

CITY OF SANTEE

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December 26, 2008

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Department of Water Resources
Office of Water Use Efficiency and Transfers
Attn: Simon Echíng
P.O. Box 942836
Sacramento, CA 94236-0001

SUBJECT: City of Santee Comments on the Modified Text of Proposed Regulation for the Model Water Efficient Landscape Ordinance

Dear Mr. Echíng:

Thank you for the opportunity to review and provide feedback on the modifications to the proposed regulations for the Model Water Efficient Landscape Ordinance. For your consideration:

1. City/Water Purveyor Relationship

Late Comment 064.1

The water purveyor, which in our case is the Padre Dam Municipal Water District (PDMWD), is not subject to the Model Ordinance, although the Ordinance would allow the City to *ask* PDMWD "to implement some, or all of the requirements contained in this Ordinance" (Section 492(a)). There is no obligation on the part of PDMWD to accept any implementation responsibility, and, as such, this Section should be deleted. Furthermore, Section 492.1(3) requires the City to submit copies of the Water Efficient Landscape Worksheet to PDMWD. Is this for informational purposes only or is the water purveyor required to take any follow-up action in response to notification?

2. Irrigation System Flexibility

Late Comment 064.2

The landscape architect should be given the flexibility to select the appropriate irrigation system within the "maximum applied water allowance". For example, the Ordinance dictates the application of drip irrigation systems on slopes that exceed 25% (Section 492.7(T)). It may be imperative to establish plants quickly with an overhead spray system, and compliance with the Ordinance eliminates the flexibility, even when adherence to the water allowance is demonstrated.

Late Comment 064.3

3. Status of Retention Basins and Bioswales

Retention basins and bioswales should be exempted from the water budget since they are methods of Low Impact Design that are required by the Water Quality Control Board to retain and treat storm water. The vegetation associated with these features is characterized by high water use plants for obvious reasons, and their inclusion in the water allowance calculations would result in an extremely low allowance.

Late Comment 064.4

4. Definitions - Section 491

Landscape area – the exclusion of gravel or stone walks and other pervious or non-pervious hardscape from the definition is contrary to the trend observed in Santee and elsewhere. Additionally, the City is receiving enquiries about the installation of artificial turf. The City of Santee includes decorative hardscape such as cobble or rock in its definition of “landscape area”, and would consider artificial turf an acceptable replacement for living turf. These features should be included in the ordinance’s definition of landscape areas, and a water allowance credit applied for their application.

Constructed wetlands should be defined. Late Comment 064.5

Pervious and non-pervious surfaces should be defined. Late Comment 064.6

Special landscape area - storm water basins should be included. Late Comment 064.7

Recreational areas – the definition should include passive, unprogrammed play areas such as landscaped park areas. Late Comment 064.8

Water feature – the definition should include “habitat creation”. Late Comment 064.9

The following definitions should be strengthened, based on the need for further clarification:

Late Comment 064.10

Irrigation Efficiency: under the definition of “irrigation efficiency”, is the minimum efficiency of 0.71 an overall standard that applies to all types of development (e.g. residential, industrial, commercial, recreational, etc.)?

Late Comment 064.11

Low volume irrigation: under the definition of “low volume irrigation” what is the standard for low volume or low pressure? Would this include rotating sprinkler heads like those manufactured by the Hunter Corporation, for which state rebates are available?

Late Comment 064.12

Rehabilitated landscapes: the definition of “rehabilitated landscapes” is unclear in terms of the scope of rehabilitation. This section could apply to very small landscapes such as those for single or multi-family dwellings.

5. Requirements for Landscape Water Meters

Late Comment 064.13

Older or smaller multi-family residential complexes frequently have one master meter, resulting in an inability to monitor these complexes for just landscape water usage. The ordinance requires that even a small change to water usage in these complexes would trigger a violation. It would be costly to retrofit such complexes with separate sub-meters, and so they should be exempted.

6. Landscape Permit Requirements

Late Comment 064.14

Section 490.1.a.3 requires a landscape permit for new landscape areas exceeding 5,000 square feet. The City of Santee does not issue a separate landscape/irrigation permit. Landscape and irrigation plans are reviewed and approved with building or grading plan approvals. The Ordinance is unclear as to whether cities must establish this new permit.

Late Comment 064.15

7. Landscape and Irrigation Planning for Project Build-out”

Section 492.7.a.1.L of the Irrigation Design Plan requirements states that the capacity of the irrigation system shall not exceed the capacity required for peak water demand, but does not anticipate phased project implementation. There may be a benefit to the design and installation of the irrigation system to accommodate future park expansions. The Ordinance should incorporate this flexibility.

Late Comment 064.16

8. Audits

Section 492.9 requires an irrigation audit to obtain a certificate of completion. *Does this mean a one time audit prior to occupancy with no subsequent audits? Can audits be eliminated for landscape projects that are operating year after year within their water budgets?*

Please consider these comments in any further revisions to the Model Water Efficient Landscape Ordinance. Feel free to contact me at (619) 258-4100 ext. 167 or mkush@ci.santee.ca.us should you have any questions.

Respectfully,

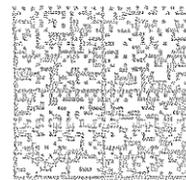
A handwritten signature in black ink, appearing to read "Melanie Kush". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Melanie Kush, AICP
City Planner

- c. Jim O'Grady, Interim Development Services Director
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