

CITY OF SANTA MARIA
 UTILITIES DEPARTMENT
 Business Services • Fleet Services
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 Water Resources • Wastewater Resources

2065 EAST MAIN STREET • SANTA MARIA, CALIFORNIA 93454-8026 • 805-925-0951, EXT. 7270 • FAX 805-928-7240

December 18, 2008

DEC 30 2008

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Mr. Simon Eching
 Department of Water Resources
 P.O. Box 942836
 Sacramento, CA 94236-0001

SUBJECT: MODEL WATER EFFICIENT LANDSCAPE ORDINANCE REGULATION

Dear Mr. Eching:

The City of Santa Maria appreciates the efforts of the Department of Water Resources to address the impact of landscape irrigation on the Stat's limited water supplies, as well as the opportunity to comment on the modified text of the proposed Model Water Efficient Landscape Ordinance Regulation. The City believes that the modifications to the ordinance have addressed some key concerns. The following comments address some of those modifications:

1. *§491(ooo) "water feature" means a design element where open water performs an aesthetic or recreational function. Water features include ponds, lakes, waterfalls, fountains, artificial streams, spas, and swimming pools (where water is artificially supplied).*

Comment 053.1

Pools and spas have a different purpose than, and should be designated separately from, other water features. Distinguishing pools and spas as recreational water features and the remainder as decorative water features will help to clarify later sections of the ordinance, such as §492.6.2, which describes "decorative water features." Recreational water features have health implications associated with their water use (for instance, not changing out the water can create a health issue), have no relationship to irrigation of surrounding landscaping, and can significantly skew calculations.

2. *§492.5 Soil Management Plan – entire section*

Comment 053.2

While the City concurs that soil type plays an important role in plant health, the information required to be gathered to complete the soils management plan has no bearing on any of the calculations used to determine the Maximum Applied Water Allowance (MAWA) or the Estimated Total Water Use). For many sites, the soil characteristics vary greatly even within a very small area. To properly characterize a site for optimum plant placement can

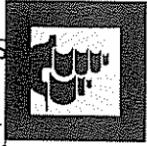
require numerous samples with costly analysis. Plant needs can vary greatly even within a single species, such that determining the success of a plant from the plan review would require a person of unique botanical experience. The requirement of a soil management plan adds substantial cost to the developer with no evidence that it will help meet the objective of the ordinance.

The City looks forward to continuing joint efforts with the Department of Water Resources on this issue. Please feel free to contact Shannon Sweeney at 805-925-0952 x7416 should you have any questions.



RICHARD G. SWEET, P.E.
Director of Utilities

CITY OF SANTA MARIA



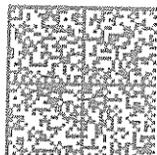
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