

Valley Water

Large Landscape Program

2024 Annual Report



Valley Water

Clean Water • Healthy Environment • Flood Protection

Participating Retail Agencies:

City of Gilroy

City of Milpitas

City of Morgan Hill

City of Mountain View

City of Palo Alto

City of Santa Clara

City of Sunnyvale

San José Municipal Water System

San Jose Water Company

April 21, 2025

(Revised December 21, 2025)

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Summary

Since 2014, Valley Water has partnered with Waterfluence to provide program services to reduce overwatering at landscape sites supplied by dedicated irrigation meters (DIM). In 2024, nine of 13 retail water suppliers within Valley Water's service area participated in this program including the cities of Gilroy, Milpitas, Morgan Hill, Mountain View, Palo Alto, Santa Clara, Sunnyvale, and the San José Municipal Water System and San Jose Water Company. These retail water suppliers serve 91% of Valley Water's 1.9 million service population.

This report highlights Valley Water's success in helping thousands of landscape sites save water and comply with California's new laws, improving the region's water sustainability and resilience. Key points include:

- ▶ **Site Characteristics.** The program included 4,716 sites irrigating 7,454 acres of irrigated landscape. The average depth of water applied over all landscape area was 3.1 feet totaling 23,388 acre feet.
- ▶ **Online Engagement.** Online engagement with the Waterfluence website by stakeholders (e.g., account holders, HOA board members/owners, and landscape contractors) is 50% by landscape area.
- ▶ **Irrigation Efficiency Opportunities.** In 2024, overwatering totaled 7,925 acre feet or 34% of all irrigation by program sites. Overwatering averaged 1.06 feet over all irrigated landscape but was greater than 2 feet at 31% of sites. The opportunity to reduce overwatering is greatest with non-public sites, sites with less than 1 acre of landscaping, and sites without online stakeholders.
- ▶ **Irrigation Efficiency Trends.** Since 2012, overwatering dropped 31% overall, and 36% and 25% respectively for non-public and public sites.
- ▶ **Regulatory Compliance.** Waterfluence is assisting retail water suppliers with elements of two relatively new pieces of State of California legislation. Regarding AB 1572, we estimate Valley Water's DIM customers may need to replace up to 1,052.6 acres of nonfunctional turf by January 1, 2029. As part of SB 606 / AB 1668, Valley Water's participating retail water suppliers have 6,111.1 acres of commercial, industrial, and institutional (CII) DIM landscape area of which 4,087.4 acres may qualify as special landscape area (e.g., irrigated with recycled water). We are continuously updating these landscape area estimates.

Program Description

Waterfluence partners with urban water agencies to reduce overwatering at landscape sites through monitoring, insights, and connection.

- › **Monitoring.** For each site, we chart how actual water use compares to a budget benchmark. Actual water use comes from meter reads made for billing purposes (monthly or bimonthly). Budgeted water use is a function of site-specific characteristics (landscape areas, plant types, irrigation system) and real-time weather. We map landscape areas and then encourage stakeholders to edit the map online to improve its accuracy and to create a controller map to assist with irrigation operations. Where available, we also monitor hourly and daily water use.
- › **Insights.** Monitored water data is channeled through algorithms to generate actionable recommendations. For targeted sites accepting additional help, our irrigation experts conduct on-site landscape field surveys to generate detailed diagnostics. When relevant, we encourage stakeholders to tap available rebates to offset improvement costs.
- › **Connection.** Our website provides a centralized location for stakeholders to better understand, prioritize, communicate, and act on solutions toward the non-controversial goals of improving irrigation efficiency and landscape appearance. Irrigation sites frequently have multiple stakeholders such as property managers, property owners, HOA board members, in-house maintenance staff, and landscape contractors. Furthermore, these stakeholders are often associated with multiple sites in multiple communities. Our website provides a hub to securely access and interact with all their sites.

Site Characteristics

In 2024, Valley Water had 4,716 sites irrigating 7,454 acres of irrigated landscape enrolled in the program. Although the average depth of water applied over all irrigated landscape was 3.1 feet, application rates vary widely with site type and size, among other factors. We segment landscape sites into non-public and public groups because of fundamental differences in how irrigation is managed. The non-public group consists of residential (apartments and homeowner associations (HOAs)) and commercial/industrial sites, commonly managed by landscape contractors. The public group consists of parks, schools, and streetscapes, commonly managed by in-house staff.

The non-public group accounts for 83% of sites and 66% of water use. The public group accounts for the remaining 17% of sites and 34% of water use. Across all sites, 52% of irrigated area is planted in turf grass and the remainder is in shrubs, trees, groundcovers, and pools/fountains. Public sites tend to have a large percentage of irrigated area in turf from large playfields and parks.

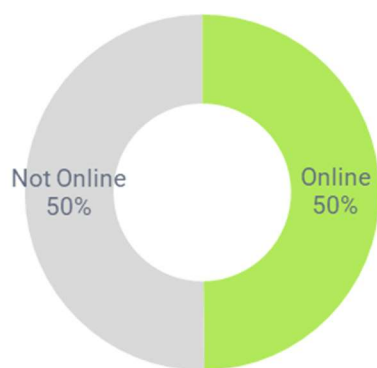
Description	Non-Public	Public	Total
Number of Sites	3,912	804	4,716
< 1 Acre	69%	41%	64%
1-3 Acres	24%	27%	25%
>3 Acres	7%	32%	11%
Irrigated Acres	4,217	3,236	7,454
Average Acres per Site	1.1	4.0	1.6
Turf %	29%	82%	52%
Shrub %	71%	18%	48%
Water Use CCF	6,740,264	3,448,304	10,188,568
Water Use Acre Feet	15,472	7,916	23,388
Water Use %	66%	34%	100%
Depth Applied Feet	3.7	2.4	3.1

Customer Engagement

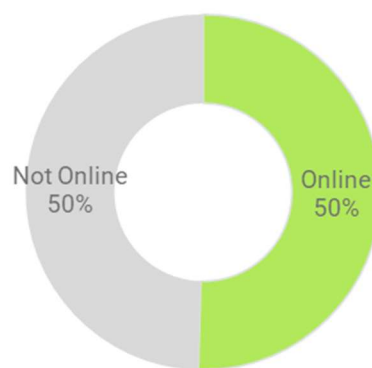
Waterfluence uses multiple tactics to onboard stakeholders to its website by leveraging: 1) account holder billing information, 2) the network effect when stakeholders have multiple sites within Waterfluence, 3) the landscape contractor community, and 4) interactions with account holders with other supplier programs. We encourage account holders to add additional stakeholders associated with landscape irrigation at each site including property managers, property owners, HOA board members, in-house maintenance staff, and landscape contractors.

Each month, Waterfluence imports supplier water use data and notifies stakeholders that new information is available for viewing. In 2024, 50% of landscape area was viewed online by at least one stakeholder. Online engagement was the same for non-public (50%) and public (50%) sites.

Online Engagement by Landscape Area: Non-Public



Online Engagement by Landscape Area: Public



The Waterfluence website can serve as a channel of hourly water use measured by advanced metering infrastructure (AMI). Along with leak alerts, the website communicates irrigation centric insights related to day spikes, midday irrigation, and number of irrigation days-per-week. In 2024, Milpitas and Palo Alto integrated their AMI data with Waterfluence for their program sites.

Landscape Field Surveys

Valley Water targets landscape field surveys at sites in most need of additional help. The account holder at pre-approved sites can accept a field survey offer from the Waterfluence website or request a field survey via the Valley Water website. The survey is free to sites and consists of an irrigation expert visiting the site to gather in-depth diagnostics and provide recommendations to improve efficiency. Field surveys complement water use monitoring by troubleshooting complicated irrigation issues and improving the accuracy of water budget inputs with “boots-on-the-ground” observations. In 2024, 19 sites received a field survey. Between 2014 and 2024, 300 sites received a field survey (6.4% of total sites) covering 759.2 irrigated acres.

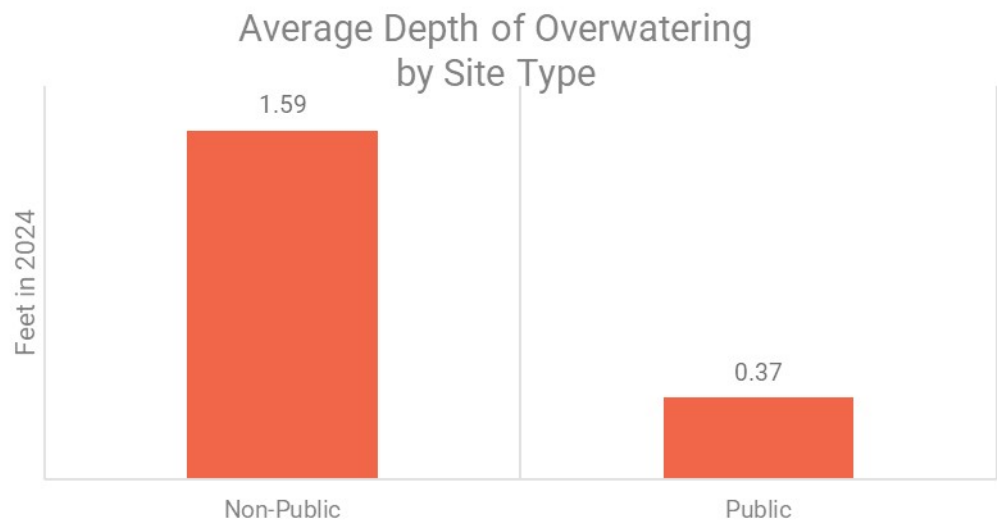
Year	Survey Count	Acres
2014	5	9.9
2015	22	55.9
2016	28	72.0
2017	29	78.0
2018	37	75.4
2019	41	260.6
2020	12	15.3
2021	50	78.9
2022	28	45.8
2023	29	43.4
2024	19	24.0
Total	300	759.2

Irrigation Efficiency Opportunities

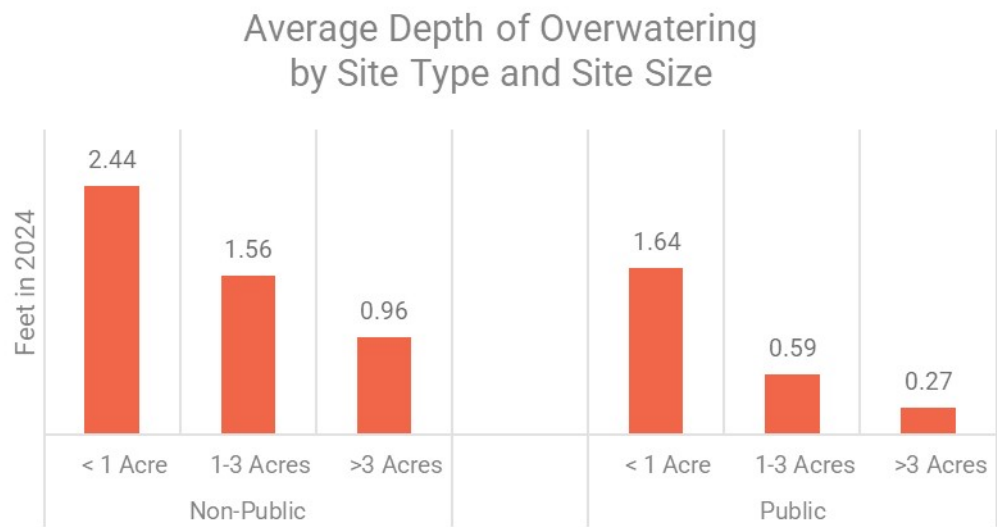
The program’s key performance metric is minimizing the depth of overwatering—defined as the volume of water used above our calculated water budget divided by irrigated area. As a benchmark, overwatering averaged 1.06 feet over all irrigated landscape in 2024.

To guide future efforts to improve the program, we analyzed 2024 overwatering with respect to site type, site size, online engagement, and magnitude.

Site Type. Non-public sites overwater significantly more than public sites, which operate near optimal levels. Additional efforts should be focused on non-public stakeholders to close this gap.

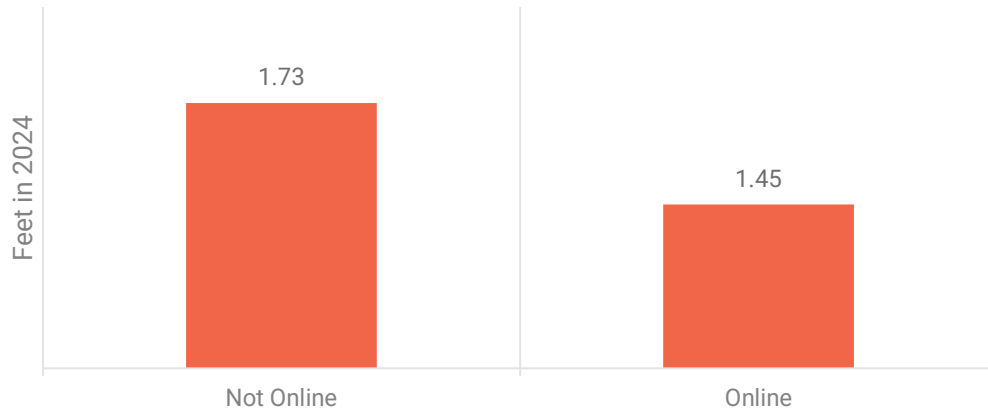


Site Size. Larger landscapes tend to be more efficiently irrigated. Although smaller sites use less water by volume, their potential to reduce overwatering on a percentage basis is greater. Small sites with less than one acre of landscape also make up 64% of total sites.

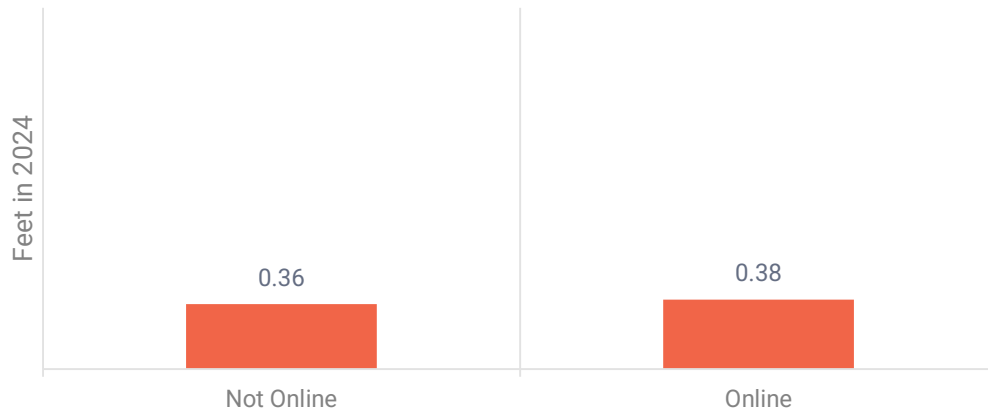


Online Engagement. Non-public sites with online stakeholders overwatered by 16% less compared to sites without online stakeholders. For public sites, overwatering was low for both.

Average Depth of Overwatering by Engagement: Non-Public Sites

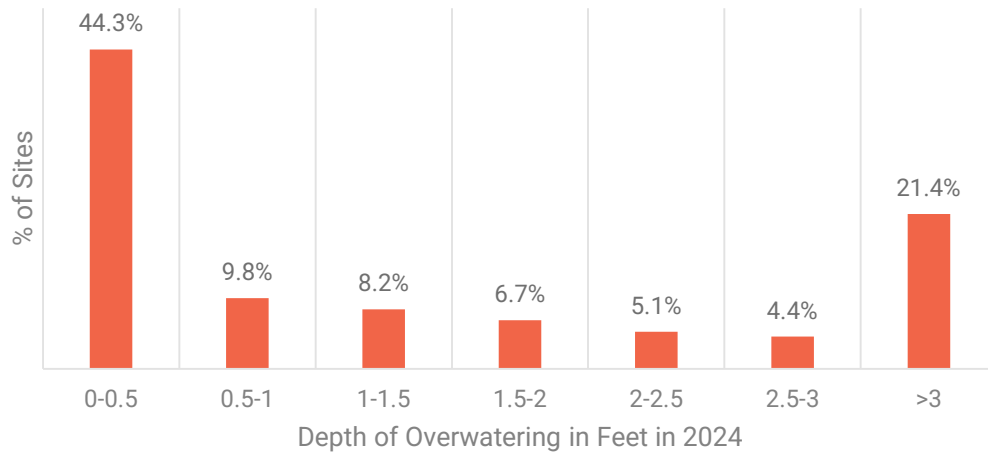


Average Depth of Overwatering by Engagement: Public Sites



Magnitude of Overwatering. A key program benefit is that problem sites in a community can be readily identified. Looking at the frequency of overwatering by magnitude, overwatering of more than 2 feet occurred at 31% of sites, predominately small and non-public. These sites are targeted for verification of water budget assumptions, landscape field surveys, program engagement, and financial incentives, among other tactics to improve performance.

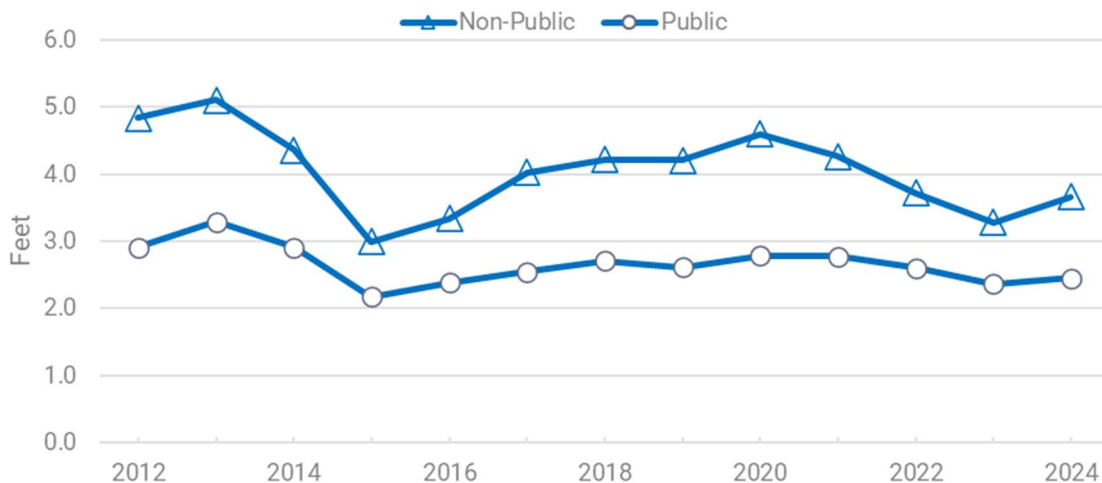
Frequency of Overwatering



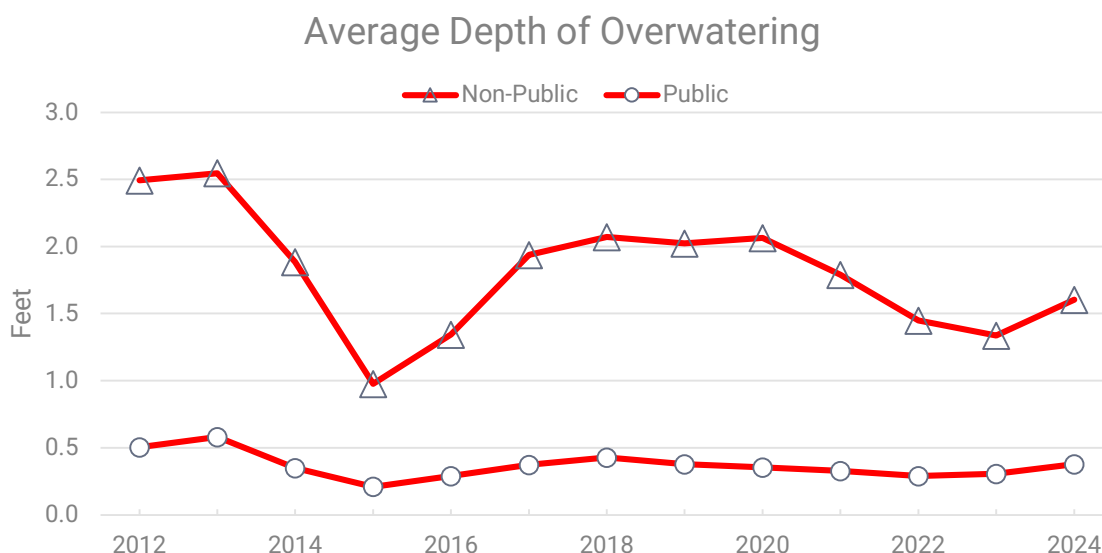
Irrigation Efficiency Trends

Depth of water applied has trended downwards since 2012, dropping 20% overall, and 24% and 16% respectively for non-public and public sites. Water applied dropped dramatically during the 2015-16 statewide drought, rebounded, and since 2020 has trended down. Water use ticked up modestly in 2024 compared to 2023. The Valley Water service area received unusually high rainfall in March and April 2023 delaying the start of the irrigation season—lowering 2023 water use relative to 2024.

Average Depth of Water Applied



Annual average depth of overwatering is a similar metric showing similar patterns. Since 2012, overwatering dropped 31% overall, and 36% and 25% respectively for non-public and public sites.



Regulatory Compliance

Waterfluence is assisting retail water suppliers with elements of two relatively new pieces of State of California legislation.

California's AB 1572, signed into law in 2023, prohibits irrigating nonfunctional turf (NFT) at governmental sites by January 1, 2027, commercial sites by January 1, 2028, and homeowner associations by January 1, 2029. Turf irrigation can continue where:

- Recycled water is used.
- Applied to cemeteries or recreational areas such as sports fields, golf courses, playgrounds, picnic grounds, or pet exercise areas.
- Necessary to ensure the health of trees and other perennial nonturf plantings, or to the extent necessary to address an immediate health and safety need.

We currently estimate up to 474.3 acres of commercial and 578.3 acres of residential NFT will need to be replaced (total of 1,052.6 acres). This is an upper bound and assumes all commercial and residential turf irrigated by potable water is NFT; exemptions will lower these NFT acreages as they are determined. In 2024, Waterfluence added the NFT classification to its online landscape maps to inform site stakeholders about the new NFT requirements and to assist water suppliers with exemptions and NFT enforcement.

The other piece of legislation, California’s SB 606 / AB 1668, was signed into law in 2018 and establishes a new framework for long-term water conservation and drought planning, including specific components targeting CII irrigation. CII excludes our residential DIM sites.

One of the key requirements for water suppliers is to measure all irrigated areas associated with CII DIM sites. About 5% of all CII DIM water use has not been measured by Waterfluence as of December 31, 2024 and is primarily associated with small sites not active in the program (i.e., using less than 200 CCF per year). As a placeholder, Waterfluence estimated the irrigated acres with 1,827 unmeasured sites based on empirical averages of depth of water applied. In total, Valley Water’s participating retail water suppliers have an estimated 6,111.1 acres of CII DIM landscape area of which 4,087.4 acres may qualify as special landscape area. We are continuously updating these landscape area estimates.

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	3,045	2,505	2,384.3	460.9	692.0
Public	Cemetery	11	5	159.2	0.0	159.2
Public	Golf	36	15	1,189.3	0.0	1,189.3
Public	Park	437	312	997.5	0.0	997.5
Public	School	334	231	946.4	0.0	946.4
Public	Streetscape	424	303	251.0	0.0	80.4
Mix	Unmeasured*	1,619	1,553	183.3	13.4	22.7
Sub Total		5,906	4,924	6,111.1	474.3	4,087.4
Residential	Apartment	478	353	385.4	70.7	132.6
Residential	HOA	2,067	1,116	1,529.1	452.4	112.5
Residential	Unmeasured*	503	274	212.2	55.3	39.2
Sub Total		3,048	1,743	2,126.7	578.3	284.3
Total		8,954	6,667	8,237.8	1,052.6	4,371.7

**Unmeasured are primarily small DIM sites with irrigated acres estimated as a function average depth of water applied.*

NFT Acres is nonfunctional turf as specified by the California Code of Regulations Title 23 Section 10608.12. NFT acres exempt (1) recycled water areas, (2) cemeteries or recreational areas such as sports fields, golf courses, playgrounds, picnic grounds, or pet exercise areas, and (3) where necessary to ensure the health of trees and other perennial nonturf plantings, or to the extent necessary to address an immediate health and safety need.

SLA Acres is special landscape areas as specified by the California Code of Regulations Title 23 Section 969. Includes edible plants, recreational areas, areas irrigated with recycled water, slopes designed and constructed with live vegetation as an integral component of stability, ponds or lakes receiving supplemental water, botanical gardens, swimming pools and similar recreational water features, and cemeteries built before 2015.

In addition to CII DIM landscape measurements, Waterfluence also provides water suppliers with regulatory assistance in identifying mixed-use-meter (MUM) sites with over 0.5 acres of irrigated landscape, and CII BMP program elements including Energy Star integration, technical assistance with irrigation, recognition of customers as water efficient, landscape field surveys, and guidance on irrigation scheduling. All these activities satisfy some elements of the SB 606 / AB 1668 legislation (§ 973 & 974).

Exhibit A. Summary Statistics by Retail Water Supplier

Gilroy			
Description	Non-Public	Public	Total
Number of Sites	189	25	214
< 1 Acre	81%	24%	75%
1-3 Acres	17%	40%	20%
>3 Acres	1%	36%	5%
Irrigated Acres	121	91	213
Average Acres per Site	0.6	3.7	1.0
Turf %	28%	86%	53%
Shrub %	72%	14%	47%
Water Use CCF	167,781	116,810	284,591
Water Use Acre Feet	385	268	653
Water Use %	59%	41%	100%
Depth Applied Feet	3.2	2.9	3.1

Milpitas			
Description	Non-Public	Public	Total
Number of Sites	345	76	421
< 1 Acre	72%	45%	67%
1-3 Acres	22%	29%	23%
>3 Acres	6%	26%	9%
Irrigated Acres	354	182	535
Average Acres per Site	1.0	2.4	1.3
Turf %	31%	75%	46%
Shrub %	69%	25%	54%
Water Use CCF	510,489	137,932	648,421
Water Use Acre Feet	1,172	317	1,488
Water Use %	79%	21%	100%
Depth Applied Feet	3.3	1.7	2.8

Exhibit A. Summary Statistics by Retail Water Supplier (continued)

Morgan Hill			
Description	Non-Public	Public	Total
Number of Sites	318	19	337
< 1 Acre	79%	32%	77%
1-3 Acres	18%	26%	18%
>3 Acres	3%	42%	5%
Irrigated Acres	249	56	305
Average Acres per Site	0.8	2.9	0.9
Turf %	32%	63%	38%
Shrub %	68%	37%	62%
Water Use CCF	354,601	57,826	412,427
Water Use Acre Feet	814	133	947
Water Use %	86%	14%	100%
Depth Applied Feet	3.3	2.4	3.1

Mountain View			
Description	Non-Public	Public	Total
Number of Sites	421	93	514
< 1 Acre	74%	63%	72%
1-3 Acres	20%	17%	19%
>3 Acres	7%	19%	9%
Irrigated Acres	396	272	668
Average Acres per Site	0.9	2.9	1.3
Turf %	25%	84%	49%
Shrub %	75%	16%	51%
Water Use CCF	669,669	280,405	950,074
Water Use Acre Feet	1,537	644	2,181
Water Use %	70%	30%	100%
Depth Applied Feet	3.9	2.4	3.3

Exhibit A. Summary Statistics by Retail Water Supplier (continued)

Palo Alto			
Description	Non-Public	Public	Total
Number of Sites	181	48	229
< 1 Acre	73%	48%	68%
1-3 Acres	21%	29%	23%
>3 Acres	6%	23%	9%
Irrigated Acres	189	105	294
Average Acres per Site	1.0	2.2	1.3
Turf %	18%	75%	38%
Shrub %	82%	25%	62%
Water Use CCF	276,866	91,298	368,164
Water Use Acre Feet	636	210	845
Water Use %	75%	25%	100%
Depth Applied Feet	3.4	2.0	2.9

San José Muni			
Description	Non-Public	Public	Total
Number of Sites	336	136	472
< 1 Acre	42%	65%	49%
1-3 Acres	46%	21%	39%
>3 Acres	12%	14%	13%
Irrigated Acres	620	355	975
Average Acres per Site	1.8	2.6	2.1
Turf %	29%	77%	46%
Shrub %	71%	23%	54%
Water Use CCF	970,065	480,625	1,450,690
Water Use Acre Feet	2,227	1,103	3,330
Water Use %	67%	33%	100%
Depth Applied Feet	3.6	3.1	3.4

Exhibit A. Summary Statistics by Retail Water Supplier (continued)

San Jose Water

Description	Non-Public	Public	Total
Number of Sites	1,277	276	1,553
< 1 Acre	69%	24%	61%
1-3 Acres	24%	33%	25%
>3 Acres	7%	42%	14%
Irrigated Acres	1,433	1,289	2,722
Average Acres per Site	1.1	4.7	1.8
Turf %	32%	83%	56%
Shrub %	68%	17%	44%
Water Use CCF	2,110,530	1,308,282	3,418,812
Water Use Acre Feet	4,845	3,003	7,848
Water Use %	62%	38%	100%
Depth Applied Feet	3.4	2.3	2.9

Santa Clara

Description	Non-Public	Public	Total
Number of Sites	413	62	475
< 1 Acre	69%	40%	66%
1-3 Acres	24%	26%	24%
>3 Acres	7%	34%	10%
Irrigated Acres	419	195	614
Average Acres per Site	1.0	3.1	1.3
Turf %	28%	83%	45%
Shrub %	72%	17%	55%
Water Use CCF	883,643	162,989	1,046,632
Water Use Acre Feet	2,028	374	2,403
Water Use %	84%	16%	100%
Depth Applied Feet	4.8	1.9	3.9

Exhibit A. Summary Statistics by Retail Water Supplier (continued)

Sunnyvale Description	Non-Public	Public	Total
Number of Sites	432	67	499
< 1 Acre	70%	27%	64%
1-3 Acres	23%	22%	23%
>3 Acres	7%	51%	13%
Irrigated Acres	437	383	821
Average Acres per Site	1.0	5.7	1.6
Turf %	26%	81%	52%
Shrub %	74%	19%	48%
Water Use CCF	796,620	445,735	1,242,355
Water Use Acre Feet	1,829	1,023	2,852
Water Use %	64%	36%	100%
Depth Applied Feet	4.2	2.7	3.5

Exhibit B. Landscape Field Surveys by Retail Water Supplier

Retailer / Year	Sites	Acres
Cal Water	2	0.0
2021	1	0.0
2022	1	0.0
Gilroy	7	15.8
2014	1	1.8
2016	1	1.7
2017	1	2.7
2018	1	5.1
2019	2	3.4
2024	1	1.0
Great Oaks	3	17.2
2017	1	17.2
2019	1	0.0
2024	1	0.0
Milpitas	11	19.7
2017	1	2.6
2021	5	7.2
2023	1	2.9
2024	4	7.0
Morgan Hill	22	34.7
2016	2	3.3
2017	10	22.2
2018	4	4.6
2020	2	1.3
2021	1	0.0
2022	2	2.8
2024	1	0.4
Mt View	49	88.7
2014	2	3.7
2015	14	31.2
2016	12	22.6
2017	2	2.5
2018	5	10.0
2020	1	0.9
2021	2	0.5
2022	3	3.3
2023	5	11.0
2024	3	2.8
Palo Alto	15	61.4
2015	3	5.4
2016	4	33.8

2017	1	5.6
2018	1	2.8
2019	1	5.9
2020	2	3.5
2022	1	1.0
2023	2	3.4
San José Muni	22	133.9
2019	9	102.2
2020	1	1.7
2021	4	8.8
2022	4	13.4
2023	2	3.2
2024	2	4.8
San Jose Water	114	200.3
2015	1	4.9
2016	3	2.0
2017	5	12.2
2018	20	42.2
2019	25	50.8
2020	3	5.3
2021	33	56.0
2022	9	11.2
2023	9	9.5
2024	6	6.1
Santa Clara	32	48.2
2015	1	1.6
2016	3	4.9
2017	7	10.7
2018	4	7.9
2019	2	1.8
2020	2	0.9
2021	3	2.6
2022	3	7.7
2023	7	9.9
Valley Water	1	96.5
2019	1	96.5
Sunnyvale	22	42.9
2014	2	4.4
2015	3	12.8
2016	3	3.6
2017	1	2.3
2018	2	2.7
2020	1	1.7
2021	1	3.8

2022	5	6.4
2023	3	3.5
2024	1	1.9
Grand Total	300	759.2

*13 field surveys were conducted at non-program sites where landscape area may not have been measured.

Exhibit C. Irrigation Efficiency Trends: All Retail Water Suppliers

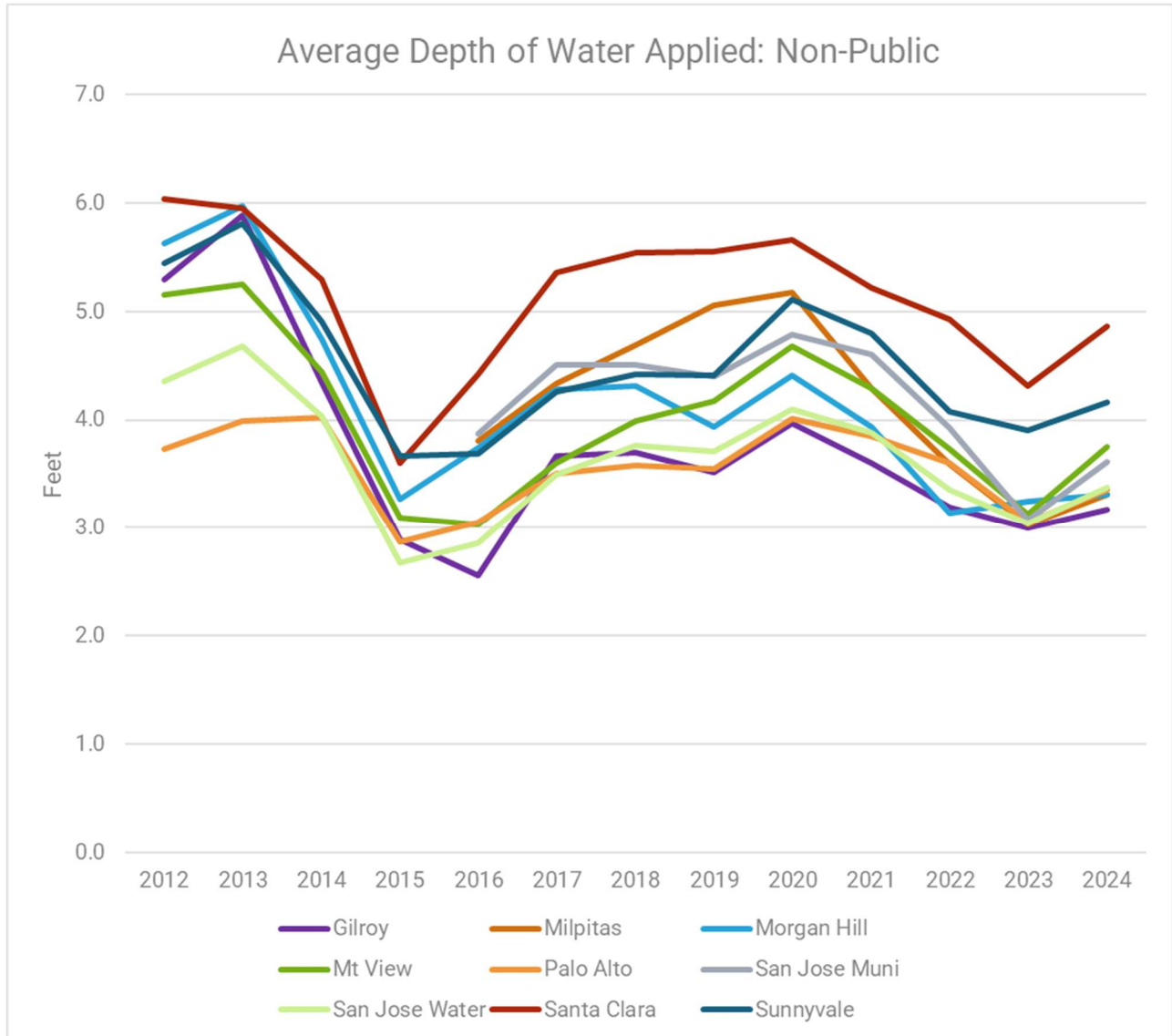


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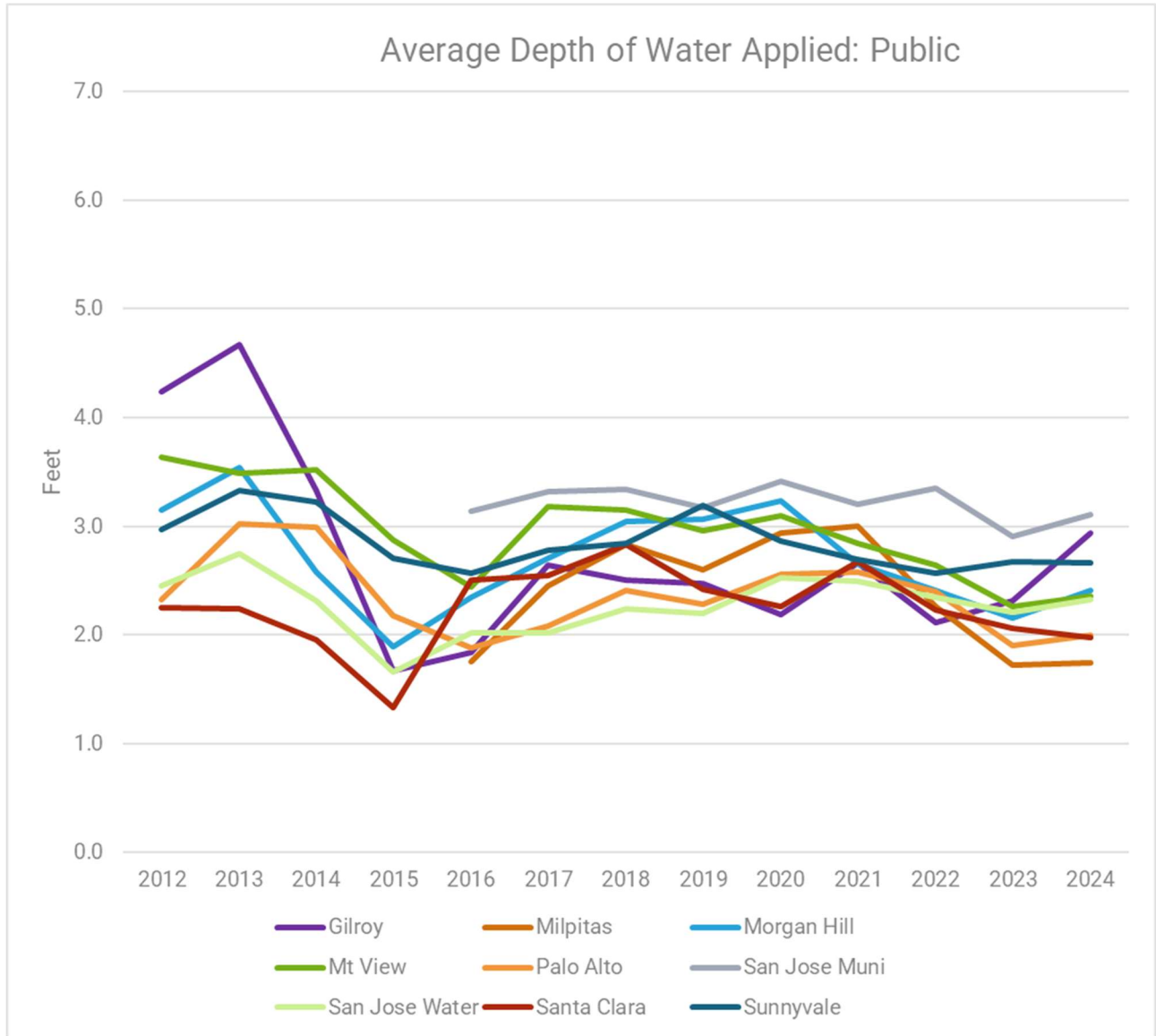


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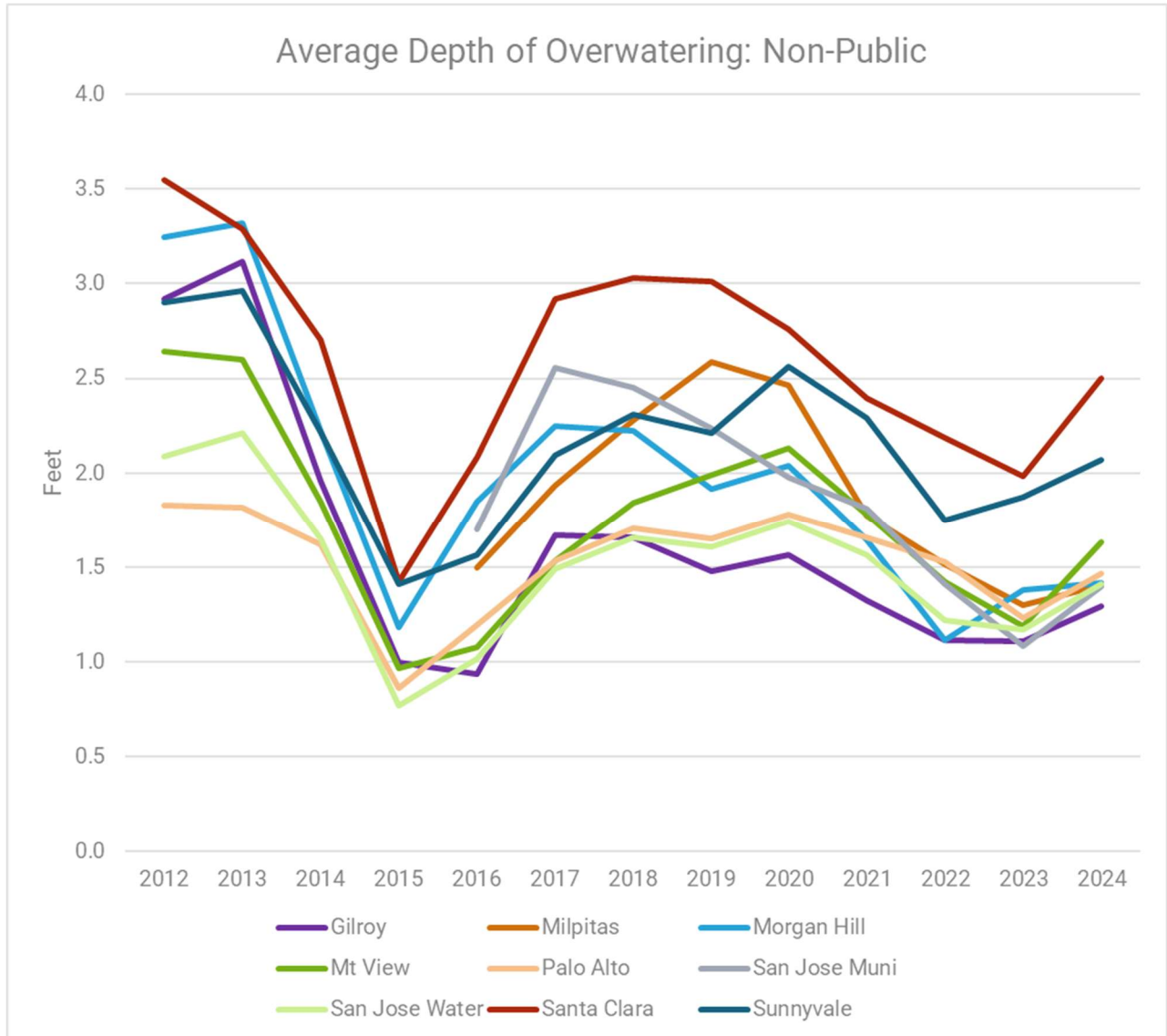


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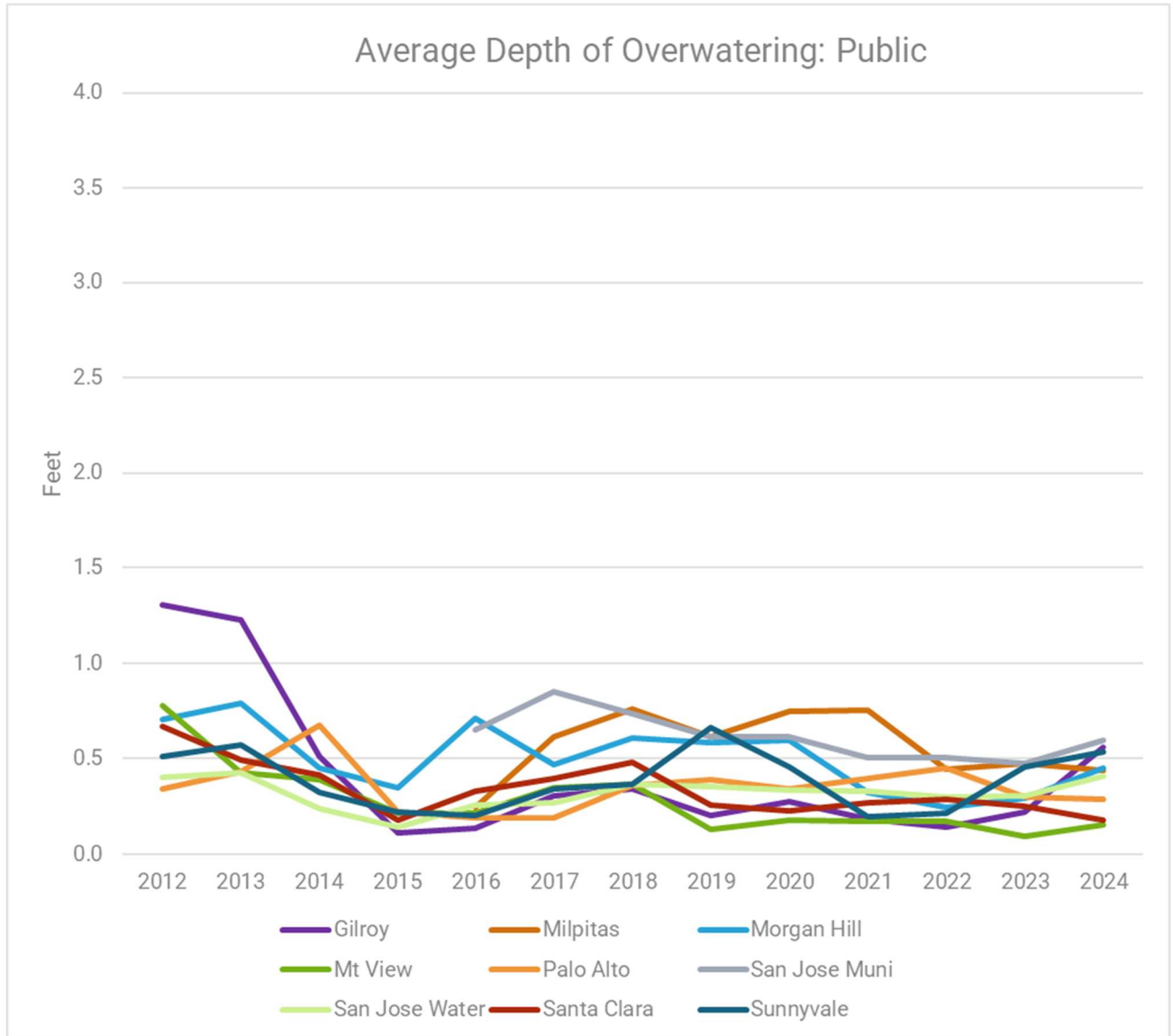
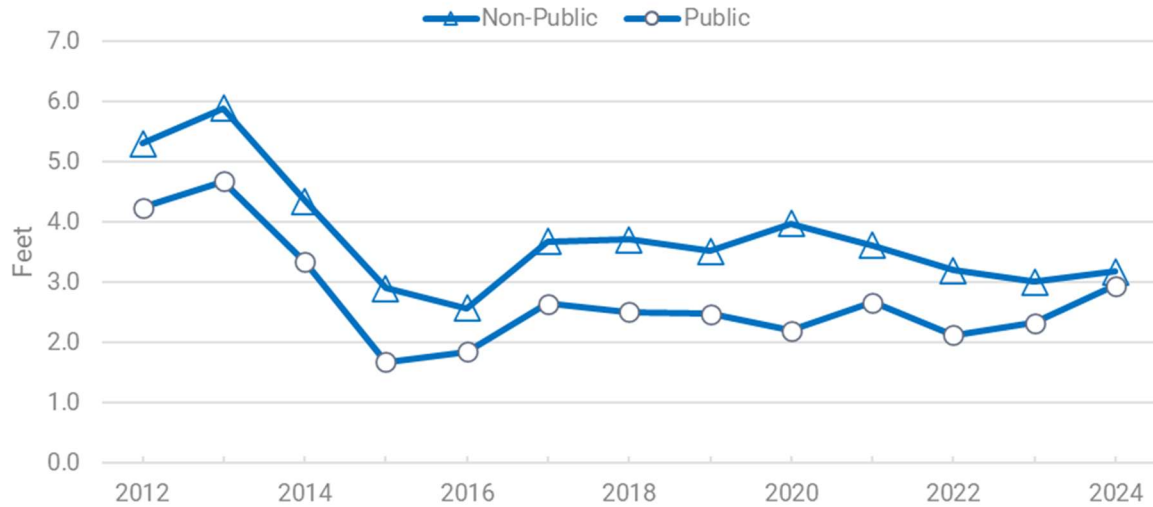


Exhibit C. Irrigation Efficiency Trends: Gilroy

Average Depth of Water Applied



Average Depth of Overwatering

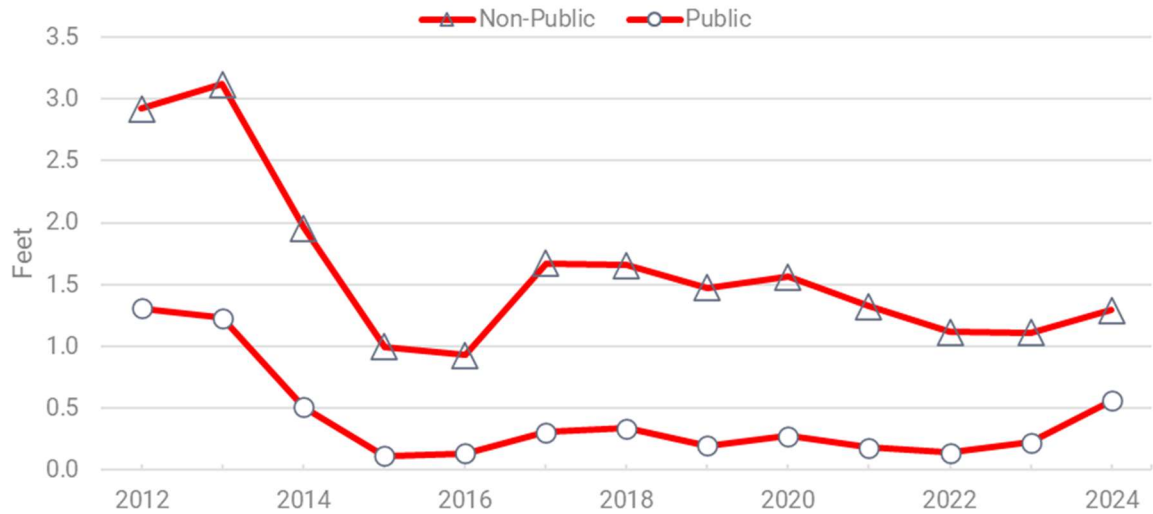
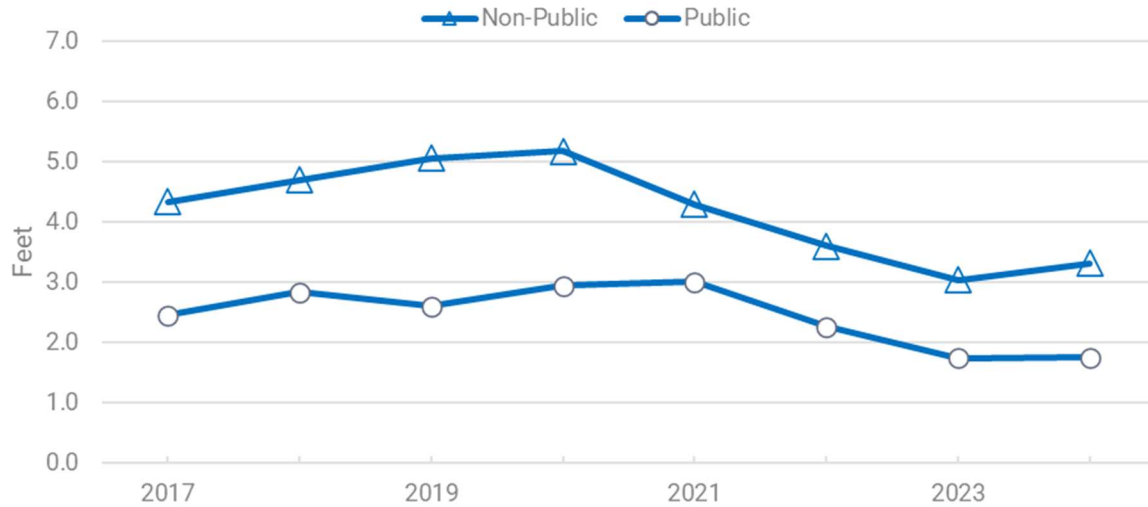


Exhibit C. Irrigation Efficiency Trends: Milpitas

Average Depth of Water Applied



Average Depth of Overwatering

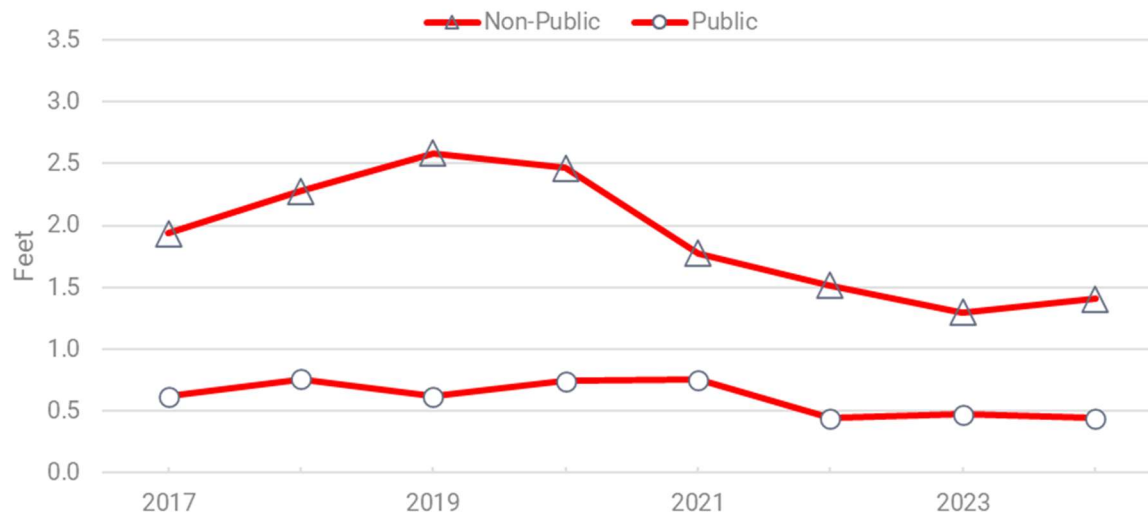


Exhibit C. Irrigation Efficiency Trends: Morgan Hill

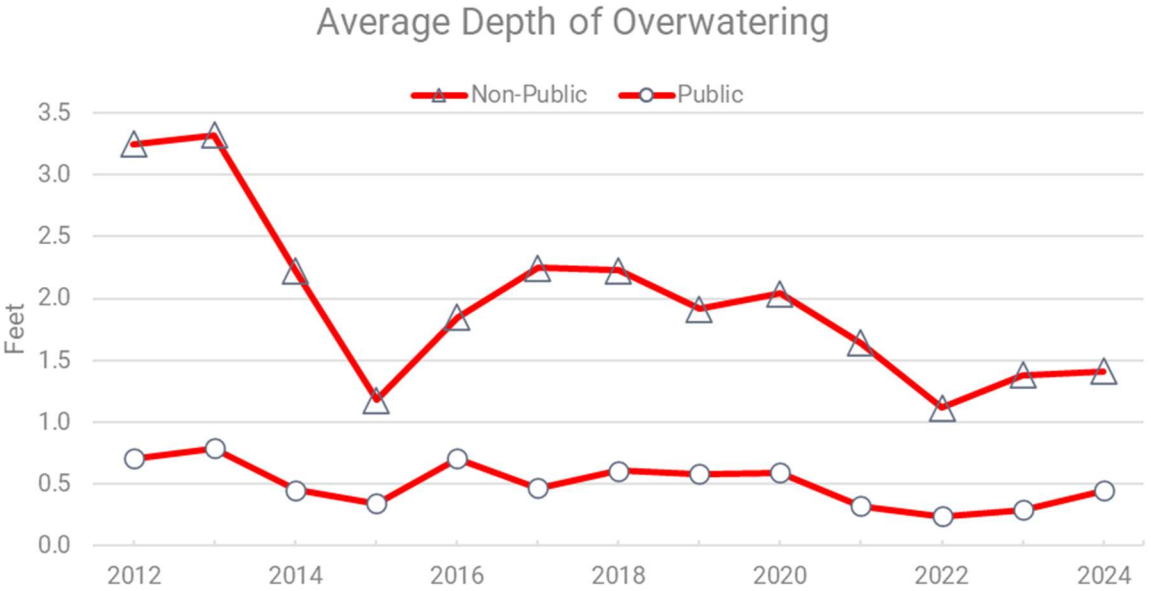
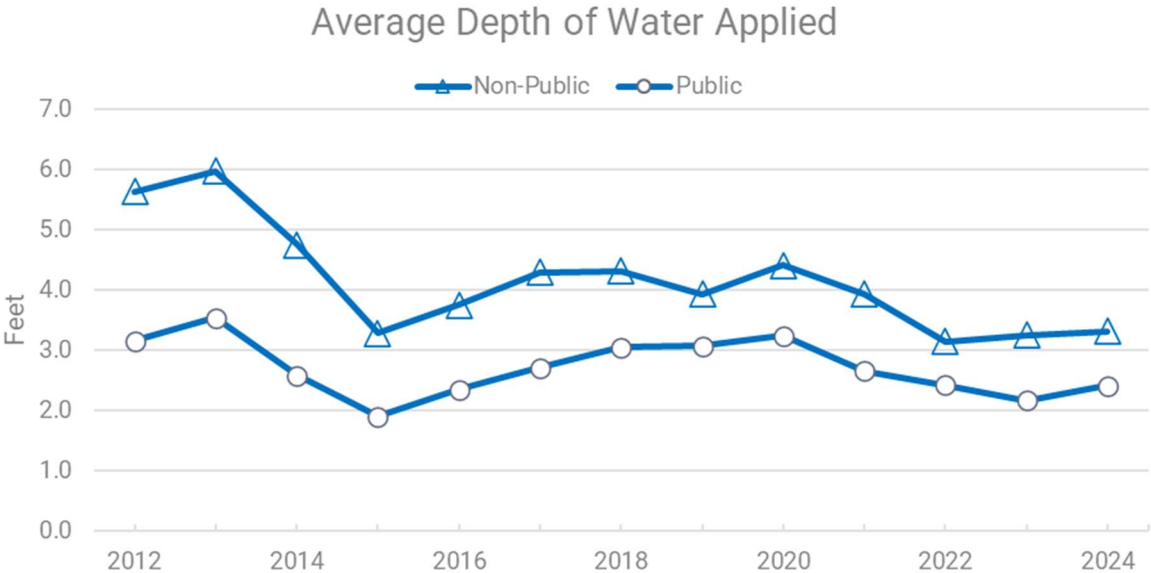


Exhibit C. Irrigation Efficiency Trends: Mountain View

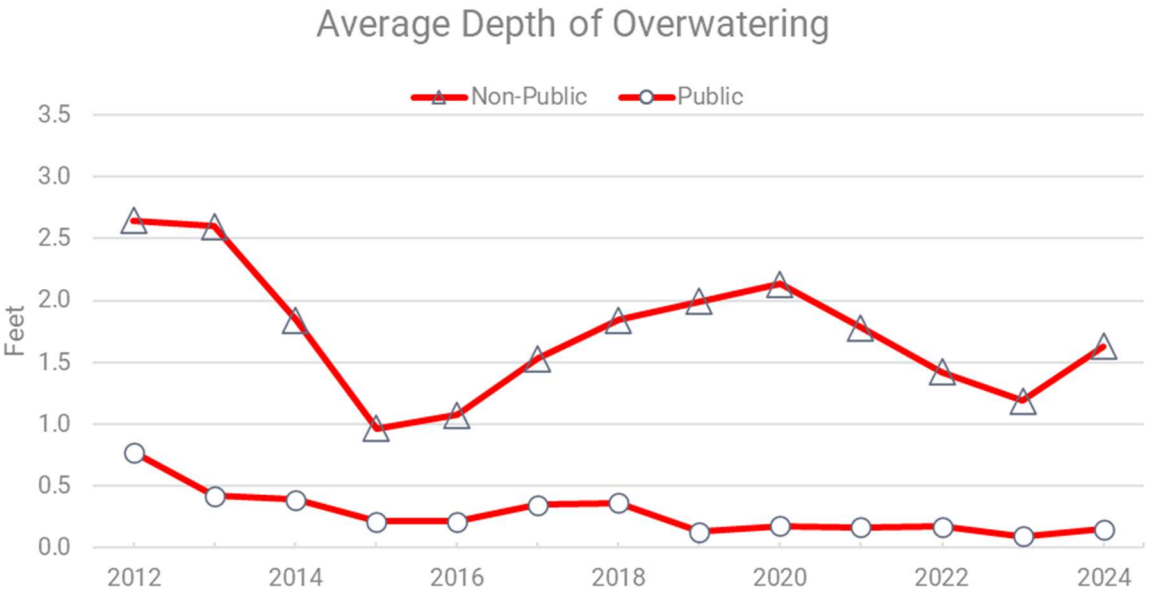
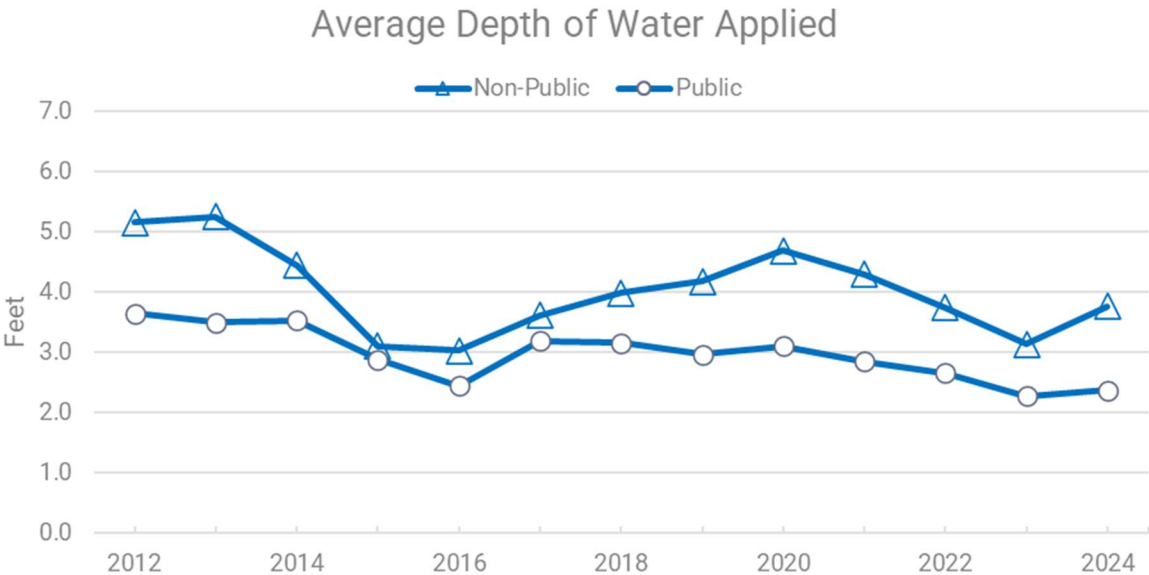


Exhibit C. Irrigation Efficiency Trends: Palo Alto

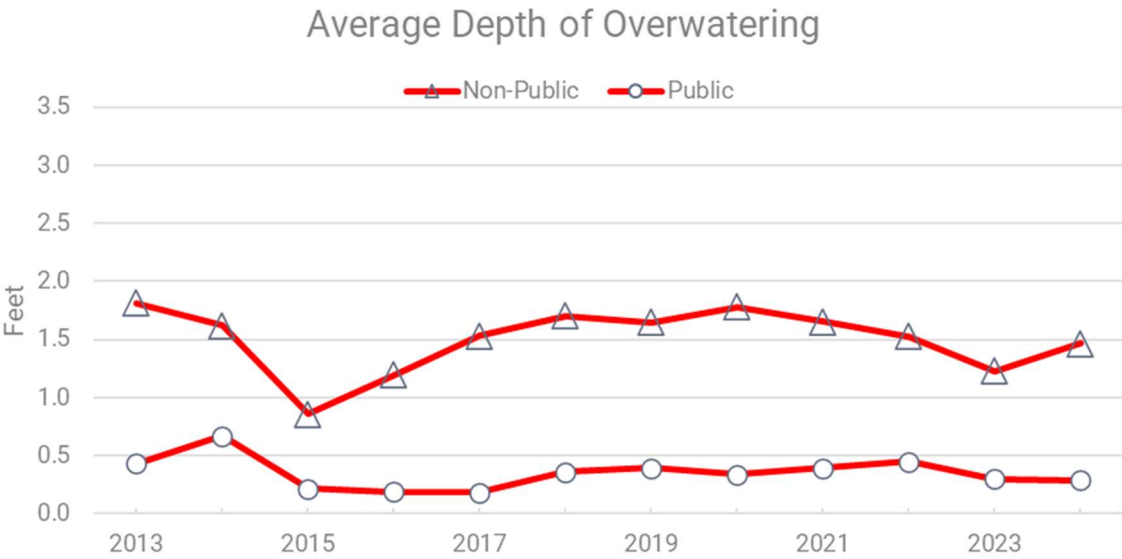
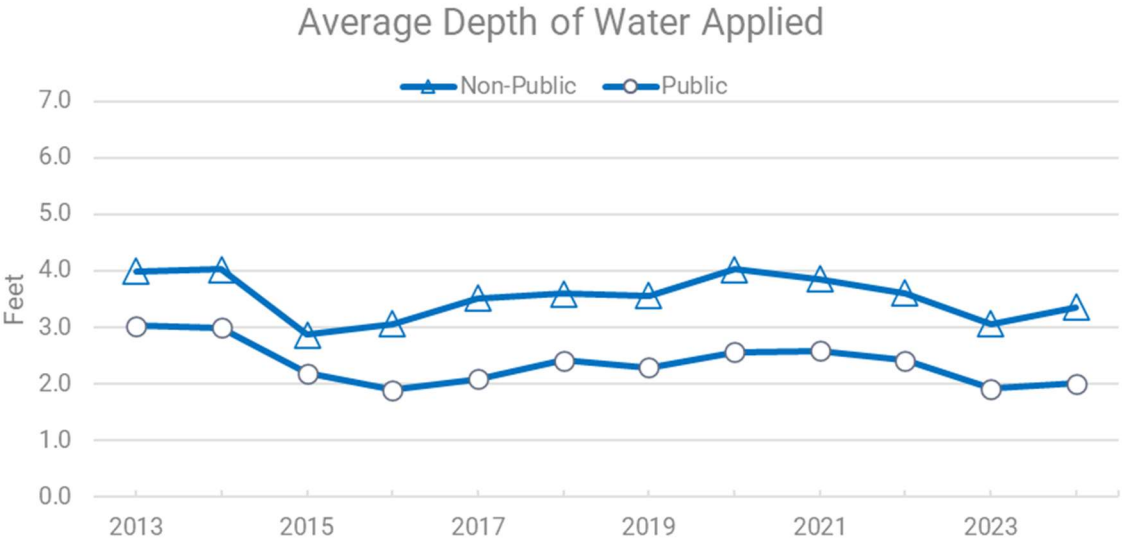


Exhibit C. Irrigation Efficiency Trends: San Jose Muni

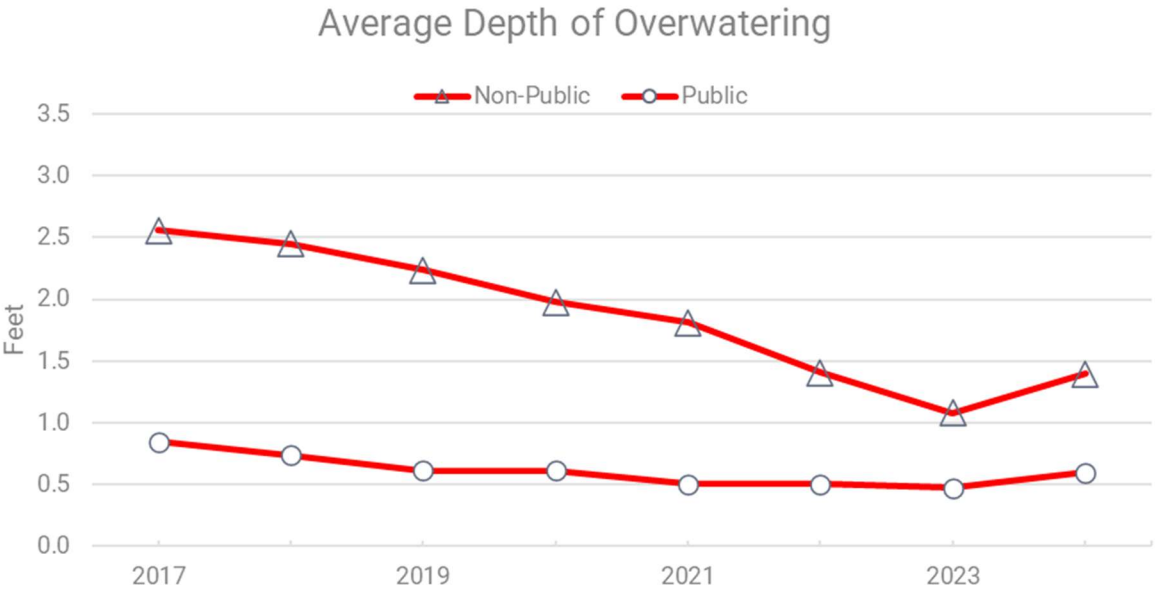
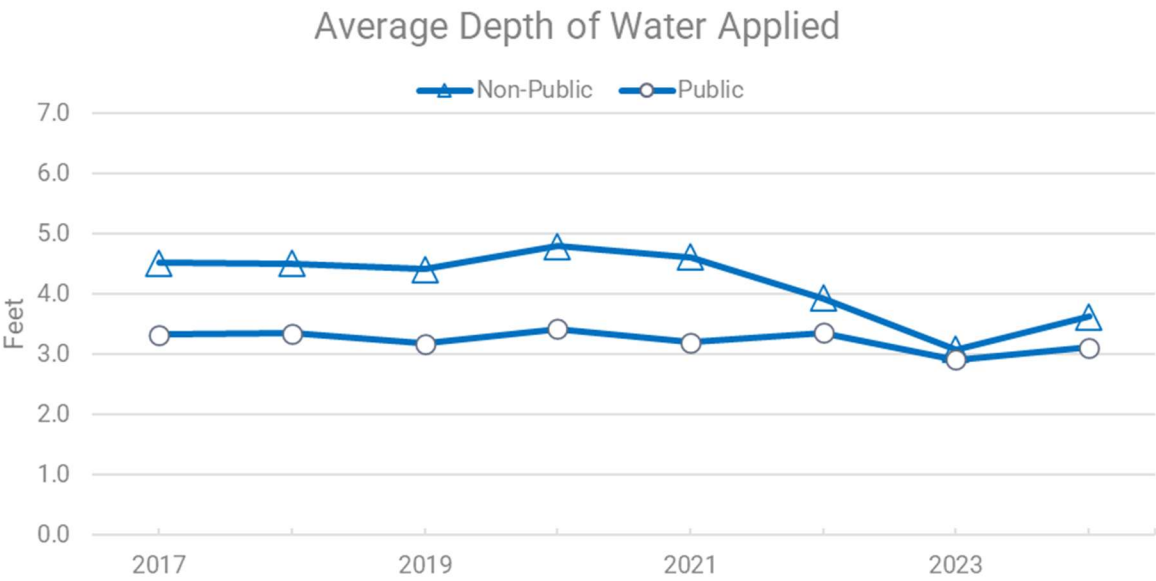
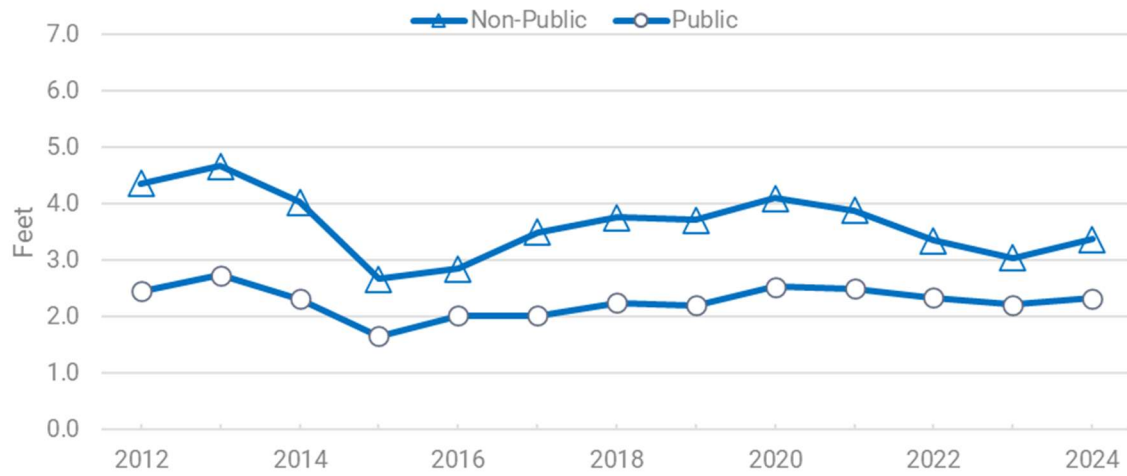


Exhibit C. Irrigation Efficiency Trends: San Jose Water

Average Depth of Water Applied



Average Depth of Overwatering

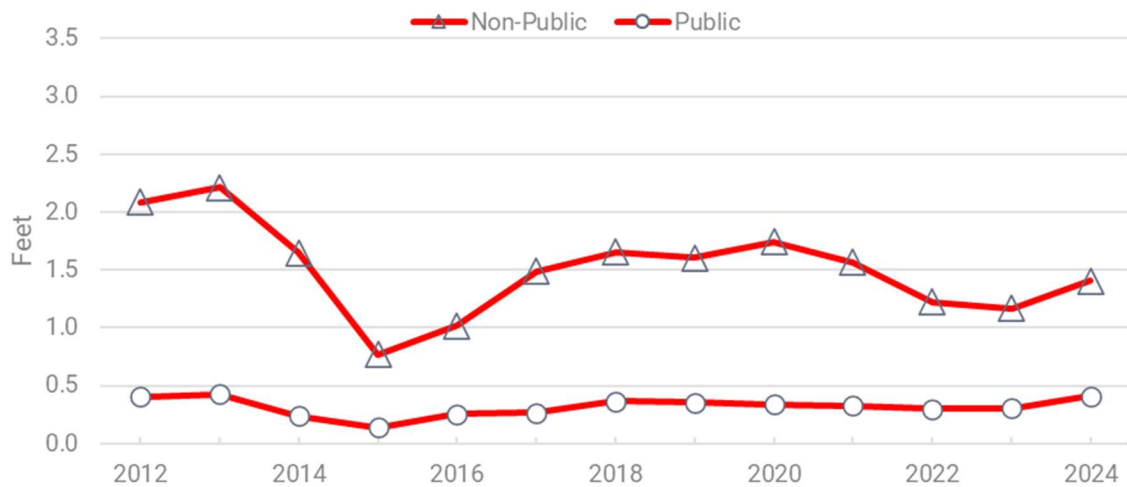
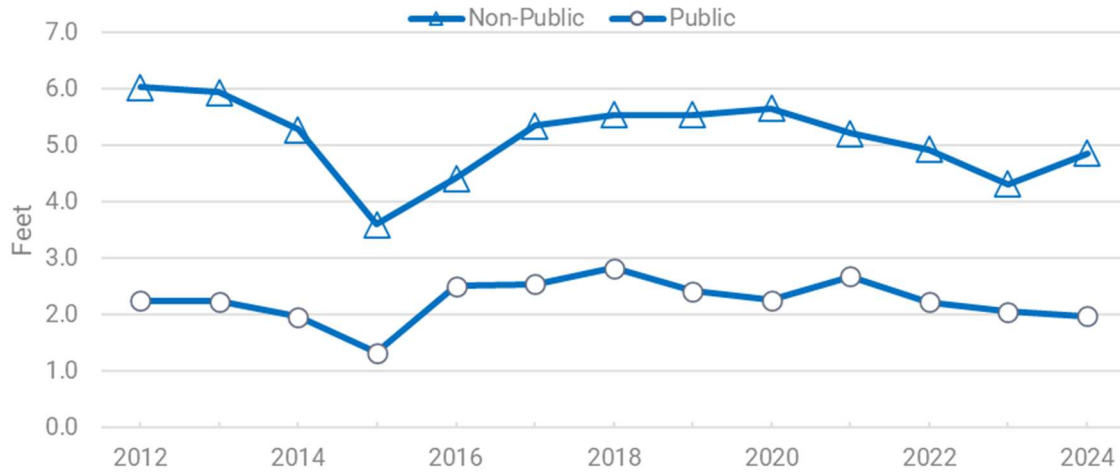


Exhibit C. Irrigation Efficiency Trends: Santa Clara

Average Depth of Water Applied



Average Depth of Overwatering

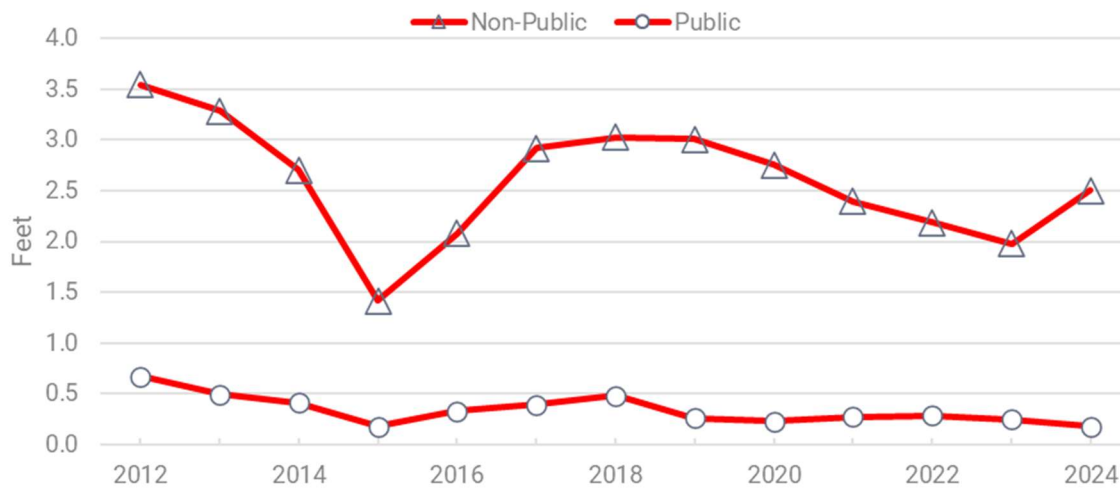
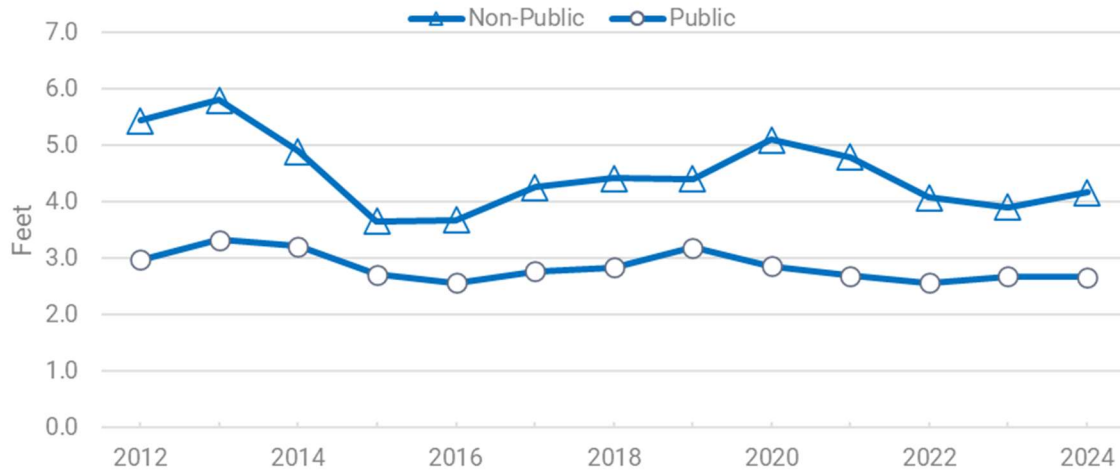


Exhibit C. Irrigation Efficiency Trends: Sunnyvale

Average Depth of Water Applied



Average Depth of Overwatering

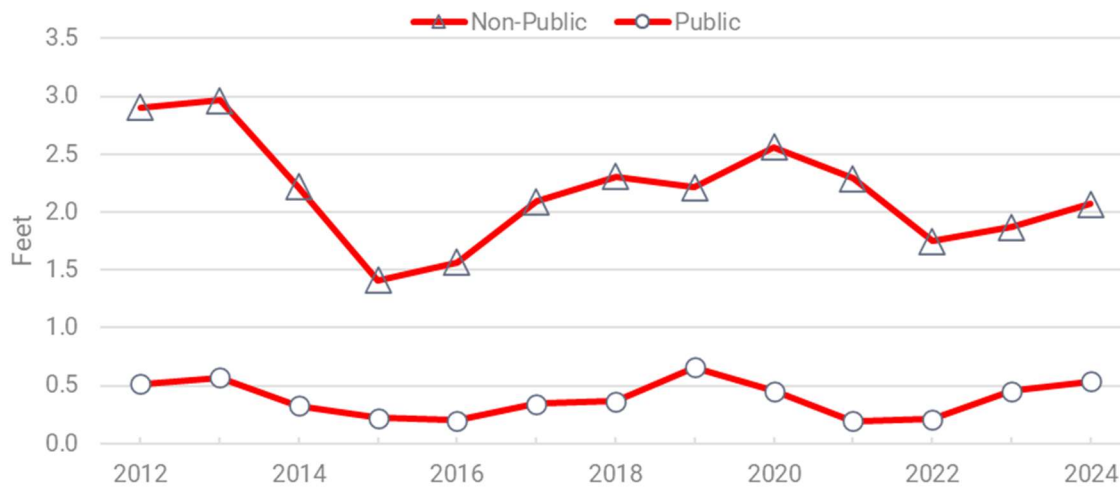


Exhibit D. Regulatory Compliance

Gilroy

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	155	135	68.3	17.8	0.0
Public	Park	27	18	57.1	0.0	57.1
Public	School	10	7	35.2	0.0	35.2
Public	Streetscape	2	1	0.2	0.0	0.0
Mix	Unmeasured*	193	178	11.9	2.3	0.2
CII Total		387	339	172.7	20.1	92.5
Residential	Apartment	16	14	10.8	1.3	0.0
Residential	HOA	88	42	42.7	15.5	0.0
Residential	Unmeasured*	89	39	36.9	12.7	0.0
Sub Total		193	95	90.3	29.5	0.0
Total		580	434	263.0	49.6	92.5

Milpitas

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	329	264	249.7	29.6	156.6
Public	Park	44	34	97.0	0.0	97.0
Public	School	17	14	59.1	0.0	59.1
Public	Streetscape	44	28	25.5	0.0	13.0
Mix	Unmeasured*	191	185	25.2	1.9	15.6
CII Total		625	525	456.4	31.4	341.2
Residential	Apartment	26	18	17.3	1.4	10.6
Residential	HOA	129	64	89.8	22.8	16.8
Residential	Unmeasured*	16	15	3.9	0.2	2.8
Sub Total		171	97	110.9	24.4	30.2
Total		796	622	567.4	55.8	371.4

Exhibit D. Regulatory Compliance (continued)

Morgan Hill

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	273	229	165.7	67.3	0.0
Public	Cemetery	1	1	1.6	0.0	1.6
Public	Park	2	2	11.6	0.0	11.6
Public	School	21	15	41.9	0.0	41.9
Public	Streetscape	2	2	0.6	0.0	0.0
Mix	Unmeasured*	95	88	15.9	3.9	1.2
CII Total		394	337	237.2	71.2	56.3
Residential	Apartment	32	22	20.4	2.9	0.0
Residential	HOA	170	78	91.3	35.8	0.0
Residential	Unmeasured*	33	22	17.8	6.9	0.0
Sub Total		235	122	129.6	45.7	0.0
Total		629	459	366.8	116.9	56.3

Mountain View

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	329	251	267.8	48.3	62.0
Public	Park	52	48	101.2	0.0	101.2
Public	Golf	3	1	131.7	0.0	131.7
Public	School	8	8	18.4	0.0	18.4
Public	Streetscape	62	47	32.9	0.0	8.5
Mix	Unmeasured*	244	242	16.3	2.3	7.5
CII Total		698	597	568.2	50.6	329.4
Residential	Apartment	51	37	30.1	5.0	0.0
Residential	HOA	228	137	111.3	33.2	0.0
Residential	Unmeasured*	66	65	7.1	1.7	0.1
Sub Total		345	239	148.4	39.9	0.1
Total		1,043	836	716.7	90.5	329.5

Exhibit D. Regulatory Compliance (continued)

Palo Alto

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	176	156	170.5	29.5	0.0
Public	Park	20	18	77.4	0.0	77.4
Public	School	17	16	23.6	0.0	23.6
Public	Streetscape	16	15	3.6	0.0	0.0
Mix	Unmeasured*	165	162	12.1	2.5	0.2
CII Total		394	367	287.3	32.1	101.2
Residential	Apartment	20	14	6.8	1.3	0.0
Residential	HOA	39	26	22.4	3.3	0.0
Residential	Unmeasured*	0	0	0.0	0.0	0.0
Sub Total		59	40	29.2	4.5	0.0
Total		453	407	316.5	36.6	101.2

San Jose Muni

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	300	263	358.1	75.5	86.9
Public	Golf	8	4	294.3	0.0	294.3
Public	Park	30	20	52.3	0.0	52.3
Public	School	22	20	70.8	0.0	70.8
Public	Streetscape	152	105	75.4	0.0	44.9
Mix	Unmeasured*	62	56	41.3	1.7	35.2
CII Total		574	468	892.2	77.1	584.4
Residential	Apartment	32	25	33.1	4.0	23.5
Residential	HOA	175	52	231.4	86.2	18.3
Residential	Unmeasured*	144	32	96.1	23.7	30.6
Sub Total		351	109	360.6	113.8	72.4
Total		925	577	1,252.8	190.9	656.8

Exhibit D. Regulatory Compliance (continued)

San Jose Water

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	705	592	465.5	89.5	114.1
Public	Golf	7	3	221.2	0.0	221.2
Public	Cemetery	8	3	133.4	0.0	133.4
Public	Park	182	111	334.4	0.0	334.4
Public	School	187	109	555.7	0.0	555.7
Public	Streetscape	118	82	102.0	0.0	13.0
Mix	Unmeasured*	155	132	32.1	2.5	19.3
CII Total		1,362	1,032	1,844.4	92.0	1,391.2
Residential	Apartment	180	134	183.1	41.4	81.4
Residential	HOA	973	564	796.9	229.4	37.4
Residential	Unmeasured*	63	24	40.0	10.2	7.0
Sub Total		1,216	722	1,020.0	281.0	125.8
Total		2,578	1,754	2,864.4	372.9	1,516.9

Santa Clara

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	384	300	305.5	43.4	149.9
Public	Cemetery	2	1	24.2	0.0	24.2
Public	Park	34	28	85.2	0.0	85.2
Public	School	26	19	79.5	0.0	79.5
Public	Streetscape	20	15	6.6	0.0	0.7
Mix	Unmeasured*	237	235	15.1	3.0	5.4
CII Total		703	598	516.0	46.3	344.9
Residential	Apartment	61	36	45.8	5.9	17.2
Residential	HOA	134	81	71.1	8.3	39.9
Residential	Unmeasured*	26	22	1.0	0.3	0.1
Sub Total		221	139	117.8	14.4	57.2
Total		924	737	633.8	60.8	402.1

Exhibit D. Regulatory Compliance (continued)

Sunnyvale

Site Type	Site Type Detail	Meters	Sites	Irrigated Acres	NFT Acres	SLA Acres
Commercial	Commercial	394	315	333.3	60.1	122.4
Public	Golf	9	3	135.8	0.0	135.8
Public	Park	46	33	181.2	0.0	181.2
Public	School	26	23	62.2	0.0	62.2
Public	Streetscape	8	8	4.2	0.0	0.2
Mix	Unmeasured*	277	275	13.9	1.6	2.8
CII Total		760	657	730.7	61.7	504.7
Residential	Apartment	60	53	38.0	7.5	0.0
Residential	HOA	131	72	72.3	17.9	0.0
Residential	Unmeasured*	66	55	18.6	4.1	0.0
Sub Total		257	180	128.9	29.5	0.0
Total		1,017	837	859.6	91.2	504.7

Exhibit E. Public Site Count and Irrigated Acres by Retail Water Supplier

Retailer	Type	Sites	Acres
Gilroy	Park	17	56.0
	School	7	35.2
	Streetscape	1	0.2
Milpitas	Park	34	97.0
	School	14	59.1
	Streetscape	28	25.5
Morgan Hill	Cemetery	1	1.6
	Park	2	11.6
	School	14	41.7
	Streetscape	2	0.6
Mt View	Golf	1	131.7
	Park	47	101.1
	School	7	11.0
	Streetscape	38	28.1
Palo Alto	Park	18	77.4
	School	16	23.6
	Streetscape	14	3.5
San Jose Muni	Golf	3	159.2
	Park	20	52.1
	School	19	70.4
	Streetscape	94	73.3
San Jose Water	Cemetery	3	133.4
	Golf	3	221.2
	Park	111	334.3
	School	106	520.6
	Streetscape	53	79.9
Santa Clara	Cemetery	1	24.2
	Park	27	84.8
	School	19	79.5
	Streetscape	15	6.6
Sunnyvale	Golf	3	135.8
	Park	33	181.2
	Golf	23	62.2
	Park	8	4.2
Valley Water	Golf	2	308.4
Grand Total	Cemetery	5	159.2
	Golf	12	956.3
	Park	309	995.5
	School	225	903.4
	Streetscape	253	221.9
	All	804	3236.2