

**Colvin, Judith**

---

**From:** mweo-bounces@water.ca.gov on behalf of Willnecker, Luisa [lwillnecker@sanramon.ca.gov]  
**Sent:** Wednesday, March 26, 2008 1:34 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEO] Comments on Proposed Changes to Model Water EfficientLandscape Ordinance  
**Attachments:** Department Of Water Resoruces.pdf

Ms. Colvin:

Attached please find our comments regarding the above mentioned. A hard copy of the attachment will be going out today.

Thank you,  
Luisa Willnecker  
Administrative Coordinator  
City of San Ramon  
Planning Services Division

CONFIDENTIALITY: This email (including any attachments) may contain confidential, proprietary and privileged information, and unauthorized disclosure or use is prohibited. If you received this email in error, please notify the sender and delete this email from your system.



---

## CITY OF SAN RAMON

2222 CAMINO RAMON  
SAN RAMON, CALIFORNIA 94583  
PHONE: (925) 973-2500  
WEB SITE: [www.sanramon.ca.gov](http://www.sanramon.ca.gov)

---

March 25, 2008

Judy Colvin  
Department of Water Resources  
Office of Water Use Efficiency and Transfers  
P.O. Box 942836  
Sacramento, CA 94236-0001  
Email: [mweo@water.ca.gov](mailto:mweo@water.ca.gov)

**Re: Comments on Proposed Changes to Model Water Efficient Landscape Ordinance**

Dear Ms. Colvin:

Thank you for the opportunity to comment on proposed changes to Title 23, Division 2, Chapter 2.7 Model Water Efficient Landscape Ordinance. I believe the comments provide below will echo those provided from other agencies and those working in the field.

**490.3.1(a) (b) (c)**

Delete proposal to include homeowner/homeowner-hired landscapes for single family homes of any and all size, not just for those under 2500 square feet in area. This proposal is unrealistic and very costly for a public agency to enforce.

**492.9**

Requires dedication of separate water meters for all projects greater than 5,000 square feet. This new requirement will impact smaller development causing additional expense to mandate separate water meters for irrigation. This has special implications for public parks and recreation facilities including sports fields.

**492.6.3(f)**

Exempt parks and recreation projects. Application of the Ordinance to 'essential' recreational landscapes will certainly restrict the use of turf. As a result, designs will need to include extensive groundcover or bare areas which have proven to be un-safe, un-maintainable, and unusable for sports and other activities. Experience shows that public

officials, working with landscape architects and other design professionals, have successfully applied efficient irrigation layouts and technology in the design of new parks throughout the State.

#### 492.7

Delete Soil Management Plan changes in their entirety. Existing language under 'Soils' adequately addresses water conservation pertaining to soils.

#### 492.8.1(a)(3)

Delete words "Avoid fire-prone plant materials and mulches". This language does not promote water conservation and it conflicts with Paragraph (d) Mulch.

#### 498.8.1(b) Turf

Delete Paragraph 4 requiring drip/subsurface irrigation systems within 24" of non-permeable hardscape. This requirement is unreasonable, and presents serious long-term public safety issues in parks and other useable landscapes. Essential landscapes, in particular, must assure long-term, sustainable pedestrian access from walkways and other hard surfaces, both within and surrounding projects. Interfaces between drip/subsurface irrigation and above-grade spray systems create turf/landscape interface issues, die-back, differential settlement, along with high installation and replacement costs.

#### 492.8.2 Specifications

(a)(5) Site. Delete 'Benchmark' requirement as it is unnecessary and time-consuming.

#### 492.8.2 Specifications

(b) Hydrozone Plan. Delete entirety of paragraph, as it is unnecessary, time-consuming, and will needlessly duplicate requirements of 492.9 Irrigation Design Plan, below.

#### Section 492.9 Hydrozone

Requirement to use drip irrigation for irregularly -shaped areas less than 8 feet in width in any direction. This may seem like a small request but this criteria could occur on almost every street corner when landscaping and a sidewalk meet an intersection. Again, turf is not conducive to a drip irrigation system, therefore, limiting the amount of turf design for a project

#### 492.9.10 Grading Design Plan

Grading plans in California are prepared primarily by civil engineers, not landscape architects and other landscape professionals. They are used by landscape architects and other design professionals as base information to inform planting and irrigation design decisions.

#### 492.12 Irrigation Scheduling

Retain existing Ordinance language without modification. Irrigation schedules prepared in compliance with existing Ordinance language are sufficiently detailed, and it is unclear what the new requirements add..

Appendix A

Contra Costa County contains the City of Benicia; include in Solano County, instead.

Should you have any questions or need further clarification, please do not hesitate to contact me at (925) 973-2560 or via email at [dchamberlain@sanramon.ca.gov](mailto:dchamberlain@sanramon.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Chamberlain". The signature is fluid and cursive, with the first name "Debbie" written in a smaller, more compact script than the last name "Chamberlain", which is written in a larger, more expansive cursive style.

Debbie Chamberlain  
Planning Manager