



June 25, 2015

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

Dear Julie

Thank you for the opportunity to offer my comments on the June 12, 2015 Public Draft of the updated Model Water Efficiency Ordinance (MWELO). I have read through the draft and my comments are on the next pages. If you have any questions or wish to discuss my concerns, please contact me at 760 889 2902 or nsterman@plantsoup.com.

Thank you

Nan Serman

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Section	Comment
490 (b) (2)	<p>Please define the clause “...that requires cross-sector collaboration to achieve the many benefits possible”</p> <p>What is “cross sector collaboration?” Which sectors? What kinds of collaboration?</p> <p>What benefits are being referred to by “the many benefits possible?” Who is benefitting? Are the watersheds benefitting? The property owners? Contractors? Collaborators (and who are the collaborators?)? Because these terms are vague and undefined, they will be difficult to fulfill, enact, and evaluate.</p>
490 (c) (5)	<p>Here, or somewhere else in this document there needs to be a provision that says that local water agencies need to allow a reasonable amount of time for the new landscapes to be installed and become established, up to 12 months for installation, and up to 24 months for establishment (especially for trees). One of the big issues at the moment is that with all the turf replacement rebate programs happening, the timelines agencies set for project completion are impossible to meet, and once we get into the hot months of the year, it is inadvisable to install new plants.</p> <p>In addition, part of encouraging the shift from high water landscape to lower water landscapes necessitates that water agencies offer special dispensation to people who are swapping out their landscape “to do the right thing,” and need 2 years of higher irrigation in order to establish the lower water plants to the point where irrigation can be reduced or totally eliminated.</p>
491 (III)	<p>How broadly is the term “design review” being applied? Is this a permitting design review or an HOA or CCR design review?</p>
492.6 (1) (G)	<p>“Avoid fire-prone plant materials” is a slippery slope. Several years ago, I looked into plant flammability and found that there is NO scientific research into plant flammability. All plants burn at some point but no scientist or agency has done the research to determine which are more, or less fire prone than others.</p>
492.6 (1) (H)	<p>I suggest including a reference for the invasive plant species. The Cal-</p>



	IPC list is the most universally acknowledged and referred to in the state. There are regional lists that are easy to access, and though they are in dire need of updating, they are extremely useful.
492.6 (1) (I)	Discourage the replacement of live plants with artificial turf or other non-living surfaces that do not offer the ecosystem services of living plants such as consuming CO2, generating oxygen, cooling the air, alleviating global warming, improving air quality, etc.
492.6 (3) (A)	This clause is unnecessary except for severely compacted soils. Not all plants require “friable” soils. In fact, natives and other Mediterranean climate plants prefer unamended soils.
492.6 (3) (C)	This clause is unnecessary except for severely compacted soils and those that result from cut and fill grading. Low water native and Mediterranean climate plants need very little organic matter in soils and in fact too much organic matter can be detrimental to their health.
492.6 (3) (G)	This statement is too broad a brushstroke. The suitability of an organic or inorganic mulch depends completely on the plant materials themselves. Organic mulches can harm succulents, for example. Non-succulents do fine with either organic or inorganic mulches. Unless the issue here is reflected heat of inorganic mulches, but that should be dealt with directly, elsewhere in the ordinance.
Appendix C, Certification of Completion: Part 2, CERTIFICATION OF INSTALLATION ACCORDING TO THE LANDSCAPE DOCUMENTATION PACKAGE	Please confirm that landscape designers can sign this certification

