

**MWEO**

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**From:** Joyce Dillard [dillardjoyce@yahoo.com]**Sent:** Monday, December 29, 2008 2:30 PM

Comment 032.1

**To:** MWEO**Subject:** Comments due 12/30/2008 to Model Water Efficient Landscape Ordinance

Notice of Modifications to the Proposed Regulation (Model Water Efficient Landscape Ordinance) to California Code of Regulations, Title 23 Section 490-495

No where do we see that you have addressed landscaping needs in hillside areas that are still open to wildlife and aviary inhabitation. When (home) building comes in and walls are erected, those wildlife corridors are stopped. There is no planning for these wildlife corridors to remain somewhat intact.

The wildlife depends on the natural plants and trees with some modification of those trees planted 100 years or so ago. These areas of hillside easily equal 2,500 square feet plus.

Even by putting drought tolerant plants, the animals' source of food may be exhausted. In my hills alone (Repetto Hills, Los Angeles ) we understand that there has been a loss of approximately 16 species of birds.

When the food source (plants, grasses, and trees) disappear and the animals migrate for such food, then other issues such as rodent population increases occur. Also, pets are endangered because they become a food source.

Water needs for wildlife need proper analysis and consideration which is not a part of this document. There can be natural trails in wildlife areas. In my area in Los Angeles , some of these trails are the original Spanish trails during settlement.

The local agencies tend to bypass the natural landscape because of tax increases of building. The loss of a natural habitat does affect water.

Natural Community Conservation Plans do not exist in the County of Los Angeles . Some type of requirement is needed to address natural watersheds and the retention. The other option is costly propositions or bonds, when proper planning is all that is needed.

Endangered, formally and informally, local species of trees and plants need recognition

You have not addressed agriculturally zoned land in city boundaries. We have such zoning in the City of Los Angeles , but no farming or other related agriculture activities take place on the land.

Water conservation needs to also be tied into Flood Management. What analysis is required to retain runoff on undeveloped hillsides or partially developed hillsides in a liquefaction, methane or landslide zone?

We have commented on before, on other water issues, that water and watershed need to be incorporated in the term "Ecoregion." Missing is the identification of the total picture and not

just the parts.

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