



AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS

CALIFORNIA COUNCIL
AMERICAN SOCIETY OF
LANDSCAPE ARCHITECTS

March 13, 2016

Ms. Julie Saare-Edmonds, Senior Environmental Scientist and ITP Project Manager
Department of Water Resources - Water Use and Efficiency
Landscape & Green Building Programs
Julie.Saare-Edmonds@water.ca.gov

RE: Independent Technical Panel (ITP) Report to the Legislature, Recommendations Report to the Legislature on Landscape Water Use Efficiency

Dear Ms. Saare-Edmonds:

The California Council, American Society of Landscape Architects (CCASLA) respectfully submits the following additional comments, suggestions, and recommendations regarding the ITP's Report to the Legislature, *California Landscape Water Use – A Framework for the Future* (the Report). These comments should be considered supplemental to our letter dated March 11, 2016.

CCASLA Suggests amending the Report as follows:

1. General: Include a brief list of commonly used definitions at the beginning of the ITP report.
2. General: Suggest changing the term "sustainable" to "more sustainable" in almost every usage in document. Reasoning: An argument can be made that just using less water in a landscape is not in and of itself a clear definition of "sustainable".
3. General: The definition of "watershed approach" is weak. We suggest possibly devising another term, perhaps "resilient." Reasoning: Confusing. A watershed is an area or ridge of land that separates waters flowing to different rivers, basins, or seas. It is also an event or period marking a turning point in a course of action or state of affairs, i.e.: "these works mark a watershed in the history of music". The document uses the term four times and only in the last usage does it give a semi-definition (Section 8, Recommendation 1, second paragraph) as (i.e., to enhance on-site rainwater infiltration). If the document is intending to say "rainwater infiltration" or "reducing supplemental potable irrigation," it should say that as such, not the lofty "watershed approach". Another issue with using the term "watershed approach" to describe landscape design is that the term, as proposed, could be implied to suggest that all water utilized for irrigation purposes would be locally sourced. It is safe to assume that throughout California, this

is not the case. A better approach could possibly be to redefine the term so that it becomes clearer that within a particular watershed, as classically defined, that planting and irrigation should be focused on simulating the environmental conditions typically found in that specific geographic location, e.g. annual/seasonal rainfall patterns, native plant palette, typical soil conditions, etc.

4. General: Define "Hydrozone Map."

5. Section 5, Recommendation 1, Item (7): Change "Notation if inspection is limited to snow or ice." to: "Notification if inspection is limited due to inclement weather or other reason."

6. Section 6, Recommendation 1, MWELo Table Item 4: Remove the "spray irrigation" and "overhead spray" from text. Reasoning: Confusing. It is TURFGRASS SLOPE that is being referenced here, not the method of irrigation. Case in point; overhead rotary and rotor irrigation can water turf slopes of 25% without runoff. We would also suggest leaving the maximum slope at 25%. Other recommendations within the updated MWELo regulations address irrigation adjacent to impermeable surfaces. Many existing landscapes include turf areas with slopes greater than 10%. It would be difficult at best to address all of these turf areas given that there is no empirical evidence that slope areas greater than 10% are creating any significant problem.

7. Section 7, Recommendation 5: Plant Labeling. Labeling each container or plant at the smaller container sizes such as 1 gallon cans, seems like an excessive use of plastic. Perhaps one label per 100 (1) gallon containers would be better. For on-site post installation inspection, require that a minimum of one plant be labeled in each plant species group.

8. Section 8, Recommendation 1: Business license requirements for landscape architects already cover the educational requirements needed to understand and implement MWELo. Suggest creation of an OPTIONAL Certificate Program for landscape designers and other landscape professionals who want/need to show competency in MWELo implementation. This program should be developed in strict coordination with the State's consumer protection agencies and within current consumer protection law.

Please feel free to contact me at (619) 916-6956 should you have any questions or wish to discuss CCASLA's thoughts on these matters.

Sincerely,



Jon Wreschinsky, PLA, ASLA
Government Affairs Liaison, CCASLA