



**CITY OF
SOLANA BEACH**

635 SOUTH HIGHWAY 101
SOLANA BEACH, CALIFORNIA 92075
www.ci.solana-beach.ca.us

Planning



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Department of Water Resources
Attn: Judy Colvin
Office of Water Use Efficiency and Transfers
901 P St., Room 313A

~~Sacramento, CA 95814~~





CITY OF SOLANA BEACH

635 SOUTH HIGHWAY 101 • SOLANA BEACH, CALIFORNIA 92075-2215 • (858) 720-2400
www.ci.solana-beach.ca.us FAX (858) 792-6513 / (858) 755-1782

April 10, 2008

late

Judy Colvin

Department of Water Resources
Office of Water Use Efficiency and Transfers
901 P Street, Room 313A
Sacramento, CA 95814

Subject: Public Comment on the DRAFT Model Water Efficient Landscape Ordinance

Dear Ms. Colvin:

Thank you for providing the City of Solana Beach a copy of the notice for the above-referenced Notice of Preparation for a revision to California Code of Regulations, Chapter 2.7, *Model Water Efficient Landscape Ordinance*.

We do apologize for the delay in this correspondence and realize that the public comment period closed on Thursday, March 27, 2008. We would appreciate you considering our comments as follows:

1. The proposed ordinance appears to lack the required language that would allow for opportunities to provide incentives to property owners from local water authorities/agencies in offering water conservation tools (i.e. water-saving irrigation devices, etc.) or public outreach programs (i.e. consumers/home-owner free audits, irrigation system tune-ups, etc.) similar to other utility agencies that involve the expenditure of public funds.
2. We have a concern regarding the implementation section for cities to conduct "annual audits". This requirement may be a significant financial burden on cities such as Solana Beach, who do not have the financial resource to support such requirements. Although there may be an opportunity to pay for these services. Solana Beach would be relying on the local water agency (Santa Fe Irrigation District) to support the financial means for this requirement.
3. The City is concerned about the proposal to set criteria for "Maximum Applied Water Allowance (MAWA)". It is not known at this time if this MAWA presents a problem for cities like Solana Beach to maintain local parks, golf courses, open spaces, etc.

4. There is a greater responsibility/burden on the part of the applicant (and its consultant) in preparation of the Landscape Document Package due to the new requirements for the Maximum Applied Water Allowance (MAWA). This proposal must take a consumer-friendly approach and reduce confusion to a homeowner.
5. The proposed ordinance Section 490.3 – Applicability is confusing. If this section applies to new or re-landscaping of 2,500 square feet, including home owners wanting to re-landscape, it will be difficult for a City to monitor and enforce implementation for a homeowner since permits are typically not required for re-landscaping a home.
6. The provision to establish specific standards to help reduce run-off from irrigation systems may have a significant impact on adopted construction/design standards. This proposal may impact how parkways, medians are designed or irrigated.
7. When these changes are approved by the State, which would require an ordinance amendment to the City of Solana Beach Municipal Code (SBMC, Chapter 17.56), it may benefit us if the local water agency assists with the preparation of a “user friendly” manual. Many of our customers are unaware of requirements for preparation of a landscape plan for projects.

We hope these comments assist you with revisions, and we look forward to commenting on the next available draft. If you have any question, please do not hesitate to contact me at (858) 720-2444.

Sincerely,



Tina Christiansen, AIA
Director of Community Development
Community Development/Planning Department

Cc: David Ott, City Manager
Rich Whipple, Principal Planner