



## CALIFORNIA ALLIANCE FOR GOLF

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March 9, 2008  
Jeanine Townsend  
Acting Clerk to the Board  
Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Re: Public Comment on Proposed Recycled Water Policy

Dear Chair Doduc and Members of the Board:

California Alliance for Golf (CAG) is a California non-profit corporation which functions as a trade association representing the golf industry in this state.

Golf courses are large water users and our constituents are current and potential end-users and customers for recycled water. As customers, we understand that California's water supply agencies are increasingly making efforts to improve water use efficiency. As an industry, we are supportive of efforts to expand water recycling as an important local water source that increases supply reliability and reduces the need for imported water and groundwater pumping. We have been coordinating our analysis and comments with the California section of the Water Reuse Association (WRA), composed mainly of suppliers. We agree generally with the comments of the WRA.

In our view the latest version of the proposed policy is much improved, but could benefit from further drafting for clarity and to reduce susceptibility to varying interpretations. Additional comments based on the current draft are these:

- 1) Pg. 2 No. 8 - Defining a salt management plan would be helpful. Can Regional Boards require recycled water producers and/or users to develop such plans? In addition to recycled water, are Regional Boards required to consider other sources of salt entering their basins?
- 2) Pg. 2 No. 9 - Are Regional Boards required to develop and implement nutrient management plans and/or practices in all cases involving more than 3mg/l total nitrogen?
- 3) Pg. 2 No. 12 - We question the implied assumption that producers of recycled water have sufficient ability to control industrial discharges and self-regenerating water softeners to meet a standard of 550 mg/l TDS in every basin statewide.
- 4) Pg. 3 No. 16 - We believe CDPH is the logical institution to establish MCLs for various recycled water constituents.
- 5) Generally, it appears that the State Water Board is authorizing Regional Boards to pursue policies with virtually no limitations, notwithstanding the goal of statewide uniformity.

Thank you for inviting us to participate in this process.

Robert L. Bouchier, Executive Director

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