



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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Ms. Julie Saare-Edmonds
California Department of Water Resources
Urban Water Use Efficiency Unit
P.O. Box 942836
Sacramento, CA 95814

Update of the State Model Water Efficient Landscape Ordinance (Per Governor's Executive Order B-29-15)

Dear Ms. Saare-Edmonds:

Thank you for providing the California Department of Resources Recycling and Recovery (CalRecycle) the opportunity to comment on the California Department of Water Resources (DWR) update of the State Model Water Efficient Landscape Ordinance (MWELo) (per the Governor's Executive Order B-29-15).

CalRecycle's mandate is to promote diversion of organic materials from landfill disposal and the recycling or reuse of the diverted material to the highest end use, which includes application of compost and mulch.

CalRecycle recommends the following revisions:

§ 490. Purpose

(c)(4) Protecting air and water quality by reducing power equipment use and landfill trips, selecting locally sourced materials, and using compost, mulch and efficient irrigation equipment to prevent erosion.

§ 492.6 Landscape Design Plan. (3) Soil Preparation, Mulch and Amendments

(C) Soils with greater than ~~25%~~ 6% organic matter in the top 6 inches of soil are exempt from ~~adding the~~ compost incorporation requirement.

(G) Organic mulch materials made from recycled or post-consumer materials shall ~~should~~ take precedence over inorganic materials and organic materials made from virgin forest products, ~~in instances where it is suitable, ecologically possible, and the material does not pose a fire hazard~~ unless the recycled post-consumer organic materials are not available within the same distance as virgin materials. Organic mulches are not required in fire hazard zones if prohibited by fire authorities. ~~Composted organic material, in particular that which includes post-consumer material, should be considered over more compacted products such as bark, wood chips, etc.~~

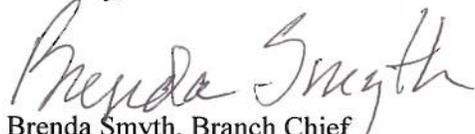


§ 492.11 Landscape and Irrigation Maintenance Schedule

(b) A regular maintenance schedule shall include, but not be limited to, routine inspection; adjustment and repair of the irrigation system and its components; aerating and dethatching turf areas; replenishing mulch; fertilizing; pruning; weeding in all landscape areas, and removing any obstruction to emission devices. It is recommended that a regular maintenance schedule include periodic application of compost topdressing if the top 6 inches of soil contains less than 6% organic matter. Operation of the irrigation system outside the normal watering window is allowed for auditing and system maintenance.

We hope that these recommendations can be added to the MWEL0 and look forward to continuing our collaborative efforts to strengthen and protect our California landscapes. If you have any questions, please contact Brian Larimore at (916) 341-6579.

Sincerely,



Brenda Smyth, Branch Chief
Statewide Technical and Analytical Resources Branch