

## Colvin, Judith

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**From:** mweo-bounces@water.ca.gov on behalf of Digital Sender - Watershed  
[dsender@rdmd.ocgov.com]  
**Sent:** Thursday, March 27, 2008 4:50 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEO] Comments on Draft Water Efficient Landscape Ordinance

**Attachments:** Document.pdf



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# COUNTY OF ORANGE

*RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT*

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March 27, 2008

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

via email: [mweo@water.ca.gov](mailto:mweo@water.ca.gov)

RE: Comments on Draft Model Water Efficient Landscape Ordinance Update

The County of Orange appreciates the opportunity to comment on the draft update to the Model Water Efficient Landscape Ordinance that was prepared in accordance with AB 1881 and the recommendations of the AB 2717 Landscape Task Force.

Orange County covers nearly 800 square miles with 34 cities and an estimated population of 3.1 million residents. We have significant coastal resources, including 42 miles of coastline. The entire county drains to the ocean, making water quality a primary concern. In 2005, the County Board of Supervisors took the progressive step of establishing three watershed management areas within the county that follow true watershed boundaries while crossing political jurisdictions. This effort is widely supported by the cities, special districts, and environmental groups as it enhances the ability to focus on local water resource management issues using a holistic or integrated approach. The success has been evidenced by the ability of the agencies to implement programs using landscape water use efficiency strategies in order to reduce urban runoff.

We believe there are strong synergies between the goals of AB 1881 and the objective of local stormwater programs to reduce landscape runoff. This is supported by the inclusion of Section 492.17 Stormwater Management and Section 493.2 Water Waste Prevention in the draft Landscape Ordinance update. The requirements in the Landscape Ordinance update for landscape irrigation audits (Sections 492.14 and 493.1) are intended to ensure continued efficiency and irrigation maintenance resulting in sustained water savings. However, this raises several issues, as noted in numerous comments submitted by cities and water purveyors: 1) this requirement will be costly to implement; 2) it is not clear which local agency will have the responsibility to carry out this requirement; 3) there are no remedies for non-compliance with audit recommendations; and 4) there are no variances for properties subject to tiered rates or that maintain their landscapes within their approved water budget.

Judy Colvin  
Department of Water Resources  
March 27, 2008  
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Therefore, we request that the Department collaborate with the State Water Resources Control Board and Regional Water Quality Control Boards to determine if there are opportunities to use NPDES permitting as a means to accomplish some of the goals of the draft Landscape Ordinance. Stormwater permits for cities and counties already have, or will have soon, requirements for new and renovated sites. These agencies have the responsibility and authority to carry out programs that meet their permit requirements. This cooperative effort could potentially alleviate the issue of the unfunded mandate for irrigation audits as well as the conflict over which agency bears responsibility for completing the audits and ensuring compliance. At the least, we believe this effort would ensure that the regulations are complementary and avoid duplication.

We thank you for this opportunity to provide our comments and look forward to participating in this process as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Thoms for". The word "for" is written in a smaller, more delicate cursive font.

Mary Anne Skorpanich  
Director, OC Watersheds Program  
OC Public Works Department