

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Lisa Martinez [lmartinez@biasc.org]
Sent: Thursday, March 27, 2008 9:17 AM
To: mweo@water.ca.gov
Subject: [MWEO] BIA/SC Comments on Model Landscape Ordinance
Attachments: BIA_SC Comments on Model Landscape Ordinance.pdf

Ms. Colvin,

Please see the attached comment letter regarding the Model Water Efficient Landscape Ordinance.

If you have any difficulty in opening the attachment please contact me at (909) 396-9993 extension 247. Thank you.

Lisa M. Martinez
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March 27, 2008

Attention: Judy Colvin
Department of Water Resources
Office of Water Use Efficiency and Transfers
901 P Street, Room 313A
Sacramento, CA 95814

Subject: Comments on Model Water Efficient Landscape Ordinance

Dear Ms. Colvin:

The Building Industry Association of Southern California (BIA/SC) appreciates the opportunity to comment on the development of a model water efficient landscape ordinance for California. BIA/SC is comprised of more than 2,100 member companies who provide much needed housing throughout a six-county region in southern California. Our members would be directly affected by the development of the Model Ordinance and as such, we have tracked the development of this model ordinance closely and offer the following comments.

The Model Ordinance in circulation contains several deficiencies and omissions. For example, the Model Ordinance requires redundant landscape audits before and after system installation and it places requirements on cities and counties that only water agencies can perform. Thus, it will be expensive to implement, and it won't work without significant changes. The most comprehensive analysis done to date has been prepared by the American Society of Irrigation Consultants (ASIC) and by way of reference we at BIA/SC urge you to consider and adopt those changes suggested by ASIC in their letter to you on March 18, 2006.

Our membership in southern California is in the forefront of using and installing water efficient appliances and fixtures within new homes and we are a leader in working with local government and water purveyors in encouraging water efficient landscaping designs and water efficient infrastructure to conserve our precious water resources. Specific examples include our close coordination with Riverside County in developing Ordinance 859, which is widely supported by our member companies, and our ongoing cooperation with the Metropolitan Water District on their California Friendly landscaping program and their ongoing conservation efforts. We seek in all instances regulatory consistency and the aforementioned Model Ordinance, as drafted, does not enhance nor does it create a consistent regulatory regime for outdoor water conservation. Please contact me should you have any questions about our letter or concerns at 909-396-9993 or mgrey@biasc.org.

Sincerely,

Mark Grey, Ph.D.
Director of Environmental Affairs
Building Industry Association of Southern California

Antelope Valley Chapter
Baldy View Chapter
Desert Chapter
Greater L.A./Ventura Chapter
Los Angeles County East Chapter
Orange County Chapter
Riverside County Chapter