14, the definition of terms used in MAWA calculation – The term used is “ET Adjustment factor.” Add the initials (ETAF) so that it is consistent with the way it is stated on page 4 in the document definitions sections – “ET Adjustment factor (ETAF).”
4. Page 24 – “Licensed professional as required by law.” Is this referencing the State of California’s Landscape Architect’s Practice Act? Clarify.
5. Page 29 – Recycled water. A maximum ETAF not to exceed 1.00 for areas using recycled water is a welcome improvement for this City that has large areas supplied with recycled water.
6. Page 30, Section 493.1 Irrigation Audit, Irrigation Survey and Irrigation water Use Analysis. – This still represents an un-funded mandate that agencies will be obligated to perform once this legislation comes into effect. If the text were to read as follows, “the local agency may administer programs” then local agencies would have the right carry out audits in instances where they see water being wasted but would not be obligated to carry them out across the board.