

## Colvin, Judith

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**From:** mweo-bounces@water.ca.gov on behalf of skmorris1@sbcglobal.net  
**Sent:** Monday, March 24, 2008 7:40 PM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEQ] Model Water Efficient Landscape Ordinance Comments on FinalDraft

Dear Ms. Colvin

I strongly support the Department of Water Resources (DWR) plan to amend the Model Water Efficient Landscape Ordinance (MO).

California's limited water supply is threatened by increasing demand, climate change and natural disasters. The State must act now to reduce water consumption. Governor Schwarzenegger recently called for a 20 percent reduction in per capita water use statewide by 2020. This updated MO, if adopted and implemented, will be an important component in the achievement of the Governor's goal.

I strongly support the following changes to the MO:

1. A Reduction of Evapotranspiration Adjustment Factor (ETAF) to 0.7.  
Improvements in irrigation technology and in landscape design and maintenance since the MO's first adoption justify a reduction of ETAF to 0.7. The switch from 0.8 to 0.7 can be easily attained with minor improvements to irrigation efficiency. Many water agencies are already achieving an ETAF of less than 0.8.
2. A 24 Setback. The current draft of the MO proposes that landscapes that are within 24 inches of nonpermeable hardscape, such as a sidewalk, need to be watered with drip or subsurface irrigation. This change will help to reduce wasteful and polluting runoff. Water agencies like Coachella already require drip irrigation or low volume flow on the 24 setback. The amendment will greatly reduce runoff and improve water quality.
3. Increased Compliance and Enforcement Mechanisms. The proposed MO identifies the required elements and responsible parties during the design, installation and inspection of a landscape project, in order to certify compliance with the ordinance. The proposed MO allows a local agency to administer penalties for non-compliance with the landscape ordinance. These penalties include denying a Certificate of Occupancy until the landscape has been certified as complying with the ordinance, monetary fines, and the termination of water service. These changes are necessary to authorize a local agency to enforce the ordinance.

Urban landscapes are vital to the quality of life in California communities. Landscape irrigation is the single largest use of water in urban areas. Water is a resource we cannot afford to waste. Thank you for amending the MO to reflect the best available science and research in order to conserve water.

Sincerely,

Sharon Morris  
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