

## MWEO

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**From:** awoodward [greendesignguru@yahoo.com]  
**Sent:** Tuesday, December 30, 2008 3:20 PM  
**To:** MWEO  
**Cc:** Dave Pagano; Andy Bowden; Anna Mendiola  
**Subject:** Comments on Updated Water Efficient Model Landscape Ordinance  
**Attachments:** MWEO Response LTR pg 1 IMG.jpg; MWEO Response LTR pg 2 IMG\_0001.jpg

Dear Mr. Eching:

Attached is my review letter on the draft Water Efficient Model Landscape Ordinance for incorporation in tot the final document.

Cordially,

Angela M. Woodward  
[greendesignguru@yahoo.com](mailto:greendesignguru@yahoo.com)

December 30, 2008

State of California  
Department of Water Resources  
Office of Water Use Efficiency and Transfers  
Attention: Simon Eching  
901 P Street, Room 313A  
Sacramento, CA 95814

Submitted via e-mail to: [mweo@water.ca.gov](mailto:mweo@water.ca.gov)

Re: Comments on Updated Water Efficient Model Landscape Ordinance

Dear Mr. Eching:

Thank you for sending the Updated Model Water Efficient landscape Ordinance (MWELo) AB 1881 for my consideration and review. We all agree for the pressing need to conserve water use in the landscape. However, the updated MWELo content has not changed; it only has been word smithed to look different.

A properly designed, constructed, managed and maintained irrigation system does not have runoff and overspray. It meets water conservation targets. The MWELo duplicates legislation dictating design, construction and water oversight that is already addressed by the State of California Business and Professional Codes, higher education and State Licensing Boards. This Ordinance also creates additional work effort resulting in higher design, Agency approval and construction time and costs. Please make the following changes to the ordinance:

- Eliminate the drip irrigation 24" set back or buffer on turf adjacent to paved surfaces.
- Change the slope irrigation requirement to water conserving irrigation system including rotors.
- Leave the ET Adjustment Factor at .8 until additional scientific research has validated the lower .7 factor.
- Delete grading design requirements and note that jurisdictional agency requirements shall govern.
- Delete storm water management requirements and note that jurisdictional agency requirements shall govern.
- Eliminate the requirement for irrigation schedules if weather based or sensor based irrigation controllers are included as a part of the irrigation design and installation.

As a landscape architect with 30 years experience, I am very interested in promoting efficient use of irrigation water and sustainable design in California. I believe the way to achieve water savings is to target the landscape contractors, property managers and owners who are

responsible for optimum water use. Irvine Ranch Water District (IRWD) experience is that improper maintenance water management in the primary cause of inefficient or wasteful water usage.

All of your time and effort on this Updated Model Water Ordinance is greatly appreciated. I am looking forward to the DWR response to all of the comments on the Model Ordinance.

Cordially,

A handwritten signature in cursive script that reads "Angela M. Woodward". The signature is written in black ink and is positioned above the printed name.

Angela M. Woodward, RLA #2126

Landscape Architect

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