

MWEO

From: Coats, Danielle [Maxson@wrcog.cog.ca.us]
Sent: Tuesday, December 23, 2008 1:58 PM
To: MWEO
Subject: WRCOG Comments on the Revised Model Efficient Landscape Ordinance

Greetings:

The Western Riverside Council of Governments (WRCOG) would like to submit the following comments on the revised draft Model Efficient Landscape Ordinance for consideration by the Department of Water Resources.

Comment 022.1

Scope (Formerly item 490.1)

The initial draft Model Efficient Landscape Ordinance contained language that specifically stated that “on or before January 1, 2010, a local agency shall adopt one of the following: (a) A water efficient landscape ordinance that is at least as effective in conserving water as this ordinance; or (b) This updated ordinance.”

Comments

It appears that all reference to a local agencies ability to develop and adopt an “as good or better” ordinance separate from the proposed State model ordinance has been deleted. Does the option for local jurisdictions to prepare an ordinance that is comparable to the State’s Model still exist?

Comment 022.2

Revisions to the ET Adjustment Factor (Item 491 [q])

Initially the draft Water Efficient Landscape Ordinance identified an ET adjustment factor of 0.8, however in the revised draft ordinance the ET adjustment factor was changed to 0.7.

Comments

DWR staff notes in the summary response for justification of lowering this number that many alternatives were considered before this number was altered. The additional scrutiny by DWR staff in the Summary of Key Public Comments document is appreciated, however we believe that local agencies would benefit from additional research into maintaining the previously identified 0.8 ET factor. The analysis further notes that studies such as the ETAF report should be examined before the final factor is determined. WRCOG would like to further echo this sentiment, as arbitrarily reducing the ET factor could have negative impacts on local jurisdictions in the WRCOG subregion because they are currently striving to meet the previously identified 0.8 ET adjustment factor. Weighing compliance of a 0.7 factor on an expected irrigation efficiency that has yet to fully materialize is risky, especially in a climate that is as arid as western Riverside County.

Comment 022.3

Irrigation Audits, Irrigation Survey, and Irrigation Water Use Analysis (Item 493.1) The most recent language states that, “for all existing landscapes installed before January 1, 2010 with a dedicated or mixed use water meter that are one acre or more, including golf courses, green belts, common areas, multi-family housing, schools, businesses, parks, cemeteries, and publicly owned landscapes, 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.”

Comments

Recent changes to language in the ordinance now allows for flexibility in determining the assigned entity in charge of conducting the aforementioned programs to meet the MAWA, however the language does not appear to identify how often the analyses and irrigation surveys must occur to ensure that a existing property is in compliance with the ordinance. The previous ordinance suggested how often the reviews of existing landscapes should take place. WRCOG would like to ensure that DWR will be satisfied with local agencies determining how often these practices should occur and will not be penalized later for noncompliance.

Comment 022.4

Comments on Changes to Overall Documentation Requirements

WRCOG applauds DWR staff for recognizing that the documentation required under the original draft ordinance was onerous and would have required a significant investment in staff time to complete and/or review. The

modifications to the documentation package and the landscape worksheet, as well as the many other suggested changes are appreciated.

WRCOG appreciates the opportunity to provide comments on this important issue. If you have any questions or comments regarding the correspondence please feel free to contact Rick Bishop, WRCOG Executive Director at (951)955-8303 or by e-mail at bishop@wrcog.cog.ca.us.

Find out more about WRCOG at
<http://www.wrcog.cog.ca.us>

Danielle Coats
Program Manager
Western Riverside Council of Governments
4080 Lemon Street, 3rd Floor MS 1032
Riverside, CA 92501
Phone: 951-955-8432
Fax: 951-787-7991
coats@wrcog.cog.ca.us