

**Colvin, Judith**

---

**From:** mweo-bounces@water.ca.gov on behalf of Farrah Jackson [farrah@Brookwater.com]  
**Sent:** Thursday, March 27, 2008 5:01 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEO] AB 1881 Comments

First I would like to thank Judy and Gwen for taking time to talk to me after Public Hearing 1 in Sacramento. It is obvious that the DWR has an interest in improving this Ordinance to better suit everyone it effects and to better understand the impacts it may have on the various industries directly touched by its creation.

I have the following comments regarding the Ordinance:

1. I think it should be clarified that a BASE line schedule is still required for weather based and ET based controllers as this is the schedule that the ET is applied to and if it is incorrect than the ET adjustment does no good. For example, if the plant needs 1" of water each week to survive but the baseline schedule is set to 4" per week- When the controller adjusts to call for 50% irrigation you will still be putting down 2" per week, or double the required amount.
2. We need a way to monitor outside versus inside water use for these ordinances to have any effect. Otherwise there is no way to tell if someone takes 15 showers a day or if they over irrigate their landscape.
3. I believe the water audit requirement should be a required in a third offense situation only. We just do not have the time or people in CA at this time to complete the required number of audits. A suggestion to deal with this would be to first issue a fix it ticket. Give the person 1 year to fix the water overage. (One year so the colder areas of California have time to thaw if a warning is issued in October, etc.) My belief is most people know when something is wrong with their system and just do not have the incentive to fix it. After the one year period if the water is within MAWA than the person should be exempt from an audit.

Thank you for your time in considering these issues.

Kind Regards,  
Farrah L. Jackson  
Associate



Five Crow Canyon Court, Suite 209  
San Ramon, CA 94583  
P: 925-855-0417  
F: 925-855-0357

E: farrah@brookwater.com

(If a plan is being submitted, please send Brookwater a printed copy of the submitted plans. Thank you.)