

May 3rd, 2022

Re: City Council May 3, 2022 Agenda Item: 6.1 Revisions to the City of San José's Water Efficient Landscape Ordinance

Dear Mayor Liccardo and Council Members,

We appreciate the proposed amendments to the Water Efficient Landscape Ordinance that aim to be more water conscious, remove invasive species, and promote environmentally friendly landscaping. Thank you for posing limitations on hardscaping, which is a large contributor to the urban heat island effect and to the pollution of stormwater runoff. Please consider a stronger emphasis on native plants and adding a limitation on lighting.

There are countless low-water native plants and shrubs that could be used in landscaping. Please only emphasize native plants and remove the broader emphasis of "non-invasive" plants. Habitat value should be a key consideration for plantings and "non-invasive" plants do not guarantee local habitat promotion. Native plants provide habitat for other native wildlife, including pollinators such as birds, bees, and butterflies.

Additionally, please provide lighting standards that reduce light pollution, prevent bird collisions, and protect insects, plants, and wildlife. These should include: lighting should only be used when and where necessary for public safety, all lighting fixtures should be shielded downward and light only what they are meant to, lighting should be as dim as possible to reduce glare and unnecessary brightness, and all lighting fixtures should have a correlated color temperature of 2,400 Kelvin or below¹.

¹ <u>https://www.darksky.org/our-work/lighting/lighting-principles/</u>, <u>https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1002/fee.2029?af=R</u>, and <u>https://www.pnas.org/doi/full/10.1073/pnas.2101666118</u>

If you have any questions, comments, or requests for further information, please reach out to <u>advocate@scvas.org</u>.

Thank you for your consideration,

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