

VIA ELECTRONIC MAIL

June 26, 2015

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

Re: Draft Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds:

California Water Association (“CWA”) submits the following comments on the 2015 Update to the Model Water Efficient Landscape Ordinance (the “Model Ordinance”) released for public review and comment by the Department of Water Resources (“DWR”) on June 12, 2015 (the “Draft Update”), pursuant to the directive contained in Paragraph 11 of the Governor’s April 1, 2015 Executive Order B-29-15 (the “Executive Order”).

CWA is a statewide association that represents the interests of 113 investor-owned water utilities (“IOUs”) that are subject to the jurisdiction of the California Public Utilities Commission (“CPUC”). CWA has been an active participant in the development of drought response regulation promulgated by both the CPUC and the State Water Resources Control Board (“State Water Board”). CWA appreciates this opportunity to comment on the Draft Update as it may impact the IOUs and their respective customers.

On the whole, CWA supports the proposed modifications to the Model Ordinance as practical, common sense changes to tighten water efficiency standards. As required by the Executive Order, the Draft Update seeks to achieve water savings through various methods, including employing more efficient landscape irrigation systems, encouraging the use of graywater usage to promote uncontaminated wastewater as a resource, and boosting public education.

In particular, CWA believes it makes sense to reduce the landscape size threshold for all new construction projects. Making the Model Ordinance applicable to smaller new landscapes will capture more projects and achieve water savings in more new developments. CWA also supports the proposed restrictions on the use of water-intensive turf in street medians and parkways

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less than 10 feet wide, as well as the directive aimed at minimizing overspray and runoff in parkways through sub-surface irrigation.

Notwithstanding CWA's support for the Draft Update, CWA has identified two proposed changes that warrant further clarification.

Outdoor Water Budgets

Model Ordinance Section 491, subdivision (www) defines a "water budget" as "a reasonable estimate of the amount of irrigation water required for a specific landscape." CWA takes no issue with the definition itself, but suggests that the defined term be "outdoor water budget," rather than simply, "water budget." This change, while perhaps minor-seeming, would better distinguish the term used by the Model Ordinance from what some California water purveyors are deploying in their respective service areas: allocation-based rates. In the ratesetting context, the term "water budget" commonly refers to an individual customer's monthly allocation inclusive of indoor and outdoor water use. Use of the same term to refer only to an estimate of outdoor requirements for landscape irrigation could cause unnecessary confusion. CWA recommends that this change from "water budget" to "outdoor water budget" be made uniformly throughout the Model Ordinance.

Meters

Model Ordinance Section 492.7, subdivision (a)(1) specifies that dedicated landscape water meters shall be required for non-residential and residential irrigated landscapes of a certain size. The Draft Update provides that such water meters may be either: (1) provided by the local water purveyor; or (2) privately owned.

It is the current experience of the CPUC-regulated IOUs that, particularly under these ongoing drought conditions, customers are clamoring for more and better information regarding their water use. Thus, CWA supports the deployment of landscape water meters. However, the Model Ordinance fails to make an important distinction with respect to the responsibility to read and maintain meters that should be memorialized in the new rules. Meters provided by the local water purveyor are read and maintained by the water purveyor. Reading and maintaining privately owned meters or submeters is the responsibility of the customer or property owner. To make this clear to those who will be impacted by the choice of whether or not to own the meter, CWA recommends that the Model Ordinance be further revised as follows:

(1) (A)

... A landscape water meter may be either:

1. a customer service meter dedicated to landscape use that is provided, read and maintained by the local water purveyor; or
2. a privately owned meter or submeter that is read and maintained by the customer or property owner.

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Conclusion

CWA appreciates the opportunity to provide these comments and participate in the development of the 2015 Update to the Model Water Efficient Landscape Ordinance. CWA urges DWR to revise the Draft Update consistent with CWA's suggested revisions.

Very truly yours,



Jack Hawks

cc: Commissioner Catherine J.K. Sandoval – California Public Utilities Commission
Rami S. Kahlon – CPUC Director, Division of Water & Audits
California Water Association Conservation Committee