

## Colvin, Judith

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**From:** Steven Cruz [scruz@cbia.org]  
**Sent:** Friday, March 28, 2008 9:44 AM  
**To:** Colvin, Judith  
**Subject:** FW: CBIA Comments to Model Landscape Ordinance: REVISED  
**Attachments:** CBIA Comments on Model Water Efficient Landscape Ordinance (2).doc

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**From:** Steven Cruz  
**Sent:** Friday, March 28, 2008 9:40 AM  
**To:** 'mweo@water.ca.gov'  
**Subject:** CBIA Comments to Model Landscape Ordinance: REVISED

Judy

If possible, could you please use the REVISED attached comment letter from CBIA. There are only minor changes to the context but the original had a number of typos. I apologize for the inconvenience. And again, we look forward to working with you on the development of the proposed Model Water Efficient Landscape Ordinance.

Thanks!

Steven D. Cruz  
Legislative Advocate  
California Building Industry Association  
1215 K Street, Suite 1200  
(916) 443-7933 Ext. 302 (office)  
(916) 443-1960 (fax)  
[scruz@cbia.org](mailto:scruz@cbia.org)

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9/9/2008





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March 26, 2008

Department of Water Resources  
Office of Water Use Efficiency and Transfers  
PO BOX 942836  
Sacramento, CA 94236-001

Attention: Judy Colvin

### **RE: Model Water Efficient Landscape Ordinance Comments**

Dear Ms. Colvin,

California homebuilders, represented by the California Building Industry Association (CBIA) are pleased to provide the attached comments on the Departments' proposed regulations to update the Model Water Efficient Landscape Ordinance. While homebuilders are fully aware of the importance of managing our limited water supply more efficiently and have made great strides in advancing water conservation strategies in new homes we have serious concern with the current version of the Model Landscape Ordinance.

We concur with many of the specific concerns expressed in comment letters from both the California Landscape Contractors Association (CLCA) and American Society of Irrigation Consultants (ASIC). Particularly, the fact that the proposed regulations are far too prescriptive and complicated, and will significantly increase compliance costs without achieving the desired water savings in a fair and cost effective manner. According the CLCA, in order to comply with the proposed landscape regulations a homebuilder can expect to pay an additional \$2,500 to \$3,100 for a typical 2,500 square foot, six valve landscape project that is currently subject to the Model Ordinance. For jurisdictions which do not have an existing Model Ordinance the added cost could range between \$5,300 to \$6,300 per unit.

Other problems with the proposed Model Ordinance include:

- Requires extremely detailed planning, design and construction and maintenance guidelines which are unbelievably specific and onerous.
- Requires costly landscape audits from landscape professionals before systems are installed, during construction and ongoing audits after systems are installed.
- Imposes cost mandates on local agencies to hire the new technical and field staff to review and conduct landscape irrigation audits on a regular basis. Lack of funding and complexity of program will certainly lead to delays in permit processing.
- Imposes monetary and other penalties on the project applicant for non-compliance.



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## CBIA Comments to Model Landscape Ordinance Page 2

- Requires a new "Certificate of Completion" for the landscaping project prior to issuance of a "Certificate of Occupancy" which is not a typical county, municipality, or district requirement. This could lead to delays in securing final approval for homebuilders.
- Requires builders to plumb new homes for future recycled water use. This policy should be developed at the Building Standards Commission and not by a model landscape ordinance.

Again, homebuilders are fully committed to adopting a model landscape that increases water use efficiency in California. However, we believe the current version does not meet the challenge in a cost effective manner. The specificity of the proposed regulations not only lacks the flexibility needed to achieve the desired water savings, but leaves little room to design landscaping that is both aesthetically pleasing and functional for our homeowners. Therefore, we recommend that you incorporate the recommended changes from CLCA and ASIS into your subsequent draft and allow for further discussion on the proposed ordinance.

We appreciate your hard work on this important matter and look forward to working with you closely to develop a Model Ordinance that accomplishes the goals of AB 1881.

Sincerely,

Steve Cruz  
Legislative Advocate

**Colvin, Judith**

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**From:** mweo-bounces@water.ca.gov on behalf of Steven Cruz [scruz@cbia.org]  
**Sent:** Thursday, March 27, 2008 5:03 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWE0] CBIA Comments on Model Water Efficient Landscape Ordinance  
**Attachments:** CBIA Comments on Model Water Efficient LandscapeOrdinance.doc

Judy

Please find attached CBIA comments on the proposed Model Water Efficient Landscape Ordinance

Thanks!

Steven D. Cruz

Legislative Advocate

California Building Industry Association

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We concur with many of the concerns expressed in comment letters received from both the California Landscape Contractors Association (CLCA) and American Society of Irrigation Consultants (ASIC) particularly the fact that the proposed regulations are far too prescriptive and complicated, and will significantly increase compliance costs. According the CLCA, in order to comply with the proposed regulations a homebuilder can expect to pay an additional least \$2,500 to \$3,100 for a typical 2,500 square foot, six valve landscape project that is currently subject to the Model Ordinance. For jurisdictions which do not have an existing Model Ordinance the added cost could range between \$5,300 to \$6,300 per unit.

Other problems with the proposed Model Ordinance include:

- Requires extremely detailed planning, design and construction and maintenance guidelines are unbelievably specific and onerous.
- Requires costly landscape audits from landscape professionals before systems are installed, during construction and ongoing audits after systems are installed.
- Uncertain rather local agency will have the resources to hire the technical and field staff needed to review and conduct landscape irrigation audits on a regular basis which may lead to delays in permit processing.
- Imposes monetary and other penalties on the project applicant for non-compliance



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