

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)

“Plant factors may be obtained from horticultural researchers with 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).”

- II. The use of mulch is strongly recommended by CNPS. However, native pollinator species, including many species of native bees, as well as other beneficial insects, require bare soil to make their homes. Designated bare soil areas incorporated into landscape plans provide habitat for these species. Therefore, two changes are recommended.

Section 492.6 (a)(3)(D)

“A minimum three inch (3”) layer of mulch shall be applied on all exposed soil surfaces or planting areas except in turf areas, creeping or rooting ground covers, **areas designated as habitat for native pollinators and beneficial insect**, or direct seeding applications where mulch is contraindicated.”

Section 492.6 (b)(6)

“Identify type of mulch, (***Delete and***) application depth, **and area(s) designated as habitat for native pollinators and beneficial insects;**”

- III. California is home for a large number of drought tolerant, native trees. The proposed regulation recognizes the important, water conserving role native plants provide and the same recognition is warranted for California native trees. Therefore, one change is recommended.

Section 492.6 (a)(1)(A)4.

“Selection of trees, **especially local native varieties**, based on applicable local tree ordinances or tree shading guidelines ...”

Or

Section 492.6 (a)(1)(A)2

“Selection of water-conserving plant, **tree** and turf species, especially local native plants;”

Thank you for the opportunity to participate in the process of updating the Model Ordinance and for considering these additional provisions. Please let us know if we can provide additional information or if you have any clarifying questions.

Sincerely,

Dan Gluesenkamp
Executive Director