



CALIFORNIA ALLIANCE FOR GOLF

October 26, 2007

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

ROBERT L. BOUCHIER
Executive Director
3200 Lopez Road
Pebble Beach, CA 93953
831-625-4653

Dear Chair Doduc and Members of the Board,

RE: Public Comment - Proposed Water Recycling Policy

We are the California Alliance for Golf (CAG), a California corporation functioning as a trade association to represent the golf industry in this state. Articulated in our Articles of Incorporation are specific corporate purposes to serve as an educational resource for the industry and to communicate to the public the economic benefits and environmental stewardship provided by the game of golf.

BOARD OF DIRECTORS

President
Ted Horton
CGCOA

Vice President
Paul Major
American Golf

Secretary
Kevin Heaney
SCGA

Treasurer
Chris Thomas
NCPGA

David Bill
NCGA

Bruce Williams
CGCSA

Tom Schunn
CMAA

Our institutional constituents include: nationally prominent golf associations in Northern and Southern California representing more than 300,000 individual members; similar associations representing golf course superintendents, golf course owners, golf course managers, golf professionals and public and private golf facilities; and various suppliers to the golf industry.

We take seriously the environmental stewardship aspects of our mission. We estimate that about 25% of golf courses in California currently depend on recycled water for the majority of their irrigation needs. We see increased use of recycled water as critical to continuing public approval and growth of our industry. We see major benefits to the public and ourselves in a coordinated statewide policy which (a) encourages the use of recycled water and (b) creates a system of regulatory requirements which is uniform and predictable to the extent feasible.

Many of our constituents already are significant end-users and customers in the recycled water supply system. They and we interact with water producers/suppliers (mainly local water agencies) and with regulators. They and we seek a reliable and sufficient supply of water which must be of usable quality, timely delivered and not prohibitively expensive or otherwise too burdensome to apply.

We work with the California section of the WaterReuse Association (WRA), largely composed of agencies that supply recycled water to our constituents. At the State Board's study session October 2 in Los Angeles we coordinated with WRA and appeared before the Board to offer brief oral comments. We are familiar with WRA written comments regarding this proposed policy and agree with them.

The points we stress on behalf of our constituents are these:

- (1) Recycled water should be viewed as a resource, not a waste, and state recycling policy should focus on incentives to maximize its use.
- (2) State recycling policy should provide a baseline of uniformity for reference of regulators focusing on local conditions, e.g., basin-wide.
- (3) 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, believing that "one size fits all" will not account appropriately for widely varying local conditions.
- (4) 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: especially commercial and residential irrigators not using recycled water, industrial users, and those who add water softeners.
- (5) In particular, we believe that singling out users of recycled water to shoulder the burden of developing and implementing nutrient management plans to reduce the discharge of nitrate to groundwater will only discourage future use of recycled water by anyone having a choice: the need for such plans logically applies equally to all other irrigation methods, but they are untouched by this policy.
- (6) Incidental runoff of recycled water should be permitted and managed under existing regulations.
- (7) Compliance with provisions of state recycling policy and Title 22 of the California Code of Regulations should be treated as a safe harbor of best practices for purposes of anti-degradation policy.
- (8) State recycling policy should state explicitly that it does not alter liability under existing law: imposing additional potential liabilities will only discourage future use of recycled water by anyone having a choice.

We appreciate this opportunity to participate in fashioning a Statewide Policy on Water Recycling with an objective of maximum sustainable benefit to the people of California.

Sincerely,



Robert L. Bouchier, Executive Director
California Alliance for Golf