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"Trusted Partner and Provider of Choice"

February 22, 2023

To: Supervisor Janice Hahn, Chair
Supervisor Hilda L. Solis
Supervisor Holly J. Mitchell
Supervisor Lindsey P. Horvath
Supervisor Kathryn Barger

From: Selwyn Hollins
Director

URBAN WATER CONSERVATION MEASURES AND ASSISTANCE IN UNINCORPORATED LOS ANGELES COUNTY (ITEM #19 AND ITEM #29 AGENDA OF AUGUST 30, 2022)

BACKGROUND

On August 30, 2022, the Board of Supervisors (Board) adopted a motion, "Urban Water Conservation Measures & Assistance in Unincorporated Los Angeles County", directing the Departments of Public Works (PW), Parks and Recreation (DPR), and Internal Services Department (ISD) to report back in writing within six months with identification and quantification of non-functional turf areas in their facilities and a prioritized plan for replanting these areas consistent with the requirements of new Board Policy No. 3047- Water Conservation.

The motion calls for the "Department of Public Works, Department of Parks and Recreation, and Internal Services Department to explore state and federal fundings as well as programs available through local water agencies such as the Metropolitan Water District to support turf removal and replacement and other water efficiency upgrades." The motion also instructs "…all County Departments that manage landscaping contracts to report back in writing within six months with identification and quantification of non-functional turf (NFT) areas in their facilities and a prioritized plan for replanting these areas consistent with the requirements in the new Board Policy."

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

California is experiencing a historic drought which severely worsened starting in 2020. State water supplies have been severely impacted, including the two major sources of imported water that the Los Angeles region relies on, the State Water Project and the Colorado River, which together typically supply 60% or more of our region's water. This year, the State Water

Project will only provide 5% of requested water supplies. Reservoirs fed by the Colorado River are now at historically low levels, threatening their ability to provide electricity as well as water supply, and California may have to cut water supply from that source for the first time since the aqueduct from the river was built in the 1930s. The federal government has suggested that next year, supplies from the Colorado River may need to be reduced by an amount equal or greater to the entire allocation to the State of Arizona, which gets over a third of its water from that source. In response, the State has imposed emergency drought restrictions. More stringent requirements may be proposed in the coming months, especially if conditions do not improve during the recent wet weather season.

The motion guides County departments to identify non-functional turf to help convert these areas into water efficient landscaping while exploring ways to obtain available funding. To support the motion:

- ISD is currently performing surveys of its 144 landscape sites to identify the NFT areas. Then, ISD will prioritize these sites with the plan to obtain available fundings to help offset the cost. with the overall goal of converting non-functional turf into aesthetically pleasing sites that are water efficient.

- PW has assessed its approximately 80 facilities including roadway medians and determined that approximately 1% of the 11 million square feet of non-paved area would be considered irrigated NFT as PW has mostly replaced NFT with drought tolerant landscaping. The majority of PW's NFT are at airports and are often used as viewing areas for aircraft and should be considered exempt. In addition, since 2016, PW has not irrigated any NFT areas within its road right-of-way which includes parkways and roadway medians.

FISCAL IMPACT/FINANCING

Renovation to existing landscape systems and design inevitably comes with a financial cost. While historical practices in the region have focused on upgrades of existing irrigation sprinkler system to water efficient system because it costs less to do so, such efforts are not as proactive as the Board of Supervisor's Motion to significantly reduce water consumption given the emergency drought issue faced in the region. Since customer departments may not have forecasted any potential landscape renovations, ISD and PW will do the following to assist:

- ISD will prioritize the list of facilities to convert that are under ISD contract. It will be done based on greatest need and best return on investment, to help develop a schedule that will minimize any disruption to business operations. To assist the departments that may be identified with a targeted location, ISD will partner with them to explore rebate and funding opportunities in addition to what is listed below.

- PW will continue to implement native/drought tolerant landscaping, use high efficiency irrigation equipment when irrigation is needed, and capture and use rainwater to increase water resiliency in the design and construction of any County Capital Improvement Project or infrastructure project per the State's Model Water Efficient Landscape Ordinance (MWELO).

Potential Grants and Rebate Opportunities Available

The primary turf removal and replacement program within Los Angeles County is run by the Metropolitan Water District (MWD) and is open to properties within their service area. ISD will partner with departments that have locations identified as priorities to submit for these grants. Once grants are approved, applicants have 180 days to complete their project. After completion of the project, the applicant submits a post-project rebate request. This program provides $3.00 per square foot to replace turf.

The rebate program sets certain criteria for what may be used as replacement for turf. These criteria include projects may not use synthetic turf; no hardscape is allowed within the transformed area, except for permeable hardscape; at least three plants must be planted per 100 square feet of lawn transformed; there must be a stormwater retention feature; and there must be replacement or modification of overhead spray sprinklers to a more water efficient irrigation system (such as drip irrigation).

In addition to the local turf replacement programs such as the one offered by MWD, there are occasional funding opportunities offered through the State. The Urban Community Drought Relief Program is one of three Department of Water Resources' Drought Relief Grant Programs that offers financial assistance to address drought impacts. One of the focus areas for this funding is turf replacement. MWD was granted an initial funding award from this program in February 2023 for a regional turf replacement incentive program. So, this grant program while available to the County, is also being utilized by water purveyors to fund projects and programs that benefit the County.

There are several resources for funding and rebates through Bewaterwise.com under Metropolitan Water District (MWD):

Commercial Equipment Rebates

Weather based irrigation controller	$35/station for active systems
Rotating nozzles for pop-up spray heads	$2/nozzle (minimum 30)
Large rotary nozzles	$14/nozzle (minimum 8)
In-Stem flow regulators	$1/regulator (minimum 25)
Soil moisture sensor systems	$35/station for active systems

Lead Department Identification and Quantification of Non-Functional Turf

Internal Service Department (ISD)

Attachment (A) is a list of all locations that ISD, Custodial and Landscaping Division (CLD) provides landscape services. The report shows each location and the square footage of functional and nonfunctional turf. As of today, ISD provides ongoing landscape maintenance to 144 sites, and this can change at any time due to cancellation or addition of service requests. The combined plot size of these 144 sites is 16.1 million square feet. Of the total square footage, 6.3 million square feet (39%) of the plot size is actual landscape vegetation comprised of planters and turf (both functional and nonfunctional turf). Of the 6.3 million square feet, turf makes up approximately 3.9 million square feet of the landscape. Non-functional turf is approximated at 2.4 million square feet whereas functional turf is 1.5 million square feet. The attached list of proposed sites has been prioritized by locations with the largest size of non-functional grass. The first ten facilities have been highlighted in grey.

Public Works

Attachment B shows a list of all locations that PW provides landscaping services. As shown, PW manages approximately 11 million square-feet of non-paved area but only approximately 1% of these areas have irrigated NFT. PW has been active in adopting sustainability and resiliency in our facilities and have been active in retrofitting NFT with drought tolerant and native landscaping including retrofitting 60,000 square feet at our headquarters building with drought tolerant, native landscaping. The vast majority of PW's NFT areas are located at the PW operated airports and are mostly intended for public use for aircraft viewing and should be exempt from NFT requirements. PW will continue to the convert remaining NFT areas at our building facilities when they are scheduled to be retrofitted as part of our asset management plan.

PW operates and maintains 26 Landscape Maintenance District (LMD) zones which is a special benefit district that is maintained and operated through funds collected directly from property owners within the zone boundary. In total, the LMDs have approximately 455,000 square feet of NFT which all comply with local water usage restrictions. Many of these zones were created decades ago without any inflation adjustment factor accounted for on the yearly annual assessment fee. The annual assessment fee can only be raised through the Proposition 218 process, which requires that residents within the zone boundary approve the increase through a vote. Due to the lack of an inflation adjustment factor during the creation of most zones, the increase in costs over time, and the lengthy Proposition 218 process, most zones do not have funds for activities other than routine maintenance. Due to these restricting circumstances, the Board passed Item 23 on June 22, 2021 agenda, directing the County to develop a plan to address funding issues and increase transparency with zone residents. As part of addressing these issues, Public Works will also look into collaborative capital projects with LMDs such as the East Los Angeles Sustainable Median Stormwater Capture Project, which converted the previously 348,000 square feet of NFT areas to a multi-benefit drought tolerant landscaped area.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

Internal Service Department

When adopting and implementing the motion to adhere to policy 3047, Custodial and Landscaping Division (CLD) will partner with ISD contractors to apply the following to all irrigation systems:

1. All new static spray irrigation equipment must be WaterSense certified or equivalent. Operation of existing static spray irrigation systems, as well as other new overhead irrigation systems such as those using rotary heads, must comply with other requirements in this Policy.

2. All new or replacement irrigation systems, as well as existing systems for large landscaped or vegetated areas (at least 3 acres in size), must have 3/4 rain sensors that shut off the systems. Within 6 months of adoption of this Policy, departments must identify existing systems in need of rain sensors per this directive, and to the extent feasible install rain sensors within a year; for remaining systems, identify and request necessary resources to implement rain sensors.

3. New or replacement irrigation systems must allow for separate watering of trees.

Pilot Program Approach

Internal Service Department

ISD has listed 10 facilities as part of our initial pilot program. These were chosen due to their large amount of non-functional turf. ISD's current contractual requirements for landscaping does not include specific requirements for the utilization of water efficient equipment or methodology. ISD will build these requirements for future contracts to be a part of the new solicitations that is upcoming in 2024 and on. Currently, there are two contracts in place, as listed below:

BOS District #	# Of location	Contract expiration date
1	53	03/31/2024
2	14	03/31/2024
3	17	03/31/2024
4	18	03/31/2024
5	34	03/31/2024
1	9	12/31/2024
4	1	12/31/2024
5	1	12/31/2024

IMPACT ON CURRENT SERVICES (OR PROJECTS)

1. Funding and programs: this could potentially result in additional funding for county operations and contracted services to support these initiatives and offsets costs.

2. Identifying and quantifying non-functional turf areas: this could require additional resources and time for county operations and contracted services to complete this task; currently there is no precise survey of existing sites. For example, DPR recommended in the report back on to the Board of Supervisors on “Resources Needed to Implement Water Conservation Measure at Department of Parks and Recreation Facilities” the need to with a consultant to provide a nonfunctional turfgrass removal proposal and design for each applicable park. Field surveys and more detailed analysis are required to provide specific amounts of nonfunctional turfgrass. This would be to provide an evaluation of all parks, engage in meetings with field staff, and to create graphics depicting recommended turf reduction areas.

3. Placing turf and implementing water conservation measures: this could result in additional costs for county operations and contracted services as well as potential disruptions to landscaping services while the turf is being replaced.

4. The water conservation measures will reduce the county's water consumption, this would also save the county money by reducing water bills; however, initial costs to renovate and upgrade will come at the cost of removing and replacing non-functional turf and implementing other water efficiency upgrades.

5. Compliance with state drought restrictions: the motion is in response to the ongoing drought in California and the state’s imposition of emergency drought restrictions. county operations and contracted services may need to comply with these restrictions which could result in additional costs.

CONCLUSION

In conclusion, the Board of Supervisors' motion on "Urban Water Conservation Measures & Assistance in Unincorporated Los Angeles County" aims to address the critical issue of drought in California by directing the ISD, PW, DPR to identify and quantify Non-Functional Turf (NFT) areas in their facilities and provide a plan for replanting with water-efficient landscaping. ISD is currently conducting surveys of 144 landscape sites and prioritizing them for conversion, exploring available funding and rebate opportunities, and minimizing any disruption to business operations. ISD has provided an attachment with a list of all locations and the square footage of functional and non-functional turf. The goal is to transform non-functional turf into aesthetically pleasing, water-efficient landscapes while being mindful of the financial cost of such upgrades; add all new requirements to the new landscape

solicitation or during the options years, if possible. ISD will report back with the results when new contracts or renewals take effect in 2024.

If you have any questions, please contact me at (323) 267-2101, via email: shollins@isd.lacounty.gov, or your staff may contact Michael Eugene at (323) 267-2107, via email: meugene@isd.lacounty.gov.

SH:MO:LG:SS:CC

Attachments

c: ISD Board Deputies
Chief Executive Officer
Department of Parks and Recreation
Executive Office, Board of Supervisors
Public Works

Attachment A- Los Angeles County Internal Service Department Non-Functional Turf Areas

Building Name	Primary Address	Primary City	Landscape Lot Size	Planter Sq. Ft.	Functional Grass	Non-Functional
SYLMAR JUVENILE COURTSHOUSE/ B.J. NIDORF ADMINI	16350 FILBERT ST	SYLMAR	385,282	55,000	125,000	425,000
JUVENILE HALL-ADMINISTRATION BUILDING-4	1605 EASTLAKE AVE	LOS ANGELES	934,612	85,000	95,000	350,000
MACLAREN CHILD CENTER-STORAGE SHED 2	4024 N DURFEE AVE	EL MONTE	544,582	21,250	0	289,500
JUVENILE CAMP SCUDDER ADMIN	28750 BOUQUET CANYON ROAD	SANTA CLARITA	555,000	62,530	99,650	195,630
JUVENILE CAMP MUNZ	42220 N LAKE HUGHES ROAD	LAKE HUGHES	308,000	32,500	65,000	165,300
JUVENILE CAMP MENDENHALL	42230 N LAKE HUGHES ROAD	LAKE HUGHES	378,000	39,600	62,000	162,300
CAMP SCOTT - ASSESSMENT UNIT	28700 N BOUQUET CANYON RD	SANTA CLARITA	450,000	35,030	93,154	115,320
SHERIFF-LASER VILLAGE I	1060 N EASTERN AVE	LOS ANGELES	682,000	195,000	0	85,000
DCSS-ANTELOPE VALLEY SENIOR CENTER	777 W JACKMAN ST	LANCASTER	99,191	3,600	0	71,200
HARRY HUFFORD REGISTRAR-RECORDER/CO CLERK BLD	12400 E IMPERIAL HWY	NORWALK	413,653	39,200	0	57,150
LANCASTER COURTHOUSE-SERVICES BUILDING (VAC)	1110 W AVENUE J	LANCASTER	113,000	1,000	0	53,700
ANTELOPE VALLEY SERVICE CENTER-BUILDING B	335 E AVENUE K-6 A-B-C	LANCASTER	49,705	18,800	0	49,000
WEST COVINA COURTHOUSE	1427 WEST COVINA PKWY	WEST COVINA	124,207	12,160	9,200	45,900
CHALLENGER YOUTH CENTER-STAFF DORMITORY BLDG	5300 W AVENUE I	LANCASTER	1,257,000	6,230	584,000	36,000
PW SEWER-OFFICE/LABORATORY/EQUIPMENT ROOM	6338 PASEO CANYON DR	MALIBU	105,000	65,000	0	31,000
PUBLIC HEALTH LABORATORIES BUILDING 1100	12750 ERICKSON AVE	DOWNEY	121,295	12,130	0	21,260
Sheriff/Sybil Brand Institute	4500 City Terrance	LOS ANGELES	455,000	8,000	0	19,000
RANCHO LOS AMIGOS CHILDREN'S CENTER	7755 GOLONDRINAS ST	DOWNEY	35,254	1,300	0	18,340
SHERIFF CRIME LAB	7717 GOLONDRINAS ST	DOWNEY	55,021	1,350	0	18,080
KENNETH HAHN HALL OF ADMINISTRATION	500 W TEMPLE ST	LOS ANGELES	247,810	35,000	0	18,000
LANCASTER JUVENILE COURTHOUSE	1000 W AVENUE J	LANCASTER	61,668	0	0	15,000
PH-POMONA PUBLIC HEALTH CENTER	750 S PARK	POMONA	47,043	2,325	0	12,750
ALFRED J MC COURTNEY JUVENILE JUSTICE CENTER	1040 W AVENUE J	LANCASTER	182,000	17,900	0	12,000
SANTA CLARITA GOVERNMENT CENTER BUILDING	23757 W VALENCIA BLVD	SANTA CLARITA	46,000	4,700	0	12,000
DPW ROAD-VENTURA PARK & RIDE PARKING LOT	10801 VENTURA BLVD	STUDIO CITY	33,516	0	0	10,795
LANCASTER COURT-DELINQUENCY CRT/DETECTIVE DIV	1010 W AVENUE J	LANCASTER	42,638	8,400	0	10,300
EAST LOS ANGELES COUNTY HALL	4801 E 3RD ST	EAST LOS ANGELES	46,254	11,936	0	9,683
DCSS-EAST LOS ANGELES SERVICE CENTER	133 N SUNOL DR	EAST LOS ANGELES	93,000	6,990	0	8,850
PH-WHITTIER PUBLIC HEALTH CENTER	7643 S PAINTER AVE	WHITTIER	15,335	4,560	0	8,740
CEO/VALENCIA CIVIC CENTER	23743 W VALENCIA BLVD	SANTA CLARITA	33,442	3,520	0	8,550
PUBLIC LIBRARY - EAST LOS ANGELES LIBRARY	4837 E. 3RD ST	EAST LOS ANGELES	85,952	15,367	15,633	7,951
PH-GLENDALE PUBLIC HEALTH CENTER	501 N GLENDALE AVE	GLENDALE	56,088	10,500	0	7,680
PROBATION-RIO HONDO AREA OFFICE	8240 S BROADWAY AVE	WHITTIER	76,850	12,910	0	7,645
DCSS-ALTADENA SENIOR CENTER	560 E MARIPOSA ST	ALTADENA	41,933	2,535	0	6,584
PH-ENVIRONMENTAL HEALTH HEADQUARTERS	5050 COMMERCE DR	BALDWIN PARK	71,003	4,270	0	6,070
PROBATION SANTA CLARITA	23759 W VALENCIA BLVD	SANTA CLARITA	22,000	1,500	0	5,800
PW SEWER-MALIBU SEWAGE TREATMENT PLANT	3620 VISTA PACIFICA ST	MALIBU	43,000	18,439	0	5,422
FORT MOORE PIONEER MEMORIAL	501 N HILL ST	LOS ANGELES	55,505	29,500	0	5,000
PROBATION-EAST LOS ANGELES AREA OFFICE	4849 E CIVIC CENTER WAY	EAST LOS ANGELES	23,459	15,807	0	4,996
YAROSLAVSKY FAMILY SUPPORT CNTR	7555 VAN NUYS BLVD	VAN NUYS	289,531	47,555	0	4,654
FIRE-L.A. COUNTY LIFEGUARD TRAINING CENTER	2600 THE STRAND	MANHATTAN BEA	21,204	3,800	0	4,515
PH-NORTH HOLLYWOOD PUBLIC HEALTH CENTER	5300 TUJUNGA AVE	NORTH HOLLYWO	41,500	595	0	4,200
LOMITA ADMINISTRATIVE CENTER	24320 NARBONNE AVE	LOMITA	19,660	9,500	0	4,100
ANIMAL CONTROL #3-ADMINISTRATION BUILDING	216 W VICTORIA ST	CARSON	63,310	6,800	0	4,000
Mental Health/Olive View Urgent Care Center	14659 Olive View	SYLMAR	138,000	37,325	0	3,895
EAST LA CIVIC CENTER-COMFORT STN/TOOL STORAGE	5019 E 3RD ST	EAST LOS ANGELES	14,424	3,850	2,840	3,810
ISD-DIST 2 FACILITIES OPERATIONS SERVICE BLDG	13811 DEL SUR ST	SAN FERNANDO	10,170	3,150	0	3,570
NORTHEAST JUVENILE JUSTICE CENTER BLDG-1	1601 EASTLAKE AVE	LOS ANGELES	113,794	8,450	0	3,450
CEO - ELA CIVIC CNTR CHILD CARE	4824 CIVIC CENTER WAY	EAST LOS ANGELES	24,400	7,734	0	3,239
PW-CITY OF INDUSTRY/LA PUENTE DISTRICT OFFICE	16005 E CENTRAL AVE	LA PUENTE	27,396	5,770	0	3,200
SHERMAN BLOCK SHERIFF'S HEADQUARTERS BUILDING	4700 W RAMONA BLVD	MONTEREY PARK	534,000	165,000	0	3,200
REGISTRAR RECORDER - VAN NUYS	14340 W SYLVAN ST	VAN NUYS	14,394	350	0	2,685
CENTRO MARAVILLA SERVICE CENTER-BLDG B	4716 CESAR E CHAVEZ AVE	EAST LOS ANGELES	59,000	7,962	0	2,660
SANTA CLARITA COURTHOUSE	23747 W VALENCIA BLVD	SANTA CLARITA	151,000	5,200	0	2,530
DPSS-COMPTON AP DISTRICT OFFICE	211 E ALONDRA BLVD	COMPTON	112,466	12,850	0	2,500
PARKING LOT (DPSS-NORWALK AP DISTRICT)	12819 NORWALK BLVD	NORWALK	40,258	4,815	0	2,300
SANTA CLARITA VALLEY-SHERIFF STATION	23740 W MAGIC MOUNTAIN PKWY	SANTA CLARITA	7,921	1,955	0	2,186
DPSS-SOUTH CENTRAL AP DISTRICT OFFICE	10728 S CENTRAL AVE	LOS ANGELES	85,937	6,145	0	2,100
PARKING LOT(SAN GABRIEL VALLEY SVC CTR)(TERM)	1441 SANTA ANITA AVE	SOUTH EL MONTE	30,112	4,638	0	1,920
ASSESSOR-LANCASTER REGIONAL OFFICES	251 E AVENUE K-6	LANCASTER	60,320	2,960	0	1,850
PROBATION-EAST SAN FERNANDO VALLEY AREA OFFIC	14414 W DELANO ST	VAN NUYS	4,988	465	0	1,830
PROBATION-CENTRAL TRANSCRIBING OFFICE	200 W WOODWARD AVE	ALHAMBRA	3,217	400	0	1,555
DHS-CANOGA PARK HEALTH CENTER (P/PP SITE)	7107 REMMET AVE	CANOGA PARK	6,648	1,320	0	1,545
DPSS-POMONA WS DISTRICT OFFICE	2040 W HOLT AVE	POMONA	83,096	1,180	0	1,520
PH-BURBANK PUBLIC HEALTH CENTER	1101 W MAGNOLIA BLVD	BURBANK	2,200	700	0	1,471
PH-PACOIMA PUBLIC HEALTH CENTER	13300 VAN NUYS BLVD	PACOIMA	7,242	790	0	1,235
PARKING (DPSS-POMONA WS DISTRICT OFFICE)	340 SHORT ST	POMONA	96,712	3,210	0	1,200
OLD BELLFLOWER HEALTH CENTER (DEMO)	10005 E FLOWER ST	BELLFLOWER	18,957	3,524	0	985
DHS-EDWARD ROYBAL COMPREHENSIVE HEALTH CENT	245 S FETTERLY AVE	EAST LOS ANGELES	126,457	9,140	0	850
DPSS-LINCOLN HEIGHTS WS DISTRICT OFFICE	4077 N MISSION RD	LOS ANGELES	3,100	1,350	0	785
PH-DR RUTH TEMPLE PUBLIC HEALTH CENTER	3834 S WESTERN AVE	LOS ANGELES	47,000	3,200	0	600
DEPT OF ANIMAL CARE AND CONTROL HEADQUARTERS	5898 CHERRY AVE	LONG BEACH	37,670	1,125	1,098	570
PH - MARTIN LUTHER KING JR. CENTER FOR PUBLIC HEA	11833 S WILMINGTON	LOS ANGELES	18,497	9,691	0	515
ISD-ADMINISTRATIVE HEADQUARTERS	1100 N EASTERN AVE	LOS ANGELES	60,530	14,150	0	500
CEO - COUNTY EMERGENCY OPERATIONS CENTER (EOC)	1275 N EASTERN AVE	LOS ANGELES	62,627	10190	0	150
PARKING/MAINT GARAGE (ALAMEDA STREET GARAGE)	1035 ALAMEDA ST	LOS ANGELES	543	0	0	0
PARKING LOT (LANCASTER COURTHOUSE ANNEX)	1040 W AVENUE J	LANCASTER	25,615	2,500	0	0
PARKING/MAINT GARAGE (ALAMEDA STREET GARAGE)	1055 N ALAMEDA ST	LOS ANGELES	10,400	3,250	0	0
ISD-EASTERN AVE COMPLEX SPECIAL CRAFTS BLDG	1106 N EASTERN AVE	LOS ANGELES	20,856	2,100	0	0
ISD-EASTERN AVE COMPLEX TELECOM BRANCH BLDG	1110 N EASTERN AVE	LOS ANGELES	250,155	12,220	0	0
LANCASTER COURTHOUSE-CENTRAL PLANT	1121 W AVENUE J-2	LANCASTER	115,512	10,000	0	0
ISD-DIST 3 FACILITIES OPERATIONS SERVICE BLDG	11236 PLAYA CT	CULVER CITY	11,154	2,100	0	0

Attachment A- Los Angeles County Internal Service Department Non-Functional Turf Areas

Building Name	Primary Address	Primary City	Landscape Lot Size	Planter Sq. Ft.	Functional Grass	Non-Functional
ANIMAL CONTROL #1-CHICKEN COOP TRAILER (DEMO)	11258 GARFIELD AVE	DOWNEY	55,534	2,575	1,600	0
HS - TEMP EMERGENCY SHELTER/HARBOR FREE CLINIC	122 W 8TH STREET	SAN PEDRO	4,375	1,800	0	0
PH- CURTIS TUCKER PUBLIC HEALTH CENTER	123 W MANCHESTER	LOS ANGELES	57,000	7,500	0	0
PW-SAN GABRIEL VALLEY DISTRICT OFFICE	125 S BALDWIN AVE	ARCADIA	55,520	20,320	0	0
FIRE STATION	12605 OSBORNE ST	PACOIMA	619,102	125,000	0	0
Sheriff Communications Center	1277 Eastern	LOS ANGELES	122,000	18,520	0	0
DCSS-WILLOWBROOK SENIOR CENTER	12915 S JARVIS AVE	LOS ANGELES	65,229	19,500	0	0
SHERIFF - EAST LOS ANGELES SPECIAL ENFORCEMENT B	130 S. FETTERLY AVE.	EAST LOS ANGELES	31,717	3,300	6,550	0
SHERIFF - INTERNAL CRIMINAL INVESTIGATIONS BUREA	13001 DAHLIA AVE	DOWNEY	33,852	16,280	0	0
FIRE-ADMINISTRATIVE HEADQUARTERS BLDG - LA-RICS	1320 N EASTERN AVE	LOS ANGELES	20,575	0	0	0
FIRE-ADMINISTRATIVE HEADQUARTERS BLDG - LA-RICS	1320 N EASTERN AVE	LOS ANGELES	712,990	162,640	0	0
PROBATION CENTINELA OFFICE/PW-BLDG & SAFETY	1320 W IMPERIAL HWY	LOS ANGELES	34,928	17,000	0	0
DCSS-EAST LOS ANGELES SERVICE CENTER	133 N SUNOL DR	EAST LOS ANGELES	92,722	0	0	0
PROBATION CENTINELA OFFICE/PW - BUILDING & SAFE	1330 W. IMPERIAL HWY	LOS ANGELES	34,928	17,000	0	0
PARKING GARAGE (LOT 10-COUNTY MALL PHASE II)	145 N BROADWAY	LOS ANGELES	0	2,500	0	0
PW CENTRAL YARD-SURVEY OFFICE	1525 ALCAZAR ST	LOS ANGELES	12,613	785	0	0
TTC - PUBLIC ADMINISTRATOR WAREHOUSE	16610 CHESTNUT ST	CITY OF INDUSTRY	221,862	17,790	0	0
ISD-DIST 4/FOS MONROVIA CRAFTS SHOPS BUILDING	1703 S MOUNTAIN AVE	MONROVIA	85,907	450	0	0
DPSS-FLORENCE AP DISTRICT OFFICE	1740 E GAGE AVE	LOS ANGELES	81,104	1,300	0	0
BOB HOPE PATRIOTIC HALL (CLOSED)	1816 S FIGUEROA ST	LOS ANGELES	25,062	2,900	0	0
DPW FAIRPLEX PARK-N-RIDE	1819 GILLETTE RD	POMONA	233,064	6,190	0	0
HALL OF JUSTICE	211 W TEMPLE ST	LOS ANGELES	26,338	19,500	0	0
DPW ROAD DIV #518-VIA VERDE PARK & RIDE LOT	21302 VIA VERDE AT SAN BERNARDINO FRWY	COVINA	1,380	8,230	0	0
DPSS-EAST L A GROW EMPLOYMENT SERVICES CENTER	2200 N HUMBOLDT ST	LOS ANGELES	42,103	55	0	0
PW CENTRAL YARD-SHOP OFFICE BLDG	2275 ALCAZAR ST	LOS ANGELES	70,803	15,590	0	0
PARKING LOT 61 (DPSS-COMPTON DISTRICT)	228 E ALONDRA BLVD	COMPTON	46,324	2,240	0	0
DPSS-METRO NORTH AP/ CALWORKS DISTRICT OFFICE	2601 WILSHIRE BLVD	LOS ANGELES	6,500	3,100	0	0
SANTA CLARITA SHERIFF STATION	26201 GOLDEN VALLEY ROAD	SANTA CLARITA	97,005	2,350	0	0
DPSS-METRO EAST AP DISTRICT OFFICE	2855 E OLYMPIC BLVD	LOS ANGELES	47,050	5,545	0	0
PITCHESS DETENTION CENTER	29320 THE OLD ROAD	VALENCIA	56,000	6,950	0	0
ANIMAL CONTROL #7-ADMINISTRATION BUILDING	29525 W AGOURA RD	AGOURA HILLS	150,000	65,000	0	0
CIVIC CENTER COGENERATION PLANT	301 N BROADWAY	LOS ANGELES	25,000	8,000	0	0
HALL OF RECORDS	320 W TEMPLE ST	LOS ANGELES	46,000	27,500	0	0
PARKING STRUCTURE (DPSS-CIVIC CENTER GR DIST)	321 S HEWITT ST	LOS ANGELES	13,101	0	0	0
MENTAL HEALTH-ARCADIA MENTAL HEALTH SERVICES	330 E LIVE OAK AVE	ARCADIA	28,124	11,100	0	0
PH - MONROVIA PUBLIC HEALTH CENTER	330 W MAPLE	MONROVIA	6,211	1,129	0	0
ANIMAL CARE & CONTROL - EAV	38550 SIERRA HIGHWAY	PALMDALE	154,000	44,330	0	0
PW SEWER-MALIBU MESA SEWAGE TREATMENT PLANT	3863 MALIBU COUNTRY DR	MALIBU	117,000	81,815	0	0
EXPOSITION PARK BUILDING & PARKING STRUCTURE	3965 S VERMONT AVE	LOS ANGELES	7,099	1,900	0	0
CULVER CITY COURTHOUSE	4130 OVERLAND AVE	CULVER CITY	15,366	7,500	0	0
CAMP KILPATRICK	427 S. ENCINAL CANYON RD	MALIBU	128,932	90,000	27,000	0
ANIMAL CONTROL #4-ADMINISTRATION BUILDING	4275 N ELTON ST	BALDWIN PARK	26,601	1,152	3,200	0
CENTRO MARAVILLA SERVICE CENTER-BLDG C	4716 CESAR E CHAVEZ AVE	EAST LOS ANGELES	0	0	0	0
CENTRO MARAVILLA SERVICE CENTER-BLDG A	4716 CESAR E CHAVEZ AVE	EAST LOS ANGELES	0	0	0	0
EAST LOS ANGELES CIVIC CENTER - BELVEDERE LAKE	4901 E. 3RD ST	EAST LOS ANGELES	434,656	19,250	261,000	0
PH - HOLLYWOOD/WILSHIRE PUBLIC HEALTH CENTER	5205 MELROSE	LOS ANGELES	7,845	2,500	0	0
DPSS-BELVEDERE AP DISTRICT OFFICE	5445 E WHITTIER BLVD	EAST LOS ANGELES	26,328	5,600	0	0
ISD - DISTRICT 2/FACILITIES OPERATIONS SERVICE VACA	720 N SPRING ST	LOS ANGELES	9,500	800	0	0
DCSS-ALTADENA COMMUNITY CENTER	730 E ALTADENA DR	ALTADENA	27,000	8,455	0	0
PW ROAD-VINCENT GRADE/ACTON METROLINK STATIO	730 W SIERRA HWY AT ANGELES FOREST HWY	PALMDALE	137,280	54,330	0	0
KENYON JUVENILE JUSTICE CENTER	7625 S. CENTRAL AVE	LOS ANGELES	39,295	800	0	0
DCSS-SAN PEDRO SERVICE CENTER	769 W 3RD ST	SAN PEDRO	31,900	27,000	0	0
DCSS-POTRERO HEIGHTS PARK	8051 ARROYO DR	MONTEBELLO	42,550	12,020	10,790	0
DPSS-CUDAHY A/P DISTRICT OFFICE	8130 S ATLANTIC AVE	CUDAHY	92,622	1,725	0	0
PROBATION-FIRESTONE AREA OFFICE	8526 S GRAPE ST	LOS ANGELES	44,440	3,485	0	0
DOWNEY ADMIN CTR - ISD/FOS DIST 4 WATER TANK	9150 E IMPERIAL HWY	DOWNEY	17,799	11,950	0	0
SAN FERNANDO COURTHOUSE ANNEX (UNUSED)	919 1ST ST	SAN FERNANDO	38,481	7,115	0	0
MH/DCFS-FAMILY SERVICES CENTER	921 E COMPTON BLVD	COMPTON	130,516	2,345	0	0
DPSS-PASADENA AP DISTRICT OFFICE	955 N LAKE AVE	PASADENA	23,857	4,240	0	0
PKG STRUCTURE (LOT 93-BELLFLOWER CIVIC CENTR)	9951 E FLOWER ST	BELLFLOWER	34,986	17,790	0	0
EAST LA FREEWAY FENCE	999 MEDNICK ST.	EAST LOS ANGELES	34,025	34,025	0	0
FIRE & EMERGENCY MEDICAL SERVICE OPERATIONS	1061 S GRAND AVE	DIAMOND BAR	42,656	8,100	0	0
			16,189,028	2,407,714	1,462,715	2,474,371
				6,344,800 sq. ft Planter + Grass		
					3,937,086 sq. ft. Total Grass	

Total Lot Size	16,191,528
Total Landscape (Planters and Grass)	6,344,800
Total Landscape/Lot size	39%
Planter size/Lot size	15%
Total Grass /Lot size	24%
Non-functional grass/Lot size	15%
Functional grass/Lot size	9%

Planter size/Total landscape size	38%
Total grass /Total landscape size	62%
Non-functional grass/Total landscape size	39%
Functional grass/Total landscape size	23%

Non-functional Grass/Total Grass	63%
Functional Grass/Total Grass	37%

Attachment B – Los Angeles County Public Works Non-Functional Turf Areas

Site	Address	City	Non-paved area (SF)	Non-Functional Turf Area (SF)
Altadena Yard	252 W. Mountain View St.	Altadena	2,612	0
Brackett Field Airport	1615 McKinley Ave.	La Verne	3,840,398	0
Compton/Woodley Airport	901 W. Alondra Blvd.	Compton	428,410	34,497
General Wm. J. Fox Airfield	4725 William J. Barnes Avenue	Lancaster	3,823,056	69,045
San Gabriel Valley Airport	4233 N Santa Anita Ave.	El Monte	552,380	0
Whiteman Airport	10000 Osborne St.	Pacoima	65,535	18,000
Headquarters	900 S Fremont Ave.	Alhambra	60,901	0
Baldwin Park Yard	14514 Central Avenue	Baldwin Park	1,896	0
Central/Lower Yard	1525 Alcazar St.	Los Angeles	4,125	0
Central/Upper Yard	2275 Alcazar St.	Los Angeles	37,675	0
Eaton Yard	2811 Woodlyn Rd.	Pasadena	24,945	0
Placerita Yard	22234 Placerita Cyn Rd.	Newhall	4,608	0
Road Maintenance District 1	14747 E Ramona Blvd.	Baldwin Park	30,940	0
Road District (RD) 416/116	14959 E Proctor Ave.	La Puente	2,147	0
RD 417/517/117	19865 E Walnut Dr.	Walnut	7,294	0
RD 518	161 N Valencia Street	Glendora	7,959	0
RD 518A	5150 N Mt Baldy Rd.	Claremont	2,170	0
RD 518B	Glendora Mountain Rd.	Azusa	2,381	0
RD 519	5213 North Encinita Ave.	Temple City	8,578	0
RD 519	California Boulevard Medians	San Gabriel Valley	11,761	0
RD 519	Michigan Boulevard Medians	San Gabriel Valley	58,124	0
RD 519	Woodward Boulevard Medians	San Gabriel Valley	68,053	0
RD 119	Potrero Grande Drive Medians	Rosemead	37,018	0
RD 119	Parmount Boulevard Medians	Rosemead	7,478	0
RD 523	17931 Sierra Hwy.	Canyon Country	2,190	0
RD 524	3916 Dunsmore Ave.	La Crescenta	9,276	0
RD 526	27624 W Parker Road	Castaic	13,403	0
RD 526A	49530 Gorman Post Rd.	Gorman	2,328	0

Attachment B – Los Angeles County Public Works Non-Functional Turf Areas

Site	Address	City	Non-paved area (SF)	Non-Functional Turf Area (SF)
Road Maintenance District 3 (RD 233)	5530 W 83rd St.	Los Angeles	1,563	0
RD 232/432	24309 Walnut St.	Lomita	2,899	0
RD 336	4055 W Marine Ave.	Lawndale	644	0
RD 339	3637 Winter Canyon Rd.	Malibu	5,282	0
RD 232	Central Ave WF	Inglewood	30,453	0
RD 233	Vermont Avenue Medians	Athens	631,615	0
RD 233	Charlene Drive Medians	Athens	1,048	0
Road Maintenance District 4	11282 Garfield Ave.	Los Angeles	13,249	0
RD 142	4304 Eugene St.	Los Angeles	1,536	0
RD 141/241	2120 E 90th St	Los Angeles	902	0
RD 446	9521 E Beverly Blvd.	Pico Rivera	1,658	0
RD 446A	13671 Telegraph Rd.	Whittier	8,418	0
RD 142	Saybrook Medians	East LA	75,760	0
RD 142	Gerhart Avenue Medians	East LA	54,000	0
RD 142	Vancouver Avenue Medians	East LA	13,910	0
RD 142	Cela Avenue Medians	East LA	13,195	0
RD 142	Woods Avenue Medians	East LA	8,466	0
RD 241	Central Ave EF Median	Florence/Firestone	20,890	0
RD 241	123rd Street - Slater Av to Compton Av Medians	Florence/Firestone	11,962	0
RD 241	El Segundo Boulevard Median	Florence/Firestone	11,496	0
RD 241	Compton Avenue Medians	Florence/Firestone	7,508	0
RD 241	123rd Street - Central Av to Elva Av Medians	Florence/Firestone	7,469	0
RD 241	Central Avenue Medians	Florence/Firestone	8,949	0
RD 241	Lime Avenue Medians	Florence/Firestone	22,534	0
RD 241	Williams Avenue Medians	Florence/Firestone	22,325	0
RD 241	Frailey Avenue Medians	Florence/Firestone	21,698	0
RD 241	Cookacre Street Medians	Florence/Firestone	18,272	0
RD 241	Castlegate Medians	Florence/Firestone	18,183	0

Attachment B – Los Angeles County Public Works Non-Functional Turf Areas

Site	Address	City	Non-paved area (SF)	Non-Functional Turf Area (SF)
RD 241	White Avenue Medians	Florence/Firestone	18,107	0
RD 446	Florence Avenue Medians	Whittier	5,592	0
RD 446	Splendora Drive Medians	Whittier	4,165	0
Road Maintenance District 5 (RD 557)	38126 N. Sierra Hwy.	Palmdale	7,940	0
RD 551	4859 West Avenue L-12	Quartz Hill	4,047	0
RD 555	17341 E Avenue J	Lancaster	14,470	0
RD 558	8505 E Avenue T	Littlerock	3,769	0
Central Yard	12015 Shoemaker Ave.	Santa Fe	687	0
East Yard	2849 Myrtle Ave.	Irwindale	230	0
North Yard	45712 N Division St.	Lancaster	2,700	0
South Yard	1129 E 59th St	Los Angeles		0
Hansen Yard	10179 Glenoaks Blvd.	Sun Valley	5,421	0
Pickens Yard	4628 Briggs Ave.	La Crescenta	46,411	0
Santa Clara Yard	21190 Centre Pointe Parkway	Santa Clarita	25,821	0
Saticoy Yard - 13436	13436 Saticoy Street	North Hollywood	2,726	0
Saticoy Yard - 13444	13444 Saticoy Street	North Hollywood	2,122	0
Longden Yard	160 E Longden Ave.	Irwindale	20,976	0
Eaton Yard	2986 New York Dr.	Pasadena	164,894	0
San Dimas Yard	118 Pony Express Road	San Dimas	2,638	0
Imperial Yard	5525 E Imperial Hwy.	South Gate	100,911	9,044
Eighty - Third Street Yard	5520 W 83rd St.	Los Angeles	3,466	0
Alamitos Yard	881 Iroquois Ave.	Long Beach	5,045	3,880
Redondo Beach Yard	615 Anita St.	Redondo Beach	8,759	0
Rio Hondo SG	353 S. Van Norman Rd.	Montebello	372,140	0
WWD North Maintenance Area	260 E Avenue K-8	Lancaster	19,538	0
		Total	**10,996,100**	**134,466**

EXECUTIVE OFFICE
BOARD OF SUPERVISORS
CELIA ZAVALA
EXECUTIVE OFFICER

COUNTY OF LOS ANGELES
EXECUTIVE OFFICE
BOARD OF SUPERVISORS

KENNETH HAHN HALL OF ADMINISTRATION
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MEMBERS OF THE BOARD

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KATHRYN BARGER

March 29, 2023

TO: Supervisor Janice Hahn, Chair
Supervisor Hilda L. Solis
Supervisor Holly J. Mitchell
Supervisor Lindsey P. Horvath
Supervisor Kathryn Barger

FROM: Celia Zavala
Executive Officer

REPORT BACK ON WATER CONSERVATION (ITEM NO. 19, AGENDA OF AUGUST 30, 2022)

On August 30, 2022, the Board of Supervisors (Board) adopted a motion, titled "Urban Water Conservation Measures and Assistance in Unincorporated Los Angeles County" (Board Motion), by Supervisors Solis and Kuehl, directing the Chief Sustainability Office (CSO), in coordination with County Counsel, and the Departments of Public Works and Regional Planning, to report back to the Board with recommendations for updating the County's 2014 water conservation ordinance. The CSO was also directed, in coordination with the Chief Executive Office, to report on the feasibility of creating programs to support equitable access to Federal, State, and local resources for the purpose of building climate resilience in communities, such as providing low to moderate income residents with financial assistance for turf removal. The Board Motion builds on two previous motions (adopted July 27, 2021, and March 1, 2022) in which the CSO was first directed to report back on recommendations to increase water conservation at County facilities, and then directed to create a Board Policy for water conservation at those County facilities. That Board Policy was adopted as Board Policy 3.047 through the August 30, 2022, Board Motion.

This memo provides a response to the directives from the Board Motion, including a summary of the process to develop recommendations, background information, and stakeholder outreach.

Introduction

The August 30th Board Motion was developed in response to severe drought conditions throughout the State. These conditions have worsened in severity since the adoption of the 2014 water conservation ordinance, and Governor Newsom extended the statewide drought emergency in 2021 in response to the most recent drought.

Additionally, several recent policy updates have occurred on both the State and Federal level in relation to the drought. Following the Governor's drought emergency declaration, the State Water Resources Control Board adopted emergency regulations in January 2022, which prohibit the overwatering of yards, washing cars without a shutoff nuzzle, hosing off sidewalks, or watering grass within 48 hours after a rainfall. In June 2022, a new temporary regulation was enacted to prohibit the watering of non-functional turf in commercial and industrial settings. Governor Newsom also proposed the use of $750 million from the State's General Fund to support drought resilience and response. Lastly, the Federal "Inflation Reduction Act of 2022" includes $4 billion for drought relief programs, such as turf removal and other conservation programs in urban communities.

While aggressive emergency regulations are critical in the short term, the goal of the Board Motion is to ensure that the County is showing leadership by both reexamining its 2014 water conservation ordinance and by implementing changes to permanently make our region more water secure. Some of these changes include addressing high water uses that do not provide substantial community benefits, such as high water need landscaping. In addition, because turf replacement programs are typically designed on a reimbursement model, which may make them relatively inaccessible to low-income communities, the Board Motion seeks to ensure equitable access to these resources.

To develop this report, the CSO convened the departments named in the Board Motion, including the Department of Public Works, the Department of Regional Planning, and County Counsel. Following an initial discussion and gathering of information from staff research, as well as interviews with interested stakeholders, these County departments convened again to discuss recommendations to include in this report. The CSO developed a draft report which was reviewed by the departments, and subsequently edited according to comments received, in order to produce this final report.

2014 Water Conservation Ordinance Update

In 2014, during the drought emergency that preceded the current one, the County passed a water conservation ordinance (Los Angeles County Code section 11.38.620-680). This ordinance implemented restrictions on various uses of water, to include the use of hoses for watering, the watering of lawns and landscaping, types of plumbing fixtures, methods of washing vehicles, service of drinking water at public eating places,

and the use of decorative fountains. Since adoption of that ordinance, there have been several relevant policy developments, such as the adoption of the State's Model Water Efficient Landscape Ordinance, other local water conservation ordinances, and the emergency drought regulations described above. While much of the County's 2014 ordinance is still aligned with current water conservation policies, a key recommendation and policy approach that has started to gain traction is addressing "non-functional turf," with the State of Nevada being the first to regulate this type of landscaping. The Nevada law and other relevant information about this policy approach are discussed in further detail below.

Non-Functional Turf Policies

Nevada Assembly Bill 356

In 2021, the State of Nevada, facing similar drought conditions to California, passed Assembly Bill 356 banning the use of Colorado River water, distributed by the Southern Nevada Water Authority (SNWA), from being used after January 1, 2027[1] to irrigate non-functional turf on any property not zoned exclusively for a single-family residence. The Colorado River is a major source of water supply for both Nevada and Southern California and is a water source that has been heavily impacted by climate change and drought.

The bill also directed SNWA to complete the following actions: 1) define what is non-functional and functional turf for the purposes of the prohibition; 2) develop a plan to identify and facilitate the removal of non-functional turf from properties, within the SNWA service area, not zoned exclusively for a single-family residence; 3) establish a waiver process for the removal of non-functional turf; and 4) create a Nonfunctional Turf Removal Advisory Committee[2].

In July 2021, the SNWA Board of Directors appointed nine members to the Nonfunctional Turf Removal Advisory Committee. The nine voting members represented commercial and industrial properties, homeowners' associations, golf courses, multifamily properties, environmental interests, and municipalities. The Committee prepared a report with its recommendations which was approved by the

1 AB356. (2021, March 22). Retrieved from Nevada Electronic Legislative Information System: https://www.leg.state.nv.us/App/NELIS/REL/81st2021/Bill/7910/Text

2 AB356. (2021, March 22). Retrieved from Nevada Electronic Legislative Information System: https://www.leg.state.nv.us/App/NELIS/REL/81st2021/Bill/7910/Text

SNWA Board on November 17, 2021[3]. A summary of some key recommendations is set forth below:

- *Definitions:* The Committee recommended that "Functional Turf" be defined as an irrigated grass area that provides a recreational benefit to the community. Included in this definition are examples of various kinds of functional turf, to include: Active/Programmed Recreation Turf, Athletic Field Turf, Designated Use Area Turf, Golf Course Play Turf, Pet Relief Area Turf, Playground Turf, and Resident Area Turf. "Nonfunctional Turf" was defined by the Committee as any irrigated grass area that does not meet the definition above, including but not limited to: streetscape turf; frontage, courtyard, interior and building adjacent turf, and certain HOA-Managed Landscape Areas.

- *Waiver Process:* The Committee recommended that any non-single family residential property be allowed to apply for a waiver for turf that is presumed to be non-functional, and therefore not permitted under the recommended definitions. Applicants must demonstrate how their turf "substantially" meets the Functional Turf definition. The Committee also agreed that the process should include the opportunity to appeal staff decisions.

- *Other Recommendations:* The Committee noted that it may be necessary to reconvene to discuss other issues that may arise pertaining to the implementation of AB 356. This may include, for example, timeline and budget challenges for some properties to remove large areas of non-functional turf. Finally, the Committee recommended that SNWA conduct outreach activities for non-single family residential property owners and managers to support the implementation of AB 356, including marketing, online tools, and staff site evaluations.

Metropolitan Water District
As noted earlier, in May 2022, the State Water Resources Control Board adopted an emergency regulation banning the irrigation of non-functional turf with potable water for all commercial, industrial, and institutional properties[4]. Following this, the Metropolitan Water District of Southern California (MWD) adopted a resolution encouraging local jurisdictions to take action to reduce or eliminate irrigation of non-functional turf with

[3] Committee, S. N. (2021, November). Southern Nevada Water Authority Nonfunctional Turf Removal Advisory Committee, Recommendations Report. Retrieved from https://www.snwa.com/assets/pdf/ntrac-2021-recommendations-report.pdf

[4] California, M. W. (2022, October 11). Board of Directors One Water (Conservation and Local Resources) Committee. Retrieved from https://www1.mwdh2o.com/DocSvcsPubs/PDFs/OWC_7-11_B-L.pdf

potable water[5]. Within the adopted resolution, MWD offered sample language municipalities can use within their water conservation ordinances to address non-functional turf. The resolution suggests three main requirements for ordinances:

1) Prohibition of irrigation of non-functional turf with potable water except for existing turf at residential properties;

2) Prohibition of installation of non-functional turf at any new or existing commercial, industrial, or public properties or facilities, as well as at any new residential properties; and

3) Setting a date after which non-functional turf must be removed from commercial, industrial, or public properties or facilities.

MWD's adopted resolution with the sample language is included in Attachment I of this report. At least one local jurisdiction with whom CSO staff spoke, the City of Burbank, is considering adoption of this language.

Financial Assistance Program for Turf Replacement

The CSO spoke to local municipalities and interested stakeholders to gather information which would inform a potential financial assistance program to support low-income communities in implementing water conservation measures such as turf replacement. A summary of key findings from those conversations is included below.

Current Turf Replacement Programs

The primary turf replacement program in the County is run by MWD and is open to properties within their service area. This program provides $2.00 per square foot to replace turf, and staff noted that they receive about 1,000 applications per week. Of those applications, 20-50 tend to be commercial projects. MWD runs the program until funding is expended. This year they will be asking the State for additional funding for this program.

Some agencies within MWD's service area offer an additional amount per square foot when funding permits. For example, the Los Angeles Department of Water and Power (LADWP) offers residents an additional $3.00 per square foot, which means residents in the LADWP service area receive a total rebate of $5.00 per square foot to replace their turf.

[5] California, M. W. (2022, October 11). Board of Directors One Water (Conservation and Local Resources) Committee. Retrieved from https://www1.mwdh2o.com/DocSvcsPubs/PDFs/OWC_7-11_B-L.pdf

For the MWD program, before an applicant begins their project, they must obtain a project start approval from MWD. Once approved, applicants have 180 days to complete their project. After completion of the project, the applicant submits a post-project request rebate application, which may take up to two weeks for MWD to review. Once the application is approved, applicants receive their rebates within 8-10 weeks.

The rebate program sets certain criteria for what may be used as replacement for turf. These criteria are as follows: no synthetic turf may be used; no hardscape is allowed within the transformed area, except for permeable hardscape; at least three California friendly plants must be planted per 100 square feet of lawn transformed; there must be a stormwater retention feature that helps keep water in the yard when it rains; and there must be replacement or modification of overhead spray sprinklers to a more water-efficient irrigation system. While MWD does not have a direct installation program, they do have a list of contractors available online who are certified through MWD's Water Efficient Landscape Dual Certification Program to perform this work.

Long Beach Water Department Direct Install Program

The Long Beach Water Department (LBWD) received a grant from the California Coastal Conservancy (CCC), which allowed it to fund the Long Beach Direct Install Gardens Program (DIG), a direct replace-your-turf installation pilot program. Due to grant requirements, the pilot program targeted a certain set of census tracts next to the LA River, and only residents in those areas were eligible to apply. As with MWD's program, LBWD would accept applications until funding was expended.

For this program, LBWD first hired a designer that came up with three design schemes that would be offered to homeowners. Once the designs were completed, LBWD partnered with the Long Beach Conservation Corps, who were trained to implement the three design schemes. The total pot of funding for the turf replacement program was approximately $450,000. Funding was comprised from the grant they received from CCC and from funds they receive annually as a MWD member agency.

The Corps also received a $50,000 grant to provide maintenance and education to people on how to care for their new gardens. Approximately 50 percent of the turf replacement program funding was used for materials and the other 50 percent was applied to labor. Staff noted that labor costs for their model were high because the Conservation Corps does all their work manually, meaning members are not able to use heavy machinery that a private company would use to remove turf at much faster speeds. Partnering with the Conservation Corps provides additional benefits, such as workforce development within the community.

In addition to the DIG program, LBWD also offers two other lawn replacement programs, the Direct install multi-family program, which is a direct installation program for multifamily dwellings, and the Lawn-to-Garden program, which is a rebate program.

Potential Funding Options

Research and discussions with stakeholders surfaced a few ideas about potential funding sources. For instance, several stakeholders cited the California Department of Water Resources' Urban Community Drought Relief Program[6] as a potential source of funding. However, because water conservation programs are typically run by water agencies, the County will need to do further exploration of options, including direct discussions with key State agencies such as the State Water Board and Department of Water Resources, as well as continuing to track and engage in the development of upcoming State and Federal programs.

Since there are significant funds being dedicated to climate resilience, the County may consider either pursuing one of these sources of funding for a turf replacement program or developing a broader home retrofit program that covers additional aspects of resilience, such as energy efficiency and electrification. While not specifically directed within the current Board Motion, such a program would align well with already established Board priorities regarding sustainability, equity, and climate resilience.

The County could also explore the establishment of a low- or no-cost loan program for low-income residents that could be paid back with existing rebate program funds, such as the one run by MWD. However, not all unincorporated communities fall within the service area of a water agency that provides such rebates.

Turf Replacement Criteria

In addition to simply removing turf, stakeholders emphasized that, similar to the criteria for MWD's turf replacement program, any program established by the County should ensure that turf should be replaced in a beneficial way, such as, for example, banning installation of artificial turf or impermeable surfaces, and also including criteria that create multiple benefits. Such criteria would ideally include the use of native, drought tolerant plants, even though some stakeholders and experts have raised issues with implementing such requirements, such as ensuring that nurseries maintain an adequate supply of native plants, identifying appropriate plant palettes depending on local factors, and providing education on the care of these plants.

[6] 2022 Urban Community Drought Relief Funding. (2022). Retrieved from California Department of Water Resources: https://water.ca.gov/Water-Basics/Drought/Urban-Drought-Grant

Expert stakeholders such as the Theodore Payne Foundation suggested workable solutions to some of these issues, such as early communication with suppliers, and limiting the types of plants used in a program to those that are readily available and easy to maintain. However, CSO will more comprehensively explore these issues and potential solutions via the report back to the "Enhancing Biodiversity and Saving Water with Native Plants at County Facilities" Board Motion (September 27, 2022), which calls for recommendations on pathways to achieve at least 75 percent California native plants at County facilities, including identifying existing resources and gaps in information, such as plant palettes, landscaping guidelines, and training[7].

Recommendations

Proposed Changes to the 2014 Ordinance

Based on the research and conversations described above, we recommend two changes to the 2014 ordinance, with the primary changes to include language and regulations related to non-functional and functional turf. We propose that the County review MWD's model ordinance language for adoption, both internally with County departments, as well as with stakeholders. As a reflection of issues raised during discussions about turf replacement programs, the County should ensure that in banning certain turf, it does not inadvertently encourage the use of maladaptive replacements, such as artificial turf or impermeable surfaces. Therefore, the County should explore levers within the ordinance to limit this outcome.

In our review of other local policies, we also noted that there is a minor difference in the allowed watering hours between the current County ordinance, that of the City of LA, and the current State guidance, so we recommend aligning these hours between all three. The recently adopted Board Policy is similarly aligned with the City of LA and the State guidance, so adjusting the County ordinance would create more consistency and lessen confusion across these jurisdictions.

We also recommend a review of existing County ordinances, which address outdoor water usage on landscaping, for consistency with the latest best practices, as well as the effectiveness of current enforcement efforts and resources.

Finally, if the Board decides to move forward with these changes, we recommend that the County conduct a more formal engagement process that includes CBO's, NGOs, the business community, and residents, both to gather input and to raise awareness. While the diverse stakeholders we spoke to were generally supportive of greater water conservation and generally did not voice any specific concerns about the policy

[7] Enhancing Biodiversity and Saving Water with Native Plants at County Facilities. (2022, September 27). Retrieved from https://file.lacounty.gov/SDSInter/bos/supdocs/172876.pdf

approaches we are weighing, the County is home to a variety of communities where the uses, sources, and management of water vary greatly (see Attachment II). As such, the County should ensure that any changes to its existing ordinance consider that diversity.

Turf Replacement Program Recommendations

If the County chooses to move forward with a financial assistance program for turf replacement, there are several approaches that could be considered, and the feasibility of these will depend primarily on the available funding and funding sources. Below we describe these approaches, as well as some other considerations the County should weigh before determining a path forward.

Program Design
The County should build on the best practices and efforts of other local agencies that have run turf replacement programs, while also tailoring an approach to the unique circumstances within the County to ensure that any program would be available to all unincorporated communities. This effort should start with data gathering to better understand these circumstances. For instance: How many unincorporated area residents are/are not served by a water agency that provides turf rebates? What portion of these communities would be considered low income? For communities that are served by agencies that run rebate programs, how much of a rebate is available? Once this information is gathered and these questions are answered, the County should reach out to agencies that serve low-income communities in the unincorporated areas in order to discuss potential partnership on this program. Such partnerships could include, for instance, exploring the potential for the County to develop a low- or no-cost loan program to bridge the gap between the upfront spending needed to replace turf and the receipt of rebate money. The County could also develop robust targeted outreach to low-income communities about the existence of these rebates and identify other needs, such as the technical assistance necessary to pursue rebates.

The County can also seek funding to develop its own turf replacement program, whether this program would serve all unincorporated areas, or just those areas that do not have any access to other replacement programs. This program could start on a pilot basis based on available funding. Such a program should also include robust outreach, ideally in partnership with local CBOs, as well as an engagement and education component to encourage more widespread landscape conversion while also fostering community connectivity. The County can take advantage of the work and resources already done by partner agencies such as MWD in order to develop multi-benefit program criteria, training, and lists of certified contractors as well.

Although the focus of the Board motion is water conservation and landscape conversion, the County could consider a more expansive program which takes a "whole house" approach which would include other residential improvements that can lower utility bills and help achieve additional sustainability and climate resilience goals. This approach would require additional steps and funding, likely starting with a detailed assessment of each property to determine its needs, and then developing a broader set of available contractors to address a range of home retrofit needs (e.g., electrical upgrades, roofing, etc.). However, such an approach may open additional funding sources, as well as address broader County sustainability goals. Even with a narrower approach, the County should ensure that the program is designed in a way that aligns with State and County goals related to climate resilience and biodiversity by building in multi-benefit criteria that not only achieve water conservation, but also water capture, cooling, and habitat benefits.

The County can also tap the expertise of County departments that run existing programs that serve County residents and property owners, such as the Los Angeles County Development Authority (LACDA), which coordinates and/or oversees home repair and improvement work within private homes through several programs, including the Handyworker Program and the County's lead abatement program. These programs may originate from Board direction, use available funding to meet known community needs, or, in the case of the lead abatement program, work with other County departments to serve as an implementation partner. They may also vary based on the funding source and program goals, with work typically being done by outside contractors, and LACDA playing a hands-on role as a project manager, ensuring that work is done according to program requirements.

Funding

As noted earlier, several stakeholders recommended that the County closely track new funding available, particularly through the State. In 2021, the Legislature amended the Budget Act of 2021, setting aside funding for Drought Relief Programs that would offer financial assistance to address drought impacts. One of those programs is the Urban Community Drought Relief Fund administered by the California Department of Water Resources (DWR). For 2022, DWR was allocated $75 million via the Urban Community Drought Relief Fund for turf replacement. DWR began accepting applications on October 10, 2022, and the final deadline for applications is January 31, 2023. Awards are set to be announced December 2022 - March 2023. Local agencies shared that this program is a rare funding source outside of MWD's funding for this type of program. We recommend that the County track this funding source, evaluate its applicability to a turf replacement program, and apply for the program if there is a next round of funding.

The County should separately connect with relevant State entities, such as DWR, the State Water Board, and the Governor's office, to communicate the goals of the proposed program, identify other funding sources that are currently available, and advocate for additional funds. The County should also consider available funding sources in development of the program design, for instance, by ensuring that the program addresses State goals around climate adaptation and mitigation and biodiversity.

Should you have any questions concerning this matter, please contact Rita Kampalath, Acting Chief Sustainability Officer, at (323) 459-3939 or rkampalath@cso.lacounty.gov.

CZ:RK:SF:jg

Attachments

c: County Counsel
Chief Executive Office
Public Works
Regional Planning

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

BOARD ACTION

- **Board of Directors**
  One Water (Conservation and Local Resources) Committee

10/11/2022 Board Meeting

7-11

Subject

Adopt resolution encouraging action to reduce or eliminate irrigation of non-functional turf with potable water; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

As a result of the record drought in the Southwest, staff brought forth four options to address the irrigation of non-functional turf with potable water to the Board for discussion in August 2022. The Board recommended that all four options be further developed for future review and action. One of the options is to adopt a board resolution encouraging municipalities within our service area to ban the irrigation of non-functional turf with potable water. As there is no fiscal impact or other action needed for this resolution, staff developed the attached resolution and is bringing it forward for board adoption.

Details

Background

Due to severe and persistent drought conditions, Metropolitan's Board declared a regional drought emergency in November 2021 and adopted an Emergency Water Conservation Program in April 2022 to address supply shortages in the State Water Project-dependent areas. Conditions on the Colorado River are equally concerning as both Lake Mead and Lake Powell are at their lowest historical levels. In June 2022, the U.S. Bureau of Reclamation Commissioner Camille Touton announced that Colorado River water users need to reduce use by two to four million-acre feet. It is clear that agencies need to permanently reduce potable water demand for all non-essential uses.

In November 2021, Metropolitan's Board adopted Legislative Priorities and Principles for 2022 that included "support administrative/legislative actions and funding to improve water use efficiency through non-functional turf management." Currently, Metropolitan's commercial Turf Replacement Program (TRP) is the focus of non-functional turf management activities. However, following board direction, staff now seeks to expand the options available for non-functional turf management.

In May, as part of the state's drought response, the State Water Resources Control Board adopted an emergency regulation banning the irrigation of non-functional turf with potable water for all commercial, industrial, and institutional properties throughout the state. This emergency regulation expires on June 14, 2023. In adopting this regulation, the state acknowledged that irrigation of turf that is not used for recreational or community gathering purposes is an unnecessary use of water.

To date, Southern California residents have removed more than 200 million square feet of turf at residential and commercial properties through Metropolitan's TRP. A recent study by Dr. Andrew Marx indicates that 96 percent of properties in Metropolitan's service area which convert from turf to California Friendly landscaping through Metropolitan's TRP maintain that landscaping over time. In addition, Metropolitan's multiplier study found that for every 100 landscapes that are installed using incentives, another 134 are installed without the use of an incentive payment. Both studies focused on residential properties, but these findings can be extended to commercial properties as well. It is expected that there would be a lower rate of reversion on commercial properties due to less frequent property sales. Therefore, the permanent ban on irrigation of non-functional turf

and the continued effort to convert these areas to California Friendly landscaping would constitute a significant reduction in potable water demand.

In August, staff presented the Board with four options to address the irrigation of non-functional turf with potable water in our service area. All options received a positive response and, accordingly, staff was directed to further develop them for future board review and action. The least complex of these called for the Board to adopt a resolution encouraging municipalities to ban the irrigation of non-functional turf with potable water. This option would not require any programmatic or legislative changes to implement and, as such, staff has prepared a proposed resolution for immediate consideration by the Board.

Attached to the proposed resolution is sample language that potentially could be inserted into a municipality's water conservation ordinance, depending on the nature and scope of its authority. The sample language provides a basic framework, including a definition of non-functional turf, and the following options for addressing non-functional turf:

1. Prohibit irrigation of non-functional turf with potable water after the effective date of the ordinance, with certain exceptions.
2. Prohibit installation of non-functional turf after the effective date of the ordinance, with certain exceptions.
3. Require the removal of all non-functional turf from commercial, industrial, or public properties or facilities by a date certain.

In addition, the proposed language provides placeholders for municipalities to insert their preferred enforcement methods and timelines. Staff recommends this approach to a proposed ordinance as it allows municipalities to make adjustments as they see fit and ensures higher levels of acceptance and accountability.

Policy

By Minute Item 52802, dated April 26, 2022, the Board adopted a resolution which declared a Water Shortage Emergency Condition and established an Emergency Water Conservation Program for the State Water Project dependent area.

By Minute Item 52579, dated November 9, 2021, the Board adopted Legislative Priorities and Principles for 2022 that included improving water efficiency through non-functional turfgrass management.

By Minute Item 52581, dated November 9, 2021, the Board adopted a resolution which declared specified emergency conditions within the Metropolitan service area.

By Minute Item 49542, dated September 10, 2013, the Board authorized new conservation program initiatives.

By Minute Item 49068, dated May 8, 2012, the Board authorized changes to Metropolitan's water conservation program.

By Minute Item 48772, dated August 16, 2011, the Board adopted the Long-Term Conservation Plan and revisions to the water conservation policy principles.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA (Public Resources Code Section 21065, State CEQA Guidelines Section 15378) because it involves continuing administrative activities, such as general policy and procedure making will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment (Section 15378(b)(2) of the State CEQA Guidelines). In addition, the proposed action is not defined as a project under CEQA because it involves organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment (Section 15378(b)(5) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt resolution encouraging action to reduce or eliminate irrigation of non-functional turf with potable water.

Fiscal Impact: $0
Business Analysis: Adoption of the resolution could lead to a permanent reduction in potable water demand.

Option #2

Do not adopt the resolution.
Fiscal Impact: $0
Business Analysis: Without this resolution, irrigation of non-functional turf with potable water may continue throughout Metropolitan's service area.

Staff Recommendation

Option #1

Brad Coffey 10/5/2022
Brad Coffey *Date*
Manager, Water Resources Management

10/5/2022
Adel Hagekhalil *Date*
General Manager

Attachment 1 – Resolution (Revised)

Attachment 2 – Draft Ordinance

Ref# wrm12692156

RESOLUTION _____

RESOLUTION OF THE BOARD OF DIRECTORS OF THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA ENCOURAGING THE BAN OF IRRIGATION OF NON-FUNCTIONAL TURF WITH POTABLE WATER

WHEREAS, The Metropolitan Water District of Southern California and Its Member Agencies are Local and Regional Water Entities Responsible for Distributing, Managing, and Developing Supplies to Meet Current and Future Water Demands Within Their Respective Service Areas and throughout Southern California.

Metropolitan is comprised of 26 member agencies, all of which are public entities, including 14 cities, 11 municipal water districts, and one county water authority, which collectively serve the residents and businesses of more than 300 cities and numerous unincorporated communities.

Metropolitan estimates that approximately 18.7 million people live in Metropolitan's service area.

Metropolitan's 2020 Integrated Water Resources Plan shows expected population growth of approximately 17 percent in Metropolitan's service area between 2010 and 2035.

WHEREAS, Long-term and Short-term Trends Suggest that Metropolitan's Imported Water Supplies May Be Constrained by Drought, Climate Change, and Other Environmental Factors.

The Colorado River system has been continuously in drought since 2000. Lake Mead and Lake Powell were near full in 2000; however, both reservoirs are now at their lowest historical levels since initial filling.

In June 2022, the U.S. Bureau of Reclamation Commissioner, Camille Touton, announced that Colorado River water users need to reduce use by two- to four million acre-feet per year.

Extended drought and increased regulatory constraints have resulted in an average 35 percent allocation of Table A contract supplies from the State Water Project over the last 10 years. During the previous 10-year period, Metropolitan received an average 68 percent allocation from the State Water Project.

Combined deliveries of allocated water from the State Water Project during the past three years are lower than in any other three-year period in the history of the SWP.

The California Department of Water Resources (DWR) classified water years 2020 to 2022 (October 1, 2019, through September 30, 2022) as dry or critically dry, and it projects these three water years will be the driest on record in California for statewide precipitation.

In addition to reduced precipitation since 2020, California's climate is transitioning to a warmer setting in which historical relationships among temperature, precipitation, and runoff are changing. In addition, precipitation in the Colorado River Basin was near 100 percent normal in 2022, but runoff was only at 62 percent of normal. In 2021 precipitation was at 87 percent of normal while runoff was at 32 percent of normal.

WHEREAS, Governor Newsom Has Declared a State of Emergency to Exist in All California Counties Due to These Severe Drought Conditions.

On October 19, 2021, Governor Gavin Newsom declared a state of emergency to exist in all California counties due to worsening drought conditions. This proclamation follows other increasingly expansive drought declarations and executive orders that have been issued since April 2021.

Governor Newsom has called on Californians to re-double their efforts to reduce water use by 15 percent and for local and regional water agencies to implement their Water Shortage Contingency Plans (WSCPs) "at a level appropriate to local conditions that takes into account the possibility of a third consecutive dry year."

California has declared a State of Emergency due to severe drought conditions three separate times since 2007.

On August 11, 2022, Governor Newsom issued his California Water Supply Strategy which includes a long-term commitment to replace 500 million square feet of turf with drought tolerant landscaping by promoting programs and policies that incentivize turf conversion.

WHEREAS, Water Conservation and Demand Management Play a Critical Role in Ensuring Supplies Meet Demands in Metropolitan's Service Area.

Water conservation and demand management increase resiliency in the event of drought and extend the availability of current and future water supplies.

Metropolitan has invested $2.3 billion in present value dollars in conservation, local water recycling, and local groundwater recovery since 1990, resulting in nearly 7.6 million acre-feet of water conserved and new supplies.

Local water suppliers and communities have also made multi-billion-dollar strategic and forward-looking investments in water conservation (within and outside the MWD service area), water recycling, stormwater capture and reuse, groundwater storage, seawater desalination and other strategies to improve drought resilience.

Water conserved throughout the service area, among other things, has helped preserve storage in Metropolitan's diverse storage portfolio and meet demands during these dry conditions.

WHEREAS, a Permanent Ban on Irrigation of Non-functional Turf and Commitment to Converting These Areas to California Friendly Landscaping through Local Ordinances and Regulations Would Result in a Significant Reduction in Potable Water Demand.

Amending local ordinances and other land use planning regulations to further prevent non-functional turf from being irrigated with potable water, installed in new construction, or maintained in existing construction will contribute to more sustainable demands within Metropolitan's service area.

Irrigation of turf grass represents the single largest application of consumptive use of potable water in Southern California and reducing the amount of turf represents a significant water conservation opportunity.

The removal of non-functional turf and replacement with drought-tolerant landscaping reduces water usage on a given site by up to 80 percent.

Approximately 96 million square feet of non-residential non-functional turf have been removed through Metropolitan's turf rebate programs, which results in water savings today of approximately 13,000 acre-feet per year.

Since the SWRCB issued an emergency regulation temporarily banning the irrigation of non-functional turf with potable water, commercial applications for the turf replacement program have tripled since the emergency regulation went into effect. Therefore, local ordinances permanently banning the irrigation, installation, and maintenance of non-functional turf would likely lead to an even greater increase in turf replacement projects.

Regulations addressing irrigation, installation and maintenance of non-functional turf may be adopted as local governmental codes and ordinances by Metropolitan member agencies and in local jurisdictions throughout Metropolitan's service area, as permitted by each jurisdiction's legal authority.

NOW, THEREFORE, BE IT RESOLVED that The Metropolitan Water District of Southern California Board of Directors supports the adoption and promotion of the following principles throughout Metropolitan's service area:

1. Potable water should not be used to irrigate non-functional turf on non-residential properties.
2. Non-functional turf should not be installed at any new or existing non-residential properties, including at any commercial or industrial properties, public buildings, or facilities, or HOAs. Non-functional turf also should not be installed in any new residential properties.
3. Non-functional turf should not be installed in public spaces, including in medians.
4. Non-functional turf should be removed from all non-residential properties, both public and private, including HOAs, by a date certain in the future.

BE IT FURTHER RESOLVED that the Board of Directors strongly recommends that all Member Agencies and local jurisdictions within Metropolitan's service area amend their regulatory codes and ordinances, as appropriate, to implement these principles in a manner consistent with each jurisdiction's legal authority. A model ordinance consistent with these principles is attached for reference and potential use.

Secretary of the Board of Directors
of The Metropolitan Water District
of Southern California

Model Ordinance Language

Section X: Definitions

(A) As used in this section:

(1) "Non-functional turf" means turf that is not regularly used for human recreational purposes or for civic or community events.

(2) "Turf" means any narrow-leaved grass species that form a uniform, long-lived ground cover that can tolerate traffic and low mowing heights (usually two inches or below). Such grasses include, but are not limited to, annual bluegrass, Kentucky bluegrass, Perennial ryegrass, Red fescue, Tall fescue, Bermudagrass, Kikuyugrass, Seashore Paspalum, St. Augustine grass, Zoysiagrass, Buffalo grass, and their associated hybrids.

Section XX: Permanent Water Conservation Requirements

(A) Prohibition on irrigation of non-functional turf

(1) After the effective date of this ordinance, non-functional turf shall not be irrigated using potable water with the sole exception of turf at residential properties that was present prior to the effective date of this ordinance.

(B) Prohibition on installation of non-functional turf

(1) After the effective date of this ordinance, non-functional turf shall not be installed at any new or existing commercial, industrial, or public properties or facilities, including parks, playgrounds, medians, greenbelts, and HOAs. In addition, non-functional turf shall not be installed in any new residential properties.

(C) Removal of non-functional turf

(1) No later than [DATE CERTAIN], non-functional turf shall be removed from commercial, industrial, or public properties or facilities, including parks, playgrounds, medians, greenbelts, and HOAs.

Section XXX: Penalties and Enforcement

[TO BE DETERMINED BY ADOPTING JURISDICTION]

ACTON TOWN COUNCIL
1887
P.O.Box 810, Acton CA 93510

January 25, 2023

Ms. Rita Kampalath
Chief Sustainability Officer
Los Angeles County
Kenneth Hahn Hall of Administration
500 W Temple Street
Los Angeles, CA 90012
Electronic Transmission of four (4) pages to:
RKampalath@cso.lacounty.gov

Subject: Acton Town Council Comments on the Upcoming Water Conservation Ordinance.

Reference: Discussion with Staff from the Chief Sustainability Office on December 14, 2022.
The Report Due Back to the Board of Supervisors within 120 days of August 30, 2022 Regarding Recommendations for Updating the County's 2014 Water Conservation Ordinance with Permanent Water Conservation Measures for Outdoor Water Use in Unincorporated Areas of Los Angeles County.

Dear Ms. Kampalath;

The Acton Town Council greatly appreciates the time that staff from the Chief Sustainability Office took on December 14 to confer with Acton Town Council members regarding the referenced report recommending updates to the County's existing Water Conservation Ordinance. The purpose of this letter is to memorialize the issues and concerns that were raised during our discussion in December and were further explored in the broad-based community meeting that was convened on January 9, 2023. For simplicity and in the interest of brevity, our comments and concerns are presented in bullet format below.

Water sources in the rural Community of Acton differs substantially from water sources found throughout most of Los Angeles County because most Acton residents obtain their water from domestic well facilities that they themselves maintain and operate. In other words, and unlike the residents in urban areas of the County, most Acton residents are responsible for securing their own water supply and maintaining their own water delivery infrastructure: if they open the taps and no water comes out, they are responsible for fixing the water supply problem. Acton residents recognize that our groundwater is a limited and precious resource that must be preserved, and we already conserve water to a significant extent; that is why residences which rely on domestic well water do not have large green lawns or water-intensive landscaping. We have often said that if every resident of Los

Angeles County were responsible for securing and maintaining their own domestic water supply, there would be little water waste and no water shortages because everyone would have a vested interest in ensuring that groundwater resources are conserved and protected. Additionally, the residents of Acton who are served by the local waterworks district also tend to have minimal landscaping (though there are some exceptions). Taken together, these facts demonstrate that the residents of Acton already operate on a "shoestring" water budget; accordingly, any new County water conservation ordinance must take into account the substantial water conservation measures that Acton residents have already implement just for survival. In other words, water use by the majority of Acton residents is already at a bare minimum, and the County will create indescribable hardships on Acton residents if it blindly imposes mandatory county-wide water usage reductions and restrictions when it revises the existing water conservation ordinance.

Outdoor water uses in the rural Community of Acton also differ substantially from outdoor water uses throughout most of Los Angeles County. Unlike urban areas in the County where the primary outdoor water use is for the maintenance of water-intensive landscaping, outdoor water uses in Acton are far more essential and tend to fall into three categories: Tree canopy development and maintenance, animal keeping, and agricultural production. Any new County water conservation ordinance must take into account these essential outdoor water uses in the Community of Acton. To provide context, these three outdoor uses are described more fully below.

Tree Canopy Development and Maintenance: Acton has high insolation rates because it is a high desert community in the Antelope Valley; thus, shade in our community is very important. Given that the most sustainable and resilient source of shade is trees, tree canopy development and maintenance is critical to Acton residents. Notably, the responsibility for developing and maintaining Acton's tree canopy is born almost entirely by private property owners; in fact, other than at the local park and library, the County and State contribute little to tree canopy development and management in Acton. As such, any water conservation ordinance that is adopted by the County must not limit or in any way restrict the ability of residents and business owners to develop and maintain tree canopy within the Community of Acton.

Animal Keeping: Acton is a rural community that is home to an extensive assortment of animal husbandry facilities; in fact, Acton has more licensed animal facilities than any other unincorporated community in the County[1]. Virtually all of the animal facilities in Acton are operated from individual residences. Some animal facilities support the movie industry; others support cottage industries

[1] https://animalcare.lacounty.gov/wp-content/uploads/2021/12/Business-License-Master-Log-December-2021.pdf

such as sheepdog training, egg production, wool production (sheep, llamas, alpacas, etc.), goat milk soap production, spinning, and weaving; others provide equine-assisted psychotherapy services. Other animal uses in Acton involve rescue operations; Acton is home to tiger and big cat rescues, dog rescues, farm animal rescues, horse rescues, and kitten rescues (to name a few). Besides licensed animal facilities, hundreds of Acton residents keep a wide variety of outdoor animals for their own personal use and enjoyment including horses, cattle, sheep, goats, chickens, turkeys, emus, llamas, rabbits, doves, and other species. In fact, many of our residents migrated to Acton because Acton allows them to practice the types of animal husbandry that are prohibited elsewhere in the County. However, the keeping of outdoor animals requires water; as such, it is imperative that any water conservation ordinance which is adopted by the County must not limit or in any way restrict the ability of residents and business owners to maintain animal facilities within the Community of Acton.

Agricultural Production: Acton began as a mining community and it has existed since before 1887; in fact, the only city in Los Angeles County that predates Acton is the City of Los Angeles (which was incorporated in 1850 a few years before mining became a significant endeavor in Acton). Homesteading farmers soon followed the miners, and farming in Acton has persisted since the 1890's. Acton's residential farms cultivate peaches, pears, pomegranates, lilacs, grapes, olives, vegetables, and other produce; some farms are large and some are small. Farms are essential businesses in the Community of Acton and as such, any water conservation ordinance that is adopted by the County must not limit or in any way restrict the ability of residents and business owners to pursue their farming interests.

As the information provided above explains, Acton has singularly unique outdoor water uses that are not like outdoor water uses found in urban portions of the County; these unique water uses must be accommodated in the recommendations that the Chief Sustainability Office makes to the Board regarding the proposed outdoor water use ordinance.

Another matter that was raised during our discussion in December pertains to the Department of Public Works' program that provides resources to assist homeowners in replacing existing lawns with artificial turf. Our concern with this program is that, unlike natural grass, artificial turf exacerbates heat effects; thus, implementation of this program in Acton will make Acton even hotter than it already is in summer. The Acton Town Council would prefer that the County assist the few homeowners in Acton who do maintain natural turf to install buffalo grass or other drought-tolerant ground covers rather than artificial turf.

Finally, the Acton Town Council would like to address a question that was posed during our discussion in December that pertained to dust control from solar farms and other green energy projects in the Antelope Valley. Water should not be used to control dust in Acton and other areas of the Antelope Valley because depositing water in our soils substantially increases the concentration of Valley Fever spores and thereby increases the chance that our residents will contract Valley Fever (a seriously debilitating and sometimes deadly disease). As you are perhaps aware, the Clean Power Alliance, Southern California Edison, Los Angeles Department of Water and Power, and other utility providers have identified the Antelope Valley as the principal location in Los Angeles County where utility scale renewable energy projects will be located and maps produced by the California Energy Commission project that virtually the entire Antelope Valley lying outside of the cities of Lancaster and Palmdale will be covered in utility scale solar farms which will surround and overrun the rural communities that currently occupy the area. Utility scale solar projects strip the land of vegetation and cause terrible dust storms. County staff have repeatedly claimed that the solar farms which have been permitted to operate in the Antelope Valley address dust control because they incorporate a "Dust Control Plan" that is approved by the Antelope Valley Air Quality Management District (AVAQMD), but a close inspection of these "Dust Control Plans" reveal that they merely require the operator to post a sign that directs people to contact the AVAQMD if they observe blowing dust; these "Dust Control Plans" do not impose any actual mitigation measures to prevent dust. Worse yet, the County consistently and persistently fails to consider the cumulative impacts of the ever expanding solar farm uses that are being continually approved. Mitigation measures which do not rely on the application of large volumes of water are available to eliminate the dust problem (such as ***clean*** mulch and gravel), but the County does not require these mitigation measures it its solar farm project approvals.

The Acton Town Council hopes that you find these comments useful; if you have any questions, please do not hesitate to contact us at atc@actontowncouncil.org. Also, we would be happy to arrange a tour of our community for you and your staff so that you can see firsthand the community circumstances described herein.

Sincerely;

_____

Jeremiah Owen, President
The Acton Town Council

Cc: Julie Gomez [Gomez@cso.lacounty.gov]
Kristin Pawling [KPawling@ceo.lacounty.gov]
Stacy Farfan-Valencia [SFarfan@cso.lacounty.gov]
Donna Termeer [DTermeer@bos.lacounty.gov]
Chuck Bostwick [CBostwick@bos.lacounty.gov]

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Norma E. García-González, Director Alina Bokde, Chief Deputy Director

July 7, 2023

TO: Supervisor Janice Hahn, Chair
Supervisor Hilda L. Solis
Supervisor Holly J. Mitchell
Supervisor Lindsey P. Horvath
Supervisor Kathryn Barger

FROM: Norma Edith García-González
Director

SUBJECT: REPORT BACK ON WATER CONSERVATION (AUGUST 30, 2022, BOARD AGENDA ITEM #19 AND ITEM #29)

SUMMARY OF ACCOMPLISHMENTS

The Department of Parks and Recreation (DPR) takes great pride in its diverse portfolio of 182 facilities, encompassing over 63,000 acres of land and a vibrant urban forest. DPR has demonstrated its leadership and commitment to water conservation through several key efforts:

- Reduced water usage by 20% during recent droughts through the implementation of efficient irrigation
- Developed and implemented the use of a native plant and drought tolerant plant palette
- Developed design guidelines directing water-efficient planting and irrigation
- Optimized water usage through scheduling of activities such as irrigation, splash pad operation, and vehicle washing
- Implemented water conservation strategies such as replacement of turf, installation of water-efficient toilets and urinals
- Partnered with DPW to implement innovative and critical stormwater capture projects

In tandem with our water efficiency projects, DPR recognizes the critical role of maintaining tree health and prioritizing the water needs of trees as essential infrastructure. Through an ongoing tree inventory initiative, we have identified over 200,000 trees under DPR's management as of June 2023. Both tree canopy and

parklands are distributed inequitably and many of our high and very high need communities have insufficient tree shade and park space. Many of these communities, are often more susceptible to respiratory illnesses and heat-related stressors, such as heatwaves. DPR facilities require a baseline water supply to maintain landscapes, trees, and recreational amenities. Trees play a vital role in supporting community health and sustainability goals by providing shade and contributing to the overall well-being of our communities.

A comprehensive summary of DPR's Water Efficiency Projects, was detailed in the November 24, 2021 "Report Back on Supporting Urban Water Conservation in Los Angeles County," this summary is provided in Exhibit A.

BOARD OF SUPERVISORS' MOTION ON "URBAN WATER CONSERVATION MEASURES AND ASSISTANCE IN UNINCORPORATED LOS ANGELES COUNTY" AND DPR'S APPROACH TO TURF

On August 30, 2022, the Board of Supervisors adopted the motion "Urban Water Conservation Measures and Assistance in Unincorporated Los Angeles County," addressing the pressing need for water conservation amid severe drought conditions in the State. This motion directed Departments to explore funding opportunities from State, Federal, and local water agencies like the Metropolitan Water District (MWD) that support initiatives such as turf removal, replacement, and efficiency upgrades. Furthermore, County Departments managing landscaping contracts were instructed to identify non-functional turf areas within their facilities and develop a prioritized plan for replanting these areas in accordance with the new Board Policy.

Considering DPR's mission to serve as stewards of parklands, promote healthy and resilient communities, and advance social equity and cohesion, turf usage plays a pivotal role in fulfilling our recreational objectives. Particularly in high and very high need communities that have limited green spaces, the presence of turf is crucial. It is important to clarify that this report specifically focuses on non-functional turf while acknowledging the value of functional turf. Non-functional turf, as defined by the State, refers to "turf that is solely ornamental and not regularly used for human recreational purposes or for civic or community events." Functional turf, on the other hand, pertains to turf areas actively utilized for open space and general enjoyment of parks, which are not considered for removal in this report. Generally, turf in parks is functional due its diverse use by park visitors.

Explore State and Federal funding and programs as well as programs available through local water agencies to support turf removal and replacement and other water efficiency upgrades

DPR is aware of the key funding sources to support turf removal. The primary turf removal and replacement program within Los Angeles County is run by the Metropolitan Water District (MWD) and is open to properties within their service area. In 2022 DPR received a rebate for turfgrass reduction in association with a stormwater capture project at Ladera Park and is exploring two additional locations for applications to MWD for turf removal and reduction.

MWD and other local water purveyors provide other key programs for water efficiency upgrades. DPR has utilized some of these programs to install weather-based controllers at park sites through the rebate program. Many of these programs will fund partial rebates, that will range between 17 and 95 percent of the costs, depending on the scope of the project. Rebates are available after the equipment is purchased and installed, so they do not cover upfront costs.

Identification and quantification of non-functional turf areas in their facilities and a prioritized plan for replanting these areas consistent with the requirements in the new Board Policy.

DPR manages 104 landscaping maintenance and mowing contracts across its 182 facilities. DPR currently employs over 360 grounds maintenance staff to maintain and steward the parks.

TURF REDUCTION AT PARK FACILITIES

If portions of Parks are determined to have non-functional turf, and in the absence of funding, a preferred approach to facilitate implementation of possible turfgrass removal is to consider turfgrass removal concurrent with park renovation projects, irrigation retrofits, building rehabilitation projects, general capital projects, reforestation efforts, or stormwater capture projects. For example, DPR is working in collaboration with the Department of Public Works in various stages on twenty-five potential stormwater capture projects. A few of the projects have started construction. These projects may present opportunities in the above-ground improvements for turfgrass removal and replanting.

As a way of prioritizing locations for possible turfgrass removal, DPR reviewed the list of the County's Top 100 Facilities' Water Use for FY 2016-17,2017-18, 2018-19 as included in the "Report Back on Supporting Urban Water Conservation in Los Angeles County (ITEM NO. 52-4, AGENDA OF JULY 27, 2021). From the Top 100 List, 48 of the locations are DPR facilities. Of the 48 locations, 42 were reviewed for opportunities for turf reduction (Exhibit B). Six locations were excluded from the review due to being either a botanic

garden, natural area. Of the 42 facilities analyzed, 39 have portions of turf that could be considered for removal and replanted with drought tolerant plant material. As each park is unique in design and function, the exact quantity of potential turf removal varies per site and requires field verification prior to any action. Opportunities for turfgrass removal exists for many parks, with smaller scale opportunities at neighborhood parks averaging 0.18 acres and community parks averaging around 0.4 acres of possible turf removal. The amount of possible turf removal increases as the park size increases, with an average of 1.9 acres possible for community regional parks. Regional Parks provide the widest range of opportunities from 0.3 acres to upwards of 12 acres.

Some of the project aspects of non-functional turf removal include, the turf removal, irrigation retrofits or installation, new plant material, mulch, and a contingency for contractor costs. As previously discussed, rebates may be available to offset some of the costs of turf replacement; however, rebate amounts will not cover full project costs, and do not cover upfront costs, but are paid after project completion.

DPR estimates a total potential amount of turf reduction to be 66 acres, with a total cost of approximately $28,832,364.

Summary of Funding Needs and Opportunities

Below is a summary of the estimated funding required to remove turf and provide replacement landscaping across prioritized parks, as well as the estimated rebates available after project completion, assuming $3.00 per square foot. For larger projects, there may be a maximum rebate off 200,000 square feet or 4.59 acres. Moreover, additional rebates may be available for eligible projects in high or very high need communities. The cost estimates provided are preliminary. DPR recommends retaining a consultant(s) with industry expertise to create project scopes, conduct design work, and provide site-specific costs for project implementation and funding.

Project Type	Acreage of Turf for consideration of Removal	Estimated Funding Needed	Estimated Possible Rebates
Turf Reduction at Priority Park locations	66.19	$28,832,000	$8,649,000

CONCLUSION

In conclusion, DPR has summarized key available funding programs offering rebates for turf reduction, rebates for water efficient irrigation installations and additional grant program information for drought relief. DPR analyzed and has provided a summary of possible locations for turf removal, and estimated costs with a focus on highest water using locations. In addition, DPR will continue to review opportunities for turf conversion at park locations that are scheduled to be retrofitted or upgraded.

If you have any questions, please contact Jill Sourial, Deputy Director Planning and Development Agency at jsourial@parks.lacounty.gov.

NEGG:JS:AV:nr

c: Board of Supervisors, Executive Office (C. Zavala)
Chief Sustainability Office (R. Kampalath)
Internal Services Division (S. Hollins)
Parks and Recreation (A. Bokde, J. Sourial)

Exhibit A
Summary of DPR's Water Efficiency Projects[1]

Project Type	Project/Park Name Description Status	Description	Status
DPW Stormwater Total 12 Sites	Earvin Magic Johnson Park	Approximately 500,000 SF of turf replacement with drought-tolerant landscape. Use of treated stormwater for irrigation (recycled water).	Completed
	Adventure Park	Turf replacement with drought-tolerant landscape (4,200 SF) as well as turf reduction for a new maintenance access road (6,500 SF). Upgrading existing irrigation with new efficient IR system and Weather-TraK Pro 3 controller.	In progress
	Roosevelt	Turf replacement with drought-tolerant landscape and updated water-efficient irrigation system.	In progress
	Alondra Park	Turf replacement with drought-tolerant landscape (41,461 SF) as well as additional turf reduction for a new maintenance road (17,000 SF).	In progress
	Ladera Park	Turf replacement with drought-tolerant landscape.	In progress
	Arboretum Baldwin Lake	Lake renovation.	In progress
	Jake Kuredjian	Turf replacement with drought-tolerant landscape.	In progress
	Hasley Canyon Stormwater	Turf replacement with drought-tolerant demonstration garden.	In progress
	Montieth Stormwater	Turf replacement with drought-tolerant landscape.	In progress
	Adventure Park	Turf replacement with drought-tolerant landscape.	In progress
	Bethune Park	Turf replacement with drought-tolerant landscape.	In progress
	Michillinda Park	Turf replacement with drought-tolerant landscape.	In progress
Efficient Irrigation	Whittier Narrows Recreation Area	Smart controllers upgrade.	In progress
Turf Reduction/ Efficient Irrigation	Obregon Park	Turf replacement with drought-tolerant landscape.	Completed
	Altadena Golf Irrigation	Turf replacement with drought-tolerant landscape.	In progress
	Amelia Mayberry Park	18,000 SF of turf reduction resulting from a new skate park. Upgraded irrigation.	Completed
	Salazar Park	Turf replacement with drought-tolerant landscape/ education garden.	In progress
	Marshall Canyon Golf Irrigation Replacement	Turf reduction from 103 acres to 65 acres. 19% annual water savings equivalent to$228,500 per year.	In progress
	Irrigation Improvement	Smart controllers upgrade.	Completed
	Stoneview Irrigation Upgrade	Turf replacement with drought-tolerant landscape.	Completed
	Salazar Park	New demonstration garden and landscape areas with native drought-tolerant plants; greywater irrigation system; renovated parking lots w/permeable paving.	In progress

[1] Source: Report Back on Supporting Urban Water Conservation in Los Angeles County, November 24, 2021 (Item No. 52-A, Agenda of July 27, 2021), pp. 14-15.

Project Type	Project/Park Name Description Status	Description	Status
Water-Efficient Products Implementation/ Irrigation/ Restroom	Castaic Lake Recreation Area	Restroom renovation and irrigation system upgrade with smart controllers.	In progress
	El Cariso Golf Course	Installation of water-efficient toilets/urinals.	Completed
	Restroom Project	Water-efficient toilets, urinals, and faucets to be installed.	In Progress

Exhibit B
Parks (from the Top 100 County Water Using List) Reviewed for Potential Turf Grass Removal sorted by Park Classification.

Park Name	Park Classification	Supervisorial District	Amount of Possible Turf (for Removal consideration) in Acres	Estimated Cost of turf replacement based on Possible Turf Removal
Rowland Heights Park	Community	1	0.2	$87,120
William Steinmetz Park	Community	1	0.3	$130,680
City Terrace Park	Community	1	0.5	$217,800
Manzanita Park	Community	1	0.7	$304,920
Col. Leon H. Washington Park	Community	2	0.5	$217,800
Athens Park	Community	2	0.8	$348,480
Amelia Mayberry Park	Community	4	0.07	$30,492
Sorensen Park	Community	4	0.3	$130,680
Adventure Park	Community	4	0.4	$174,240
Jackie Robinson Park	Community	5	0.06	$26,136
Acton Park	Community	5	0.08	$34,848
George Lane Park	Community	5	0.2	$87,120
Charter Oak Park	Community	5	0.6	$261,360
Dr. Richard H. Rioux Memorial Park	Community	5	1	$435,600
Pathfinder Community Regional Park	Community Regional	1	0.08	$34,848
Belvedere Community Regional Park	Community Regional	1	1.3	$566,280
Ted Watkins Memorial Park	Community Regional	2	0.6	$261,360
Victoria Community Regional Park	Community Regional	2	1	$435,600
Jesse Owens Community Regional Park	Community Regional	2	1.5	$653,400
Franklin D. Roosevelt Park	Community Regional	2	1.6	$696,960
Alondra Community Regional Park	Community Regional	2	1.7	$740,520
Earvin "Magic" Johnson Recreation Area	Community Regional	2	4	$1,742,400
El Cariso Community Regional Park	Community Regional	3	4.8	$2,090,880
La Mirada Community Regional Park	Community Regional	4	2.4	$1,045,440

Park Name	Park Classification	Supervisorial District	Amount of Possible Turf (for Removal consideration) in Acres	Estimated Cost of turf replacement based on Possible Turf Removal
Don Knabe Community Regional Park	Community Regional	4	7.6	$3,310,560
Crescenta Valley Community Regional Park	Community Regional	5	0	$0
Stephen Sorensen Park	Community Regional	5	0	$0
Loma Alta Park	Community Regional	5	0.5	$304,920
Castaic Regional Sports Complex	Community Regional	5	0.7	$304,920
Veterans Memorial Community Regional Park	Community Regional	5	2	$871,200
Arcadia Community Regional Park	Community Regional	5	2.2	$958,320
Gloria Heer Park	Neighborhood	1	0	$0
Eugene A. Obregon Park	Neighborhood	1	0.2	$87,120
Rimgrove Park	Neighborhood	1	0.2	$87,120
Everett Martin Park	Neighborhood	5	0.1	$43,560
Pearblossom County Park	Neighborhood	5	0.4	$174,240
Santa Fe Dam Recreational Area	Regional	1	0.3	$130,680
Peter F. Schabarum Regional Park	Regional	1	1	$435,600
Whittier Narrows Recreation Area	Regional	1	12	$5,227,200
Kenneth Hahn State Recreation Area/YBB	Regional	2	3.7	$1,611,720
Frank G. Bonelli Regional Park	Regional	5	1.9	$827,640
Castaic Lake State Recreation Area	Regional	5	8.7	$3,789,720
TOTAL			**66.19**	**$28,832,364**