Dear Director Buschatzke,

Thank you very much for your continued willingness to work with Arizona’s golf course industry. McCormick Ranch Golf Club ("MRGC") remains deeply concerned about the impact of the proposed Phoenix Active Management Area Fifth Management Plan ("5MP") conservation requirements for golf courses. These requirements encompass such dramatic decreases in the allotments for pre-1985 golf courses with over 90 acres of turf, with reductions of up to 24%, that MRGC and courses like it will undoubtedly have to make near impossible decisions regarding 1) keeping lakes full, 2) maintaining flood control and soil stabilization in washes, and 3) eliminating irrigation to large amounts of acreage that may be next to homes, in washes, or within very visible parts of their properties. Nevertheless, MRGC sincerely appreciates the opportunity to provide feedback on the proposed requirements prior to adoption of the 5MP.

As you may know, MRGC is part of an iconic golf course community with 3,100 acres, 8,900 residences and 27,000 citizens, in the heart of Scottsdale, steeped in the history of Arizona since 1972, that provides recreational amenities, tourism benefits, as well as economic and ecological value to people and wildlife. Its property includes two golf courses, a restaurant, 288 acres of land and seven lakes with 38 acres of water surface area. It has remained a family owned and operated business since 1979 and is an essential feature of the McCormick Ranch community. Please note that since 70% of the MRGC property is in floodplains, we are requesting that a Floodplain Allotment Addition be added to the 5MP (see below).

Even though the golf industry uses only 1.9% of Arizona’s total water use, its economic return is about $4 billion each year. MRGC has been a good water steward, having utilized best management practices and highly efficient technology to operate its golf courses and having invested $5 million to install a new irrigation system. MRGC recently hired a golf course architect to evaluate what additional actions it can take to conserve water, improve efficiencies and develop a Conservation Plan. MRGC is committed to responsible water management and to reducing water use over time in a manner that is economically achievable and technically feasible.

via first-class mail and email: managementplans@azwater.gov
The Arizona Department of Water Resources’ ("ADWR") proposed 5MP conservation requirements represent a dramatic shift in approach that has serious impacts for pre-1985 golf courses, which were designed and constructed before the Groundwater Code was enacted. While the post-1984 golf courses are given up to 16% increases in their water allotments, hundreds of acres of land, if not thousands, that are integral to the historic courses and communities around them will have no water allotment, since only up to 18 acres of low water use landscaping per golf course is being provided for in the 5MP.

ADWR proposes to decrease allotments for larger courses by up to 24%, nearly one quarter of the total allotment for some courses. Previous management plans reduced MRGC’s allotment gradually and incrementally, while ADWR’s proposal for 5MP conservation requirements, planned for promulgation in 2022, would reduce MRGC’s current allotment by a staggering 15.9%. An up to 24% reduction in allotment for courses established prior to the Groundwater Code is not economically feasible.

Request to include a Floodplain Allotment Addition in the 5MP for golf courses with large amounts of water surface area and turfed acreage located within designated floodplains: MRGC was originally designed to incorporate floodplains within the property as part of Scottsdale’s Green Belt, an elaborately engineered drainage system with turf consisting of parks and golf courses. The floodplains serve multiple purposes with benefits for recreation, wildlife, and property owners, while also serving to slow run-off, improve drainage, minimize erosion and dust problems, and protect downstream communities such as Scottsdale and Tempe from damage during storm events. Over 70% of MRGC’s turfed and lakes acreage are located within these designated floodplains. Because of its unique golf course design, MRGC would be faced with a nearly impossible choice in order to comply with ADWR’s proposed 5MP allotment: 1) stop keeping its lakes filled, 2) remove or eliminate the watering of turf in designated floodplains, and/or 3) substantially reduce watering on its golf courses. Therefore, MRGC requests that ADWR include a Floodplain Allotment Addition in the 5MP for golf courses with large amounts of water surface area and turfed acreage located within designated floodplains. MRGC’s suggested changes to ADWR’s proposed 5MP conservation requirements for golf courses are attached hereto.

In addition, MRGC is aware that the Recreation Centers of Sun City submitted comments requesting certain changes to the 5MP, including but not limited to a water allotment being given for all low water use landscaping on pre-1985 golf courses, as well as adjustments to the length of time for implementation of turf transition and the amount of mature vegetation coverage in low water use areas. MRGC supports these requests.

MRGC appreciates ADWR’s willingness to listen to the regulated community and the public in developing the 5MP and hopes to continue collaborating with ADWR to determine the optimal strategy to promote water conservation and efficiency within the golf industry. However, ADWR’s 5MP conservation requirements as proposed could leave many historic golf courses with no choice but to remove hundreds of acres of turf at great expense, leaving empty or depleted lakes, dirt in floodplains, bare granite in common areas within established communities, decreased home values, unfair advantages for golf courses that were built into the desert as opposed to these courses that will have to be "retrofitted," and a drop in tourism once the non-residents discover:
that the “traditional” golf courses have been all but eliminated. We hope that you will seriously consider our proposed Floodplain Allotment Addition. Please don’t hesitate to contact me if you have any questions.

Sincerely,

Stuart Kirk
President, McCormick Ranch Golf Club

Enc: Suggested Changes to ADWR’s Proposed 5MP Conservation Requirements

Cc: Governor Doug Ducey, dducey@az.gov
    Daniel Ruiz, Chief of Staff, druiz@az.gov
    President Karen Fann, AZ Senate, kfann@azleg.gov
    Speaker Rusty Bowers, AZ House of Representatives, rbowers@azleg.gov
    Michelle Ugenti-Rita, AZ Senate, LD 23, mugenti-rita@azleg.gov
    Joseph Chaplik, AZ House of Representatives, LD 23, jchaplik@azleg.gov
    John Kavanagh, AZ House of Representatives, LD 23, jkavanagh@azleg.gov
    Mayor David Ortega, City of Scottsdale, dortega@ScottsdaleAZ.gov
    Scottsdale City Councilmembers, citycouncil@ScottsdaleAZ.gov
    Carol Ward, ADWR Deputy Assistant Director, cward@azwater.gov
    Natalie Mast, ADWR Management Plans Program Manager, nlmast@azwater.gov
    Ken Slowinski, ADWR Chief Counsel, kslowinski@azwater.gov
    Jaime Uhrich, Director, McCormick Ranch Property Owner’s, jameuhrich@mrpoa.com
    Alexandra Arboleda, TSL Law Group PLC, alex@tsslawgroup.com
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6.4 INDUSTRIAL CONSERVATION REQUIREMENTS AND MONITORING AND REPORTING REQUIREMENTS FOR TURF-RELATED FACILITIES

6-501. Definitions

In addition to the definitions set forth in Chapters 1 and 2 of Title 45 of the Arizona Revised Statutes, and section 6-401 of this chapter, unless the context otherwise requires, the following words and phrases used in sections 6-501 through 6-507 shall have the following meanings:

1. "Body of water" means a constructed body of water or interconnected bodies of water, including a lake, pond, lagoon, or swimming pool, that has a surface area greater than 12,320 square feet when full and that is filled or refilled primarily for landscape, scenic or recreational purposes, or regulatory storage.

2. "Common area" means an area or areas that is owned and operated as a single integrated facility and that is used for recreational or open space purposes. A common area is maintained for the benefit of the residents of a housing development.

3. "Contiguous" means in contact at any point or part of the same master-planned community. Two parcels of land are contiguous even if they are separated by one or more of the following: a road, easement, or right-of-way.

4. "Direct use effluent" means effluent transported from a facility regulated pursuant to Title 49, Chapter 2, Arizona Revised Statutes, to an end user. Direct use effluent does not include effluent that has been stored pursuant to Title 45, Chapter 3.1, Arizona Revised Statutes.

5. "Golf course" means a turf related facility used for playing golf with a minimum of nine holes and including any practice areas.

6. "Hole" means a component of a golf course consisting at a minimum of a tee and a green. A practice area or driving range is not a hole.
7. "Landscape watering" means the application of water from any source, at a turf-related facility to a water-intensive landscaped area, a low water use landscaped area, and revegetation acres.

8. "Low water use landscaped area" means an area of land at least one acre in aggregate, which is located in a turf-related facility, which is watered by a permanent water application system within the landscaped area and planted primarily with plants listed in ADWR’s Low Water Use/Drought Tolerant Plant List for the PhxAMA. Mature vegetation planted in a low water use landscape area must cover at least 50 percent of the area.

9. "Newly turfed area" means, for a calendar year, an area of land planted with a warm-season grass species that was not planted with a warm-season grass species during the preceding calendar year.

10. "Non-overseeded" means an area of land not planted with a cool-season grass species that grows over dormant warm season grasses during the fall/winter period.

11. "Overseeded" means an area of land planted with a cool-season grass species that grows over dormant warm season grasses during the fall/winter period. The allotment is calculated based on an assumed number of acres and does not require annual overseeding.

12. "Effluent recovered within the area of impact" means effluent that has been stored pursuant to Title 45, Chapter 3.1, Arizona Revised Statutes, and recovered within the stored effluent’s area of impact. For purposes of this definition, “area of impact” has the same meaning as prescribed by A.R.S. § 45-802.01.

13. "Total cemetery area" means an area of land being used for cemetery-related purposes, including any area of land covered by grave markers or by cemetery-related buildings, walks, pathways, and landscaping, but not including roads, parking lots, and any areas of land being held for future expansion of the cemetery.
14. "Total water surface area" means the total surface area of all bodies of water that are an integral part of the water-intensive landscaped area of a turf-related facility, but not including bodies of water used primarily for swimming purposes.

15. "Turf acres" means an area of land within a turf-related facility that is watered with a permanent water application system and planted primarily with plants not listed in ADWR’s Low Water Use/Drought Tolerant Plant List for the PhxAMA. Turf acres may be overseeded or non-overseeded.

16. "Turf-related facility" means any facility, including cemeteries, golf courses under nine holes, parks, schools, or common areas within housing developments, with a water-intensive landscaped area of 10 or more acres.

17. "Water-intensive landscaped area" means, for a calendar year, the turf acres and the water surface acres within a turf-related facility.

18. "Water surface acres" are the number of acres of total water surface area, excluding the surface area of any bodies of water entirely filled and refilled with effluent. For purposes of this definition, a body of water allowed under an interim water use permit issued pursuant to A.R.S. § 45-133 shall be deemed to be filled and refilled entirely with direct use effluent or effluent recovered within the area of impact if the body of water will be filled and refilled entirely with direct use effluent or effluent recovered within the area of impact after the permit expires.

6-502. Conservation Requirements for All Turf-Related Facilities

A. Maximum Annual Water Allotment

Beginning with calendar year 2025 or the first full calendar year after commencement of landscape watering, whichever is later, and for each calendar year thereafter until the first compliance date for any substitute conservation requirement after the 5MP as established by the legislature, an industrial user who uses water at a turf-related facility shall not withdraw, divert, or receive water for landscape watering purposes at the turf-related facility during a year in an amount that exceeds the turf-related facility’s maximum annual water allotment for the year as calculated in sections 6-503 and 6-504.
B. Conservation Plan

No later than January 1, 2025 or 180 days after receiving official notice of conservation requirements, whichever occurs later, an industrial user who uses water at a turf-related facility shall prepare a conservation plan for the facility that contains an accurate and detailed description of the conservation technologies, including management practices, that are applied at the facility when water is used for landscape watering purposes. The industrial user shall maintain or update the conservation plan at least annually. The industrial user shall remain in compliance with this requirement pursuant to the SMP until the legislature determines otherwise.

C. Limiting Water-Intensive Landscaped Area

1. Beginning on January 1, 2025 or upon commencement of landscape watering, whichever occurs later, and continuing until the first compliance date of a future conservation program or until the legislature determines otherwise, an industrial user who uses water at a turf-related facility that is not a cemetery shall design, construct, and maintain the grounds of the facility in a manner that minimizes the water-intensive landscaped area and is consistent with the use of the facility. All of the facility’s water-intensive landscaping shall be planted in those areas directly associated with the turf-related facility’s primary purposes, and the total water-intensive landscaped area shall be limited to 90 acres, or to five acres per hole for golf courses. Turf-related facilities with greater than 90 acres of water intensive landscape prior to January 1, 2023 are exempt from the limitation on water-intensive landscaped area but are encouraged to reduce water-intensive landscaped area.

2. Beginning on January 1, 2025 or upon commencement of landscape watering, whichever occurs later, and continuing until the first compliance date for any substitute requirement after the SMP, as established by the legislature an industrial user who uses water at a turf-related facility that is a cemetery shall limit the water-intensive landscaped area within any portion of the cemetery that was neither in operation as of December 31, 1984 nor substantially commenced as of December 31, 1984 so that no more than 75 percent of the total cemetery area within that portion of the cemetery is planted with plants not listed in ADWR’s Low Water Use/Drought
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Tolerant Plant List for the PhxAMA. This requirement shall not apply to any expanded portion of a cemetery in operation as of December 31, 1984 or substantially commenced as of December 31, 1984 if the expanded portion of the cemetery was under the same ownership as the cemetery as of December 31, 1984.

6-503. Calculation of Maximum Annual Water Allotment for Turf-Related Facilities that are not Golf Courses

For each calendar year, the maximum annual water allotment for a turf-related facility that is not a golf course shall be calculated by multiplying the number of acres within the facility during the calendar year in each of the categories by the applicable application rate for each category, both listed in Table 6-503-1 and then adding together the products.

TABLE 6-503-1 APPLICATION RATES FOR TURF-RELATED FACILITIES THAT ARE NOT GOLF COURSES

From 2025 until the first compliance date for any substitute requirement after the SMP

<table>
<thead>
<tr>
<th>Type of Landscaping:</th>
<th>Application rate: (acre-feet per acre per calendar year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Turf acres</td>
<td>4.77</td>
</tr>
<tr>
<td>2. Total water surface area</td>
<td>6.2</td>
</tr>
<tr>
<td>3. Low water use landscaped area</td>
<td>0.74</td>
</tr>
</tbody>
</table>

6-504. Calculation of Maximum Annual Water Allotment for Golf Courses

For each calendar year, the maximum annual water allotment for a golf course shall be calculated by multiplying the number of acres in existence within the facility by the applicable application rate for each category, subject to the limitations all listed in Table 6-505-1 and footnote 1, and then adding together the products plus any allotment additions allowed under section 6-505.
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The first 3.89 acres per hole of turf acres or the total number of turf acres in existence within the facility, whichever is less, will be calculated at the overseeded application rate listed in Table 6-505-1. The remaining turf acres in existence within the facility or turf acres in existence within the facility up to five acres per hole, whichever is less, will be calculated at the non-overseeded rate listed in Table 6-505-1. The number of turf acres used for the purposes of calculating the maximum annual allotment does not constitute a requirement related to overseeding. The total maximum annual allotment may be used within the facility as the facility operators deem appropriate, subject to the flexibility criteria in section 6-506.

**TABLE 6-505-1**

**APPLICATION RATES FOR GOLF COURSES**

*From 2025 until the first compliance date for any substitute requirement established by the legislature*

<table>
<thead>
<tr>
<th>Type of Landscaping:</th>
<th>Application rate: (acre-feet per acre per calendar year)</th>
<th>Limitation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Turf acres (Overseeded)</td>
<td>6.035</td>
<td>Up to and including 3.89 acres per hole</td>
</tr>
<tr>
<td>2. Turf acres (Non-overseeded)</td>
<td>4.36</td>
<td>Between 3.89 and up to 5 acres per hole</td>
</tr>
<tr>
<td>3. Low water use landscaped area</td>
<td>0.74</td>
<td>Up to 1 acre per hole</td>
</tr>
<tr>
<td>5. Total water surface area</td>
<td>6.2</td>
<td>See footnote 1</td>
</tr>
</tbody>
</table>

1 The number of acres of total water surface area in existence within the facility, shall be limited to an area calculated by multiplying the number of holes present within the facility during the year by 0.14 acre per hole, or the facility's total water surface area in existence prior to 1989, whichever is greater.

6-505. Allotment Additions

A. Floodplain Addition

The owner or operator of a turf-related facility may apply to the Director for an allotment addition to support existing historic turfed acreage located in a designated floodplain that is not
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part of the facility's water allotment. The Director shall grant an allotment addition of 4.36 acre-feet of water per acre per annum upon a showing that:

1. A golf course contains existing historic turfed acres located in a floodplain designated by a government agency; and
2. The floodplain turf serves as an integral part of the drainage system for the land.

B. Newly Turfed Area Establishment Addition

For any year in which a warm-season turfgrass species is planted in an amount that does not increase total turfed area at a turf-related facility, the facility may apply to the Director for an allotment addition of 1.0 acre foot of water per acre of newly turfed area. For golf courses, the newly turfed area establishment addition shall not exceed an amount calculated by multiplying the number of holes present within the newly turfed area by five acre-feet of water. This allotment addition may be used for the purposes of renovation.

C. Revegetation Addition

The owner or operator of a turf-related facility may apply to the Director for an allotment addition to revegetate areas within or around the facility after initial construction or renovation. The Director may allow up to an additional 0.74 acre-feet of water per acre for up to three years if the following conditions apply to the acres for which the revegetation addition is sought:

1. The plants that are planted are listed in ADWR's Low Water Use/Drought Tolerant Plant List for the PhxAMA, or were adapted to the site prior to construction;
2. The aggregate area to be watered exceeds one acre and has at least 50 percent vegetative cover at maturity;
3. An allotment is not provided for the revegetation area under sections 6-503 and
4. All of the water applied is measured and reported as part of the total water use of the facility.

D. Body of Water Fill and Refill Addition

1. A turf-related facility shall receive a one-time body of water fill allotment addition equal to the volume of water used for the initial filling of any new body of water
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added after January 1, 2023 within the facility. The facility shall receive the allotment addition only for the calendar year in which the body of water is filled.

2. If a body of water at a turf-related facility is drained or partially drained to allow for repairs to reduce water losses, the owner or operator of the facility may apply to the Director for an addition to the facility’s maximum annual water allotment in the amount of water necessary to refill the body of water. The Director shall grant the allotment addition only for the calendar year in which the body of water is filled if the Director determines that drainage of the body of water was necessary to allow for repairs to reduce water losses.

E. Leaching Allotment Addition

The owner or operator of a turf-related facility may apply to the Director for an allotment addition for leaching purposes. The Director shall approve the application if the water supply used for landscape watering at the facility contains at least 1,000 milligrams per liter of total dissolved solids, and shall calculate the additional allotment as follows:

\[
\left( \frac{1}{1 - \left( \frac{EC_w}{5EC_e - EC_w} \right)} - 1 \right) \times \left( \frac{CU}{0.85} \right)
\]

Where:

Ecw = Electrical conductivity of water used

Ec = Tolerance of the turfgrass species grown to the soil salinity in electrical conductivity of the soil saturation extract

CU = Consumptive use requirement for the turfgrass species

Any allotment addition granted under this subsection shall remain in effect until the water supply used for landscape watering at the facility contains less than 1,000 milligrams per liter of total dissolved solids or until the first compliance date for the facility’s conservation requirements after the SMP, as established by the legislature whichever occurs first.
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F. Combined Allotments for Contiguous Facilities

The maximum annual water allotments for contiguous turf-related facilities under one ownership or operation may be combined. All or a portion of the combined maximum water allotment may be applied to any part of the contiguous facilities.

G. Nothing in this section shall be construed as authorizing use of more groundwater or surface water than may be used pursuant to any groundwater or appropriate water rights or permits associated with the use. Nor shall this section be construed as authorizing use groundwater or surface water in any manner that violates Chapter 1 or Chapter 2 of Title 45, Arizona Revised Statutes.

6-506. Compliance with Maximum Annual Water Allotment

A. Effluent Use Adjustment

For purposes of determining compliance with the maximum annual water allotment requirement, the Director shall count each acre foot of direct-use effluent or effluent recovered within the area of impact used at the facility for landscape watering purposes during the calendar year as 0.6 acre-foot of water.

B. Flexibility Account

The Director shall determine if a turf-related facility is in compliance with its maximum annual water allotment through the maintenance of a flexibility account for the facility according to the following:

1. Beginning with the first full calendar year after commencement of landscape watering, a flexibility account shall be established for a turf-related facility with a beginning balance of zero. The beginning balance in the flexibility account of a facility that was previously regulated shall be the ending balance in the flexibility account maintained for the facility in the 4MP, subject to the limitations in paragraph 3 of this section.
2. Following each calendar year in which groundwater is withdrawn, diverted, or received for landscape watering purposes at the facility, the Director shall adjust the turf-related facility’s flexibility account as follows:
   
a. Subtract the total volume of water from any source, including effluent as adjusted under subsection A of this section used by the facility for landscape watering purposes during that calendar year, from the facility’s maximum annual water allotment for that year.

b. If the result in subparagraph a of this paragraph is positive, credit the flexibility account by this volume.

   c. If the result in subparagraph a of this paragraph is negative, debit the flexibility account by this volume.

3. The account balance existing in a turf-related facility’s flexibility account, after the adjustment provided for in paragraph 2 of this subsection is made, shall carry forward, subject to the following limitations:

   a. The maximum positive account balance allowed in the flexibility account of a turf-related facility after any credits are registered pursuant to paragraph 2, subparagraph b of this subsection, shall be calculated by multiplying the facility’s maximum annual water allotment for the calendar year for which the credits are registered by 0.2. If the account balance exceeds the maximum positive account balance after the credits are registered, the balance carried forward shall be equal to the maximum positive account balance.

   b. The maximum negative account balance allowed in the flexibility account of a turf-related facility after any debits are registered pursuant to paragraph 2, subparagraph c of this subsection shall be calculated by multiplying the facility’s maximum annual water allotment for which the debits are registered by -0.2. If the account balance exceeds the maximum negative account balance after the debits are registered, the balance carried forward shall be equal to the maximum negative account balance.
C. Compliance Status

If the adjustment to a turf-related facility's flexibility account at the end of a calendar year as provided for in subsection B, paragraph 2 of this section causes the account to have a negative account balance which exceeds the maximum negative account balance allowed in the flexibility account for the calendar year as calculated in subsection B, paragraph 3 of this section, the industrial users who use water at the facility are in violation of the facility’s maximum annual water allotment for that calendar year in an amount equal to the difference between the facility’s flexibility account balance and the maximum negative balance allowed in the facility’s account for that year.

6-507. Monitoring and Reporting Requirements for Turf-Related Facilities

A. Beginning January 1, 2025, if turfed acres, low water use landscaped area, or water surface acre in a turf-related facility is added or removed, an industrial user shall submit to the Director documentation of the updated acres no later than 90 days after commencing of landscape watering those acres or receiving notice of these conservation requirements, whichever is later. The scale of the submitted documents, extent of turf acres, water surface acres, and low water use landscaped area must clearly be shown. The documentation must also include indication of the year the turf-related facility was established including labelling the year for any areas that were added after the initial construction. Documentation may consist of one or more of the following:

1. As-built plans certified by a registered professional such as a civil engineer, golf course designer, or landscape architect.

2. Aerial photography at a scale no smaller than 1"=200'.

3. A survey of the facility certified by a registered professional such as a civil engineer or land surveyor.

4. Any other documentation upon approval by the Director.

B. For calendar year 2025 or the calendar year in which landscape watering commences, whichever occurs later, and for each year thereafter until the first compliance date after
the 5MP as established by the legislature, an industrial user who uses water at a turf-related facility shall include in the annual report required by A.R.S. § 45-632 the following information, regarding the turf-related facility characteristics and water use during the calendar year.

1. The total quantity of water by source, disaggregated by source, including effluent, withdrawn, diverted, or received for landscape watering purposes at the facility, as measured with a measuring device in accordance with the Department's measuring device rules. A.A.C. R12-15-901, et seq.

2. The total amount of effluent, disaggregated by direct use effluent, effluent recovered within the area of impact and effluent recovered outside the area of impact that was withdrawn or received for landscape watering purposes as measured with a measuring device in accordance with ADWR's measuring device rules, A.A.C. R12-15-901, et seq.

3. The number of acres of total water surface area within the facility.

4. The number of acres of low water use landscaped area within the facility.

5. The number of acres of turf acres within the facility, not including newly turf area.

6. The number of acres of newly turfed area within the facility.

7. The number of turf acres removed within the facility.

8. The number of acres of total water surface area added or removed within the facility.

9. The number of acres of low water use landscaped area added or removed within the facility.

10. If the facility is a golf course, the length of the course as measured from the back of each tee ground furthest from the associated green then down the center line of the hole to the center of the green.

11. The number of acres approved by the Director for a revegetation addition pursuant to section 6-505, subsection B, within the facility.
12. The quantity of water used to fill or refill a body of water within the facility for which an allotment addition is sought pursuant to section 6-503, subsection B.

13. The number of acres of overseeded area within the facility.

14. If the facility is a golf course, the number of holes within the facility.

15. If the facility is a golf course, the number of holes added within newly turfed area.

16. An estimate of the quantity of water from any source, including effluent, used for each purpose other than landscape watering purposes at the facility. Any water used at the facility that is not measured separately from the water used for landscape watering shall be counted by the Director as water used by the facility for landscape watering for purposes of calculating the compliance with the maximum annual water allotment.

C. A single annual report may be filed for contiguous turf-related facilities that are under the same ownership or operation if the allotments for the facilities are combined pursuant to section 6-505, subsection E. The annual report shall report water use and landscaped areas of the contiguous facilities as required in subsection B in this section.