

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Robert Larkins [rlarkin@ci.lemon-grove.ca.us]
Sent: Thursday, March 27, 2008 10:37 AM
To: mweo@water.ca.gov; troy@sdewa.org; Kate Breece
Cc: Graham Mitchell
Subject: [MWE0] Comments Re: Model Water Efficient landscape ordinance

The following are the comments from the City of Lemon Grove regarding the draft Model Water Efficient Landscape Ordinance:

- Additional full time staff will be required to inspect properties, review Landscape documentation packages and conduct irrigation system audits. The ordinance may also require specialized training for new staff in order to interpret and administer these requirements.
- There are approximately 7,056 parcels in the City of Lemon Grove. If 60% of these parcels contain in excess of 2,500 sf of landscaping (likely a higher percentage) the city will be required to audit approximately 850 properties per year/71 per month/4 properties per business day to comply with this requirement.
- The ordinance presumes all landscapes are irrigated by an underground automatic irrigation system. Because Lemon Grove is an older community many landscapes may be watered by a hose and sprinkler. The ordinance appears to require homeowners to install expensive underground irrigation systems.
- The complexity of the Landscape Documentation package makes it unusable by the average homeowner. Compliance will require the use of expensive licensed or certified professionals and laboratories.
- Landscaping planted on slopes should be excluded from the total landscaped area because the landscaping is necessary for erosion control and the prevention of water pollution.
- Onerous landscape documentation that is required upon issuance of a permit and that is too complex for the average homeowner to comply with will discourage people from obtaining permits.

Thank you for this opportunity to comment on this draft ordinance. Please feel free to contact me if you have any questions.

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