PARKS AND RECREATION DEPARTMENT

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June 25, 2015

Julie Saare-Edmonds, Senior Environmental Scientist
State of California, Department of Water Resources

Re: MWELO Update 2015 – Public Comment

Dear Ms. Saare-Edmonds:

The Cosumnes Community Services District (CCSD) is a special district located in the community of Elk Grove providing parks, recreation and fire services. Our district maintains 93 parks in the City of Elk Grove and has over ten (10) parks in the planning and design phases to be constructed in the next 6-8 years. Therefore, MWELO and any update to it will affect the way we plan, design and build parks in the future.

CCSD staff attended the public meeting in Sacramento on June 19th and appreciates the opportunity to provide comment. Our comments and concerns are as follows:

1. Definition q, 'ET adjustment factor' – Although we support reduction of water use in the landscape and acknowledge the need to reduce turf, we believe reducing the ETAF to 0.4 could be potentially disastrous to public parks. Although the SLA equation addresses that to some degree, we are of the opinion that this is too severe and recommend an ETAF of 0.5 or 0.55.

2. Definition iii, 'recreational area' – Recommend providing more clarity to this definition regarding the inclusion of picnic grounds and amphitheaters. Suggest specifying that the definition only include facilities that are on irrigated landscape. For instance, if these facilities are set upon concrete, decomposed granite or other impervious surface, then they should not be included in the SLA.

3. Definition yyy, 'water feature' – If splash pads are to be regulated elsewhere in the document, then a splash pad should be included in the definition or a separate definitions added for 'recreational water feature' and 'ornamental water feature.'

4. Section 492.4 Water Efficient Landscape Worksheet – Recommend providing an example for a non-residential landscape with an SLA included.

5. Section 492.6(1)(F) – The phrase 'or by other technology that creates no overspray or runoff' is impossible to design, plan check, defend or enforce. There is no overhead irrigation technology that does not create some runoff or overspray. If operated incorrectly, all irrigation including subsurface drip systems can cause runoff. If the intent is to require subsurface or point-source irrigation in narrow parkways, then be direct and clear in the language and state such. The language as written will result in designs with short radius rotary nozzles and irrigation companies defending their products claiming they 'create no overspray or runoff'. In addition, you will have applicants, plan preparers, plan submitters, designers and public officials debating the intent and definition of this phrase.

6. Section 492.6(2)(E) – This section states, "Recreational water features (swimming pools, splash pads or similar) must recirculate water." As a park agency that is responsible for providing recreational amenities to the public, we have issue with the blanket inclusion of splash pads in this requirement.

   Our district also operates four (4) 'drain away' systems which have been non-operational during the drought. We also have a fifth system that was built in 2014 and has never operated due to the drought. These systems typically operate with very low flows between 5 and 25 GPM and cost between $25,000 and $60,000 to build. Operation of these systems is controlled by a computer so that not all features are on at a single time and water flows never reach the maximum flows. In addition, they only operate between May and September and for prescribed hours, typically 10am to 8pm.

   Our district also operates two large re-circulatory spraygrounds (splash pads). These systems are designed with high flows (ie. 150 - 275 GPM max.) These systems cost a minimum of $250,000 to design, permit and build. They are complex systems including sand filtration, chlorination, UV light sanitation systems, computerized detection of bacteria and large underground reservoirs. In addition, annual maintenance costs are about $25,000, which includes chlorine, UV replacement bulbs, and general repairs. Although re-circulatory, these systems use daily additional water to replenish what is lost to evaporation and overspray and daily backwash cycles to maintain sanitary conditions.

   The inclusion of water play is always in the top five park amenities requested at public outreach meetings. These amenities provide a significant community recreational benefit in the hot central valley of California. Low flow neighborhood splash pads use approximately the same amount of water per day as a three single family homes. And, use less water per hour than if individual children were playing with a hose at home or running through sprinklers. In addition, our preliminary assessment at our own parks has suggested that converting large areas of turf in a park and installing a splash pad instead results in annual water savings.

Low flow splash pads are the most efficient way to provide summer cooling to a large group of people. Requiring all systems to be re-circulatory would likely be cost prohibitive and reduce park agencies' ability to provide these amenities to the public.

Our recommendation would be to consider allowing or including some of the following:

- Designate a maximum flow (10-20 GPM) for all non-re-circulatory splash pads.
- Allow if the system drains to a bioswale or other onsite drainage facility that allows the water to percolate back into the soil profile.
- Allow if the system captures and stores the water in an underground reservoir and reuses for subsurface or drip irrigation.
- Allow if the system drains to septic system.

7. Section 492.7(1)(M) – This section states that precipitation rates (PR) shall not exceed 1 inch per hour. We concur with many of the statements made at the public meeting regarding this requirement. Although it sounds logical on the surface, it may prove to be counter intuitive and potentially exclude the use of bubblers or drip irrigation when calculated. In addition, many standard spray nozzles have precipitation rates approaching a 1" PR and when used in irregularly shaped areas may result in a PR above 1 inch in order to provide adequate coverage. If this section remains, then recommend excluding drip irrigation and bubbler products from the definition.

8. Section 492.7(1)(T) – Same comment as #5 above.

9. Section 492.7(1)(U) – No changes were proposed for this section, but we suggest a revision be considered. The interpretation of the phrase, "or other low flow non-spray technology" has been debated and is a constant point of contention among designers and public agencies. This would be an ideal time to correct or clarify the intent of this phrase. Recommend terminology consistency with sections 492.6(1)(F) and 492.7(1)(T). It seems that the phrase should refer to "low volume irrigation" per definition (nn), rather than "low flow non-spray technology". At a minimum define "low flow non-spray technology". Designers have been getting around this requirement by using Hunter MP Rotators as a 'low flow non-spray technology' even though the first sentence of this section says that overhead irrigation shall not be permitted.

10. Section 492.12 – Per public comment at the meeting, we concur that the irrigation audit should not include calculating distribution uniformity for drip irrigation or bubbler systems. All other portions of the audit (system checks, etc.) shall apply to these systems.

11. Section 492.13 – Per public comment at the meeting, we concur that achieving an irrigation efficiency of .85 and .92 may prove to be extremely difficult or potentially impossible. Irrigation design is not a perfect science and irrigation system installation can further alter the ability to reach these efficiencies.

As a park agency, we irrigate large recreational turf areas which would be classified as Special Landscape Areas with large rotor systems. They are subject to the most evapotranspiration and wind. Although this type of system is potentially the least efficient of all types, it is the best use for this application. Achieving an IE of .92 in these areas is impossible with existing overhead irrigation technology. We acknowledge and appreciate the intent, but recommend reducing the IE to a more attainable rate of 0.8.

12. Section 492.17(b)(1) – Signage should not specify who designed and installed the landscape. This infers some level of expertise or quality which may not be the case and can mislead the public into contracting with individuals who do not produce quality landscapes. In addition, it is akin to public policy endorsing free advertising for landscape professionals.

We thank you for the opportunity to comment and commend your efforts in attempting to modify the ordinance in such a short timeframe. If you have any questions, please feel free to contact me at (916) 405-5309.

Sincerely,

Paul Mewton
Chief of Park Planning, Design & Construction
RLA #4878