



June 26, 2015

RE: City of Hayward Comments and Recommendation to California Department of Water Resources (DWR) Model Water Efficient Landscape Ordinance Update 2015

The City of Hayward promotes sustainable landscape design and early adopter of Bay-Friendly landscape principles into the City's water efficient landscape ordinance. The City has a full time licensed landscape architect reviewing all permitted projects overseeing the compliance of the current water efficient landscape ordinance with Reference Evapotranspiration value of 0.7 adopted in 2009. Additional restrictions especially lowering the applicable threshold significantly for full compliance with the ordinance updates will have serious financial impacts to residential and development communities as well to the City. In Hayward, conscientious water conservation efforts by existing and new residential and non-residential landscape developments throughout the City contributed to the City's placement in the lowest assigned conservation tier (8 percent). The City's Sustainability Committee is proactively looking into requiring graywater recycling system plumb-ready for all new residential developments.

The City's comments on the proposed Ordinance Update are as follows:

1. Recommend having one water efficiency standards for all new developments:
 - a. Applicable project threshold to 1,000 square feet of new and rehabilitated landscape or greater for full compliance with the ordinance.
 - b. ETAF (reference evapotranspiration adjustment factor) to be consistent with CAL Green Building Code of 0.55 for both single family residential and non-single family residential developments with additional 0.3 ETAF for Special Landscape Area (SLA) resulting total ETAF of 0.85 for SLA.
 - c. Special Landscape Area shall include bio-retreatment areas. Irrigation for bio-treatment areas should be allowed to use overhead spray system with matched precipitation rate rotator type (MP Rotator) when bio-retreatment area would be larger than ten feet by ten feet, meet Maximum Applied Water Allowance (MAWA) for the overall landscape, and be recessed minimum three (3) feet from the edge of paving or structure.
 - d. Average irrigation efficiency to be 0.85 for both single family residential and non-single family residential developments.
2. Recommend including water re-use requirements for all new developments:
 - a. Grey water recycling plumbing installation ready for hook up
 - b. Rainwater catchment/harvesting system installation

3. City is in support of lowering dedicated irrigation meter requirement for non-residential irrigated landscapes of 1,000 square feet or greater and requiring a sub-meter for single family home equal or larger than 5,000 square feet of irrigated landscapes.
4. Prohibiting turf in less than ten feet by ten feet and irrigated with irrigation system that meets the irrigation efficiency standard of 0.85 and water budget for MAWA (Maximum Applied Water Allowance).
5. Limiting total turf area to maximum twenty five percent (25%) of the front yard in single family dwelling that meets minimum ten feet by ten feet dimension and irrigation efficiency standards.
6. Turf shall not be allowed on slopes greater than twenty percent (20%) and shall maintain less than two percent (2%) slope for minimum three (3) feet when turf is located adjacent to paving or structure.
7. Minimum planting coverage in the required landscape areas to fifty percent (50%) as long as the remaining areas are maintained as permeable.
8. City prohibits the use of invasive and noxious plant species identified in California Invasive Plant Council (CAL-IPC) in the current ordinance, and will maintain the requirement.
9. Installation of compost at a rate of minimum nine (9) cubic yards of organic compost per 1,000 square feet of planting area; and incorporation to a depth of nine inches of soil unless sheet mulching is used or contradicted by soil test.