Colvin, Judith

From: mweo-bounces@water.ca.gov on behalf of Patrick Larkin [plarkin@RSABG.org]
Sent: Thursday, March 27, 2008 5:00 PM
To: mweo@water.ca.gov
Subject: [MWEO] AB 1881 Comments

Dear Ms. Colvin,
Rancho Santa Ana Botanic Garden (RSABG) is the largest garden in California dedicated to advancing the use and knowledge of California's native flora. For more than 80 years, we have been extolling the virtues of California native plants, and their use in water efficient, ecologically sound landscapes.
RSABG supports the overall goals of AB1881, but have concerns about several of the unintended consequences it might have.

Requiring landscape architects do much of the work, when as a group they are often not the best choice, I believe is problematic. Landscape and garden designers often do equal or better work - especially for home owners. There are also cases where ecologists are much more appropriate choices for landscape projects. There should be here as there is in other parts of the ordinance with wording such as "a licensed landscape architect or a qualified designer, contractor, botanist, horticulturist, ecologist or other appropriate professional."

There does not seem to be recognition in this document that water use may increase during the establishment period (1 to 3 years) of a drought tolerant landscape. After that establishment period, the landscape would then be more efficient, and recognition of that is vital.

The ordinance is predicated on a false notion - that ET rates are stable and uniform. Or that these numbers can be directly applied to a wide array of landscapes. This is not at all true. Nearly all the CIMIS numbers are based on turf - not LANDSCAPES or GARDENS which are much more complex systems. This is a difficult problem to solve, and a number of people (particularly at UC) are trying to solve.

Page 1
490.1. (d) - Saying "replacing ecosystems lost to development," is not the best word choice. I would think that "RESTORING" would be a much better concept as it implies that the "replacement" would be with the appropriate native plants and therefore more sustainable.

Page 4:
490.3.2.(c) Since so much of California's riparian vegetation has been destroyed, and riparian restoration projects are very common throughout the state and are desirable, is the enforcement of this ordinance going to jeopardize these water requiring landscapes if they do require ongoing irrigation systems?

Page 17
492.7 Soil Management Plan.
Nearly ALL soil nutritional reports are done with crops or turf as the baseline, and with the assumption that "amendments" will be needed. What would be much more appropriate and sustainable is to say, based on the soils report, this is what you can grow here without

additional inputs to the landscape system.

Page 18
492.8.1 (a) (2) (A)
With reference to Sunset Western Garden book climate zones: It should be noted that with climate change, all the zones are changing. This phenomena is well documented.

Finally, I would ask that there be an exception made for botanic gardens. These institutions hold some of the most rare of plants species in the world, and the ordinance could put these invaluable collections at risk.

Thank you for your attention.

Patrick S. Larkin, Executive Director
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