

May 20, 2015

Adam Laputz, Assistant Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670  
[adam.laputz@waterboards.ca.gov](mailto:adam.laputz@waterboards.ca.gov)

RE: Proposed Revisions to the Waste Discharge Requirements for Growers within  
Sacramento River Watershed (R5-2014-0030)

Dear Mr Laputz:

**I. Option to Participate in a Regional Monitoring Program**

The Sacramento Valley Water Quality Coalition (Coalition) has reviewed the proposed language providing the Coalition with the option to participate in the Delta Regional Monitoring Program (RMP) and propose a reduction in other monitoring if the Coalition chooses to participate. The language is consistent with the Regional Board's approach to identify and evaluate opportunities to reduce the ever increasing regulatory burden placed on California agriculture at a time when it faces challenges brought on by an extended drought.

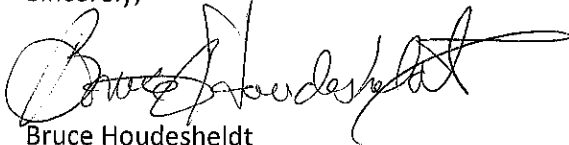
Given the uncertainty about the scope of the Delta RMP monitoring requirements, the cost and duration of monitoring, and the interpretation of results, the language proposed for inclusion in the Coalition's Waste Discharge Requirements (WDR) provides an opportunity to cost effectively provide the Regional Board with the coordinated monitoring it seeks to achieve in the Delta RMP. The Coalition will continue evaluate the proposed Delta RMP to determine if we can achieve the efficiency and flexibility anticipated by this change in the Order. The scope of the final Delta RMP and Coalitions level of participation must be proportional to and related to the demonstrated water quality issues of irrigated agriculture in the Sacramento Valley.

A decade of surface water quality monitoring has provided the Regional Board scientifically sound information about irrigated agriculture's impacts on waterways and drainages, including those in the Delta. The Coalition's 2014 Annual Monitoring Reports (AMR), as in ten previous years, show that more than 97% of all pesticide analyses performed by the Coalition were below detection and that pesticide toxicity is a rare occurrence in the Sacramento Valley watershed.

**II. Due Date or Submittal of a Comprehensive Groundwater Quality Management Plan**

The proposed revisions would change the due date for a comprehensive Groundwater Quality Management Plan from needing to be submitted along with a Groundwater Quality Assessment Report to being due 60 days after the Executive Office approves the Groundwater Assessment Report. The Coalition appreciates and support the inclusion of this revision in the WDR.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Houdesheldt", with a long horizontal flourish extending to the right.

Bruce Houdesheldt  
Director of Regulatory Affairs  
Northern California Water Association