



CALIFORNIA
NATIVE PLANT SOCIETY

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June 18, 2015

Ms. Julie Saare-Edmonds, Sr Environmental Scientist
Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
PO Box 942836
Sacramento, California 94236-0001

Dear Ms. Saare-Edmonds:

The California Native Plant Society (CNPS) applauds the Department of Water Resources work to update and improve the Model Water Efficient Landscape Ordinance. CNPS has reviewed the Model Water Efficient Landscape Ordinance public draft dated June 12, 2015 and generally concurs with the proposed regulatory changes proposed in this document. However, we believe the regulatory package can be improved in several critical aspects. These changes will increase the technical information available to homeowners, landscape professionals, and local enforcement agencies regarding the water saving attributes of California native plants, and reduce the environmental impact of the proposed regulations on native pollinators and beneficial insects.

The Society urges the Department to adopt the regulatory package with additional modifications in three areas.

- i. Not all California native plants that are suitable for horticulture purposes have established WUCOLS. CNPS has 50 years of native plant conservation, restoration, and advocacy experience. CNPS and many member plant scientists and biologists are uniquely qualified to establish WUCOLS for California native plants. Therefore, two changes are recommended.

Section 491 (ddd)

"... Plant factors may also be obtained from horticultural researchers from academic institutions, **the California Native Plant Society for California native plants**, or nursery industry professional associations as approved by the California Department of Water Resources (DWR)."

Section 492.4 (b)(1)

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