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Section 491 Definitions:

1. It would be helpful if the term “new landscape” within the *section qq (new construction)* was clarified. The term is not adequately defined and a separate definition would be appropriate.

Section 492.8 Grading Design Plan:

2. A grading design plan is not always needed. Small projects or those with a limited scope of work might use existing record drawings or surveys as a base and address minor grading with simple notes. It is suggested language be added to exempt small or limited scope projects from the requirement of a grading design plan.

Since civil engineers prepare precise grading plans, and they would not likely be familiar with the requirements contained in AB 1881, it is suggested that statements such as “I have **reviewed** the precise grading plan and find it in compliance with the criteria....” be allowed to be signed by the person preparing the landscape documentation package.

Section 493.2 Water Waste Prevention:

3. Add the word “runoff” in *subsection b* after the word “overspray” since the sections below it refer to both runoff and overspray.