

Colvin, Judith

From: Debbie Pedro [dpedro@losaltoshills.ca.gov]
Sent: Monday, March 24, 2008 9:12 AM
To: Colvin, Judith; mweo@water.ca.gov
Subject: RE: Comment Letter on the Updated Model Water Efficient Landscape Ordinance AB 1881
Attachments: State Model Eff Landscape Ord.pdf

In my previous email, I attached a letter with the incorrect address zip code. Please disregard the previous attachment and use this one instead. Thanks.

Debbie Pedro, AICP
Planning Director
Town of Los Altos Hills
Phone: (650) 947-2517
Fax: (650) 941-3160

From: Debbie Pedro
Sent: Monday, March 24, 2008 9:05 AM
To: 'Colvin, Judith'; 'mweo@water.ca.gov'
Subject: Comment Letter on the Updated Model Water Efficient Landscape Ordinance AB 1881

Hi Judy,

Here is the comment letter from the Town of Los Altos Hills. A hard copy was also sent last Thursday via regular mail. Please let me know if you have any questions. Thank you.

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LOS ALTOS HILLS



CALIFORNIA

March 20, 2008

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

Subject: Proposed Update to the Model Water Efficient Landscape Ordinance

Dear Ms. Colvin:

This letter sets forth the Town of Los Altos Hills comments and suggestions on the proposed update to the State's Model Water Efficient Landscape Ordinance. The Town generally supports the provisions of the draft ordinance with the following exceptions, and respectfully requests the Department of Water Resources to include the following changes:

490.3. Applicability - Homeowner provided landscaping in single-family residential projects should remain exempt from the Model Ordinance.

The Town strongly supports the existing Model Ordinance which applies to public agency projects, commercial projects, and developer installed single-family and multi-family projects. However, the proposed ordinance update will require the homeowner of a single-family residence to meet the complex criteria and specifications of the Landscape Documentation Package. Unlike applicants for large scale residential or commercial projects, a typical homeowner does not have the ability or resources to prepare the required landscape documentation such as water budget calculation, hydrozone information, soil management plan and irrigation plan.

The Town of Los Altos Hills is a small rural residential community with less than 3,000 developed parcels which consists primarily of single-family homes on one plus acre lots. The proposed change to include single-family residential projects in the ordinance will affect more than 90% of the properties within the Town and will create an additional review process that increases the time and cost for homeowner-installed landscaping projects. In addition, it is estimated that the average cost to prepare the required documentation package for a landscape project on a one acre property would cost approximately \$3,000 to \$4,000. Therefore, we request that homeowner installed landscaping in single-family residential projects remain exempt from the Model Ordinance.

26379 Fremont Road
Los Altos Hills
California 94022
650/941-7222
Fax 650/941-3160

493.1. Annual Survey and Landscape Irrigation Audits - Annual survey and landscape irrigation audits for existing landscaping equal or greater than 2,500 sq. ft. should not be required.

The proposed regulation is difficult to enforce and imposes a burden on the Town because:

- a) The Town does not have information on the square footage of existing landscape areas on any properties and will have to conduct an inventory of ALL properties within Los Altos Hills to determine which ones exceed 2,500 square feet.
- b) The new regulation calls for an annual water use survey and analysis of all existing landscaping over 2,500 square feet. In addition, landscape irrigation audits are required on 20% of those customers with landscaping exceeding 80% of the local reference evapotranspiration. This requirement will require significant staff time. The Town has a small planning department with a staff of three that oversees all development projects in the Town. Depending on the number of customers with landscaping exceeding the evapotranspiration threshold, staff could potentially be faced with managing 100+ audits a year.

Water conservation efforts in Los Altos Hills

The Town's water service is provided by two water suppliers: Purissima Hills Water District (PHWD) and the California Water Service Company (Cal Water). PHWD is a public agency that provides water to residents in the northern two-thirds of Los Altos Hills; Cal Water is an investor-owned utility that serves the remaining area. To encourage the conservation of water resources, PHWD has recently established a progressive, multi-tiered rate structure to incentivize homeowners to reduce landscape water use. In addition, both PHWD and Cal Water have implemented programs such as the provision of homeowner assistance in water management and the distribution of water-efficient appliances.

Furthermore, the Town is currently developing a Green Building Program which will include water efficient landscape as part of a comprehensive list of requirements for energy and resource conservation for new development.

While the Town supports the State's efforts to reduce the wasteful, inefficient, and unnecessary consumption of water in landscaping, we respectfully request that single-family residential projects remain exempt from the ordinance and that no annual survey and irrigation audit be required. We would like to meet with representatives of the Department of Water Resources to discuss the constraints of small rural residential communities like Los Altos Hills and together develop innovative and effective ways to achieve our water conservation goals. Thank you for your consideration. If you have any questions about this letter, please contact me at (650) 947-2517.

Sincerely,



Debbie Pedro, Planning Director
Town of Los Altos Hills

Colvin, Judith

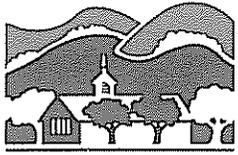
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