

MWEO

From: Schaffer, Carolyn A [CSchaffer@mwdh2o.com]
Sent: Monday, December 22, 2008 10:14 AM
To: MWEO
Cc: Sienkiewich, Andrew; Hui, Andy; Blair, Tim; Arakawa, Stephen N
Subject: MWD Comments on Proposed Model Water Efficient Landscape Ordinance
Attachments: MWD Comment Ltr.St Model LS Ord 12-19-08.pdf

Dear Mr. Eching,

Thank you for the opportunity to provide comments on the current draft of the <<MWD Comment Ltr.St Model LS Ord 12-19-08.pdf>> Model Water Efficient Landscape Ordinance.

Carolyn Schaffer

Associate Resource Specialist

Metropolitan Water District

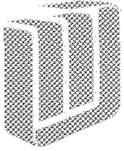
Water Resource Management - Regional Supply Unit

700 N. Alameda Street

Los Angeles, CA 90012

(213) 217-6244 or (213) 217-6119 FAX

cschaffer@mwdh2o.com



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

December 19, 2008

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

Dear Mr. Eching:

Comments on the Modified Text of the Proposed Model Water Efficient Landscape Ordinance

Thank you for the opportunity to comment on the current draft of the Model Water Efficient Landscape Ordinance. The Metropolitan Water District of Southern California (Metropolitan) supports the Department of Water Resources' efforts to update California's Model Water Efficient Landscape Ordinance. This regulation will become an increasingly important tool for managing water resources while ensuring the continued quality of landscapes.

Metropolitan is working collaboratively with counties, cities, and wholesale and retail water agencies within a six-county service area to promote landscape water efficiency in new and existing landscapes. Through a long-term commitment of resources, we provide a comprehensive landscape conservation program that includes device and performance based incentives along with programs for recycled water, public education, and assistance to landscape professionals on best management practices. Metropolitan is also working with local agencies within our service area to adopt effective water conservation ordinances, an effort that correlates with the update to the model water efficient landscape ordinance.

Provisions We Support:

Metropolitan specifically supports the following provisions in the modified text of the Model Water Efficient Landscape Ordinance:

1. ET Adjustment Factor and Irrigation Efficiency

We strongly support the Department's use of an ET adjustment factor of 0.7 and a minimum irrigation efficiency of 0.71. They are appropriate and achievable within water efficient landscapes.

Comment 017.1

2. ET Adjustment Factor for Special Landscape Areas

Increasing the ET adjustment factor from 0.7 to 1.0 for Special Landscape Areas, including areas irrigated with recycled water, creates an incentive for use of recycled

Comment 017.2

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water. Irrigating with recycled water provides additional benefit by allowing a savings of 100 percent of landscape water demand and stricter standards for runoff control.

Suggested Changes:

Metropolitan requests that the Department consider the following changes to improve implementation and increase the ordinance's effectiveness:

1. Irrigation Audit, Survey, and Water Use Analysis for Existing Landscapes

We appreciate the changes that were made to Section 493.1 to allow additional flexibility for local agencies to provide water audits, surveys and water use analyses on existing landscapes. To clarify the Department's intent for local determination, we request that language be added as follows:

...the local agency shall administer programs that may include, but not be limited to irrigation water use analyses, irrigation surveys, and irrigation audits to meet the existing landscape MAWA. *The local agency shall be responsible for determining the programs appropriate for local conditions.*

2. Definition of certified landscape irrigation auditor and designer

Certification should be provided by an EPA WaterSense partner, which could encompass education institutions and professional organizations. Linking certification to EPA's WaterSense program provides the opportunity for additional certifying entities to participate while maintaining quality standards. This would also provide for new auditing methodologies that may arise due to advances in technology.

3. Requirement to use low volume irrigation

An irrigation system design should be based on Maximum Applied Water Allowance (MAWA), Estimated Total Water Use (ETWU), site conditions and plant palette. This approach allows for efficient irrigation systems appropriate for the project landscape. Low volume irrigation should be recommended but not required for slopes and mulched areas.

4. Incorporating Water Features in ETWU

The surface area of water features is required to be included in the calculations for high water use hydrozones. However, water features should have an Irrigation Efficiency of 1.0. It would be helpful to incorporate a water feature into the MAWA-ETWU examples in Section 492.4 and note whether there is any difference in the calculation if the water feature uses recycled water.

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5. **Water Waste Prevention**

Comment 017.7

Section 493.2 requires local agencies to prohibit runoff and other conditions caused by inefficient landscape irrigation. Prohibiting these conditions sets an unattainable standard, particularly due to the inefficiencies in existing landscape irrigation systems. We suggest that the language be changed as follows:

Local agencies shall prevent water waste resulting from inefficient landscape irrigation by ~~prohibiting~~ *requiring property owners to minimize runoff...* Penalties for *water waste* violations ~~of these prohibitions~~ shall be established locally.

6. **Local Ordinance Requirements**

Comment 017.8

We note that the requirement for local agencies to adopt the model ordinance or a water efficient landscape ordinance that is at least as effective in conserving water has been deleted. However, Government Code Section 65595(c) states the same requirement and we request that this be noted in the Final Statement of Reasons. Requiring local ordinances to be "at least as effective" is important to achieving the water savings envisioned with the ordinance update. Metropolitan would like to be included in discussions or have the opportunity to comment on how the Department intends to determine whether local ordinances meet this standard.

Metropolitan would like to acknowledge the significant effort of the Department in updating the Model Water Efficient Landscape Ordinance. We understand the Department will be preparing a guide to implementation in the coming months. We would like to offer our assistance on technical issues and review.

Again, thank you for the opportunity to comment.

Sincerely,



Stephen N. Arakawa
Manager, Water Resource Management

CS:jc

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