

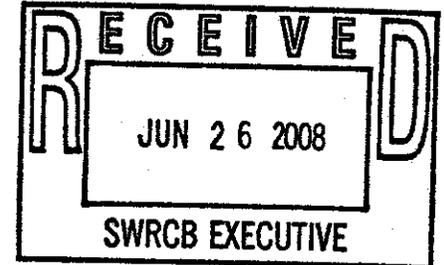


CALIFORNIA ALLIANCE FOR GOLF

June 26, 2008

ROBERT L. BOUCHIER
EXECUTIVE DIRECTOR

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Re: Public Comment on Landscape Irrigation General Permit

Dear Chair Doduc and Members of the Board:

The California Alliance for Golf (CAG) notes the message that Assemblyman De La Torre (author of AB 1481) delivered to the CEQA scoping meeting on June 18, 2008: AB 1481 was intended to simplify and expedite the process of obtaining permits to use recycled water and to avoid the difficulties of differing requirements of Regional Boards.

CAG is a trade association representing the golf industry. Golf courses and driving ranges constitute a significant group (approximately 1,000 statewide) of current and potential end-users and customers in the recycled water supply system. We see increased use of recycled water as critical to continuing public approval and growth of our industry. We seek a reliable and sufficient supply of water of usable quality, timely delivered and not prohibitively expensive or otherwise too burdensome to apply.

As we read AB 1481, it grants the Water Board authority to increase the usage of recycled water. We look to the Water Board for a general permit as contemplated by AB 1481 which creates an incentive for golf facilities and others to use recycled water.

We work with the California section of the WaterReuse Association (WRA), largely composed of agencies that supply recycled water to our constituents. We are familiar with WRA written comments regarding the general permit and agree with them.

We agree with the comments made by the Los Angeles County Sanitation Districts at the June 18 meeting to the effect that the State Department of Public Health (DPH) is the logical institution to have authority over public health concerns presented by emerging contaminants. We also agree that DPH requirements for control of the recycled water use area, coupled with irrigation best management practices, minimize the potential for incidental runoff or groundwater recharge. Consistent application of DPH requirements prevent degradation of surface and groundwater.

In the same vein we agree with comments made by the City of Roseville at the scoping meeting: existing MS4 permits provide an efficient, effective vehicle to manage occasional and incidental discharges of tertiary treated water. There is no reason for further, cumbersome rules in the general permit to add monitoring, nutrient management plans and new prohibitions against discharge.

We note that singling out users of recycled water to address anti-degradation is disproportionate, onerous and ultimately ineffective considering that the problem is created by all users of water from any source. Singling out users of recycled water to shoulder the burden of developing and implementing nutrient management plans will only discourage future use of recycled water by anyone having a choice.

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We were impressed by comments at the meeting on June 18 from the Castle Oaks Golf Course. The situation there should be considered a case example of issues the statewide general permit could help to address. Castle Oaks' use of recycled water is subject to extensive and expensive monitoring, various best management practice requirements, and prohibitions against incidental runoff and the escape of aerosol mist to neighboring property. The result is a golf course that currently looks forward to a day when it might be able to shut down its use of recycled water in favor of well water. A statewide general permit, properly constructed and implemented, should aim to lessen burdens for this course and others currently using or contemplating the use of recycled water.

CAG has a particular interest in the quality of recycled water. We believe that more golf courses would be potential end-users or customers for recycled water if some of their fears could be put to rest. Salts present one of the biggest challenges for golf course superintendents who currently use or are considering the use of recycled water. Regulating TDS beyond the source water level would be very helpful to golf users to avoid damage to turf, but CAG does not favor a single standard, statewide, because "one size fits all" will not account appropriately for widely varying local conditions. We believe that the general permit should take account of this concern.

We support the idea that the definition of landscape irrigation for purposes of the general permit should be broad in order to accommodate and induce more users. For example, commercial, industrial, government and roadway uses could be included within the definition.

Specific to golf industry needs, we would support including by definition on-site storage and treatment facilities for recycled water. In that regard we agree with comments made at the meeting on June 18 by the Los Angeles County Sanitation Districts that ponds to store recycled water are particularly important for golf courses, since production of recycled water is more easily available during the day, but use by the courses generally is after dark. We also note that golf courses typically can benefit by storing excess water in the winter for greater use in the summer.

We emphatically agree with the WRA that the Water Board needs to consult with water producers and users during the development of the permit as opposed to using the scoping process as the primary means of collecting information. In that connection, we hereby propose that we should be consulted as part of that process.

We appreciate this opportunity to participate in fashioning a landscape irrigation general permit with an objective of maximum sustainable benefit to the people of California.

Sincerely,



Robert L. Bouchier, Executive Director

cc: Assemblyman Hector De La Torre