

**Colvin, Judith**

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**From:** Pamela Pavela [ppavela@wmwd.com]  
**Sent:** Wednesday, March 26, 2008 4:08 PM  
**To:** John Rossi; dkuenzi@rcbos.org; Kristi Lovelady; Paul Ruge; Jeff Sims; Jeffrey Minkler; Jack Safely; mweo@water.ca.gov; Michele Underwood; Monique Navarrette; Rebecca Garcia-Holtzclaw; Tedi Jackson; Alison Loukeh; Barbara Gallert; Bill Thompson; Cheryl Russell; Clay Monroe; Cordell Chavez; Dave Lopez; Karl Schalow; Lydia Popow; Rob Whipple; Rose Matthews; Roseann Becerra; Shelby Wimberly; Terry Piorkowski; Tim Barr; Yolette Meyers  
**Subject:** Western's Comments to the State Model Landscape Ordinance  
**Attachments:** Western Comment Letter.doc

Attached is a letter of comment from Western to the Department of Water Resources regarding the State Model Landscape Ordinance. Go to [www.owue.water.ca.gov/landscape/ord/updatedOrd.cfm](http://www.owue.water.ca.gov/landscape/ord/updatedOrd.cfm) to view the ordinance. The public comment period ends tomorrow with a meeting at Inland Empire Utilities Authority. I will be present at the meeting.

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March 26, 2008

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

***Comments to the State Model Water Efficient Landscape Ordinance***

Dear Ms. Colvin:

Considering the current and unknown future of water supplies in California, the California Department of Water Resources is to be commended for its attempt to create an updated model water-efficient landscape ordinance for the State of California. Western Municipal Water District applauds the ordinance for its intent and goals. The Water Task Force of Riverside County, which Western now chairs, created the Riverside County Ordinance No. 859, Water Efficient Landscape Requirements Ordinance. The County ordinance closely aligns with the intent of the State Model Ordinance, and the Water Task Force is looking forward to updating its ordinance to comply with the State ordinance.

The attempt to establish a new ordinance that will affect the vast majority of Californians is monumental. Thus, it is likely to have some opposition and obstacles which will generate comment and concerns. Western Municipal Water District's main concern, as well as the concern of other commenting agencies, is the burden of additional time and resources that will be required to implement this ordinance as it is written. Of particular concern is the water audits portion of the ordinance (Sections 492.14 and 493.1). We agree that water use should be tracked over time to ensure ongoing compliance with water budgets; realistically, however, there are little to no resources available to provide the extensive tracking required by the model ordinance as currently written, especially for existing landscapes.

Western would like to see an exemption to the water audits portion of the ordinance if a landscape for which the ordinance applies is subject to individual allocated water-budgeted tiered rates provided by its water purveyor. As the Association of Irrigation Consultants pointed out in their comments to this ordinance, the only realistic way to ensure saving water in the landscape over time is to track water use against the Maximum Applied Water Use calculations (MAWA), and assess penalties for exceeding the MAWA. This will require landscape area data for each customer—a costly endeavor. But if water-budgeted tiered rates are in place, this tracking is automatically occurring at regular intervals as part of the billing system. The Model Ordinance, as currently written, mandates an evapotranspiration adjustment factor of 0.7, or 70%, of reference evapotranspiration. Irvine Ranch Water District, which has had a successful water-budgeted tiered rate structure in place since 1991, has been able to surpass the mandate by maintaining an average customer water use at 0.6, or 60%, of their reference

evapotranspiration rate without an ordinance requiring their customers to maintain this rate.

On a more specific note, Western would like to see the following recommendations considered:

1. Clearly define the roles and requirements of water purveyors and local agencies.
2. Define plant coefficients for use in the Estimated Water Use formulas. In other words, which species are ranked as low water use, moderate water use, etc.?
3. Eliminate the requirement for irrigation schedules, since smart controllers or soil moisture technologies do not require the use of schedules.
4. To simplify, the use of turf should not be allowed in medians or parkways. These two types of areas are a cause of significant irrigation run-off.

Thank you for considering our concerns and recommendations.

Respectfully submitted,

John Rossi  
General Manager  
Public Affairs – Conservation Section