

Dear Ms. Julie Saare-Edmonds,

Thanks for the opportunity to comment on the Model Water Efficient Landscape Ordinance. Listed below are the items we are most concerned with.

1. 490.1 Applicability – please clarify if the new projects with a landscape area greater than 500 sf requiring a permit means an area greater than 500sf of landscape or hardscape areas proposed to be altered. Some building construction projects may not intend to replace landscape at the time of the permit application but do so after the construction process. For example, a tenant improvement project may not have any work proposed for the landscape areas but the Building dept. may require ADA upgrades or the property owner repairs the landscape damaged from construction or staging equipment; would they be required to show that the existing or repaired landscape meets the water budget for existing landscapes or be required to upgrade it to the current standards? We think the largest water wasters are existing landscapes that are not proposing upgrades but could be required to do so when permits are issued for related on-site work.
2. 492.54 Water Efficient Landscape Worksheet – Please add an ETWU calculation for a site with 100% recycled water, not a combination. If an entire site is recycled water the ETWU calculation should show zero for the non SLA sf amount, when adding to the total sf for the SLA. The ETWU result would be equal to the MAWA. This is confusing for many designers since most landscape sites are either all potable or all recycled water. Your example shows a combination of both.
3. 492.87 B. Controller installation: the ET controllers are installed by the contractor but since the power to a project is often not supplied until after the permit is finalized, there is no method to verify if the ET function was set up and is running. In addition, some ET controllers require the property owner to sign up for control of the account. For new homes, the contractor and developer completes the project prior to homeowners' purchase. Please provide suggestions so we can ensure the ET function on the controller is actually set up.
4. 492.8 Master valves and flow sensors are typically not installed on residential projects because of the expense and small scale of the systems. Do you mean for this to be on only commercial, industrial and park projects – not to include residential projects?
5. 492.10 #2 Please clarify that the operation of a drip irrigation may be scheduled outside of the normal watering window since drip is not exposed to evaporation and wind-carry like spray irrigation.
6. 492.14 Recycled water. Please clarify that recycled water irrigation systems must meet all the requirements of the MWELO and is not exempt from conservation and best practices for irrigation design methods. Or state that it is.

Thank you for your consideration,

**Carolyn Bell, ASLA**  
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