

May 26, 2009

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

Re: Model Water Efficient Landscape Ordinance Revision Comments

Dear Ms. Huff,

The California Urban Water Conservation Council supports the amendments to the Model Water Efficient Landscape Ordinance as proposed in the May 7, 2009 revision.

One comment we have is a request for clarification in Section 492.10 (a) (1). As stated, this is very prescriptive, requiring that all irrigation scheduling shall use automatic irrigation systems and ET data. As recent studies have shown, this may not be the ultimate answer for efficient landscape irrigation. We propose that the language be clarified to say "When irrigation scheduling uses automatic irrigation systems, evapotranspiration data such as those from CIMIS or other weather or soil moisture data shall form the basis of the irrigation schedule."

The Council appreciates DWR's efforts to improve landscape water use efficiency in the Model Ordinance.

Thank you for considering these comments.

Sincerely,



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