

**Colvin, Judith**

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**From:** mweo-bounces@water.ca.gov on behalf of Cathleen Brennan [cbrennan@coastsidewater.org]  
**Sent:** Tuesday, March 25, 2008 11:33 AM  
**To:** mweo@water.ca.gov  
**Subject:** [MWEO] CCR-Title 23- Div 2 - DWR-Chapter 2.7 Model Water EfficientLandscape Ordinance  
**Attachments:** comments on draft. 3.24.2008.pdf

Judy Colvin,

Attached are comments on the proposed Model Water Efficient Landscape Ordinance.

Thank you.

Cathleen Brennan  
Water Resources Analyst  
Coastside County Water District

# Coastside County Water District



March 24, 2008

Attention: Judy Colvin  
Department of Water Resources  
Office of Water Use Efficiency and Transfers  
901 P Street, Room 313A  
Sacramento, CA 95814  
[mweo@water.ca.gov](mailto:mweo@water.ca.gov)

Subject: California Code of Regulations - Title 23 Water – Division 2. Department of Water Resources – Chapter 2.7 Model Water Efficient Landscape Ordinance

Dear Judy Colvin,

Thank you for your consideration of Coastside County Water District's written comments on the proposed Model Water Efficient Landscape Ordinance.

After reviewing this draft ordinance, it is evident that these regulations impact both the local water retail purveyors and the local agencies that review and permit landscape plans. There are instances where the local agency that reviews and permits projects is also the water retailer, but that is not always the case.

In order to meet the purpose and intent of these proposed regulations, more guidance is needed to define the role of the water retail purveyor in maintaining, managing and enforcing the regulations on new and existing landscapes covered by this ordinance.

Please find additional comments listed in the table below.

Page	Description	Comment
2	490	The purpose describes the need to establish a structure for maintaining water efficient landscapes, managing water efficient landscapes and providing provisions for water waste prevention in landscapes. The scope of the purpose goes beyond the authority for the approval of a permit, plan check and plan review process. The scope creeps into the authority and jurisdiction of the local water retail purveyor. The role of the local retail water purveyor should be defined more clearly and the relationship between the local retail water purveyor and the local permitting authority should be defined in regards to maintenance of the approved landscapes and the water landscape audits.
3	490.2	The intent describes the use of the MAWA, water use education, and rates all of which are usually implemented primarily by the local water retailer or wholesaler. The roles of the local water retail purveyor and the local

# Coastside County Water District



		(permitting) agency should be better defined.
22	492.9	Dedicated landscape water meters should also be required on single family residences with landscaped area grater than 5,000 sq-ft.
9	429.1	Since the local retail water purveyor has a role in compliance with these regulations, they should be given a copy of the Landscape Documentation Package not just the Water Efficient Landscape Worksheet.
10	492.4	Please note that termination of water service is only practical, if there is a dedicated irrigation meter serving the property. And termination of water service would need to be done by the local retail water purveyor, requiring the local retail water purveyor to adopt a policy or ordinance allowing for these penalties for non compliance. Guidance should be developed for the local retail water purveyor regarding these regulations.

If you have any questions, please feel free to contact me at 650-726-4405.

[Cathleen Brennan](#)

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