alifornia Native Plant Society
707 K Street, Suite 1
acramento, CA 95816-5113

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Judy Colvin
Office of Water Use Efficiency and Transfers
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

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California Native Plant Society

March 31, 2008

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Judy Colvin
Office of Water Use Efficiency and Transfers
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Model Water Efficient Landscape Ordinance – Comments on Final Draft

Dear Ms. Colvin,

The California Native Plant Society (CNPS) supports the Department of Water Resources (DWR) plan to amend the Model Water Efficient Landscape Ordinance (MO). CNPS and our 10,000 members, including plant scientists and lay people, supports the conservation of California's native plants

California's limited water supply is threatened by increasing demand, climate change and natural disasters. It is imperative that the State act now to reduce water consumption. Governor Schwarzenegger has recently called for a 20 percent reduction in per capita water use statewide by 2020. I believe that this updated MO, if adopted and implemented, will be an important component in order to achieve the Governor's goal.

We commend DWR for updating the MO in order to reduce California's water use. In particular, we support the following changes to the MO:

1. **A Reduction of Evapotranspiration Adjustment Factor (ETAF) to 0.7.** Improvements in irrigation technology, landscape design, and maintenance since the MO was first adopted, justify a reduction of ETAF to 0.7. The switch from 0.8 to 0.7 can be easily attained with minor improvements in irrigation efficiency. Currently, 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. I support this change in the MO because it will help to reduce wasteful and polluted runoff. Water agencies like Coachella already require drip irrigation or low volume flow on this 24"setback. This amendment will do much to reduce runoff and improve water quality.

3. **Increased Compliance and Enforcement Mechanisms**. The proposed MO clearly 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, and water is resource this state cannot afford to waste. We thank DWR for amending the MO to reflect the best available science and research in order to conserve water.

Sincerely,

Amanda Jorgenson
Executive Director