

March 7, 2016

To: The Independent Technical Panel on Demand Management Measures

Subject: Comments on “Recommendations Report to the Legislature on Landscape Water Use Efficiency”

Forest Lawn Memorial-Park Association appreciates the opportunity to provide comments on the Recommendations Report to the Legislature on Landscape Water Use Efficiency.

We believe that the efforts of the Department of Water Resources to affect future legislation that will result in water savings across the State are vital to the interests of all Californians. Toward that end, we would like to submit the following comments.

Concerning Section 5: Improvements in Existing Landscapes, Recommendation No. 2, it is proposed that:

Upon notice from the local agency or its representative, each owner or owner’s agent of an irrigated landscape of more than one acre shall submit a landscape irrigation report once every three years to the Department of Water Resources. . . . Each landscape irrigation report shall include the following:

- (1) Irrigation system overview: water meter number and type (if existing), assessor parcel number, irrigation zone map, zone description, plant factor by zone (MWELo defaults).
- (2) Water budget as defined in MWELo: gallons per minute per zone, operating pressure by zone, expected peak month consumption.
- (3) List of responsible parties: owner, landscape contractor, property manager.

The report goes on to explain that the water use data will be compiled by the Department of Water Resources (Department) and ultimately used to provide updates to the Governor and the Legislature. It appears that the purpose of this reporting is to track issues related to *potable* water use for future policy-making purposes. Therefore, including water use data for landscape operations that use recycled water will have a confounding effect on the statistics that are being reported.

It should also be noted that the regulation quoted in the recommendation (493.1 of the Model Water Efficient Landscape Ordinance or MWELo) includes the calculation of Maximum Applied Water Allowance (MAWA) which does not (unlike the MAWA equation for new development) specify an additional allowance for Special Landscaped Areas (SLA). Areas that are irrigated with recycled water are considered SLA’s, but for existing landscapes, these areas are unnecessarily held to the same standard as areas irrigated with potable water (once again conflicting with the stated purpose of the Department’s mission – reduction of potable water use).

With regard to Section 5, Recommendation No. 2, Forest Lawn Memorial-Park Association submits the following comments.

1. Users of recycled water should be exempted from the requirement to submit triennial reports.
2. The MAWA equation for existing landscapes should include an additional allowance for water use (the SLA factor) for areas that are irrigated with recycled water.

Concerning Section 6, Recommendation No. 1.

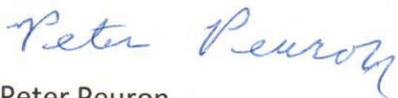
Within this recommendation, it is proposed that the Special Landscape Area be reduced from 1 to 0.8. Again, this is the factor which allows areas irrigated with recycled water (among other "special" areas) to have a higher water allowance. Note that this is for the MAWA equation that applies to new development. As the report acknowledges, increased use of recycled water can play a significant role in reducing potable water demand. Given the fact that that most of the recycled water that is currently being produced is sent back into the environment due to a lack of users, it seems clear that efforts should be directed at finding ways to incentivize, rather than discourage potential future users of recycled water. Reducing this factor will discourage future recycled water use at a time when recycled water users have been significantly increasing the costs of this valuable commodity.

Concerning Section 5, Recommendation No. 2, Forest Lawn Memorial-Park Association submits the following comment.

3. The Special Landscaped Area factor should remain at 1.

Thank you for the opportunity to provide comments on these important issues.

Sincerely,



Peter Peuron  
Environmental Project Manager  
Forest Lawn Memorial-Park Association