## MWEO

**From:** Russell Ackerman [Russell.Ackerman@SMGOV.NET]
**Sent:** Tuesday, December 30, 2008 9:48 AM
**To:** MWEO
**Cc:** Dean Kubani; Neal Shapiro; Shannon Parry; Kimberly O'Cain
**Subject:** CSM comments on State Model Water Efficient Landscape Ordinance
**Attachments:** SantaMonica.pdf

Mr. Simon Eching,

Please see the attached document for the City of Santa Monica's comments on the Modified Text of the Proposed Model Water Efficient Landscape Ordinance. Thank you.

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**December 20, 2008**

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

**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, Title 23, Section 490-495. The Office of Sustainability and the Environment of the City of Santa Monica supports the Department of Water Resources' efforts to update California's Model Water Efficient Landscape Ordinance. The update to the model water efficient landscape ordinance can strengthen water resource management throughout the state, and it supports our city's water conservation ordinances, which have proven successful in promoting landscape water efficiency.

**Provisions We Support**:

1) **Requirement to use low volume irrigation**

Comment 038.1 Low volume irrigation should be required for slopes and mulched areas. This will eliminate runoff caused by irrigation devices with higher application rates.

2) **Overhead irrigation shall not be permitted within 24 inches of any non-permeable hardscape**

Comment 038.2

**Suggested Changes**:

1) **Water Waste Prevention**

Comment 038.3 Section 493.2 requires local agencies to prohibit runoff and other conditions caused by inefficient landscape irrigation. The prohibition of runoff should extend to all sections. Section 492.7 (H) should read 'the irrigation system shall be designed to completely preclude any possibility of runoff..." and Section 492.15 (a) should read "Stormwater management practices will eliminate runoff…" and Section 492.8 9(a) should read "grading of a project site shall be designed to eliminate soil erosion, runoff and water waste."

2) **ET Adjustment Factor and Irrigation Efficiency**

Comment 038.4 The use of an ET adjustment factor of 0.7 assumes a minimum average irrigation efficiency of .71. However, if requiring low volume irrigation systems, irrigation efficiency can reach a minimum average of .90. Therefore, the ET Adjustment Factor (0.5/.90) should be .55.

3) **MAWA formula**

Comment 038.5 The MAWA formula sets a much higher limit for the use of water than the ETWU. The MAWA formula essentially treats the entire landscape as one high water using plant and allows 70% of that high water using plant water requirement to be used as the basis for budgeting water to the entire landscape, which is often much more water than the landscape actually needs. The ETWU uses appropriate species factors to estimate water use and should be the benchmark formula that sets the limit for all water budgets because it more accurately reflects the actual water use needs of a landscape.

4) **Applicability**

Comment 038.6 This ordinance applies to landscape projects requiring a "building or landscape permit, plan check, or design review." However, many public agencies do not require landscape or irrigation permits. Consideration should be given to making these types of permits a requirement for public agencies.

5) **Definition of "low volume irrigation"**

Comment 038.7 The ordinance definition of low volume irrigation includes devices such as bubblers, that have high application rates which often exceed soil infiltration rates, resulting in runoff. The definition should be more specific and define "slowly" to include flow rates for low volume irrigation systems that are equal to or less than 2.0 gph and have an application rate of .75 inches per hour or less. (Note: Ordinance's original definition of low volume irrigation included a 'flow rate' equal to or less than .75 inches per hour. This is an application rate not a flow rate.)

6) **Definition of certified landscape irrigation auditor and designer**

Comment 038.8 Certification should be provided by an EPA WaterSense partner, which would encompass education institutions and professional organizations. However, it is critical that 'low volume irrigation' audit training become a mandatory part and greater focus of any landscape irrigation auditing curriculum or certification.

7) **Check valve requirement**

Comment 038.9 Section 492.7 (Q) requires check valves or anti-drain valves for all irrigation systems. However, it does not specify where in the system they are required, nor under what conditions they are required. Check valves should only be required where necessary to prevent low-head drainage.

8) **Section 492.7 (2) (B) Hydrozone**

Comment 038.10 Should read **"**Sprinkler heads and other emission devices shall be selected based on what is appropriate for the plant and soil type within that hydrozone."

9) **Training for public agency officials**

Comment 038.11 Formalized training in landscape and irrigation design should be provided by the State to public agency officials in order to help them understand and calculate the MAWA and ETWU formulas.

Again, thank you for the opportunity to comment.

Sincerely,

Neal Shapiro
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Office of Sustainability and the Environment
City of Santa Monica