

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Walter Pease [WPease@ci.pittsburg.ca.us]
Sent: Thursday, March 27, 2008 11:52 AM
To: mweo@water.ca.gov
Subject: [MWEO] Model Water Efficient Landscape Ordinance comments
Attachments: Model Water Efficient Landscape Ordinance comments - Mar27 '08

Comments.

thanks

Walter Pease
City of Pittsburg
(925) 252-6966



CITY OF PITTSBURG
PUBLIC WORKS DEPARTMENT
65 Civic Ave., Pittsburg, California 94565

March 27, 2008

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

e-mailed to: mweo@water.ca.gov

re: Model Water Efficient Landscape Ordinance

Dear Ms. Colvin:

Thank you for the opportunity to comment on the Model Water Efficient Landscape Ordinance. I wrote and administered my first water rationing program in 1977 and, as a result, have been very interested in water conservation issues. My goal, as I would assume is yours', is to make water conservation both efficient, easy to understand and practical. I don't believe that this is being accomplished by the proposed ordinance.

My comments are as follows:

Section 490.3 Applicability. This requirement will require that we track all accounts, including single family homes, that have rehabilitated their landscape under the criteria listed. This will have a limited benefit, will require a significant amount of staff time to keep updated, and therefore is not practicable. This might be more appropriate for accounts with dedicated irrigation meters.

Section 492.8(b) Landscape Design Plan. This seems to apply to all development. This will be a challenge to implement for single family homes and some other customers. The drip/subsurface irrigation that is required is likely to not be properly maintained nor retained by customers that do not have a skilled irrigation professional.

Section 492.14 Landscape Irrigation Audits and Audit Schedules

(a) *Annually compare...* – the amount of data that will be required to be developed and stored is not practicable.

(b) To my knowledge, we do not have the authority to require audits for other governmental agencies.

Section 492.16 Recycled Water There is no sense to require dual distribution systems to make provisions for recycled water that will never be provided. There are some areas of the City of Pittsburg where recycled water will never be cost effective to install. The

recycled water is generally available in the north and lower portions of the city (Pressure Zones 1 and 2), and development is in the south and higher portions of the city (Pressure Zones 3 to 7). Recycled water to the higher pressure zones, which are not interconnected between the east and west development areas, will require multiple large transmission lines, pump stations and reservoirs, and therefore will not be affordable.

Section 493.1 Landscape Irrigation Audits *For existing landscapes installed before January 1, 2010. Annually survey and compare customers' landscape water use to local reference. Conduct audits on a minimum of 20% of total customer landscapes...".*

You appear to be asking us to develop a water budget for 16,000 customers based on the amount of landscape on their properties. We do not know the amount of landscape on every property and the only ones that we could compare are the ones with dedicated irrigation meters. Others with mixed use (inside and outside) could not be analyzed effectively. The solution would be to install irrigation meters for all accounts for irrigation system, which would be very expensive, increase operational costs and meet significant resistance from the public.

We are currently using an inclining block rate for water use for single family customers, and making audits available for customers, including single family customer with water use over 750 gallons per day. This seems to be effective for the customers that want to reduce their water use and water bill. Even though the program is free, there is not as much participation as we would like to see.

Sections 492.12 and 493.1 This proposed ordinance requires that the water agency gets permission to conduct a landscape irrigation audit and then shall charge them. *"The local agency's cost of conducting the landscape irrigation audit shall be paid by the property owner..."* What do you think that the chances will be that they will give us permission if they know that it will result in a charge? Or does this propose that we shut off their water to meet the State audit mandate?

Thank you for the opportunity to comment on the Model Water Efficient Landscape Ordinance. While the design criteria for new landscapes is a step forward, the audit requirement will be costly and difficult to implement. We would like to have an ordinance that can be reasonably implemented.

Sincerely,



Walter C. Pease
Assistant Director, Public Works
(925) 252-6966

c. John L. Fuller, Public Works Director