

TO: BOARD OF DIRECTORS  
DATE: May 29,2020

RE: DESIGN GUIDELINE LANDSCAPE REVISIONS WHICH MAY,

A. UNNECESSARILY INCREASE RESIDENT IRRIGATION ...

DESPITE, FORECASTS OF DROUGHT,  
WATER SHORTAGES AND STRICT RATIONING \*

B. INCREASE POTENTIAL FIRE FODDER ...

DESPITE, BORDERING A TIER 2 FIRE HAZARD AREA \*\*

With all due respect, in view of the above 'A' and 'B' concerns I would like to know our recently elected BOD's thoughts, regarding the DG2020 directives for private yard area not seen by the public, to now attain '*at least 50%*' live matter ground coverage using new plant counts up to several times the former DG2000 minimum for all SCLH model type interior back yards ....

in conjunction with substantial DG2017 escalations for all SCLH front yards.

My own back yard plant count has gone up ten-fold; my front yard 'required' plant count is nearly four times our former DG2000 minimum, even with DG2020 reduction from '*8 plants per each 100 sq ft*' per DG2017, to '*7 plants*'. \*\*\*

## SPECIFICALLY

1. Why, escalate SCLH front and back yard minimum live matter ground coverage to 50% (fifty-percent), with no apparent consideration for this community's prolonged drought era, or, for a predicted, very dry future posing strict water rationing and serious wildfire risks ....?

*See 'Why has HOA Increased our Mandatory Live Matter?' below.*

2. Why, even consider escalating the DG2000 plant count for SCLH front and back yards, when virtually any percentage goal for live matter coverage for any size plantable area, attaining any desired landscape density, is readily achieved by monitoring the DG2000 minimum-plant-count's expected growth data found on our *SCLH Approved Plant List* ....?

*See 'How to Monitor Expected Coverage' below.*

3. Why, was the SCLH DG2000 landscape plan design strategy -- incorporating the DG Section 6 esthetics while monitoring selected plant coverage sq ft to achieve all ARC-DG live matter coverage goals -- replaced, with trying to accommodate ARC-DG ambitious plant count 'guesstimates' that are based on yard size without consideration of expected plant coverage sq ft ....?

Were my yard re-landscaped today, the 2020 ARC-DG dictated 'minimum 7 plants per each 100 sq ft' logic used routinely by DG 6.1-requisite professional landscapers to design SCLH yards .... requires 67 more plants than currently meet 50% coverage. \*\*\*\*

WHO IS MINDING THE STORE ....?

Our former DG2000 landscape design strategy was apparently well received / attracted thousands of SCLH buyers for many years, and it is presumably well within the scope of the DG 6.1-dictated professionals: '*Landscape Architect, Landscape Designer, or Landscape Licensed Contractor*'....

With such expertise at hand, we don't need to force the cart (ARC-guesstimated plant volume) before the horse (yard plans requiring minimal irrigation to achieve DG 50% coverage goal)?

See '*February DG Landscape Forum Missed Mark*' below.

INSTEAD ....

It now appears to be up to SCLH residents with conceivably more important Life Matters on their plates, to bear the burden of knowing how to recognize, and then officially contest, any ARC-DG 'approved' landscaping plan that might require UNNECESSARY irrigation and /or fire fuel content.

EVEN THOUGH . . . .

Each yard area's expected live coverage sq ft can easily be tracked on ARC worksheet plant detail lists using the same growth data from our *SCLH Approved Plant List* as on the ARC-required, professional landscape scaled design drawings; ARC worksheets can then incorporate this data to:

- 1 Alert residents before exceeding 50% live coverage goals.
- 2 Prevent plantable area overload / unhealthy, crowded roots.
- 3 Recommend bark cover on up to 50% of plantable areas.

INCREDIBLY (to this MSU math major) . . . .

When post-DG2000 DG-ARC Landscape criteria stopped using our *SCLH Approved Plant List* expected growth data as a reliable, readily accessible tool for confirming the DG minimum 50% live matter ground coverage goals . . . . and began mandating at least 8 (now 7) plants per EACH 100 sq ft (square feet) of EACH plantable area . . . .

The impact on my own front yard was to QUADRUPLE the DG2000 minimum-28 plant count which had always attained attractive, ARC-approved landscape density while meeting all DG live matter ground coverage goals. \*\*\*

NOR . . . .

may, 'clearly showing 50% coverage on landscape plans',  
serve to get a savvy lot owner off the hook, **per the**  
**revised 2020 DG 6.2 verbiage = 'fully landscaped appearance'.**

See '*February DG Landscape Forum Missed Mark*' below.

VISUALLY RELYING . . . .

on our landscape design drawings, to 'clearly show 50% live  
coverage', and / or, 'to have a fully landscaped appearance',  
**in order for ARC 'to consider approving fewer plants' for**  
**a lot owner sufficiently wary and concerned about possible**  
**irrigation waste to choose to accompany DG-requisite landscape**  
**professional during the ARC project approval process . . . .**  
is arguably much less efficient and reliable, than monitoring  
expected plant growth coverage data via ARC worksheets:

*2018 ARC team advised 'confirming' 50% coverage goal via  
\$50 SCLH Compliance Certification inspection, after my  
ARC worksheets dictated adding 93 more plants. . . .  
but my own expected growth data worksheet indicated front  
yard coverage EXCEEDED ARC-DG minimum 50% goal by 81 sq ft.*

**Technically, I could REMOVE ten plants to conserve water (!)**

**But, my 2018 landscape plan did not 'clearly show' this. \*\*\*\***

MOST DISTURBINGLY . . . .

The original DG2000 minimum 11-plant count in my BACK yard invisible to public, has now jumped TEN-FOLD, to 112 plants.

AND, the new DG2020 dictates that a minimum 50% = 1400 sq ft

in my private areas MUST now contain live matter --

replacing a considerable amount of inert material/bark used during last 20 years to minimize irrigation and discourage fire fodder.

*See 'February DG Landscape Forum Missed Mark' below.*

NOR . . . .

may SCLH DG 'grandfather clause' help block all SCLH back lots from possible, substantially-increased flammability risk compared to their DG2000-required live matter content.

-- This ARC-DG loophole for retaining current, resident landscape status assumes we had specific, prior HOA approval... and so, generally may not apply to the myriad interior back lots which were not technically required over the last twenty years as landscape ground coverage was changed, to seek ARC approval / draw up a new back yard design plan.

WERE, I TO UPGRADE MY BACK YARD TO DG2020 COMPLIANCE ....

-- As a cautious buyer might request whenever this house goes on the market, or, if I trigger the need to do so by making certain changes to my last ARC-approved back yard plan ....

my own back yard irrigation consumption could easily climb THREE TIMES current levels.

ARC-advised drought tolerant foliage might reduce irrigation, but may be extremely flammable due to low moisture content. Losing back yard irrigation during California water shortages or strict rationing logically increases fire fuel hazard ....?

HAS HOA CONSIDERED ....

Cumulative SCLH resident irrigation impact on local water reserves from such yard coverage and plant count increase?

OR, cumulative SCLH tinderbox potential, if/when the DG2020 mandated 50% live ground coverage for all back lots previously opting to use bark mulch cover to reduce water usage and fire risk without requiring formal ARC 'approval', now dries out or dies during water shortages?

## FEBRUARY DG LANDSCAPE DESIGN FORUM MISSED MARK . . . .

The rationale proffered in February Landscape DG Forum regarding substantial plant volume increases for SCLH lot owners did not include concern for today's serious water shortage predictions, or backlot fire fuel risks.

It has also been my observation, that residents tend to rely on their ARC-DG-requisite professional landscapers to always design HOA-approved yard plans in their best interests.

What is not generally recognized, is that the ARC worksheets used by those planners may dictate many more plants than might be necessary to satisfy all SCLH DG Section 6.0 landscape requirements.

### >>>>>>>>> FRONT YARDS

"We chose 7 plants per each 100 sq ft for all front yards REGARDLESS of existing coverage . . . ."

"because, some aging landscapes which DO have 50% coverage right now, have developed holes from plant losses and such over the years . . . ."

### ISSUES

1) Landscape 'holes' may be necessary . . . .

a. To minimize fire spread between plants and to house:  
[https://ucanr.edu/sites/SAFElandscapes/Defensible space fire safe landscaping and fire hazard reduction/](https://ucanr.edu/sites/SAFElandscapes/Defensible%20space%20fire%20safe%20landscaping%20and%20fire%20hazard%20reduction/)

b. To facilitate all DG2020 6.0 intended yard esthetics ....

*"Plant material should be dispersed to provide a balanced design."*

-- It has been voiced in the 'hood', that some of today's ambitious front yard efforts trend toward '*overstocked mini-garden-nurseries*', and '*imploding lollipop-jungles*'.

Meanwhile, there appears scant evidence of the DG-allowed 50% inert material/ bark ground coverage for optimal water conservation / fire fuel reduction.

c. To avoid unhealthy, short-lived landscaping:

While shrubs placed too close to each other might satisfy the DG-minimum 50% ground coverage goals, "*as clearly shown on a landscape plan*", over-crowded roots yield diseased, insect-infested, unattractive SCLH foliage potentially impacting property value.

2) Why not, enforce the original, DG2000 minimum 28-plant count as dictated for all SCLH interior front yards ....?

-- In my 20-year SCLH yard maintenance experience,  
28 plants can fill a LOT of landscape 'holes'....  
Our SCLH Approved Plant List offers over 2,000 attractive  
and interesting selections providing sundry levels of  
landscape 'density' for desired 28-plant combinations.

*(Depending on plant variety, creative landscapers can  
fill up to 100% of all plantable area by using 28 plants  
of appropriate density for any size yard.)*

- 3) The above '7 plant per EACH 100 sq ft' calculation  
performed prior to designing a landscape plan, is not  
appropriate for many water-conserving, wide coverage  
plants on our SCLH Approved Plant List.

EXAMPLE:

A single drought tolerant juniper shrub can cover 60 sq ft,  
which is well over the DG 50% minimum live coverage goal  
= 50 sq ft for any 100 sq ft plantable area. No room left,  
for the other 6 DG-required plants per EACH 100 sq ft area.  
*(Worksheets preceding design plan dictate 6 'extra' plants).*

.... 7 similar coverage shrubs could cover 420 sq ft, thus  
achieving DG 50% live coverage goal for 840 sq ft.  
840 sq ft x 7/100 sq ft = 59 'DG minimum required plants'.  
*(ARC worksheets will dictate 52 'extra' plants for design).*

>>>>>>>>> BACK YARDS

" '4 plants per each 100 sq ft' for all interior back lots seemed like a good number to tell lot owners when they asked us what the rules were ...."

.... Why not, just remind all lot owners of the original DG2000 rule = 11 plant-minimum combinations of plants for ALL interior back yards...?

..... Why not, encourage the original DG2000 strategy for supporting low back yard maintenance with minimal irrigation and fire fodder risk (*no minimum coverage requirement*) .... ?

DG2020 ARC WORKSHEET ISSUES RELATED TO WATER CONSERVATION AND FIRE FUEL REDUCTION:

- There are no plant detail worksheets for monitoring actual live matter sq ft coverage in plantable areas.
- All available ground is automatically filled with plants, regardless of achieving DG 50% coverage goal.
- There are no worksheet options suggesting the use of DG-allowed inert material/bark mulch on up to 50% plantable area to try to conserve water and reduce possible fire fuel content.

WHY PUT THE CART BEFORE THE HORSE .... ?

As seen with my own front yard landscape experiences \*\*\*\*,  
the ARC-DG mandate to design our SCLH landscape in ways  
to accommodate up to several multiples of the former DG2000  
plant counts,  
may not only promote substantial irrigation waste / fire  
fodder .... overly-ambitious plant counts might impede  
some of the other DG Section 6 required landscape esthetics.  
*(See above reference to yards trending as 'overstocked mini-  
garden nurseries' and 'imploding lollipop jungles').*

NOT Rocket Science ...?

12-year-old grandson used less than one hour to  
track growth data for all existing plants in my  
2018 front yard Area A and Area B.

The results, which I double-checked ;-), indicated  
56% live ground coverage with 27 shrubs in Area B;  
smaller Area A attained 57% coverage with 4 plants,  
= 31 total front yard plants meeting DG coverage goals.

Had I chosen ARC-approved total front yard replacement  
with a DG-requisite landscape professional,  
the 2018 ARC worksheets dictated that my new landscape  
plan -- at a MINIMUM -- must include 109 Area B plants  
plus 15 Area A plants = 124 total front yard plants (!)

DG2020 reduced my front yard minimum to 108 total plants,  
*which is still over 3 times 'too many'.*

*Photos and worksheets, 'grandfathered' ARC approvals:*

<https://ourimaginalcells.info/my-project-worksheets.html>

WITH ALL DUE RESPECT ....

Given, our area's serious water shortage forecast, plus  
our proximity to a designated fire hazard area ....

HOA good stewardship appears to dictate returning to  
those SCLH conservative 2000 *Landscape Design Guidelines*  
which conceivably helped attract thousands of new home  
buyers to this community for nearly two decades. \*\*\*

The DG2000 28-plant count using specific plant growth  
data from the *SCLH Approved Plant List* for achieving (any)  
desired live plant ground coverage percentage goal/density,  
is provably much more appropriate for minimizing resident  
landscape irrigation and fire fuel risk,  
than relying on the DG2017, and now DG2020, bulk-plant  
guesstimate calculations ignoring expected plant growth. \*\*\*\*

Water-conserving SCLH DG2000 standards supported attractive  
yard landscape designs offering retired seniors much-  
appreciated low maintenance, minimal irrigation bills, and  
prudent fire fodder containment options ....  
perceived as deal breakers by many, myself included.

I am therefore respectfully asking our BOD, to consider initiating the below actions intended to help future ARC-DG approved landscape design plans attain HOA goals without promoting unnecessary irrigation or fire fodder:

-- Retract all DG2017 and DG2020 live matter escalations (*revert to DG2000 minimums*).

-- Upgrade ARC worksheets to monitor all expected plant growth, alerting lot owner when DG 50% coverage goals are exceeded; include worksheet option for use of inert material/bark on up to 50% of remaining plantable area (*instead, of automatically filling with plants*).

-- Instruct the DG-requisite landscape professionals to satisfy all DG Section 6.0 landscape design esthetics while staying within the 50% live matter coverage goals, before committing to plant counts.

Thank you for your time,

c.c.: (all BOD members)

>>>>>>> FOOTNOTES <<<<<<<<<

WHY HAS HOA INCREASED OUR MANDATORY LIVE MATTER, DESPITE:

\* California water shortage / strict rationing forecasts ....

-- *We've had the driest February on record since 1864;  
Spring rainfall not expected to change dire forecasts ...*

<https://californiawaterblog.com/2020/03/01/driest-february-and-the-coming-drought/>

[https://www.cpc.ncep.noaa.gov/products/expert\\_assessment/sdo\\_summary.php](https://www.cpc.ncep.noaa.gov/products/expert_assessment/sdo_summary.php)

<https://www.drought.gov/drought/states/california>

-- *"Get ready to save water: Permanent California restrictions approved by Gov. Jerry Brown" ...*

<https://www.sacbee.com/news/politics-government/capitol-alert/article211333594.html>

<https://www.usatoday.com/story/news/nation/2020/02/25/anderson-reservoir-california-draining-ongoing-drought/4873725002/>

\*\* Sharing borders with 'Tier 2 Elevated Fire Hazard Area' ....

<https://ia.cpuc.ca.gov/firemap/>

<https://www.tdworld.com/vegetation-management/article/20970687/california-commission-adopts-new-fire-safety-regulations>

\*\*\* DG HISTORY 2000-2020

DG2000 supported practical irrigation and reduced fire fuel risk for all SCLH lots while adhering to all DG required landscape features:

Interior FRONT YARDS without sod = 28 shrubs;  
with sod = 19 shrubs;

ALL model type BACK YARDS = 11 shrubs.

....dsgnrvsn.001 REVISED 04/27/00; Page 5, Section II.B.2.(g)

Minimum 40% of all non-sod FRONT YARDS must be covered with living material; up to 60% can be inert material/bark.

BACK YARDS = No minimum live coverage requirement.

....dsgnrvsn.001 REVISED 11/20/00; Page 7, Section II.B.2.(i)

\*\*\*\* MY YARD PHOTOS AND WORKSHEET DETAIL

*HOA file includes grandfathered ARC approvals 2000 - present.*

2018 ARC Approval project, plus early 2020 additions:

<https://ourimaginalcells.info/my-project-worksheets.html>

DG 2020 Landscape ARC Worksheet and Guidelines

<https://sclhresidents.com/documents/10184/251862/Checklist+20+Landscape/c785f65f-ded0-4cf9-babb-a62397897e84?version=1.5>

<https://sclhresidents.com/documents/10184/13538/Design+Guidelines/94dab357-9b8f-48d7-bc0d-2fbd4f21baa7?version=1.1>

## HOW TO MONITOR ALL EXPECTED PLANT COVERAGE SQ FT

A plant's expected width at maturity can be found on our *SCLH Approved Plant List*:

<https://sclhresidents.com/documents/10184/252552/Acceptable+Plant+List/0cde3f9c-8a2a-45e7-b052-3c0432a1ca7f?version=1.1>

Given, that the calculation for the sq ft area of a circle can tell us how much sq ft area will be covered if we know a plant's expected width, there are online apps for this:

<https://www.calculatorsoup.com/calculators/construction/square-footage-calculator.php>

OR, we can use the below table with plantable area sq ft already calculated for standard plant widths:

Where Expected Plant Width =

1'	2'	3'	4'	5'	6'	7'	8'	9'	10'
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Then, Total Plant Coverage Sq Ft =

1	3	7	12	20	28	38	50	64	78
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### EXAMPLE

If a plant will be 3 feet wide at maturity, its total expected ground coverage = 7 sq ft.

If a plant will be 9 feet wide at maturity, its total expected ground coverage = 64 sq ft.

- a. Repeat for all desired plants, accumulating 'TOTAL Sq Ft'.
- b. Compare 'TOTAL Sq Ft' to 50% total plantable area sq ft.
- c. **Follow all DG 6.15 esthetic landscape requirements** while adding or removing plants from the landscape plan design drawing until DG 50% live coverage sq ft goal is met.