



California Association of Nurseries and Garden Centers

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RE: Draft Model Efficient Landscape Ordinance

The California Association of Nurseries and Garden Centers (CANGC) is the only organization in California that represents the entire nursery sector. Our 300 members range from growers to retailers which support the entire supply chain to the nursery and landscape industries. In addition, we have certified over 4,000 California Certified Nursery Professionals through an in-depth training and testing program. The CANGC has represented the nursery industry for over 100 years.

We commend the Department of Water Resources for their efforts in updating the ordinance and appreciate their engagement of the industry during the process. We understand that this is a difficult task. Following are our comments in regards to the ordinance.

In general, we believe that the ordinance should only address water and avoid other areas that may be related to landscape or landscape design. Specifically, language in regards to pesticides – we have the CAL EPA and the Department of Pesticide Regulation (DPR) which specifically deals with pesticide use, label approval and certified applicators. We believe there should be no reference to pesticides in the ordinance and that this responsibility remains with DPR.

In addition there should not be references to reducing power equipment usage, specific application or products. While proper application of mulch and fertilizer in landscapes is critical to increasing watering efficiency, this is a water ordinance and items like pesticides, equipment, plant foods and plant selection should not be included or referenced.

We also believe that the ordinance should not eliminate the use of any plant or plant category in specific applications. Specifically the ordinance does not allow turf in medians; we believe that it should define grasses for use in medians as native grasses, drought tolerant grasses, no mow grasses, clumping ornamental grasses. We do not agree with the requirement for no turf in medians.

There is a general concern on recommending a whole system watershed approach to landscapes of any size. Granted, this is just a recommendation, but this could be misrepresented and could cause individuals to seek a landscape architect or water professional for small projects. The reference to minimal supplemental water could be interpreted to mean landscapes that need little irrigation. We agree with the need to reduce water usage but should avoid the directive to eliminate.



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In regards to mulch, the definition of mulch should also include recycled rubber mulch. Composting should not be considered a weed suppressing top dressing but as an amendment. In our professional opinion composting does little for weed suppression and mulch is significant in reducing evaporation rates.

We oppose the requirement for a dedicated landscape water meter because it would not allow for a choice in where people choose to conserve water, indoors as well as outdoors. This sounds like a control factor specific to outdoor water use and that could be an expensive requirement when water meters in general are already mandated.

There is also confusing language in the use of the term non-volatile memory – there are multiple definitions in regards to this term and it should not be utilized to avoid confusion.

We agree in the need to utilize recycled water, but we are far from possessing a mature technology and believe that we need to study this area more to understand the optimum landscape application.

We appreciate the opportunity to comment and welcome further discussion on the ordinance. Individuals at different stages of their lives have unique requirements. We do not want to see an ordinance that restricts a young family from having grass in the yard for their children and pets to play on or medians that serve as spaces where people stand or board public transportation or other specific needs. Crafting the ordinance in such a way that Californians do not abandon their landscapes entirely is critical. Landscape watering bans are counterproductive as they contradict long-term conservation goals by destroying established landscapes that will eventually be replaced. Moving from planted landscapes to paved hardscapes also increases runoff and reduces the permeable surface area that allows rainwater to percolate into the ground and recharge aquifers.

Respectfully,

Chris Zanobini
President