

Hi Julie,

Thank you for providing the 2015 draft Model Water Efficient Landscape Ordinance for public comments. The State Water Resources Control Board (State Water Board) appreciates the efforts of the Department of Water Resources in the development of this ordinance. As a sister agency, the State Water Board - Division of Water Quality is providing the following informal comments through this email.

The State Water Board encourages the use of storm water management practices that minimize storm water and dry weather runoff, and increase groundwater infiltration to improve water quality and water supply. The intention of our informal comments below, shown in blue underline/ red strike-out format, to the Department's draft ordinance (shown in black font) is to further support storm water management through storm water and dry weather runoff capture and use:

*We suggest that your proposed section (d) follows your proposed section (e), and is modified as follows:*

(e)(d) It is recommended that storm water projects ~~also~~ incorporate any of the following elements to improve on-site storm water ~~retention and dry weather runoff capture and use~~:

- Grade impervious surfaces, such as driveways, during construction to drain to vegetated areas.
- Minimize the area of impervious surfaces such as paved areas, roof and concrete driveways.
- Incorporate pervious or porous surfaces (e.g., permeable pavers or blocks, pervious or porous concrete, ~~etc.~~) that minimize runoff.
- Direct runoff from paved surfaces and roof areas into planting beds or landscaped areas to maximize site water ~~retention capture and use~~.
- Incorporate rain gardens, cisterns, and other rain harvesting or catchment systems.
- Incorporate infiltration beds, swales, basins and drywells to ~~retain capture~~ storm water and dry weather runoff and increase percolation into the soil.
- Consider constructed wetlands and ~~retention~~-ponds that retain water, ~~handle equalize~~ excess flow, and filter pollutants.

~~(c) Rain gardens, cisterns, and other landscapes features and practices that increase rainwater capture and create opportunities for infiltration and/or onsite storage are recommended.~~

(d)(e) It is strongly recommended that landscape areas be designed for a ~~retention capture~~ and infiltration capacity that is sufficient to prevent runoff from ~~roof impervious~~ surfaces (e.g., roof and paved areas) and the ~~landscape area~~ from either: ~~the~~ one-inch, 24-hour rain event, ~~or~~(2) the 85th percentile, 24-hour rain event, and/or (3) ~~such~~ additional capacity, ~~if any, as may be required by any applicable local, or regional, state or federal regulation, be provided.~~

The Division of Water Quality staff looks forward to continue working with your Department. Please contact Ms. Laurel Warddrip, our Statewide Storm Water Manager, at (916) 341-5531 or [Laurel.Warddrip@waterboards.ca.gov](mailto:Laurel.Warddrip@waterboards.ca.gov) if you have any questions regarding the above informal comments, or if there is further opportunity for our Division of Water Quality staff to continue working with your Department on this or other efforts.

Sincerely,

Diana Messina

Diana C. Messina, P.E., BCEE, Section Chief  
Surface Water Permitting Section  
State Water Board, Division of Water Quality