

December 17, 2025

Department of Water Resources
Water Use Efficiency Branch
715 P Street
Sacramento, CA 95814

Re: MWELO Triennial Review – Comments on Proposed Updates to the Model Water Efficient Landscape Ordinance

Dear DWR Water Use Efficiency Team:

The California Water Efficiency Partnership (CalWEP) appreciates the opportunity to provide comments on the Department of Water Resources' triennial review of the Model Water Efficient Landscape Ordinance (MWELO). CalWEP is a non-profit organization whose mission is to maximize urban water efficiency and conservation throughout California by supporting and integrating innovative technologies and practices; encouraging effective public policies; advancing research, training, and public education; and building collaborative approaches and partnerships. We work closely with public and private water suppliers, local governments, landscape professionals, and community partners across the state.

CalWEP recognizes MWELO as a foundational tool for advancing outdoor water efficiency statewide. Based on feedback from our members and partners who are actively implementing MWELO at the local level, we offer the following comments and recommendations to support clarity, equity, and effective implementation.

1. Align MWELO with AB 1572 (Non-Functional Turf Restrictions)

CalWEP strongly recommends aligning MWELO with the requirements of AB 1572 related to non-functional turf. In addition to general alignment, MWELO should clearly and explicitly state that no new non-functional turf may be installed on commercial, industrial, institutional, or homeowners association properties. Codifying this prohibition within MWELO would reduce confusion and conflicting interpretations between state and local requirements, particularly for smaller or under-resourced communities responsible for implementation and enforcement.

2. Streamlining MWELO Requirements for Turf Conversion and Replacement Projects

CalWEP encourages DWR to explore opportunities for City & County administrators to streamline MWELO requirements for projects participating in turf removal or turf replacement programs. From the perspective of local agencies and program implementers, permitting fees and administrative requirements can pose meaningful barriers to participation, particularly for low-income residents, small businesses, and smaller or under-resourced agencies.

To reduce these barriers and accelerate landscape transformation, DWR could consider including within the MWELO and encouraging Cities and Counties to provide streamlined pathways for qualifying turf conversion projects, such as exceptions from certain substantive MWELO requirements or categorical exemptions from permitting altogether where projects meet defined program criteria.

3. Clarifying and Updating the Special Landscape Area Definition

CalWEP recommends updating and clarifying the definition of Special Landscape Areas (SLAs) to improve consistency and avoid unintended interpretations during local implementation. Illustrative examples would help ensure that guidelines for SLAs are clearly defined and ensure provisions for SLAs are applied uniformly across the state.

As part of this clarification, DWR could consider providing additional guidance on appropriate and inappropriate SLA uses. This may include explicitly identifying recreational water features, such as pools and spas. Further, establishing guardrails around specific site conditions, such as prohibiting SLAs in parking lots, within a defined distance from public rights-of-way, or on slopes exceeding certain grading thresholds, could help prevent overbroad application and improve statewide consistency. Providing this level of clarity would support equitable enforcement and reduce uncertainty for project applicants and local jurisdictions alike.

4. Supporting Climate-Appropriate Plant Selection Through Complementary Tools

CalWEP supports continued reliance on the Water Use Classification of Landscape Species (WUCOLS) as the foundational resource for landscape water budgeting under MWELO, recognizing its essential role in ensuring consistent, science-based implementation statewide. Complementary tools can strengthen this framework by improving public understanding and application of plant selection principles. For example, through CalWEP's partnership with the California Native Plant Society (CNPS), resources such as Calscape expand access to climate-appropriate, low-water-use plant information across California's diverse regions and help address misconceptions about biodiversity in water-efficient landscapes. CalWEP encourages DWR to recognize such publicly accessible tools as supportive resources within existing water-efficiency frameworks.

5. Recommendation for a Statewide Effectiveness Study

CalWEP recommends that DWR consider sponsoring a statewide study to evaluate the effectiveness of landscape projects designed to MWELO standards by comparing designed water use with actual water use outcomes. The study could include a representative sample of projects across California, encompassing both new construction and renovated landscapes, to better understand how MWELO performs under real-world conditions.

CalWEP further encourages that the study include projects across a range of income levels, climates, and geographic regions. Findings from such an evaluation could help identify best

practices, highlight where MWELo is achieving its intended outcomes, and reveal where additional guidance, resources, or flexibility may be needed. Understanding whether and how capacity or resource constraints influence performance would support data-driven refinements to MWELo and strengthen its effectiveness statewide. CalWEP, in partnership with organizations such as the California Data Collaborative, would be well positioned to support this type of analysis.

CalWEP appreciates DWR's leadership and looks forward to continued collaboration. If you have any questions, please don't hesitate to contact Tia Fleming, Executive Director, at tia@calwep.org or (916) 552-5885.

Sincerely,

A handwritten signature in dark ink that reads "Tia Fleming". The signature is written in a cursive, flowing style.

Tia Fleming
Executive Director, External Affairs
California Water Efficiency Partnership