

Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Ogden, Derek [DOgden@roseville.ca.us]
Sent: Thursday, March 27, 2008 2:37 PM
To: mweo@water.ca.gov
Cc: Morse, Mark; Gee, Tara; Isom, Mike; Amaral, Lisa; Kriz, Ed
Subject: [MWEO] City of Roseville - Model Water Efficient Landscape Ordinance

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Hello,

Attached you will find the City of Roseville's comments on the proposed Model Water Efficient Landscape Ordinance. Please feel free to contact me with any questions regarding our letter.

Thank you, Derek Ogden

Derek Ogden
Assc. Environmental Specialist
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Community Development

311 Vernon Street
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March 27, 2008

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

Via: Standard and Electronic Mail

mweo@water.ca.gov
Page 1 of 3

Subject: Model Water Efficient Landscape Ordinance

Dear Ms. Colvin:

Thank you for the opportunity to provide comment in response to the proposed Draft Model Water Efficient Landscape Ordinance. The City wishes to provide the following comments from our Environmental Utilities and Parks and Recreation Departments.

Environmental Utilities Comments

1. The new landscape requirements increase the coverage of the ordinance which will require additional City sponsored and funded processes to ensure compliance. This will result in increased staff and development costs. DWR should consider the fiscal impacts to local communities before making the proposed changes to the Model Ordinance. For the City of Roseville this is specifically related to:
 - Developer installed single family landscapes over 2,500 sq-ft will now require design and permitting.
 - The requirements of permits for rehabilitated landscaped areas by homeowners is not currently a city permit action and could require an entirely new process. This will have a significant effect on City resources.
2. Page 4 Section 491- Definition 8: The definition for "certified Irrigation Designer" needs additional clarification as to certification requirements.
3. Page 5 Section 491- Definition 19: DWR is proposing to reduce the ET Adjustment Factor from 0.8 to 0.7 as a measure of water use efficiency. 0.8 is an effective and aggressive factor for our area as we are working to reduce the factor from 1.0 to .8. Further reductions will not be feasible.

4. Page 6 Section 491- Definition 25: Irrigation efficiencies of 0.71 are very aggressive. Current requirements of 0.625 are a challenge to meet in most installations as it is. This is not a feasible target.
5. Page 9 Section 492.2: Local agency requirements for reviews, permits and inspections are a considerable increase in effort which will increase costs to development. This will be challenged by the development community and will require additional processes to be developed by local agencies.
6. Page 17 Section 492.7: Soil testing requirements are very time and labor intensive and will add costs to landscape designs. What would be considered appropriate representation of sample data to design a landscape? Also, for areas with similar soil characteristics it may be acceptable to use typical soil samples and eliminate specific analysis.
7. Page 19 Section 492.8 (b): The City relies heavily on Specific Plans to guide development within the City. These plans have irrigation specifications contained within the documents. The proposed ordinance requires the use of subsurface irrigation for turf areas that are long, narrow, or irregularly shaped and less than 8' in width, or that fall within 24" of non-permeable landscape. This conflicts with our current specific plan documents. Furthermore, subsurface irrigation for turf areas has not been proven to be effective.
8. Page 22 492.9 1(a) (2): Plan calls for installation of weather based controllers. This is costly and if implemented needs an educational element associated with it (a comprehensive user's manual).
9. Page 22 492.9 1(a) (5): Plan calls for installation of sensors to control irrigation. This is costly and not reliable technology. If implemented there needs to be an educational element associated with it.
10. Page 23 Section 492.9 1(b) (7): The draft calls for trees to be irrigated off of a separate valve, where feasible. Will trees still be allowed in turf areas?
11. Page 28 Section 492.12 (2): The water agency/district should make the determination when overhead irrigation should be scheduled. Agencies need the flexibility for establishing peaking factors compatible with distribution system design.
12. Pages 30 and 32 Section 492.14: Audits should not be included as part of a landscape model ordinance. These are specified in an Urban Water Management Plan following the BMP practices established within them so there is no reason to add them here. Also who will track and monitor the receipt of large landscape audit reports every 5 years? What if customers do not submit, who follows up? This requires an additional process that will be a burden to local jurisdictions.
13. Page 30 Section 492.15: As noted earlier, irrigation efficiencies of 0.71 are very aggressive. Current requirements of 0.625 are a challenge to meet in most installations as it is. This is not a feasible target.
14. Page 32 Section 493.1: This section should not be contained in an irrigation and landscape design guide; this is more related to ongoing maintenance and operation.

Audit requirements are already required as part of Urban Water Management Plan BMP implementation and should not be contained in the landscape design guidelines.

15. Page 33 Section 493.2: Water waste requirements are already required as part of Urban Water Management Plan BMP implementation and should not be contained in the landscape design guidelines.
16. Page 35: The Water Efficient Landscape Worksheet asks the applicant questions as to whether they worked with the water agency and/or planning agency to develop a landscape design plan, an irrigation plan and a water budget. This isn't specified elsewhere in the document that this is a requirement. These questions should be removed from the worksheet.

Parks and Recreation Department

17. The Parks Department has reviewed the Ordinance and believes active turf areas cannot comply with the Model Water Efficient Ordinance. The City would like an exemption to be included in the Ordinance for these types of active use athletic fields. Examples include organized game and practice sports fields, and multi-use fields. It should be noted that the City of Roseville currently has an Ordinance in place which requires recycled water to be used in these areas where available.

Thank you for your consideration of our comments. Please feel free to contact me with any questions (916-774-5334).

Sincerely,


Mark Morse
Environmental Coordinator