



CITY OF SANTA MARIA  
UTILITIES DEPARTMENT  
Business Services • Fleet Services  
Flood Control • Regulatory Compliance  
Solid Waste Services  
Water Resources • Wastewater Resources

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June 3, 2009

20x2020 Agency Team  
c/o California Department of Water Resources  
1416 Ninth Street  
PO Box 942836  
Sacramento, CA 94236-0001

Subject: Proposed Final Draft Statewide Implementation 20x2020 Plan for Urban Water Conservation

The City of Santa Maria appreciates the opportunity to comment on the 20x2020 Agency Team's Proposed Final Draft Statewide Implementation 20x2020 Plan for Urban Water Conservation.

Hydrologic Region 3, which encompasses San Luis Obispo, Santa Barbara, Monterey, and Santa Cruz Counties, has the lowest per capita water use of all the hydrologic regions in the state, despite having higher average evapotranspiration rates than some of the northern coastal counties. This is a reflection of the efforts already made by counties within Region 3 to implement water conservation mechanisms during and after the 1987-1991 drought. As such, there are fewer opportunities for cost effective water conservation within Region 3 than in other regions. This plan asks water agencies in Region 3 to make even more concessions to meet the state's 20 percent water conservation goal, which will result in an even greater financial and staffing burden. Finding a way to credit regions for efforts already made would help to equalize the process. Some ideas include referencing the per capita conservation goal to a regional evapotranspiration rate, or by calculating conservation effectiveness on an earlier baseline year, such as one prior to 1987.

That being said, hydrologic regions are not political bodies, and do not have cohesive structures to work together to meet the goal. Focusing on targets from a local agency perspective will likely be more effective. Focusing on an agency-based solution, and calculating a per capita water allowance similar to that outlined in the Model Water Efficient Landscape Ordinance, but including indoor as well as outdoor use, would provide a mechanism for equalizing the approach for water conservation.

Thank you for considering these comments. Please feel free to contact me at (805) 925-0951 x7416 if you would like to discuss these comments further or need clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shannon Sweeney', with a stylized flourish at the end.

Shannon Sweeney  
Water Resources Manager