



January 17, 2013

Attn: Chris Jimmerson  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

Re: Provisions under C. Requirements for the Third-Party Group in the San Joaquin County and Delta Water Quality Coalition Tentative Draft Waste Discharge Requirements released by the Central Valley Regional Water Quality Control Board, December 2013

Dear Mr. Jimmerson,

The Contra Costa Resource Conservation District would like to comment on the provision C.9 Requirements for the Third-Party Group in the San Joaquin County and Delta Water Quality Coalition Tentative Draft Waste Discharge Requirements (referenced at the end of this letter). Under this provision, it is our understanding that third-party groups would be required to identify why growers have failed to maintain good standing of their membership in the third-party group. While this new provision may not be an issue for organizations whose mission includes regulation, it is a serious concern for Resource Conservation Districts (RCDs). The reason for the success of RCDs in developing relationships with growers across California and the nation is the fact that we are a non-regulatory organization. Growers can discuss resource issues more freely with RCD staff and work to find solutions without the worry of being ticketed or fined.

Our request is that provision C.9 be modified to not require regulatory reporting by third-party groups.

The San Joaquin County Resource Conservation District (SJRCDD) who currently acts as the third-party group for the San Joaquin County and Delta area has made huge strides to improve water quality because of its great relationships with growers in the area. It would be unfortunate if the California Regional Water Quality Control Board (CRWQCB) stipulates that the third-party group take on this regulatory role. The result of this action would most definitely be the inability of the SJRCDD to serve as the third-party group. The SJRCDD is providing a great service to the CRWQCB by working directly with growers to improve water quality, coordinating water quality monitoring and education events, and submitting reports. In the absence of this service, the CRWQCB would definitely have an increase in workload.



We strongly recommend the CRWQCB consider the modification of this provision.

Sincerely,

Igor Skaredoff  
Board President  
Contra Costa Resource Conservation District

Referenced Provision, page 22 in Tentative Draft

**C. Requirements for the Third-Party Group.** *In order to remain eligible to serve as a third-party representative to Members, the third-party shall perform the following:*

*9. Work cooperatively with the Central Valley Water Board to ensure all Members are providing required information and taking necessary steps to address exceedances or degradation identified by the third-party or board. As part of the Membership List submittal, identify the growers known by the third-party who have: (1) failed to implement improved water quality management practices within the timeframe specified by an applicable SQMP/GQMP; (2) failed to respond to an information request from the third-party associated with any applicable SQMP/GQMP or other provisions of this Order; (3) Failed to participate in third-party studies for which the third-party is the lead; (4) failed to provide confirmation of participation in an outreach event (per section IV.B.4 of this Order); or (5) otherwise failed to maintain good standing of their membership in the third-party group.*