



Christopher W. McKinney
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June 26, 2015

California Department of Water Resources
Urban Water Use Efficiency Unit
P.O. Box 942836
Sacramento, CA 94236-0001
Attn.: Julie Saare-Edmonds, Senior Environmental Scientist

Re: Comments - California State Model Water Efficiency Landscape Ordinance

Dear Ms. Saare-Edmonds:

The City of Escondido Utilities Department provides retail water service to about 25,000 customer accounts in the City and adjacent areas of San Diego County. The City has enacted water use restriction since 2009 and is committed to efficient water use by its customers. Please accept the following comments concerning the proposed update to the California State Model Water Efficiency Landscape Ordinance.

The proposal to require dedicated landscape water meters for non-residential irrigated landscapes with an area larger than 1,000 ft² and for residential irrigated landscapes with an area larger than 5,000 ft² is overly burdensome on retail water agencies if these meters are the responsibility of the water agency. Such a requirement of retail water agencies would force these agencies to incur significant ongoing maintenance costs which will necessarily impact service rates. Therefore, we recommend that this financial burden is not placed on water agencies and their ratepayers.

The proposed ordinance includes requirements that are infeasible and overly financially burdensome for smaller projects. Specifically, the proposal would include requirements on new construction projects with landscape areas larger than 500 ft². We recommend removal of the requirements for a soil management report, grading design plan, irrigation audit, and landscape design plan for landscapes smaller than 2,500 ft².

The proposed ordinance recommends incorporation of constructed wetlands and retention ponds even for single-family homes and small commercial sites. This recommendation is not practical for such small scale projects. Stormwater regulatory requirements already address issues of water retention and pollutant filtration.

The City of Escondido Utilities Department is grateful for the opportunity to comment on the proposed updates to the California State Model Water Efficiency Landscape Ordinance. Please feel free to contact me at the number above if you have any questions about this letter.

Sincerely,

A handwritten signature in blue ink that reads "Christopher W. McKinney".

Christopher W. McKinney
Director of Utilities