

June 26, 2015

Ms. Julie Saare-Edmonds, Senior Environmental Scientist
California Department of Water Resources
Urban Water Use Efficiency Unit
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Saare-Edmonds:

The Landscape Architects Technical Committee (LATC) is pleased to have the opportunity to comment on the proposed changes to the Model Water Efficient Landscape Ordinance.

LATC is concerned that the regulations as drafted will cause confusion among consumers, contractors, agencies, etc. The Landscape Architect Practice Act clearly defines the professional services that may be provided by landscape architects, as well as the "exempt area of practice" for unlicensed individuals. The proposed regulations require professional services that can be beyond the exempt area of practice. Should unlicensed individuals provide such services, consumers may be put at risk, as unlicensed individuals do not possess appropriate education, experience, and knowledge (as verified via a valid occupational examination developed pursuant to established national psychometric standards) to protect the public health, safety, and welfare. Accordingly, we urge the Department of Water Resources (DWR) to modify the proposed language to be consistent with current statutory provisions commencing with Business and Professions Code section 5615 et seq.

LATC is also aware that industry technical experts have reported that the standards in the regulations are such that compliance may be difficult if not impossible to adhere to. DWR may wish to hold a special workshop or use some other means to collect additional feedback as to the technical standards defined in the regulations.

Thank you, again, for the opportunity to comment. Should you have questions, please feel free to contact Executive Officer Doug McCauley at (916) 575-7230

Sincerely,



ANDY BOWDEN
Vice Chairman