

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Gary Halbert [GHalbert@ci.santee.ca.us]
Sent: Monday, March 17, 2008 5:12 PM
To: mweo@water.ca.gov
Cc: troy@sdwca.org; Keith Till; neal@padre.org; jeff.barnes@helixwater.org
Subject: [MWEQ] Model Water Efficient Landscape Ordinance

Attachments: Halbert, Gary.vcf



Halbert, Gary.vcf

Jody Colvin,

Hello, I'm Gary Halbert, Deputy City Manager of Santee. We have had the opportunity to review the draft Model Water Efficient Landscape Ordinance and would like to offer the following comments:

We are concerned that the applicability of the draft Ordinance is overly broad. The requirements for comprehensive studies and plans of the Ordinance as written would apply equivalently to large commercial developments, residential subdivisions, and homeowner construction on a single family residence. The costs involved may likely discourage homeowners from making needed improvements to their homes (or avoiding required permits). Also, there is confusion about what constitutes "new construction" as it determines applicability. Does "new construction" refer to any permitted construction on the property (e.g. kitchen remodel, water heater replacement)? Or, is it referring to landscape construction? And, if so, how much new landscaping would trigger applicability for an existing home with over 2,500 sq ft of landscaping?

The sections outlining the required studies and plans are very complex and detailed, particularly the section on Water Efficient Landscape Worksheet. It would seem more appropriate for the Ordinance to establish performance criteria rather than analysis methodology and providing calculation examples.

The Provisions for Existing Landscapes would be extremely onerous for local agencies to comply with. Cities would be required to "identify customers whose landscapes exceed 80% of local reference evapotranspiration for at least one year". Cities would be further required to "annually conduct landscape irrigation audits on a minimum 20% of the total customer landscapes", "obtain permission to access the property for the purposes of conducting (the)landscape irrigation audit", and collect payment for the audit which "shall be paid by the property owner or his/her designee." These requirements would place an untold burden on local agencies. The logistics would be staggering. At a front door level, our residents would be asked for permission to enter their property for a landscape irrigation audit that they will be required to pay for. It is unlikely that we would receive that permission very often.

Thank you for the opportunity to provide feedback on the draft Ordinance. If you have any questions on our comments, please feel free to contact me at 619-258-4100 x166.

Gary Halbert, PE, AICP
Deputy City Manager
City of Santee