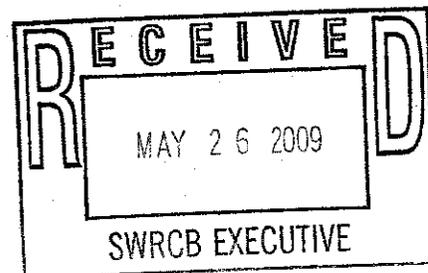




## CALIFORNIA ALLIANCE FOR GOLF

May 26, 2009

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Re: Revised Draft General Permit for Landscape Irrigation of Municipal Recycled Water

Dear Chair Hoppin and Members of the Board:

The California Alliance for Golf (CAG) appreciates the opportunity to comment on the revised draft General Permit.

The primary goal of the general permit is to induce more potential end users to utilize recycled water and we hope these comments of the revised draft will provide the proper framework to accomplish that goal.

CAG submits the following general comments plus some detailed analysis of the revised draft:

We encourage the State Board to always keep the opt-in option for distributors/producers/end users. We also suggest the regional Boards conduct business as usual when issuing new Master Reclamation Permits for distributors/producers. Forcing them to accept the General Permit as their current permit or future permits expire is not acting in good faith to what the General Permit was intended to do.

Drafting permits such as this is a difficult process. Accepting input from stakeholders and other interested parties plus finding a balance of the regulations and ease of implementation is not as easy as it sounds. Our desire is that the intentions of the staff that helped author the General permit are clearly expressed in the final draft. Listing or defining each of the requirements in simple concise language is paramount in deflecting criticism about vagueness or ambiguity of the General Permit.

The General Permit has been very specific regarding the standards for tertiary treated recycled water. Has there been any consideration for developing a fast-track option for those producers/distributors/end users that use water that is treated beyond tertiary treatment? Perhaps a section can be developed for those who are using advanced treated water?

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Pg. 5 - #15 – Please remove the first sentence as the General Permit is addressing landscape irrigation not agriculture uses.

Pg. 7 - #23 – Please consider revising the section for clarity. Our suggest follows “Recycled water used for irrigation of golf courses, parks or other open spaces and landscaped areas *frequently* occur in areas containing numerous hills and sloped areas. *This type of topography can promote runoff* unless closely managed during irrigation.

Pg. 7 - #24 – Consider the suggestion: Attachment C of this General Permit includes a list of *suggested* BMPs, including specific requirements of the Recycled Water Policy.

Pg. 10 - #39 – Please consider this suggestion. A. Recycled water will be applied at agronomic rates reflecting the seasonal hydraulic requirements of the Use Area. *Nutrient values of the recycled water should be considered when determining the nutritional needs of the plants in the Use Area.*

Pg. 11 - #42 a. – Please consider this small suggestion. Requires application of recycled water at reasonable agronomic rates considering soil, climate, and nutrient demand *of the crop/crops grown in the Use Area.*

Pg. 11 - #42 c. – This section establishes a monitoring and reporting program under CEQA. The chain of command should be clearly listed in this section. If the Administrator is responsible for the monitoring/reporting then it should be listed. If the end user has some type of reporting responsibility it should be listed in this section as well.

Pg. 14 - #13 – Please consider this suggestion. Spray, mist, or runoff of recycled water shall *be managed to avoid contact with* dwellings, designated outdoor eating areas, or food handling facilities.

Pg. 15 - #16 – Please consider the suggestion. Recycled water *should* not be allowed to escape from the Use Area by airborne spray or by surface flow except in minor amounts such as that associated with BMPs for good irrigation practices.

Pg. 15 - #1 c. – This section describes who is responsible for the application of water in the Use Area. Holding the Use Area site supervisor accountable for the application of recycled water to the Use Area is recommended. The Producer/Distributor should encourage the site supervisor to follow the recommended or industry-based BMPs for correct application and use of recycled water. The Producer/Distributor should be required that the site supervisor attend a yearly training regarding the BMPs.

Pg. 17 - #5 – The last paragraph of the revised b section is confusing. The section is describing sub-irrigation management plans. While the concept, as mentioned by the staff at the May 21 working session, has merit, the suggested wording does not lend itself to clarity. The term “Sub- irrigation” can quickly be confused with sub-surface irrigation. Refining the section so that the intention of the concept is clear and concise is advisable.

Draft Monitoring and Reporting Guidelines – Much dialogue occurred between staff and stakeholders about this section at the May 21 work session. The staff discussed their desire to obtain the information pertaining to how much water is being applied to a certain amount of acreage. Stakeholders commented that many of the items to be monitored/reported are already being performed and readily available. The implementation of the reporting of the Nitrogen and possible salt values within the recycled water sent to the end users can be accomplished via the site supervisor training or through a website. Who is responsible for reporting the monitoring/reporting should also be spelled out with precise clarity. This section should not be an extraordinary amount of work for the Administrator or the End User if the State Board wants to encourage more users of recycled water.

Draft Monitoring and Reporting Guidelines Pg. 2 – This section was discussed at length at the May 21 meeting between staff and stakeholders. The weekly reporting and documenting in a logbook is just not feasible for those agencies acting as Administrators. The concepts discussed between the stakeholders and staff was productive and a workable solution to this idea seemed likely. Again understanding the staff's intent of the logbook and reporting requirements needs to be clearly written so that the Administrator/End Users can comply in a reasonable manner.

Attachment A – Definitions – b. Agronomic rate – see our comments from Page 10 - #39.  
m. – Irrigation Management Plan – This section should be retitled Nutrient Management Plan. There is nothing in this definition as it pertains to an Irrigation Management Plan. Acknowledging the amount of nutrients in the recycled water is very important and this information should be relayed to the end users at the site supervisor training sessions.

Attachment C - Best Management Practices (BMPs) - Consider reformatting the section. After the Required BMPs section I., enter a few returns between I D. and include Suggested BMPs as a center text followed by a few more returns that proceeds to II. General Operational Controls. Sections II – IV as listed seem to be mandatory and not suggested. This formatting change would provide clarity to this section.

Summarizing our perspective, we do not find the monitoring and reporting requirements listed in the revised draft General Permit to be helpful. We believe that requiring weekly site investigations and annual reports for each use area would be excessive and impractical for most landscape irrigation projects. Especially for end users, most of the monitoring and reporting requirements should be deleted. Refining the procedural requirements of the revised draft General Permit will hopefully support the goal of greater use of recycled water on landscapes.

Thank you for your consideration.



Robert L. Bouchier, Executive Director  
California Alliance for Golf