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May 26, 2009

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

Comments on the Modified Text of the Proposed Model Water Efficient Landscape Ordinance

Dear Ms. Huff:

In accordance with the Notice of 2nd 15-day Comment Period for the Proposed Modifications to the Regulation Model Water Efficient Landscape Ordinance to California Code of Regulations, Title 23, Sections 490-495, Western Municipal Water District ("Western") submits the following comments for consideration.

- Page 6 - 491(vv): The last word of the sentence should remain plural as "landscapes."
- Page 16 – 492.5(a)(1)(B)6: Remove comma after the semi-colon.
- Page 19 – 492.6(b)(end of section): "Note: Authority Cited: Section 65595." This needs the words "Government Code" reinstated following the section number.
- Page 22 - 492.7(b)(7): Define "irrigation consultant."
- Page 28 – 492.12 (a), page 31 493.1(b): What defines a "certified" landscape irrigation auditor? Sections 65595 and 65596 of the Government Code do not specifically address this.

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Comments on the MAWA formula:

- Page 14 – 492.4(1) and (2), page 35 – Section B1 (2 places): Place parentheses in the bracketed portion of the MAWA formula to clearly define the order of operations. Otherwise completely differing answers can result: “[$(0.7 \times LA) + (0.3 \times SLA)$].”

Western supports your efforts in updating the State ordinance. It is our desire that your office provide details regarding the process for confirmation of local ordinance compliance with the “at least as effective” requirements of the State’s Model. This will allow local ordinances to be quickly tailored to meet local conditions while satisfying the State requirements.

Thank you for the opportunity to comment. If you have any questions, please contact Pam Pavela at (951) 789-5036.

Sincerely,



PAUL RUGGE
Assistant General Manager/Chief Administrative Officer
Western Municipal Water District