Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Stratton, Helen [strattoh@emwd.org]
Sent: Thursday, March 27, 2008 2:41 PM
To: mweo@water.ca.gov
Subject: [MWEO] Model Ordinance Comments
Attachments: Model Ordinance Comments.pdf

Good Afternoon,

Attached please find a copy of public comments we would like to share regarding the State of California's Model Landscape Ordinance.

Thank you,

Helen Stratton
Eastern Municipal Water District
Conservation Analyst
951-928-3777 ext. 4545
strattoh@emwd.org

EASTERN MUNICIPAL WATER DISTRICT
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Ms. Judy Colvin
Office of Water Use Efficiency and Transfers
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Model Ordinance Comments

Dear Ms. Colvin,

With the uncertainty and challenges facing California's water supply, Eastern Municipal Water District (EMWD) supports the California's Department of Water Resources efforts to update the Model Water Efficient Landscape Ordinance for the State of California. As leaders in the Water Task Force of Riverside County and contributors to Riverside County Ordinance No. 859, Water Efficient Landscape Requirements Ordinance, EMWD is a strong supporter of water use efficiency and the reduction of waste.

After reviewing the updated Model Water Efficient Landscape Ordinance, EMWD supports many of its components, but does have concerns about the following items:

1. The measure used to define a "at least as effective as" ordinance is not quantified. Performance criteria should be added to determine local ordinance compliance.
2. The ordinance requires audits for existing customers, which could cause an excessive burden on agencies. Since existing landscapes may not have been designed to achieve 80% of local reference evapotranspiration an audit, and the resulting recommendations may not achieve water savings.
3. The audits required for new development by the ordinance also seem excessive and may not achieve any water savings, especially on landscapes meeting budget targets. Water waste penalties or budget based tiered rates may be a more effective way to deter water waste.
4. There should be additional clarification about the responsibilities of the water supplier and the local agencies.
5. The water supplier should be allowed the flexibility to exempt projects from recycled water use if applicable.

Thank you for considering our comments. If you have any questions please contact Elizabeth Lovsted at 951-928-3777 ext. 4307 for clarification.

Sincerely ,

Behrooz Mortazavi, Ph.D., P.E.
Assistant General Manager of Resource Development

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