

From: **Toms, Joanne** <[JToms@glendaleaz.com](mailto:JToms@glendaleaz.com)>  
Date: Mon, Aug 30, 2021 at 11:13 AM  
Subject: RE: Responses to 5MP Questionnaire  
To: Management Plans - ADWR <[managementplans@azwater.gov](mailto:managementplans@azwater.gov)>

Dear Makenna,

Thank you for the opportunity to provide feedback about the draft 5<sup>th</sup> Management Plan Municipal Regulatory Language, which was presented at the Municipal Subgroup meeting on July 28, 2021. I appreciate the opportunity to provide feedback through email as I missed the deadline to submit via the online questionnaire.

In the 5<sup>th</sup> Management Plan draft, BMP "1.6 Xeriscape Demonstration Garden" is valued at one point. The city of Glendale recommends that this be changed to two points due to our nearly 30 years of experience in maintaining the Glendale Xeriscape Demonstration Garden. This community treasure requires daily upkeep and is among the city's most resource-intensive water conservation BMPs. Although the majority of the labor is contracted out to specialized landscape companies, Water Conservation staff serve as the contract monitors. Additionally, Conservation staff provide daily upkeep, including monitoring the grounds for safety, and coordinate monthly workdays in the garden for community volunteers. As the garden matures, it continues to be renovated through the use of grant funds that require additional staff time and attention.

| <b>1.6 Xeriscape Demonstration Garden</b> |   |   |
|---|---|---|
| <b>1 point</b>                            | Water providers install and maintain a low-water-use or water-efficient demonstration garden. The garden must meet the following criteria:<br><ol style="list-style-type: none"><li>1. Be available to the public</li><li>2. Include interpretive signage and/or literature about low-water-use plants and/or water-efficient landscape practices</li><li>3. Maintain natural pruning practices, within safety constraints</li><li>4. Utilize and maintain efficient irrigation system(s) and practices</li></ol> | Water providers must verify in their CER that the xeriscape demonstration garden meets all the required criteria and state the location of the garden and its approximate size. |

and/or use passive rainwater harvesting

In the 5<sup>th</sup> Management Plan draft, BMP “**4.2 Water Tampering and/or Water Waste Prohibition**” combines two different items valued at one point. The city of Glendale recommends that this be changed to two separate BMPs, each valued at one point. The city of Glendale treats these items separately in Glendale City Code:

- [Theft of water](#) - Chapter 33, Article II., Sec. 33-37
- [Discharge of water into streets prohibited](#) – Chapter 30, Article I., Sec. 30-4

| <b>4.2 Water Tampering and/or Water Waste Prohibition</b> |   |   |
|---|---|---|
| <b>1 point</b>  | Water waste or water tampering are prohibited on residential or non-residential properties. | Water providers must submit with their CER the requirement’s ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. To get credit for this BMP, the provider must have a documented system for compliance and/or enforcement and include a description of those activities with their CER. |

Thank you.

Sincerely,

Joanne Toms

City of Glendale Water Services Department

Conservation and Sustainable Living Division