

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of awoodward [greendesignguru@yahoo.com]
Sent: Thursday, March 27, 2008 9:23 AM
To: mweo@water.ca.gov
Subject: [MWE0] Model Water Efficient Landscape Ordinance PublicDear Ms.Comments
Attachments: 1797238401-MWE0 Ltr pg 1.jpg; 3499761890-MWE0 Ltr pg 2.jpg

Dear Judy,

Attached is my review comment letter addressing the AB 1881 Model Water Efficiency Ordinance.

All of you and your staff's time, effort and work on this updated Model Water Ordinance is greatly appreciated. Please keep me informed of when the next update of the Model Water Ordinance is available for public review.

Cordially,

Angela Woodward, ASLA
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Judy Colvin
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California Dept. Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Updated Model Water Efficient landscape Ordinance AB 1881
Landscape Architect Stakeholder Review

Dear Judy,

Thank you for sending the Updated Model Water Efficient landscape Ordinance AB 1881 for my review. As a State of California licensed landscape architect with 29 years of experience, I have the following comments regarding the Updated Model Water Efficient Landscape Ordinance to modify Division 2, Title 23, California Code of Regulations to amend Chapter 2.7 Model Water Efficient Landscape Ordinances, Section 490 through 496.

I believe the Model Ordinance may be written better. It also appears cumbersome to administer. It relies on unproven assumptions. It puts the entire burden of water savings on the local agencies, developers, residential homeowners, commercial owners and landscape architects to do their part in the design and construction of a project. The Model Ordinance does not look at the financial burden and additional time required for project implementation.

This ordinance applies to new construction and rehabilitated landscapes requiring a permit on landscape areas greater than 2,500 square feet. California landscape contractors estimate that an additional \$500 to \$800 will be added to the cost of a 5,000 square foot residential landscape from this ordinance. Recommend that this requirement be deleted for residential landscapes or that residential landscape areas are increased to 10,000 square foot.

The Model Ordinance requires a new landscape documentation package that conflicts with existing jurisdictional requirements. Grading and right of way improvement utility location and details will be required to be shown on the landscape plans. Water quality and storm water best management practices and details will be required to be incorporated in the landscape design and shown on the landscape plans. These requirements are shown on grading plans prepared by civil engineers. Recommend that grading plans be included as a part of the landscape submittal process. The requirement of adding the above details to the landscape plans should be dropped.

Irrigation design criteria are legislated by the Model Ordinance. Drip irrigation or micro spray irrigation is to be used on slopes. In turf areas, a two (2) foot wide area adjacent to hardscape will need to be irrigated by drip or other low volume irrigation to avoid runoff. Irrigation water schedules for both temporary plant establishment and long term maintenance will be required. Maintenance schedules will also be required. Irrigation designers estimate that their fees may double as a result from the Model Ordinance requirements.

Approved project entitlements, community specific plans and design guidelines will need to be evaluated on their water consumption. The new community and project landscape design may

need to be redesigned to conform to the Model Ordinance. This will add to public agency review time to duplicate previous efforts.

Water audits are required as a condition of occupancy in the Model Ordinance. In addition, water audits are to be performed every five (5) years on all landscape projects over 2,500 square feet. The Irvine Ranch Water District (IRWD) has 77,000 residential and 5,000 commercial water meters. Per the ordinance 20% of the landscapes would need to be audited for a total of 16,000 per year. There are about 10 certified irrigation auditors listed in the phone book leaving a severe shortage to perform the required audits. This will delay new project occupancies. By delaying project occupancies, this will increase the land development costs for private as well as delay the use of public facilities such as parks. In addition, there is the additional cost for the water audits.

As a landscape architect, I am very interested in promoting efficient use of irrigation water and sustainable design in California. I believe the way to achieve water savings is to target the landscape contractors and landscape water managers who are responsible for optimum water use. IRWD experience is that improper maintenance water management causes inefficient or wasteful water usage. But there are no requirements for landscape maintenance contractors and landscape water managers on water management as a part of the Model Ordinance.

All of your time and effort on this Updated Model Water Ordinance is greatly appreciated. Please keep me informed of when the Model Water Ordinance is available for public review again.

Cordially,



Angela M. Woodward, RLA #2126

Landscape Architect

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