



1201 L Street Modesto, CA 95354  
[www.esjcoalition.org](http://www.esjcoalition.org)

---

January 27, 2014

Pamela Creedon  
Executive Officer  
California Water Quality Control Board Central Valley Region  
11020 Sun Center Drive, Suite #200  
Rancho Cordova, CA 95760

**SUBJECT: Request for Time Extension of 2014 Farm Evaluation Reporting timelines in the Waste Discharge Requirements General Order R5-2012-0116-R1**

Dear Pamela:

The East San Joaquin Water Quality Coalition (ESJWQC) respectfully requests that specific limited provisions of the Waste Discharge Requirements General Order R5-2012-0116-R1 (General Order) and its associated Monitoring and Reporting Program (Attachment B to the General Order) be revised. Specifically, for the reasons provided below, we request that Provision VII.B.2 of the General Order be revised to extend the time for which members in high vulnerability areas must prepare and submit their Farm Evaluation to the ESJWQC. The time extension would be for approximately 60 days, or until 1 May 2014. Similarly, and related, the ESJWQC also requests that the time to submit Annual Monitoring Report component (18) (Attachment B, Provision V.C) be extended from 1 May 2014 to 1 July 2014.

The time is necessary to allow the ESJWQC sufficient time to develop an electronic web-based system for its members to submit their Farm Evaluations, and for the ESJWQC to aggregate and summarize the information collected from the Farm Evaluations in a manner that is consistent with Annual Monitoring Report component (18). The ESJWQC needs the additional time due to unforeseen circumstances related with the development the web-based system. Specifically, the ESJWQC issued a Request for Proposal (RFP) in late September of 2013. Included with one of the RFP responses was a letter putting the ESJWQC on notice that proceeding forward could constitute an infringement of a patent that was issued several months prior to the RFP and owned by that respondent. Due to the patent infringement issues, the ESJWQC was unable to proceed forward with development of an electronic web-based system as originally intended to comply with the timelines adopted in the WDR.

Within the last week, however, the ESJWQC has learned that the patent issues will be resolved in a manner that is satisfactory to the ESJWQC. Accordingly, the ESJWQC is now seeking to re-start its process for developing the electronic web-based system for growers to prepare and submit their Farm

Evaluations. We are currently proceeding to mail farm evaluations to members who do not have access to the internet. However to develop and implement the web based system, the ESJWQC needs 60 days of additional time for its members and itself to meet the obligations contained in the WDR and the Monitoring and Reporting Program.

We appreciate your consideration of such extensions due to the unforeseen circumstances faced by the ESJWQC.

Sincerely,

A handwritten signature in black ink, appearing to read 'PK' with a stylized flourish extending to the right.

Parry Klassen  
Executive Director