

# Tehama County

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## Planning Department

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Department of Water Resources  
Office of Water Use Efficiency and Transfers  
901 P Street, Room 313A  
Sacramento, CA 95814

Attn: Judy Colvin

RE: Comment on Proposed Title 23; Model Water Efficient Landscape Ordinance.

Thank you for the opportunity to review the proposed ordinance. We will not be attending the public hearings but would like to make the following comments and have them entered into the record.

Comment on Section 490.3

Section 490.3.1 a-c refers to landscapes requiring "a permit, plan check, or design review." A plan check and design review are fairly self-explanatory, however, the word "permit" is not. Does this include grading permits and construction permits? Also, if the project itself requires a conditional use permit and landscaping is a condition of approval, but there are no permits required for the landscaping itself, is the conditional use permit the "permit" for which the regulation is referencing? An addition to Section 491, Definitions, titled "permits" with a complete explanation of the type of permits being referred to would be helpful.

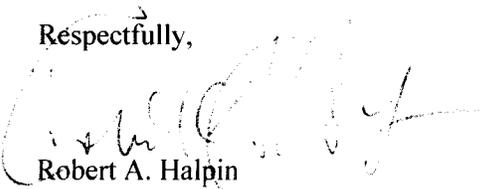
Section 490.2, refers to activities not covered by the ordinance. Please add "agricultural activities."

Comment on Section 491; #27.

It is our understanding that this proposed ordinance does not apply to agricultural related activities. However, under Section 491, Definitions. #27, titled "landscape area", the last sentence refers to areas permanently and solely devoted to edible plants such as orchards and vegetable gardens as being subject to the MAWA. This is confusing. This reference appears on its face to be an area devoted to agricultural activities to which these proposed regulations do not apply. Agricultural activities; commercial or private, large or small, should not be subject to this regulation. Please provide clarification.

Also, the preceding sentence states what is "not" included in the landscape area. This sentence should be at the end of the definition so that we are not reading what is a landscape area, then what is not, then what is again.

Respectfully,

  
Robert A. Halpin  
Planner II