

# OAKMONT

IN THE VALLEY OF THE MOON

## **AB 1572 Implementation – Request for Exemption or Hardship Extension for Oakmont Sub-HOAs due to Disproportionate Impacts on Senior Residents**

**From:** Oakmont Village Association (OVA) and League of Oakmont Maintained Areas Association (LOMAA)

**Date:** February 6, 2026

**To:** California State Water Resources Control Board

**CC:**

Mike McGuire, California State Senator

Chris Rogers, California Assembly Member

Rebecca Hermosillo, Sonoma County Supervisor

Mark Stapp, City of Santa Rosa Mayor

Dianna MacDonald, City of Santa Rosa Council Member

Scott Westrope, Santa Rosa Fire Chief

Jennifer Burke, Director, City of Santa Rosa Water Department

**RE:** Public Comment on AB 1572 Implementation – Request for Exemption or Hardship Extension for Oakmont Sub-HOAs Due to Disproportionate Impacts on Senior Residents

Dear Members of the State Water Resources Control Board:

On behalf of the Oakmont Village Association (OVA) and the League of Oakmont Maintained Areas Association (LOMAA), representing one of California's largest 55+ senior residential communities with over 4,500 residents, we submit these comments on the implementation of Assembly Bill 1572 (AB 1572, Water Code § 10608.14 et seq.).

We strongly support California's water conservation objectives and the goal of reducing potable water use to irrigate nonfunctional turf. **However, AB1572 itself provides mechanisms for flexibility, including hardship extensions of up to three years and exemptions where compliance would pose risks to public health or safety (e.g. fire**

**prevention or heat-related vulnerabilities).** The law's application to our sub-HOA common areas would impose disproportionate and severe unintended consequences on Oakmont's elderly, mobility-limited, medically vulnerable, and fixed-income residents. Pursuant to Water Code § 10608.14(c), we respectfully request that the Board exercise its authority under the statute to grant targeted exemptions for senior-focused communities like Oakmont or extensions of the January 1, 2029 prohibition (and related certification requirements) based on demonstrated hardship, public health and wildfire safety risks.

**Oakmont Community Overview** Oakmont is a 55+ active adult community in Santa Rosa, spanning ~1,500 acres with ~3,050 independent-living, single-story units (primarily single-family, duplex, triplex, and quad-plex dwellings). It includes geographically distributed sub-HOAs managing common areas with no non-residential buildings. The sub-HOAs rely on OVA for recreation and meeting facilities. Most residents are seniors facing mobility, health, and financial challenges. (Exhibit 1: Community layout and sub-HOA map)

**Financial Impacts and Hardship** A survey of 67% of impacted sub-HOAs estimates ~976,000 sq ft of potentially nonfunctional turf; extrapolating to all sub-HOAs suggests over 1 million sq ft total. Conversion to drought-tolerant alternatives (mulch, rock, low-water plants) is estimated at \$6.75 per sq ft, totaling greater than \$6 million community-wide—an enormous burden on sub-HOAs with limited reserves already committed to fire safety and other essentials. (Exhibit 2: Turf survey summary, square footage, and cost estimates)

The compressed timeline exacerbates hardship: The prohibition takes effect January 1, 2029, with HOA self-certification for areas >5,000 sq ft required starting June 30, 2031. Santa Rosa's \$1/sq ft turf removal rebate expires January 1, 2029, limiting incentives. Compliance would require special assessments, depleting reserves and harming fixed-income residents. This meets the statutory "good cause" for extension due to economic hardship (§ 10608.14(c)).

Additionally, parity concerns arise: Adjacent individually owned single-family homes are exempt under AB1572; they may retain potable irrigated turf and are not required to invest personal funds in compliance. In Oakmont, because the majority of sub-HOA common turf directly surrounds and is integral to the residential properties themselves, the cost differential between individual owned home (exempt) and the sub-HOA properties in Oakmont will create particularly stark inequities, potentially depressing sub-HOA property values and equity—critical for retirees' financial security.

**Wildfire and Health/Safety Risks** Oakmont lies entirely within a CAL FIRE high fire hazard severity zone (Exhibit 3: CAL FIRE high fire hazard severity zone map). The community has

evacuated twice due to wildfires with six units destroyed (2017: 10 days; 2020: 5 days). This law does not require turf removal; sub-HOAs could phase in compliant landscaping over time. However, the strict 2029 deadline risks rush changes that compromise fire safety.

CAL FIRE defensible space guidelines emphasize irrigated, well-maintained vegetation (including turf) near structures reduces surface fire spread and intensity by acting as a fuel break. Given that the majority of the common-area turf directly surrounds residential homes, ceasing potable irrigation in these locations would particularly undermine defensible space immediately adjacent to living units. Additionally, removing irrigated turf risks increased fuel loads if replaced with dry/organic mulch (combustible when dry) or inorganic materials (which may not provide equivalent cooling/suppression). This could heighten ember ignition and evacuation risks for mobility-limited seniors. AB 1572 explicitly allows exemptions or flexibility where ceasing potable irrigation would pose a direct risk to public health or safety and allows potable water use “to the extent necessary... to address an immediate health and safety need” (§ 10608.14(b)); wildfire prevention in a high-hazard zone qualifies.

Removing irrigated turf also raises heat risks: Seniors face thermoregulation declines, with prolonged exposure accelerating biological aging by up to 14 months (USC Leonard Davis School of Gerontology, 2025; National Institute on Aging, 2023). Turf provides cooling; alternatives increase ambient temperatures and health vulnerabilities—another basis for health/safety consideration for potential exemptions.

**Functional Turf and Precedent Considerations** AB 1572 distinguishes between nonfunctional (decorative) turf and functional turf (used for recreation, community spaces, or other purposes), which remains exempt from the prohibition. In Oakmont, the majority of common-area turf directly surrounds residential homes and serves functional roles: providing passive recreation, cooling microclimates for vulnerable seniors, and contributing to defensible space in a high-fire zone. Existing exemptions in the law—such as for cemeteries, areas irrigated with recycled water, single-family residences, and functional areas like arks or picnic spaces—demonstrate legislative intent to avoid disproportionate harms where turf provides tangible benefits. No broad precedents for senior-specific or wildfire-zone exemptions have been established yet (as regulations are forthcoming), but the statute’s hardship, health and safety, and functional turf provisions provide clear authority for tailored relief in cases like ours.

**Conclusion and Specific Request** Without tailored relief—such as an exemption for senior-focused communities or an extension under the authorized hardship provisions--AB 1572 implementation would exacerbate financial hardship, increase wildfire and heat-related risks, and disproportionately burden Oakmont’s vulnerable senior population.

We urge the Board to incorporate considerations of public health, wildfire safety, economic hardship, and community vulnerability into the final regulations and implementation framework. Specifically, we request:

- An exemption for HOA common areas in 55+ communities where turf provides functional benefits for resident health, safety and quality of life (consistent with the law's functional turf allowances and health/safety exemptions).
- Or, at a minimum, extensions of up to three years under the hardship provisions to allow phased transitions to compatible landscaping.

We appreciate the Board's commitment to balanced, equitable water conservation and stand ready to provide additional data. Thank you for considering these critical concerns.

Sincerely,



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**Exhibits** (attached/referenced):

- Exhibit 1: Community Layout and sub-HOA Distribution
- Exhibit 2: Turf survey summary, square footage, and cost estimates
- Exhibit 3: CAL FIRE high fire hazard severity zone map



Exhibit 2: Turf survey summary, square footage, and cost estimates

<p style="text-align: center;"><b>Oakmont Village Sub-HOA Associations Turf Survey and Cost Estimates 2025</b></p>						
Association	Dev No.	Units	Turf Sq Ft	Est Cost	Total Cost	Per Unit Cos
Aspen Meadows	6D	77		6.75		
Brookgreen	R4	39		6.75		
Fairfield	20	24		6.75		
Fallgreen #1	15	8	3085	6.75	20823.75	2,603
Fallgreen #2	14	9		6.75		
Glengreen	37	21		6.75		
Golf Court	11G	19	36,000	6.75	243000	12,789
Meadowcreek	12B	24	57803	6.75	390170.25	16,257
Meadowgreen #1	6A	44		6.75		
Meadowgreen #2	6C	47	17186	6.75	116005.5	2,468
Meadowridge	12A	29	18451	6.75	124544.25	4,295
Mesa Oaks	12D	40		6.75		
Mount Vista	14B	50	90,000	6.75	607500	12,150
Oak Forest	7	43	0	6.75	0	0
Oakgreen	109	27		6.75		
Oak Island	109	71	51500	6.75	347625	4,896
Oak Leaf Isle #1	11A	28	45203	6.75	305120.25	10,897
Oak Vista	11H	41	34770	6.75	234697.5	5,724
Orchard	23	55	0	6.75	0	0
Overlook	16B	32	33660	6.75	227205	7,100
Pleasant Vista	9B	28		6.75		
Pythian Court	15D2	15		6.75		
Quail Run	19,21	61	0	6.75	0	0
Riven Rock	17B	31	63,672	6.75	429786	13,864
Rockgreen	120	44	77,000	6.75	519750	11,813
Singing Brook	17F	49		6.75		
Singing Woods	91A	35	0	6.75	0	0
Starry Knoll	20	42	50000	6.75	337500	8,036
Stone Creek	15B	33	93,228	6.75	629289	19,069
Twin Lakes	14E	92	267,500	6.75	1805625	19,626
Valley Green	5	29	13000	6.75	87750	3,026
Woodgreen #1	17	8	7459	6.75	50348.25	6,294
Woodgreen #2	1RR17	37	17000	6.75	114750	3,101
<b>TOTAL</b>	<b>33</b>	<b>1232</b>	<b>976,517</b>	<b>6.75</b>	<b>6,591,489.8</b>	

Exhibit 3: CAL FIRE high fire hazard severity zone map

