

MWEO

From: Carolyn Bell [CBell@ci.ontario.ca.us]
Sent: Tuesday, December 23, 2008 5:43 PM
To: MWEO
Cc: Elizabeth Hurst; Scott Murphy
Subject: Model Water Efficient Landscape Ordinance
Attachments: Model Water Efficient Ordinance - Letter.pdf

Good evening,
Enclosed is our letter with comments for the Model Water Efficient Landscape Ordinance.

Thank you for your consideration,

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December 23, 2008

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Department of Water Resources
Office of Water Use Efficiency and Transfers
Attn: Simon Eching
Post Office Box 942836
Sacramento, CA 94236-0001

SUBJECT: MODEL WATER EFFICIENT LANDSCAPE ORDINANCE

Dear Mr. Eching,

Thank you for the opportunity to comment on the modified text of the Model Water Efficient Landscape Ordinance. We have reviewed the new version and are very pleased with the corrections made and appreciate the work that has been accomplished. There are still a few items of concern:

Comment 025.1

1. 491 Definitions, ccc: "rehabilitated landscapes' means any re-landscaping project that requires a permit, plan check or design review....". This should be corrected so that any project (not just re-landscaping projects) that will have rehabilitated landscapes will be included. This would include additions to existing buildings, remodeling, or any development where new construction including access ways, staging or storing of materials affected the landscape and would require re-landscaping to repair damaged landscape or modify existing irrigation systems to adjust for new development.

Comment 025.2

2. 492.1 Compliance with Landscape Documentation package, c, 3; "Submit a copy of the Water Efficient Landscape Worksheet to the local water purveyor." What happens from here? Is the water purveyor to form a data base of MAWA and EWU for comparisons to actual water

use? Without any direction this information could be thrown away instead of utilized and still be in compliance with the Ordinance.

Comment 025.3

3. 492.4 Worksheet ETWU formula; PF "Plan factor from WUCOLS". WUCOLS calls it a species factor but PF for plant factor is better instead of plan factor.

Comment 025.4

4. 492.5 Soil Management Plan a, 2; "Estimated date of soil analysis report, (to be conducted after mass grading is complete)". The landscape plans are typically complete before mass grading occurs so this information would not get on the plans and probably would not happen otherwise. It would be better to change this wording to, "A soil analysis report is required. One shall be conducted where the soil will not be cut or filled. If all areas contain cut and fill, one report to be conducted after mass grading is complete and revised plans shall be submitted.

Comment 025.5

5. 492.5 Soil Management Plan a, 3; "Identification of limiting soil characteristics" and 4; "Identification of planned soil management actions to remediate limiting soil characteristics". What does this mean and how would the landscape architect know what would be limiting except for what the soil test tells us (depending on the soil test locations)? Items in the standard specifications (removal of weeds, rocks, debris, etc.) would cover typical soil prep. Could you offer examples? Do you mean limiting site uses such as a detention basin or vegetated swale shown on the grading plan but not the landscape plans. This would affect how the site is planted and irrigated. Often the Civil and Landscape Architect are not coordinating their plans and this conflict of uses needs to be resolved.

Comment 025.6

6. 492.5 Soil Management Plan b, 2; "determine an appropriate level of soil sampling and method needed to obtain a representative soil sample." If this were left to the project applicant or designee they would determine that no sampling is needed. Change to, "Quantity of samples and locations for testing shall be based on the variation of plant material and depth of rootball (trees, palms, ornamental or natives shrubs, groundcovers, depth of specimen sized boxes or flat sized containers); in strategic locations where site or soil conditions change. (We require a test at 24"-30" deep, shrubs 12-18" deep and turf at 6" deep one set every 1,000l linear feet or as dept. approved. And note "Soil test results and recommendations for amendments shall be listed on the plan noting the soil testing lab name, address, phone number and date of test."

Comment 025.7

7. 492.5 Soil Management Plan b, 3; "Conduct a soil probe test to determine if the soil in the landscape area has sufficient depth to support intended plants". How would the project applicant or designee determine this?

Comment 025.8

8. 492.5 Soil Management Plan c, F "...the soil analysis may (change may to shall) include: (F) recommendations (add for soil amendments". We require only generic soil amendments to prevent a fertilizer company from testing and specifying only their product (such as Gro-power) without a true analysis and identification of the product. For example "2 lbs of nitrogen per 1000sf" instead of "2 lbs of Gro-power plus" which adds other nutrients besides nitrogen which can conflict with other micro-nutrients in the soil.

9. 492.6 Landscape Design Plan b, 13; "A licensed landscape architect's or licensed landscape contractor's signature and stamp (if applicable)" Remove reference to landscape contractor signature. This is not an industry standard. Contractors may be required to have a C-27 license to install landscape but this training is not sufficient to develop plans.

Comment 025.10

10. 492.8 Grading Design Plan (1) "The project applicant shall submit a landscape grading plan that indicated finished configurations and elevations of the landscape area (add 'or submit a precise grading plan by a registered civil engineer') including..."

Comment 025.11

11. 492.10 Irrigation Scheduling, "Irrigation schedules meeting the following criteria shall be submitted with the Certificate of Completion" (add, and be included on the reduced size irrigation layout chart, color coded to identify stations and valves as-built and be located in the controller box). This provides the maintenance staff the reduced plan with as-built information and the irrigation schedule so that corrections may be made to the controller during maintenance. Also, if ET programming information is lost, the designed schedule is easily located and available for use.

Thank you,

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