



**WATER
MANAGEMENT
CERTIFICATION
PROGRAM**

~~December 3, 2015~~
December 3, 2015

Proposed CBSC Changes of Emergency
Building Standards
Page 1 of 2

BSC EF 01/15 15 day
Public Comment

December 3, 2015

STATE OF CALIFORNIA
GOVERNMENT OPERATIONS AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833

RECEIVED
2015 DEC - 9 A 11: 21
CALIFORNIA BUILDING
STANDARDS COMMISSION

**RE: 15-Day Public Comment Period for Model Water Efficient
Landscape Ordinance (MWELo) Emergency Building Standards**

Dear CA Building Standards Commission,

The California Landscape Contractors Association has always supported the Model Ordinance's overall approach to landscape water conservation, going way back to the Water Conservation and Landscape Act of 1990.

We especially liked its predominately performance approach, which encourages creativity and variety as well as the use of existing technological innovations. We believed that the landscapes it envisioned—those of an average plant factor of 0.5—were reasonable. Landscapes with a possible mix of 1/3 low-water-use plants, 1/3 medium-water-use plants and 1/3 high water-use-plants seem to strike an appropriate balance between the need to save water and maintaining the quality of life in our state.

Given our approval of the Model Water Efficient Landscape Ordinance (MWELo), we would like to applaud the California Building Standards Commission (CBSC) for the emergency changes made to building standards in response to the ongoing drought. More specifically, mirroring MWELo provides an uncomplicated temporary solution for not only enforcement, but for our members already familiar with the current ordinance. So many times, our members become confused with the many updates and changes



WATER MANAGEMENT CERTIFICATION PROGRAM

December 8, 2015

Proposed CBSC Changes of Emergency
Building Standards
Page 2 of 2

made to existing codes. Referring to one standard for all makes building easier for all of our contractor members.

We know the state is still in a drought emergency. We understand more must be done to cut landscape water use. We feel that these amended changes to the building standards are a step in the right direction towards a more streamline solution to water-efficient irrigation installation projects. We fully support the proposed changes presented.

CLCA

CLCA is a nonprofit trade association of licensed landscape and landscape-related contractors. Also included among our approximately 2000 members are landscape suppliers, landscape architects and designers, public officials, educators and students.

Yours sincerely,

DAVID SILVA CWM, QWEL
Water Certification & Resource Management Manager

cc: Governor Edmund G. Brown, Jr.
CLCA Executive Director Sandra Giarde, CAE
CLCA Board of Directors
CLCA Resource Management Committee
CLCA Legislation Committee