



Land Use Services Department Planning

Tom Hudson
Director

June 26, 2015

California State Department of Water Resources
Urban Water Use Efficiency Unit
ATTN: Julie Saare-Edmonds, Senior Environmental Scientist
P. O. Box 942836
Sacramento CA 94236-0001

Email: Julie.Saare-Edmonds@water.ca.gov

RE: 2015 MODEL WATER EFFICIENT LANDSCAPE ORDINANCE UPDATE

Dear Ms. Saare-Edmonds:

Please consider these comments on the draft update to the Model Water Efficient Landscape Ordinance (WELO). The County supports swift and austere measures to conserve water in the severe drought conditions we now face in California. The following comments and requests are intended to facilitate implementation of the WELO update in a manner that will focus on increasing conservation while minimizing the need to modify operations and create new procedures and tracking and reporting requirements.

1. Please retain the exemption for homeowner-installed landscaping. The original model WELO provided an exemption for up to 5,000 sq. ft. of new landscaping installed by single-family homeowners. The update removes that exemption and decreases the threshold for all landscaping projects requiring a building or landscape permit to 500 square feet. The County does not require landscape and irrigation plans or landscaping permits for homeowner-installed landscaping. If the final model WELO would apply to homeowner-installed landscaping exceeding 500 sq. ft., the County may have to deviate from the model. Otherwise, a major change in our permitting process would be required. This would also necessitate extensive public education about the new permit requirement that would be better spent on water conservation education.
2. Please simplify and streamline reporting requirements to avoid the need to create new reports and new data tracking systems. Building data already collected and reported annually will identify new development being constructed under the new WELO regulations. Tracking the actual square footage of new landscaping would require the County to create a new data collection and reporting system specifically for WELO compliance.
3. Please provide additional guidance for the role of local agencies expected to cooperate with water purveyors to implement conservation measures for existing landscapes exceeding one acre. If the local agency will be expected to enforce landscape and irrigation system modification requirements, this could be a significant code enforcement and administrative burden for the County.

Finally, as always, funding is scarce for implementation on new regulations. Local agencies will need any assistance that may be available to fund the costs of implementing the WELO update, including: training for review and inspection of alternative irrigation systems that utilize rain water or gray water; creation and maintenance of performance tracking systems and enforcement activities of yet unknown scope. If you have any questions or responses to these comments, please contact me at (909) 387-4110 or by email at Terri.Rahhal@lus.sbcounty.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rahhal".

Terri Rahhal
Planning Director

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