

BSC 07/12 - HCB 04/12



October 15, 2012

Mr. Michael L. Nearman
Deputy Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Eliminate Invasives Species Planting in CALGreen Code

Dear Mr. Nearman:

We are writing to request that the Commission to include a provision within the proposed 2013 edition of the California Green Building Standards Code, Title 24 Part 11 (CALGreen) that calls for avoidance of invasive species plantings for permitted construction projects covered by CALGreen. This should apply to both the Residential and Non-Residential new construction and additions/alterations portions of the code.

Invasive species pose a plethora of risks to California's dynamic native species, some of which are either classified threatened or endangered due, in part, to the unchecked proliferation of invasives planting throughout the state. However, there are multiple additional compelling reasons to avoid invasive plants that include:

- **Increased green waste.** Invasives grow fast, spread beyond their original planting areas, and result in greater amounts of green waste than non-invasive species that often requires the use of herbicides classified as hazardous waste to effectively eradicate.
- **Costs.** In California, the cost of control, monitoring, and outreach is estimated at \$82 million annually and does not take into consideration additional indirect costs such as increased severity of wildfires and floods, loss of productive range and timber lands, reduced land values, and damage to infrastructure.
- **Additional statewide environmental impacts.** This includes increased frequency and intensity of fire regimes in California, altered soil composition, lack of dissolved oxygen in waterways, changes to natural hydrologic cycles, and threatened wildlife.

We believe invasive plants should be avoided for all newly constructed landscape areas. Avoiding invasive plants via the building code is effective and low-cost, and fits within the scope statement of Title 24, Part 11, Sections 4.101 and 5.101: "...to protect, restore and enhance the environmental quality of the site and respect the integrity of adjacent properties."

For these reasons, we urge you to include a mandatory measure that does not allow for the planting of invasive species in the finalized CALGreen code.

Sincerely,

Joe Liszewski
California ReLeaf