

Dear Julie,

I am writing this letter to reiterate the comments I presented at the June 16, 2015 Public Meeting held in Los Angeles regarding my views on revisions to Model Water Efficient Landscape Ordinance. I wish to endorse several of the proposed changes, as well as express the need to include several other changes and options to this Ordinance.

First, I fully support the revision of the ET Adjustment Factor to .5 for Residential landscapes, and .4 for non-residential landscapes, as well as the requirement to install dedicated water meters or sub-meters for all landscapes. I also support the new flexibility to supplement the WUCOLS plant factors with other authoritative sources of information.

I further recommend three significant changes to the Ordinance:

I recommend providing an Alternative Ordinance that has only 3 performance-based guidelines. Applicants can either choose the existing Ordinance approach, or the Alternative Ordinance. The Alternative Ordinance would have three components: (a) a landscape documentation package that complies with an approved MAWA budget, (b) require the installation of a dedicated water meter (or sub-meter), and (c) requires the applicant to provide quarterly water use data to municipalities (subject to auditing) for purposes on demonstrating compliance.

This Alternative Ordinance will enable a great variety of successful landscape designs while meeting the principal water budget goal. This will also reduce the many conflicts the exist among the prescriptive conditions of the current ordinance which is plagued by too many competing and conflicting prescriptive criteria and guidelines. The current Ordinance is cumbersome and does not effectively apply to all situations attempts to over-guide how to achieve efficiency.

Additionally, I strongly recommend modifying the current ETo based water budget criteria that leads to a larger water allowance for hotter and drier (desert) regions in comparison to cooler and moister (coastal, northern, mountain) regions. It is remarkably illogical to have a budget formula that allocates higher budgets throughout inland and desert areas of Southern California. The ETo basis can still be applied, but limits also need to be established to set maximum annual allowances according to different regions in the state.

Lastly, there is great need to increase the attention and framework for addressing existing landscapes. While this is not the principal purpose of this Ordinance, I strongly encourage requiring dedicated meters or sub-meters for all existing landscapes. Since the adoption of the Model Ordinance in 1992, we are no closer to measuring or knowing the amount of water is being used in landscapes. We must take this first step; possibly in conjunction with a turfgrass rebate program.

I express this support and make these recommendations based upon 45 years of experience as a landscape architect, author and educator. I have also participated in the first iteration of the Model Ordinance in 1992, as well as been a long-standing member of the WUCOLS task force. I appreciate the opportunity to contribute these comments for your consideration.

Thank you for helping achieve greater levels of efficiency in landscape water use.

Sincerely,

Bob Perry, FASLA  
Landscape Architect