

MWEO

From: Patti Webster [pwebster@wmwd.com]
Sent: Tuesday, December 30, 2008 3:15 PM
To: MWEO
Cc: John Rossi; Tim Barr; Tedi Jackson; Paul Ruge; Pamela Pavela; 'lovstede@emwd.org'; 'Kristi Lovelady (klovelad@rctlma.org)'
Subject: Model Ordinance Comment letter
Attachments: Western's Letter of Comment 12-30-08 DRAFT.DOC

Thank you,
Patti A. Webster
Executive Assistant
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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. Western Municipal Water District (Western) is a strong advocate of water use efficiency and the reduction of water waste.

In reviewing the updated proposed Model Water Efficient Landscape Ordinance, Western has found the revisions to be appropriate while allowing for local flexibility. Western considers the following four components of the revised ordinance to be of particular importance.

- Comment 048.1 **1. ET Adjustment Factor of 0.7 and irrigation Efficiency of 0.71**
They are achievable in water efficient landscapes and will encourage efficient design in new landscaping.
- Comment 048.2 **2. Clarification of roles and responsibilities of water agencies and land management agencies**
- Comment 048.3 **3. Flexibility of Irrigation Audit, Survey, and Water Use Analysis**
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.
- Comment 048.4 **4. Overhead Irrigation Prohibition within 24 inches of non-permeable surfaces and in areas less than 8 feet in width**
These two restrictions will greatly reduce runoff and overspray.

Western 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