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Miguel A. Pulido
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Michele Martinez
COUNCILMEMBERS
P. David Benavides
Vicente Sarmiento
Jose Solorio
Sal Tinajero
Juan Villegas



CITY OF SANTA ANA

20 Civic Center Plaza • P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

PUBLIC WORKS AGENCY

(11/21/17) Public Workshop
Prohibiting Wasteful Water Use Practices
Deadline: 12/26/17 by 12 noon

CITY MANAGER
Raul Godinez II
CITY ATTORNEY
Sonia R. Carvalho
CLERK OF THE COUNCIL
Maria D. Huizar



December 18, 2017

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Comment Letter – Prohibiting Wasteful Water Use Practices

The City of Santa Ana appreciates the opportunity to provide input to the State Water Resources Control Board (State Board) proposed Water Conservation Regulations. The City provides the following comments:

Subdivision (b)(1) (G): The new regulation will restrict the irrigation of medians and verges/parkways and differs from the emergency regulation which only restricted irrigation of ornamental turf on street medians. The proposed rule should not include verges and parkways in the restriction for the environmental benefits they provide. Turf grasses stabilize the soil and enhance safety by reducing run-off and diminishing soil erosion.

It is recommended that the proposed regulations define local residential streets with medians that are adjacent to a neighborhood aesthetic gateway and officially considered a residential street according to the City's General Plan/Circulation Element and as not a public street. Therefore having grass in the residential neighborhood gateway medians and providing irrigation with potable water should not be considered wasteful water use practices.

General Comment: If the proposed regulation is approved, cities will incur significant costs by re-landscaping medians and parkways. This unbudgeted expenditure may force cities and counties to cut services or programs in other areas in order to comply. The cost for cities and counties to remove turf in medians and verges represents a significant financial burden that does not appear to be considered in the Economic and Fiscal Impacts of the Proposed Regulation to Permanently Prohibit Certain Wasteful Water Use Practices dated November 1, 2017. The cost to retrofit these landscapes should be considered. According to the Orange County Chapter of the California Landscape Contractors Association, the cost to convert a landscaped area to conform

SANTA ANA CITY COUNCIL

Miguel A. Pulido
Mayor
mpulido@santa-ana.org

Michele Martinez
Mayor Pro Tem, Ward 2
mimartinez@santa-ana.org

Vicente Sarmiento
Ward 1
vsarmiento@santa-ana.org

Jose Solorio
Ward 3
jsolorio@santa-ana.org

P. David Benavides
Ward 4
dbenavides@santa-ana.org

Juan Villegas
Ward 5
jvillegas@santa-ana.org

Sal Tinajero
Ward 6
stinajero@santa-ana.org

to this regulation can be up to \$8 per square foot. The City of Santa Ana contains over 2.5 million square feet of median and parkway landscaping and translates into tens of millions of dollars in conversion costs.

Thank you for the opportunity to provide comments regarding the proposed regulation for wasteful water uses. Should you have any questions or need additional information regarding these comments, please contact Baominh Nguyen, Public Works Projects Specialist at (714) 647-3303.

Sincerely,



Pedro Guillen
Public Works Maintenance Manager

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dbenavides@santa-ana.org

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Ward 5
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Sal Tinaje
Ward 6
stinajero@santa-ana.org