

I thoroughly object to WELO in it's current and proposed form. The hurdles and extra expense for a rehab project will either discourage people from removing their turf or encourage them to circumvent the process .

I propose you separate new landscaping and rehab rules since the goals are entirely different.

For new landscaping you want to ensure it is done properly and is water efficient. The ordinance should be simplified.

For rehabs you want to reduce water usage no matter how much. So the only question that needs to be asked is "Does this project reduce water use?" If you want to mandate a 25% or 50% reduction that is fine, but make the process easier and cheaper.

The new WELO draft requires any rehab project over 2500 sf obtain a permit and provide documentation for the following:

- Water efficient landscape worksheet
- Landscape design plan
- Soil management report
- Irrigation design plan by a licensed designer
- Grading design plan
- Soil management report
- Soil analysis report
- Certificate of completion
- Maintenance schedule

This is ridiculous and does nothing to encourage people to do the right thing.

WELo places the burden on local jurisdictions to write their own complying ordinance and enforce it, with zero funding. Therefore they are forced to pass on the costs to the landowner. If the state wants WELo, the state should run it and make it as easy and cheap as possible for the landowner.

There are 482 cities, 58 counties and hundreds of water districts in California. This means there are probably over 500 different ordinances attempting to achieve the same goal.

Everything in this document stinks of unnecessary bureaucracy and encourages the landowner to do the wrong thing. Make it simple.