

September 7, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



*Sent via email*

Dear Jeanine,

I am providing the attached comments on the draft General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) on behalf of the Bay-Friendly Landscaping & Gardening Coalition. Bay-Friendly Landscaping & Gardening is based on 7 guiding principles and 55 specific practices that foster soil health, conserve resources, and reduce waste and pollution. The 7 guiding principles are: Landscape Locally, Less to the Landfill, Nurture the Soil, Conserve Water, Conserve Energy, Protect Air & Water Quality, and Create & Protect Wildlife Habitat. The cornerstone of the Bay-Friendly system is the Bay-Friendly Rated Landscape program, a third party rating system used to ensure that landscapes meet or exceed the requirements of a sustainable landscaping rating scorecard currently in widespread use in Alameda County, and now spreading regionally. Bay-Friendly Rated Landscapes have low water consumption and reduce or avoid the use of synthetic fertilizers and pesticides. Specific design features and maintenance practices are known to reduce suspended sediment in runoff and associated toxic chemicals.

Over the past few years, Bay-Friendly Landscaping & Gardening has increasingly been incorporated into the planning and regulatory framework of the Bay Area. The Board explicitly listed Bay-Friendly Landscaping as a Best Management Practice in its 2009 Municipal Regional Stormwater NDPES permit. In addition, the Central Valley RWQCB includes Bay-Friendly Landscaping in the East Contra Costa County Municipal NDPES Permit. The use of Bay-Friendly practices also implements key provisions of the TMDL for Diazinon and Pesticide-Related Toxicity in Bay Area Urban Creeks. The Bay-Friendly Coalition is eager to explore new opportunities to leverage Bay-Friendly tools and resources to help meet the Board's goals and objectives.

Thank you for your consideration of you comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Anne E. Cook".

Anne Cook  
Executive Director, Bay-Friendly Landscaping & Gardening Coalition  
(510) 859-8026

## The Bay-Friendly Landscaping & Gardening Coalition’s Requested Changes to the Draft Fact Sheet:

### Section IX. Program Elements, Pollution Prevention/Good Housekeeping for Permittee Operations

1) Page 25, paragraphs 5 and 6, insert the following sentences and footnote, shown in redline below.

Resource-sensitive landscaping practices such as integrated pest management (IPM), climate appropriate plant selection and irrigation, and mechanical (nonchemical) removal of unwanted plants are required under this General Permit. The use of other landscaping practices, such as mulch and compost, minimizing chemical inputs (pesticides, herbicides, and fertilizer), emphasis on maintaining and enhancing soil quality, and erosion control is required. **The Permittee is encouraged to use Bay-Friendly Landscaping Practices<sup>1</sup> or equivalent.** The Order recognizes the storm water quality benefits that will likely result from implementation of the Water Efficient Landscape Ordinance required under AB 1881.

#### *Training and Education*

Training and educating municipal and contracted staff is also required and an important component of the storm water management program to ensure that everyone is knowledgeable and proficient in the newest and most effective approaches to minimizing pollutant discharges from municipal facilities and activities, **and may include training opportunities such as Bay-Friendly Landscape Maintenance Training & Qualification Program.**

- 1 **For example, “meet or exceed the minimum requirements on the Bay-Friendly Rated Landscape Scorecard”[www.BayFriendlyCoalition.org](http://www.BayFriendlyCoalition.org).**

## The Bay-Friendly Landscaping & Gardening Coalition’s Requested Changes to the Draft Tentative Order

### Section E.5.b. Public Outreach and Education, Implementation Level

1). Page 27, insert the foot note after subsection (i), shown in redline

- (i) Technical and financial assistance and implementation guidance related to storm water-friendly landscaping<sup>15</sup>;

<sup>15</sup> For example, Surfrider’s Ocean Friendly Garden Program (<http://www.surfrider.org/programs/entry/ocean-friendly-gardens>) **and the Bay-Friendly Landscaping & Gardening Coalition's Landscaping & Gardening Program (<http://www.bayfriendlycoalition.org/bflguidedetail.shtml>)**

### Section E.9.j. Pesticide, Herbicide, and Fertilizer Application and Management, ii Implementation tasks

2). Page 53, insert the redline footnote and additional text, shown in redline

- (1) Implement educational activities<sup>1</sup> and require permits, certifications, and other measures for municipal applicators and distributors.
  
- (2) Implement integrated pest management measures that rely on non-chemical solutions and incorporates other **appropriate sustainable landscaping practices and programs such as Bay-Friendly Landscaping (For example, “meet or exceed the minimum requirements on the Bay-Friendly Rated Landscape Scorecard, [www.BayFriendlyCoalition.org](http://www.BayFriendlyCoalition.org))”** including:

**<sup>1</sup> For example, training such as Bay-Friendly Landscape Maintenance Training & Qualification Program.**