

# LOS ANGELES WATER & POWER

## ALTERNATIVE MEANS OF COMPLIANCE PROGRAM

DWP forgoes all use of baseline methodologies in favor of a budget allocation methodology that keeps firmly in place those policies adopted 12 years ago that have led to that golf community using substantially less water in 2021-2022 than they did in 2005-2009 – policies that incentivized investments in conservation (e.g., turf reduction, elimination of overseeding, substitution of warm season for cool season grasses, upgraded irrigation systems, lake liner replacements) and in essence punished those facilities that didn't take such action.

Golf courses that elect to participate in Los Angeles' **"Alternative Means of Compliance"** program are assigned water budgets per the **MAWA (maximum allowable water allocation)** formula embedded in California's and Los Angeles' Codes (AB 1881 and the California Model Water Efficient Landscape Ordinance that is specifically incorporated into the City of Los Angeles' Codes by direct reference). That formula involves a combination of acreage and climate (ET<sub>o</sub>) per a **1.0 plant factor for turf** and a 0.2 plant factor for those areas of a golf course that have removed turf in favor of California friendly drought tolerant cover.

LADWP asks each course that wants to participate in the Alternative Means program to make that clear to LADWP's Water Conservation Unit that indeed they want to either enter or remain in the program. That can be done with a simple E-mail that confirms that the golf facility meets the criteria for participation in the program, something that every facility in the service area long ago met. It's the parks, sports fields, and cemeteries that along with golf courses form the class of "Large Landscapes" eligible for the program that often have difficulty on that count, not the golf courses.

Here are the relevant criteria for eligibility in the program:

- Large Landscape Areas may deviate from the non-watering days by meeting the following requirements: 1) must have approved weather-based irrigation controllers registered with the LADWP (eligible weather-based irrigation controllers are those approved by the Metropolitan Water District of Southern California or the Irrigation Association Smart Water Application Technologies initiative); 2) must reduce overall monthly water use by the Board of Water and Power Commissioners--adopted degree of shortage plus an additional five percent from the Customer Baseline Water Usage within 30 days; and 3) must use recycled water if it is available from the LADWP.
- Sports Fields upon written notice to the LADWP, irrigation of Sports Fields may deviate from the non-watering days to maintain play areas and accommodate event schedules; however, to be eligible for this means of compliance, a customer must reduce overall monthly water use by the Board of Water and Power Commissioners adopted degree of shortage plus an additional five percent from the Customer Baseline Water Usage within 30 days.
- Who Can Apply:
  - Sports Fields: Sports Fields means a public or private facility supporting a business necessity or public benefit use that provides turf areas as a playing

surface for individual and team sports and does not include a facility on a residential property.

- Large Landscape: Large Landscape Area means an area of vegetation at least three acres in size, supporting a business necessity or public benefit uses such as parks, golf courses, schools, and cemeteries.
- Request for participation in the Alternative Means of Compliance Program in order to request approval to participate in the Alternative Means of Compliance Program and deviate from non-watering days, the following documentation must be submitted by the Applicant: (1) Request Letter should include the following:
  - The property address where the Alternative Means of Compliance is being requested.
  - Square footage of landscaped area including percentage of turf. (Separate measurements for greens and tees & fairways and roughs, if applicable).
  - Submit documentation of methodology utilized in taking landscape measurements (GPS, GIS or equivalent).
  - List of water meters to be included in the Alternative Means of Compliance Program (meters can be aggregated by site).
  - List of Weather-Based Irrigation Controllers (WBICs), include number of stations, make and model number and whether or not you are using the weather-based capabilities of the controller. (This is not required for “Sports Fields”)
  - Submit a description of actions to be taken to achieve the required 20% reduction in overall monthly water usage.
  - Point of contact information for Alternative Means of Compliance Request (name, address, telephone number, e-mail address).

Those facilities that primarily use recycled water to irrigate their golf courses continue to remain exempt from all restrictions, including those courses that use a small amount of potable water to irrigate their greens. Those facilities that supplement their potable purchases with groundwater continue to be assigned MAWA budgets that don’t factor that supplementation into the equation.

While there is a penalty structure for violations and these penalties do apply to golf courses (and all “Large Landscapes”), the real penalty for a golf course is not these fines; it’s the fact that repeated violations of the MAWA assigned budget results in excision from the “Alternative Means of Compliance” program for a minimum of 12 months, which for golf courses in summer/early autumn months is practically a death sentence. That is how important retention of **100% control of irrigation application is to the golf community; it is prepared to exceed by 5% the goal enunciated in Los Angeles’ Drought Contingency Plan/Ordinance (“up to 30%) for a total of a 35% reduction from the MAWA assigned budget in order to avail itself of the privilege of this “Alternative” program, which is very much a “privilege” in Los Angeles and not a “right.”**

**Key takeaway:** LADWP long ago landed on the central organizing principle of any good public policy – a system of incentives and disincentives that taken together reward the behavior that is the goal of the policy – in this case by rewarding those that have made the investments necessary to achieve significantly lessened water footprints. One size that fits all would amount to the opposite – bad public policy.