



## County of Sacramento

May 26, 2009

Department of Water Resources  
Office of Water Use Efficiency and Transfers

SUBJECT: QUESTIONS ON MODIFIED TEXT OF PROPOSED REGULATION

1. The County of Sacramento requests the following questions be answered in a timely fashion;
  - a. Preparation for the transition to the revised Water Efficient Landscape Ordinance may take longer than the remaining 7 month period; will the State allow a grace period while municipalities become acclimated to the new ordinance?
  - b. If the County of Sacramento decides to adopt its own landscape ordinance will the State allow a grace period while that County ordinance adopted?
  - c. If the County of Sacramento decides to adopt its own landscape ordinance, what is the submittal process? Whom is the ordinance submitted to?
  - d. The County of Sacramento is interested in obtaining a final copy of the Water Efficient Landscape Ordinance without any strikeouts, italics, or underlines. When will the final regulation text be available? Are there going to be further comment periods?

### Following Comments are from Sacramento County Stormwater Quality Program

**Comment 1.** I suggest adding item 4 to **§ 492 .6 Landscape Design Plan (1)(C)** as highlighted:

*(C) Plants shall be selected and planted appropriately based upon their adaptability to the climatic, geologic, and topographical conditions of the project site. To encourage the efficient use of water, the following is highly recommended:*

1. use the Sunset Western Climate Zone System which takes into account temperature, humidity, elevation, terrain, latitude, and varying degrees of continental and marine influence on local climate;
  2. recognize the horticultural attributes of plants (i.e., mature plant size, invasive surface roots) to minimize damage to property or infrastructure [e.g., buildings, sidewalks, power lines];
  3. consider the solar orientation for plant placement to maximize summer shade and winter solar gain;
- and**



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4. consider pest resistance of plant materials to protect water quality by reducing pesticide use.

Comment 2. I suggest adding language to **§ 492 .6 Landscape Design Plan (3)** to reduce pest harborage associated with mulch near buildings. This is important for reducing pests known to infest buildings that in turn results in otherwise avoidable pesticide use. I've highlighted suggested language.

*(3) Mulch and Amendments*

*(A) A minimum two inch (2") layer of mulch shall be applied on all exposed soil surfaces of planting areas except in turf areas, within 1 foot of building foundations or exterior walls (to reduce harborage and access to buildings for Argentine ants, termites and other structural pests, creeping or rooting groundcovers or direct seeding applications where mulch is contraindicated, .*

*(B) Stabilizing mulching products shall be used on slopes.*

*(C) The mulching portion of the seed/mulch slurry in hydro-seeded applications shall meet the mulching requirement.*

*(D) Soil amendments shall be incorporated according to recommendations of the soil report and what is appropriate for the plants selected (see Section 492.5).*

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Department of Transportation