

Ms. Bean -

Our core comment is that we request that additional guidance or language be added into the regulations specifying how the rules limiting irrigation in new development are to be implemented.

Some questions that we would hope be answered by either the regulations themselves or accompanying guidance include:

If a project is fully permitted by the City prior to the adoption of the regulations, but hasn't yet started to install its irrigation system, does it need to redesign its irrigation and landscape plans to comply?

If a project has installed its irrigation prior to the effective date of the regulations, but isn't yet been occupied or received its final building inspection, does it need to reinstall its irrigation to comply?

If a project's landscape is in mid-construction on the effective date, does it just need to comply for the irrigation installed after the effective date?

Since we have a number of projects in process that may have to redesign their landscape plans or installations as a result of the regulations, we know that having clarity on exactly what is required is essential to successfully communicating the rules and ultimately conserving water.

Thank you.

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