

From: Melanie Thomson [cuwa@sbcglobal.net]
Sent: Monday, September 27, 2010 4:50 PM
To: ILRP Comments
Cc: Ernesto Avila
Subject: ILRP Draft Program EIR
Attachments: EIR ILRP Comment Letter 092710.pdf

Megan Smith –

CUWA
appreciates the
opportunity to
review the
Irrigated Lands
Regulatory
Program Draft
Program EIR. At
this time, we
would like to
submit the
attached
comment letter
for
consideration.

Should you
have any
questions,
please feel free
to contact
Ernesto Avila,
CUWA's
Executive
Director, at
(916) 552-2929.

Thank you.

Melanie Thomson
Project Coordinator
California Urban Water Agencies
(916) 552-2929



September 27, 2010

ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

**RE: Irrigated Lands Regulatory Program
Program Environmental Impact Report Comments**

Dear Ms. Smith:

Thank you for providing the California Urban Water Agencies (CUWA) with an opportunity to review the Irrigated Lands Regulatory Program-Draft Program Environmental Impact Report (Draft EIR). CUWA comments on the Draft EIR are noted below for your consideration. We request that the Central Valley Regional Water Quality Control Board (Regional Board) address these comments as part of the Final EIR process.

Stakeholder Input – CUWA urges the Regional Board to include an information sharing process in the preferred alternative that will describe how the drinking water community and other affected stakeholders will be kept informed of progress on the program and be allowed to provide input at critical points.

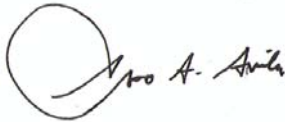
Monitoring Program – CUWA urges the Regional Board to assure that the preferred alternative include a monitoring program that includes drinking water constituents of concern (organic carbon, nutrients, salinity, and pathogen indicator organisms) in the ambient monitoring and in the monitoring of the effectiveness of management practices. CUWA also believes that the preferred alternative monitoring program should include: 1) a process for reporting on the data and findings that will allow the data and findings to be shared with the drinking water community and other affected stakeholders; 2) a method which allows these same stakeholders with an opportunity to provide input at critical points regularly; and 3) consideration of future drinking water constituents of concern as they are identified by the drinking water community and other affected stakeholders.

Classification of Water Bodies (Alternative 4) – CUWA believes that should Alternative 4 be selected as the preferred alternative, it should: 1) include a detailed discussion of how high priority surface and groundwater will be defined, as this is the basis for determining if waste discharge requirements will be issued or if a conditional waiver will be granted; 2) classify all surface water and groundwater for which the MUN beneficial use currently exists, or could reasonably exist in the future, as high priority waters; and 3) include the drinking water community in any stakeholder process used to identify these high and low priority waters.

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CUWA appreciates the efforts of the Irrigated Lands Regulatory Program staff to develop a long-term program that protects water quality in the Central Valley. Thank you for the opportunity to review the EIR on this program. If you have any questions on our comments, please call me at (916) 552-2929.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernesto A. Avila". The signature is written in a cursive style with a large, circular initial "E" on the left.

Ernesto A. Avila, P.E.
Executive Director

EAA/mmt