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California Department of Water Resources  
Urban Water Use Efficiency Unit  
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RE: Comments on the Proposed Revised State Model Water Efficient Landscape Ordinance (WELO)

Dr. Saare-Edmunds

The US Composting Council applauds your updated Model WELO. Widespread adoption will certainly help as part of realigning our landscapes with current and future drought conditions. With that in mind we offer the following comments.

Definition of compost.

We note that compost is not defined, and offer this definition: The safe and stable product of controlled biologic decomposition of organic materials that is beneficial to plant growth.

Compost Incorporation Requirements

Rather than the one-size-fits-all approach of 4 cy/1000 sq. ft, as detailed in §492.6(a)(3)(C), regarding compost incorporation prior to planting landscape installation, we encourage a more nuanced approach, as exemplified in Washington State's BMP T5.13, Post-Construction Soil Quality and Depth. Key features of this BMP are that it differentiates between turf areas and planting beds, the latter requiring twice the level of organic matter (OM) as the former, and in giving the installer three options:

- Use a pre-approved application rate, like has been proposed in the revised Model WELO, except that in addition to turf requiring 4 CY/1000sf, planting beds would require 8CY/1000 sf
- Calculate the amount of compost that is needed to meet the required OM level based the existing OM
- Demonstrate that the existing soil already meets the required OM levels

The details of the Washington BMP can be found at [http://soilsforsalmon.org/pdf/Soil\\_BMP\\_Manual.pdf](http://soilsforsalmon.org/pdf/Soil_BMP_Manual.pdf). We also strongly recommend that all compost come from permitted compost facilities, as that assures that the compost has met strict limits on pathogens and other safety parameters.

The US Composting Council (USCC), a 501(c)6 Trade and Professional Association, is the only national organization in the United States dedicated to the

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development, expansion and promotion of the composting industry. The USCC has over 800 member companies, including private and municipal compost producers, equipment manufacturers, product suppliers, academic institutions, public agencies, nonprofit groups and consulting/engineering firms.

We appreciate the opportunity to comment of the Model WELO, and would be happy to answer any questions you may have.

Regards,



Alfred Rattie  
Interim Executive Director