
Central Valley Regional Water Quality Control Board

2 October, 2014

David Guy, President
Bruce Houdesheldt, Director, Regulatory Affairs
Northern California Water Association
455 Capitol Mall # 335
Sacramento, CA 95814

FAILURE TO PROVIDE SUPPLEMENTAL INFORMATION BY THE NORTHERN CALIFORNIA WATER ASSOCIATION (NCWA) TO SERVE AS A THIRD PARTY UNDER GENERAL ORDER R5-2014-0030

Thank you for your 12 September 2014 response to my 12 August 2014 letter requesting supplemental information for your application to serve as a third-party under General Order R5-2014-0030 (Order). In my request to you, I asked for supplemental information that: 1) identifies the methods by which summaries of fees and revenues required by the Order are readily available to Members in every watershed; 2) provides copies of bylaws of the subsidiary organizations and copies of agreements between collaborating organizations.

You indicate that annual meetings, Subwatershed Group websites, and newsletters will be used to meet the requirements of section IV.C.2. of the Order. Unfortunately, we were unable to find any information on fees on the Subwatershed Group websites. In addition, you failed to provide copies of the bylaws of the subsidiary organizations and copies of agreements between collaborating organizations. Your failure to provide the required information is a violation sections IV.C.1 and VIII.A. of the Order. You are required to submit this information by **27 October 2014**.

This request is being made after discussion with the Board's Agriculture Subcommittee. We note that the Board provides a public forum at the start of every Board meeting, and you are welcome to bring this matter to the Board's attention during the public forum at the Board's October 2014 meeting, provided that the Board has not by then opted to consider this issue at a future Board meeting.

If you have questions regarding this letter, please contact me at (916) 464-4639 or Joe Karkoski at (916) 464-4668.



PAMELA C. CREEDON
Executive Officer

Enclosures: 4 June 2014 and 12 August 2014 Letters
cc: Sacramento Valley Water Quality Coalition Subwatershed Groups
Central Valley Water Board Members

Central Valley Regional Water Quality Control Board

12 August 2014

David Guy, President
Bruce Houdesheldt, Director, Regulatory Affairs
Northern California Water Association
455 Capitol Mall # 335
Sacramento, CA 95814

REQUEST FOR SUPPLEMENTAL INFORMATION TO ADDRESS THE CONDITIONAL NOTICE OF APPLICABILITY ISSUED TO THE NORTHERN CALIFORNIA WATER ASSOCIATION (NCWA) TO SERVE AS A THIRD-PARTY UNDER GENERAL ORDER R5-2014-0030

Thank you for your 27 June 2014 response to my 4 June 2014 letter requesting an addendum to your application to serve as a third-party under General Order R5-2014-0030 (Order). In our request to you, we asked for an addendum that: 1) identifies the methods by which summaries of fees and revenues required by the Order are readily available to Members in every watershed; 2) provides copies of bylaws of the subsidiary organizations and copies of agreements between collaborating organizations; and 3) provides a copy of the Memorandum of Agreement between NCWA and the subsidiary subwatershed organizations.

We appreciate your inclusion of the Memorandum of Agreement between NCWA and the subsidiary subwatershed organizations. However, your response was incomplete, since it did not address items 1 and 2, above. We will not be able to provide a final Notice of Applicability until we receive a complete response that addresses the requirements of the Order.

The supplemental information to address the conditional Notice of Applicability must be submitted no later than 12 September 2014.

We appreciate the NCWA's commitment to make the new program a success and look forward to working with you and the Sacramento Valley Water Quality Coalition participants to protect water quality in the Sacramento River Watershed. If you have questions regarding this letter, please contact Susan Fregien at (916) 464-4813, or by e-mail at Susan.Fregien@waterboards.ca.gov.

*Original signed by Ken Landau,
for*

Pamela C. Creedon
Executive Officer

Enclosures: 4 June 2014 Letter
cc: Sacramento Valley Water Quality Coalition Subwatershed Groups

Central Valley Regional Water Quality Control Board

4 June 2014

David Guy, President
Bruce Houdesheldt, Director, Regulatory Affairs
Northern California Water Association
455 Capitol Mall # 335
Sacramento, CA 95814

CONDITIONAL NOTICE OF APPLICABILITY ISSUED TO THE NORTHERN CALIFORNIA WATER ASSOCIATION TO SERVE AS A THIRD-PARTY UNDER GENERAL ORDER R5-2014-0030

Thank you for the 10 April 2014 application to serve as a third-party entity to represent owners and operators of irrigated lands within the Sacramento River Watershed subject to General Order R5-2014-0030 (Order). The application was submitted by the Northern California Water Association (NCWA), which has been an umbrella organization for the irrigated lands served by the Sacramento Valley Water Quality Coalition (SVWQC) since 2003. Supplemental information was provided in an email and attachment on 13 May 2014.

This letter serves as a Conditional Notice of Applicability and conditional approval of NCWA to serve as the third-party group under the Order. Based on the application, the supplemental email, SVWQC's record of representing growers and the attached review, NCWA and its subsidiary organizations conditionally meet the requirements to serve as the third-party as described in section VIII.A. of the Order. Additional documentation related to organizational governance and accountability is necessary to complete the verification of NCWA's and SVWQC's qualifications per the requirements of the Order.

A final Notice of Applicability confirming NCWA as the third-party under the General Order will be issued upon submission of an addendum to the application that 1) identifies the methods by which summaries of fees and revenues required by the Order are readily available to Members in every watershed; 2) provides copies of bylaws of the subsidiary organizations and copies of agreements between collaborating organizations; and 3) provides a copy of the Memorandum of Agreement between NCWA and the subsidiary subwatershed organizations.

The addendum to the application should be submitted no later than 27 June 2014.

The enclosed table lists compliance dates associated with the issuance of this Conditional Notice of Applicability; all other compliance dates described in the General Order R5-2014-0030 apply.

We appreciate the NCWA's commitment to make the new program a success and look forward to working with you and the SVWQC participants to protect water quality in the Sacramento

River Watershed. If you have questions regarding this letter, please contact Joe Karkoski at (916) 464-4668, or by e-mail at Joe.Karkoski@waterboards.ca.gov.

Original signed by

Pamela C. Creedon
Executive Officer

Enclosures: Table of Compliance Dates Associated with Issuance of the NOA
Staff Memorandum: Review of Application to Serve as Third-Party

cc: **[via email only]**
Susan Fregien, Central Valley Water Board
Mark Cady, Central Valley Water Board

COMPLIANCE DATES FOR THE THIRD-PARTY REPRESENTING GROWERS IN THE SACRAMENTO RIVER WATERSHED AND MEMBERS UNDER ORDER R5-2014-0030

Effective compliance dates associated with the 4 June 2014 Conditional Notice of Applicability (NOA) issued to the Northern California Water Association to serve as a third-party under General Order R5-2014-0030.

Due Date	Requirements
21 July 2014	Provide Members with a notice of requirements and process for the Notice of Confirmation and Farm Evaluation Template
4 August 2014	Propose templates for managed wetland reporting
2 September 2014	Groundwater Quality Assessment Report outline
2 October 2014	Non-member enrollment deadline
	Groundwater Quality Assessment Report
4 June 2015	Sediment Discharge and Erosion Assessment Report
	Comprehensive Groundwater Quality Management Plan