

January 18, 2016

Susan Fregien, Unit Chief
Monitoring and Implementation Unit
Irrigated Land Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Dr., #200
Rancho Cordova, CA 95670-6114

RE: Proposed Changes to WDRs for Managed Wetlands and Irrigated Pasture

Dear Ms. Fregien:

The Sacramento Valley Water Quality Coalition (Coalition) supports the proposed changes to a number of Waste Discharge Requirements (WDRs), including the Coalition's, removing the requirement for completion of a Nitrogen Management Plan (NMP) and NMP Summary Report by owner and operators of land operated exclusively for managed wetlands and operated exclusively for irrigated pasture operations that do not apply nitrogen. Irrigated pastures are a perennial cover crop, have legumes that fix nitrogen from the air (like alfalfa) and filter any nutrients or sediment.

Other crops --wine grapes and alfalfa—use little to no nitrogen. The Central Valley Regional Water Quality Control Board's (Regional Water Board) should weigh the value of continuing to collect NMP and NMP Summary Reports for these crops. As UC Cooperative Extension Farm Advisor Rachel Freeman Long stated in her [May 28, 2013 article in Alfalfa and Forage News](#), "Nitrogen (N) fertilizer is generally not required for alfalfa production since alfalfa can obtain its own N from N-fixing nodules. Alfalfa fixes most (70-90%) of its N needs from the air through Rhizobium bacteria residing in alfalfa root nodules."

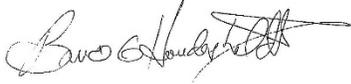
Additionally, the Coalition supports the revision to WDRs to remove the requirement for land operated exclusively for managed wetlands to complete a Sediment and Erosion Control Plan (SECP). As the Regional Water Board notice states wetlands "act as sediment basins." Similar attributes can be ascribed to California's wild rice (*Zizania L.*), a semi-aquatic grass species grown predominately in the Sacramento Valley and land operated exclusively as irrigated pasture. Because these agriculture operations filter sediment preventing erosion or soil to discharge to surface water bodies, the Coalition requests they also not be required to complete a SECP. Wild rice is actually a semi-aquatic grass that historically has grown in lakes, tidal rivers and bays in water between 2 and 4 feet deep where pesticides cannot be used.

Vineyards have cover crops which hold soil and prevent erosion. As Regional Board staff has seen on tours of foothill vineyards this is especially important to maintain soil health. Hay crops also serve to maintain soil stability and reduce erosion.

Lastly, since management practices for managed wetlands, irrigated pasture, wild rice and alfalfa are consistent from year-to-year, updating the Farm Evaluations every five years would be consistent with the low intensity of land use and impact on water quality.

The Coalition and its 7750 owners and operators of irrigated lands in the Sacramento Valley, appreciate the Regional Board's periodic review of Waste Discharge Requirements (WDR) ensures both resources are appropriately focused and water quality protection is maintained. It has been three years since the first WDR was adopted. Much has been learned about the management practices from the reporting that has taken place and the need for continued reporting.

Sincerely,

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

Bruce Houdesheldt
Director, Regulatory Affairs
Northern California Water Association