**San Diego County Water Authority**
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June 23, 2015

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County of San Diego

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 on the Department of Water Resources' Update to the State Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds:

The San Diego County Water Authority is a wholesale water agency supplying 24 member agencies in San Diego County. We have a strong interest in ensuring efficient water use by existing and future water customers and thank you for the opportunity to comment on the proposed update to the State's Model Water Efficient Landscape Ordinance (MWELO).

The Water Authority supports changes in the landscape ordinance that will reduce the allowable turf used in landscaping, increase the efficiency of water used for landscape irrigation and reduce the allowable water budget for new development. We also support a comprehensive approach that includes alternative water supplies such as stormwater and graywater. At the same time, to ensure a high level of participation and compliance by the regulated community, we want to ensure that the model ordinance is practical and feasible to implement.

The proposed update to Section 492.7(a)(1)(A) requires dedicated landscape meters for all non-residential irrigated landscapes of 1,000 square feet but not more than 5,000 square feet and residential irrigated landscapes of 5,000 square feet or greater. The landscape water meter may be either a meter provided by the local water purveyor or a privately owned meter or submeter. To clarify that the local water purveyor has the discretion as to whether the submeter is the responsibility of the water purveyor or it is a private submeter, we recommend that Section 492.7(a)(1)(A)(1) be revised to read, "A customer service meter dedicated to landscape use provided by the local water purveyor *at the water purveyor's discretion*; or."

The proposed update to Section 490.1(a) expands the scope of the ordinance to include new construction projects with a landscape area greater than 500 square feet. The complete set of requirements in the ordinance includes a soil management report,
grading design plan, irrigation audit and a landscape design plan that bears the signature of a licensed landscape architect. These requirements are excessive and impractical for a single-family home or small commercial project with a small landscaped area. The ordinance

should allow small-scale projects installing between 500 and 2,500 square feet of landscaping to waive these requirements and simply design to meet the site's water budget requirements.

The proposed update to Section 492.16(d) recommends that a project incorporate constructed wetlands and retention ponds that retain water, handle excess flow and filter pollutants. A project in this case could be a single-family home, small commercial site, or large development. This recommendation is not appropriate nor practical on a small scale due to maintenance requirements and potential for mosquito breeding. It should be deleted from the proposed update since it is better addressed at a developer level through stormwater regulatory requirements.

The proposed update to Section 492.16(e) recommends retention and infiltration capacity sufficient to prevent runoff from roof surfaces and the landscape area from either the one inch, 24-hour rain event or the 85$^{th}$ percentile, 24-hour rain event. While we support this as a recommendation, we would not support this as a mandate that would apply to all situations. That determination should be made at a local level to ensure that consideration is given to local hydrological conditions and management of surface and ground water supplies. In some instances, regional percolation ponds, surface capture and reuse, or wastershed-based management of water quality may be more appropriate than on-site capture. The San Diego region has small groundwater basins and significant clay soils where percolation is not reasonable or practical. There are downstream reservoirs that may capture stormwater runoff. In that case, the highest priority is to minimize water quality impacts from the stormwater runoff. The San Diego Regional Water Quality Control Board is developing criteria for alternative compliance with stormwater runoff requirements. We expect that a watershed-based alternative compliance program, with approaches such as centralized wetlands treatment or percolation, will be more effective than on-site capture of a 24-hour rain event. This current flexibility should be maintained.

The proposed creation of Section 495 mandates new implementation and enforcement reporting requirements for local agencies. While this information is valuable, the reporting requirements should be streamlined and target the collection of quantifiable data. Submittal of the information should be made in an electronic format.

Thank you for the opportunity to comment on these proposed updates to MWELO. If you have any questions regarding this letter, please contact Jeff Stephenson, Principal Water Resources Specialist, at (858) 522-6750.

Sincerely,

Maureen A. Stapleton
General Manager

JS: nf