

SOUTHLAND

SOD FARMS

July 11, 2015

Exclusive Growers of Genuine Marathon

California Water Commission
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

Re: Revised Model Water Efficient Landscape Ordinance (MWEL0)

Dear Commissioners:

We urge you to disapprove the revised MWEL0 as not consistent with what the legislature intended. Among the purposes stated in the original legislative findings are the following:

Sec 490 Purpose.

(a)(3) "That it is the policy of the State to promote the conservation and efficient use of water and to prevent the waste of this valuable resource."

(a)(4) "That landscapes are essential to the quality of life in California by providing areas for active and passive recreation and as an enhancement to the environment by cleaning air and water, preventing erosion, offering fire protection, and replacing ecosystems lost to development."

The Revised Model Water Efficient Landscape Ordinance reduces landscape water budgets to levels that dictate plant choices and go well beyond water use efficiency. The shift is made clear in the revisions to Sec 490(b)(1):

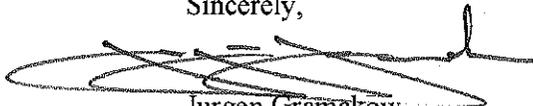
"promote the values and benefits of landscaping practices that integrate and go beyond the conservation and efficient use of water."

To go beyond efficient use of water was not intended by the legislative findings and is beyond the scope of the Governor's Executive Order B-29-15, which directed DWR to "increase water efficiency standards" not limit property owners freedom of choice as to what they can plant in their landscape and circumvent CEQA and the APA.

Obviously we are in a drought and must save water wherever possible. However, the revised MWEL0 makes highly restrictive changes **permanent**. The implementation of government dictated plant limitations down to the level of the smallest landscapes will not be met favorably by the public. The law will be unenforceable and create much animosity. It is akin to telling people what kind of furniture they can have.

The existing ordinance has already been modified to the point where it is quite stringent on defining water budgets at 0.7 ET. We submit that the Governor's directive to increase water efficiency standards has already been met in the landscape arena.

Sincerely,



Jurgen Gramckow
President