



G3, The Green Gardens Group

May 26, 2009

CA Dept. of Water Resources
Office of Water Use Efficiency and Transfers
Attn: Gwen Huff
PO Box 942836
Sacramento CA 94236-0001

I am writing to comment on the modified text of the Model Water Efficient Landscape Ordinance.

Specifically, our organization educates residential landscape design professionals, homeowners, and land stewards (maintenance programs), creating certification programs in sustainable landscape practices that promote both water conservation and low impact development. We work collaboratively with a wide range of non-profit organizations, local government agencies, and water providers, to develop curriculum and certification testing that reinforces the landscape ordinance legislative process.

Please include the following comments, noted in Red referencing the paragraphs as indicated.

The irrigation consultant is referenced as one who can sign the irrigation design plan on Page 22, 492.7 Irrigation Design Plan.

Therefore, a definition of irrigation consultant must be added in definitions. This is critical to the inclusion of landscape designers who are neither architects nor contractors, but who have completed sustainable landscape

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design certification programs and are qualified to consult on irrigation design at residential properties as well as to conduct irrigation surveys of residential properties.

491. Definitions.

(z) "irrigation consultant" means a person who performs professional services such as consultation, investigation, reconnaissance, research, design, preparation of drawings and specifications and responsible supervision, where the dominant purpose of such service is the design of landscape irrigation, in accordance with accepted professional standards of public health and safety.

If certified irrigation auditors are authorized by legislation to conduct irrigation audits, then the following must be authorized explicitly as well:

492.12 & 493.1 Irrigation Audit, Irrigation Survey and Irrigation Water Use Analysis (new and existing landscapes). An irrigation consultant may conduct irrigation surveys and irrigation water use analysis.

492.5 Soil Management.

We understand that biological testing is a critical part of remediating a site for optimal soil health. The following should be inserted into the requirements for soil management report:

7. biological assay to determine diversity and quantity of beneficial soil microorganisms.

We agree with Doug Johnson of Cal-IPC in his assessment of the invasive plant section of the ordinance.

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), 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.”

Thank you for considering these comments.

Sincerely,

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