



City of  
**Chino Hills**

March 26, 2008

Judy Colvin  
Office of Water Use Efficiency & Transfers  
California Department of Water Resources  
P.O. Box 94236-0001  
Sacramento, CA 9236-0001

**Subject: Model Water Efficient Landscape Ordinance**

Dear Ms. Colvin:

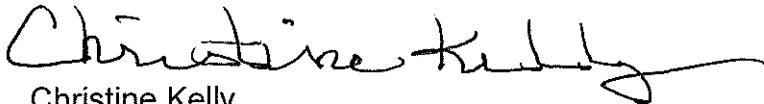
Thank you for allowing the City of Chino Hills an opportunity to review and comment on the above referenced ordinance. The following are the City's concerns:

- The model ordinance states that new construction and rehabilitated projects with a landscaped area of 2,500 square feet or greater would be subject to the requirements of the ordinance. The City does not currently require or regulate landscaping for single-family residential projects (only tract developments). The model ordinance will affect a considerable portion of development projects. The minimum lot size for R-S, Low Density Residential zone is 7,200 square feet with maximum building lot coverage of 40%, which leaves 4,320 square feet available for landscaping. Given this calculation, a majority, if not all of the homes within the R-S zone would be required to comply with the model ordinance, including room additions. This would create a financial burden on homeowners to bring existing landscaping into compliance. This ordinance would force the City to require and regulate landscaping for all projects requiring permits that have landscape areas in excess of 2,500 square feet.
- Requiring annual audits can be expensive and time consuming to both local agencies and applicants. The City does not currently have in-house landscaping staff. The annual audits would require the creation of multiple positions and/or contract expenditures to administer the provisions of the ordinance. Since the project applicant would be responsible for the City's cost of conducting the audit, the City would have to adopt a fee schedule. The City currently does not issue landscape permits, therefore tracking required audits would be difficult.

- The model ordinance would require the City to regulate landscaping in order to enforce the model ordinance. Does the ordinance require the City to report to an enforcement body? If so, who is the enforcement body?

The City of Chino Hills recognize there is a need for water conservation and looks forward to working with other local agencies to develop an ordinance that would benefit all.

Sincerely,



Christine Kelly  
Community Development Director

cc: Douglas La Belle, City Manager  
Kathleen Gotch, Assistant City Manager  
John Mura, Assistant to the City Manager  
Pat Hagler, Public Facilities and Operations Director  
Sean O'Connor, Maintenance and Operations Manager  
Valerie McClung, Community Relations Manager  
Don Powell, City Consultant