



# Cal-IPC

California Invasive Plant Council

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CA Dept. of Water Resources  
Office of Water Use Efficiency and Transfers  
Attn: Gwen Huff  
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I am writing to comment on the modified text of the Model Water Efficient Landscape Ordinance. Specifically, our organization is interested in strengthening language defining invasive plants and discouraging their use.

Section 491(x) defines "invasive plant species" as "species of plants that have a tendency to colonize open spaces, riparian corridors and other sensitive habitats." This should more accurately read "species of plants not historically found in California that spread outside cultivation and that damage environmental or economic resources." The section should reference (1) the California Invasive Plant Inventory (maintained by our organization as a list of the non-native plant species that have been shown to have significant ecological impacts in the state—see [www.cal-ipc.org/ip/inventory/index.php](http://www.cal-ipc.org/ip/inventory/index.php)), and (2) state and federal noxious weed lists. Because a later section references "noxious plant species" it would be useful to amend the sentence here that reads "Invasive species may be regulated by county agricultural agencies" by adding "as 'noxious' species." (For future reference, note also that the state's newly created Invasive Species Council, chaired by the CA Department of Food & Agriculture, intends to develop comprehensive lists of invasive species in California.)

Section 492.6(a)(1)(F) recommends "The use of invasive and/or noxious plant species is discouraged." We suggest adding "strongly" before "discouraged." We work with a diverse range of partners, including industry, on preventing additional introduction of invasive plants through horticulture, and the model ordinance should provide clear and solid support for this effort.

Sincerely,

Doug Johnson  
Executive Director