

## MWEO

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**From:** Patti Webster [pwebster@wmwd.com]  
**Sent:** Tuesday, December 30, 2008 11:40 AM  
**To:** MWEO  
**Cc:** John Rossi; Tim Barr; Tedi Jackson; Paul Rugge; Pamela Pavela; 'lovstede@emwd.org'; 'Kristi Lovelady (klovelad@rctlma.org)'  
**Subject:** Model Ordinance Comment letter  
**Attachments:** Model Ordinance Comments-final 12-30-08.doc

Please see attached corrected letter including logos!

Thank you,  
Patti A. Webster  
Executive Assistant  
**Western Municipal Water District**  
[pwebster@wmwd.com](mailto:pwebster@wmwd.com)  
951-789-5024 951-780-3837(fax)  
Visit us on the web at [wmwd.com](http://wmwd.com)



December 30, 2008

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

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

Dear Mr. Eching,

Thank you for the opportunity to comment on the modified text of the proposed Model Water Efficient Landscape Ordinance. The Riverside County Water Task Force (Task Force) is a strong supporter of water use efficiency and the reduction of waste.

The Landscape Efficiency sub-committee of the Task Force has reviewed the updated proposed Model Water Efficient Landscape Ordinance, and appreciates the flexibility written into the ordinance. The Task Force supports the following provisions in the modified text of the Model Water Efficient Landscape Ordinance:

**1. ET Adjustment Factor of 0.7 and irrigation Efficiency of 0.71**

Comment 037.1

They are achievable in water efficient landscapes and will encourage efficient design in new landscaping.

**2. Clarification of roles and responsibilities of water agencies and land management agencies**

Comment 037.2

**3. Flexibility of Irrigation Audit, Survey, and Water Use Analysis**

Comment 037.3

This will allow agencies that implement a budget based tiered rate to identify customers with inefficient water use through analysis and assist them in reducing demands.

**4. Overhead Irrigation Prohibition within 24 inches of non-permeable surfaces and in areas less than 8 feet in width**

Comment 037.4

These two restrictions will greatly reduce runoff and overspray.

The Task Force would like to request clarification on the following deleted item under the Scope section (490.1):

*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.*

Comment 037.5 In deleting this item, does it now mean that the only option is to adopt the State Ordinance?

We would also like the Department to consider the attached comments and changes from the Riverside County Task Force, Landscape Efficiency Sub-committee, as we feel they will improve implementation and increase the effectiveness of the ordinance.

The Task Force would like to acknowledge the significant effort the Department of Water Resources has put forth in updating the State of California Model Water Efficient Landscape Ordinance.

Again, thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Rossi', with a horizontal line extending to the right.

John Rossi  
General Manager  
Western Municipal Water District  
Riverside County Task Force Chairman

	Page	Section	Current Language	Recommended Changes
#037.6	5	490.1.b.4	Botanical gardens and arboretums open to the public	Add water conservation gardens to the list of exempted sites.
#037.7	6	491.f	an accredited educational institution	An EPA WaterSense Approved Professional Certifying Organization
#037.8	6	491.g	an academic institution	An EPA WaterSense Approved Professional Certifying Organization
#037.9	6	491.p	the total water used for the landscape as described in Section 492.4	The sum of the Estimated Total Water Use calculations for all hydrozones within a landscape project shall not exceed the Maximum Applied Water Allowance as described in Section 492.4.
#037.10	9	491.ss	“pervious” ... the material <b>land</b> into the underlying soil	<i>Remove “land”</i>
#037.11	11	492.a	...to define each “entities” specific...	<i>s/b entity’s</i>
#037.12	15	492.4.a.2	...from other cities located nearby in the same Reference Evapotranspiration Zone Map	<i>What map? Need a reference to a particular map.</i>
#037.13	15	492.4.b.2	All water features shall be included in the high water use hydrozone...	<i>All water features shall be in a separate hydrozone with a calculation of (ETo x .62 x 1.0) (surface area sq ft).</i>
#037.14	15	492.4.c	where:...(list)	<i>Eppt needs to be listed and defined under the “where” section. Use the definition from 491.1. Is it always 25% of annual precipitation? If so, put it in the definition. If not, define how to determine the value.</i>
#037.15	17	492.4.d	Estimated Total Water Use shall not exceed MAWA.	<i>The sum of the Estimated Total Water Use calculations for all hydrozones shall not exceed MAWA.</i>
#037.16	18	492.4.d	PF = Plan Factor...	<i>s/b Plant Factor</i>
#037.17	18	492.4.d	HA = Hydrozone Area [high, medium, and low water use areas] (square feet)	<i>HA = Hydrozone area in square feet (high, medium, and low water use areas)</i>
#037.18	22	492.5.c	(A) soil texture; (B) infiltration rate...	<i>Shouldn’t these points be numbered instead of lettered so they will be consistent with (a) and (b) above them?</i>
#037.19	24	492.6.a.1.F	Invasive species of plants...	<i>If a local list of invasive species is not available, refer to the California Invasive Plant Council lists at <a href="http://www.cal-ipc.org">www.cal-ipc.org</a>.</i>
#037.20	24	492.6.a.2.C	Surface area of a water feature shall be included...	<i>Stipulate that the surface area shall be calculated with a plant factor of 1.0. Otherwise, designers will assign it 0.7.</i>
#037.21	26	492.6.b.6-11		<i>Each statement needs to start with a verb like “identify” since each statement follows the word “shall.”</i>
#037.22	26	492.6.b.10	(10) e	<i>Remove “e”</i>
#037.23	26	492.6.b.12-13		<i>Start each statement with “contain.” Adjust wording in (12).</i>
#037.24	28	492.7.a.1.c.ii	Static water pressure ... the water supply shall be measured.	<i>Specify: “measured at the point of connection”</i>

#037.25	29	492.7.a.1.Q	Check valves or anti-drain valves are required for all irrigation systems.	<i>Check valves or anti-drain valves are required for all irrigation systems on all low-draining heads or emission devices.</i>
#037.26	34	492.9.a.6	Results of preliminary inspection that the...	<i>Results of preliminary inspection verifying that the...</i>
#037.27	35	492.9.a.8	Audit is mandatory	<i>Notation of contradiction. Need to state exemptions in (a)(8) for clarification.</i>
#037.28	35	492.9.b.3	Audit Report if applicable	
#037.29	36	492.10.a.3	Actual irrigation schedules should be based on current time ETo data...	<i>Add the requirement that controllers automatically default to historical ETo data when subscription is cancelled.</i>
#037.30	39	493.a	...to define each "entities" specific...	<i>s/b entity's</i>
#037.31	40	493.1.a		<i>Add "single-family residence"</i>
#037.32	40	493.1.b	Maximum Applied Water Use Allowance	<i>Remove "Use"</i>
#037.33	40	493.1.c	The audit shall be comply	<i>Remove "be"</i>
#037.34	41	493.2	Cities and counties shall...	<i>Add "or Water Agencies"</i>
#037.35	49	B1	(List)	<i>Add Eppt = Effective Precipitation Rate</i>
#037.36	49	B1	Maximum Applied Water Allowance = _____ gallons or cubic feet/year	<i>Remove "or cubic feet/year." Gallons and cubic feet are two different conversions. If a conversion to cubic feet/year is desired, add it separately.</i>
#037.37	54	D	The plant materials are installed as specified. The irrigation system is designed as specified.	<i>"The irrigation system is installed as specified." The <u>design</u> for planting and irrigation is checked at the plan approval stage.</i>

**MWEO**

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**From:** ~~Patti Webster [pwebster@wmwd.com]~~  
**Sent:** ~~Tuesday, December 30, 2008 10:26 AM~~  
**To:** ~~MWEO~~  
**Cc:** ~~John Rossi; Tim Barr; Tedi Jackson; Paul Rugge; Pamela Pavela; 'lovstede@emwd.org'; 'Kristi Lovelady (klovelad@rectlma.org)'~~  
**Subject:** ~~RE: Model Ordinance Comment Letter~~

~~Please be advised the letter I sent earlier will be resent adding WMWD's logo and the Water Task Force logo. I hope to have that to all of you within the next couple of hours.~~

~~Thank you,  
Patti A. Webster  
Executive Assistant  
Western Municipal Water District  
pwebster@wmwd.com  
951-789-5024 951-780-3837(fax)  
Visit us on the web at wmwd.com~~

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**From:** ~~Patti Webster~~  
**Sent:** ~~Tuesday, December 30, 2008 9:28 AM~~  
**To:** ~~'mweco@water.ca.gov'~~  
**Cc:** ~~John Rossi; Tim Barr; Tedi Jackson; Paul Rugge; Pamela Pavela; 'lovstede@emwd.org'; 'Kristi Lovelady (klovelad@rectlma.org)'~~  
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