



April 10, 2014

Pamela Creedon  
Irrigated Lands Regulatory Program  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

*Re: Request for Notice of Applicability (NOA) – Third-party application for Waste Discharge Requirements General Order R5-2014-0030 for Growers in the Sacramento River Watershed*

Dear Ms. Creedon:

The Northern California Water Association (NCWA) is submitting this request for the issuance of a Notice of Applicability (NOA) by the Central Valley Regional Water Quality Control Board (Regional Water Board) Executive Officer. Pursuant to this request, NCWA will be the third-party entity on behalf of the owners and operators of irrigated lands enrolled in the thirteen Subwatershed Groups of the Sacramento River Watershed (see attached map) and will fulfill the requirements and conditions of the Waste Discharge Requirements General Order R5-2014-0030 (General Order), and associated Monitoring and Reporting Program.

Since 2003, the Regional Water Board has recognized NCWA as the lead entity responsible for regulatory compliance under the Coalition Conditional Waiver of Waste Discharge, Order R5-2006-0053. In a working partnership, NCWA and the Subwatershed Groups comprise the Sacramento Valley Water Quality Coalition (SVWQC), representing owners and operators of irrigated lands within Sacramento River Watershed. The Northern California Water Association (NCWA) has the ability to carry out the third-party responsibilities as listed in the General Order and restated below.

- 1) Provide the Central Valley Water Board documentation of its organizational management structure. The documentation shall identify persons responsible for ensuring that program requirements are fulfilled. The documentation shall be made readily available to Members. Indicate how Members have the ability to direct or influence the governance of the third-party through the by-laws.*

Governance and Binding Agreements with Subsidiary Groups - A binding Memorandum of Agreement (MOA) delineating the roles and responsibilities between NCWA and the Subwatershed Groups was first executed in 2004. Each Subwatershed Group's Board of Directors designates qualified representatives to serve on the SVWQC Management Advisory Council. In addition, to the qualified representatives, each Subwatershed Group has a designated Subwatershed Coordinator who has overall knowledge of the Irrigated Lands Regulatory Program (ILRP) requirements, and is responsible for outreach and education, as well as assisting in documenting management and cultural practices when a Management Plan is triggered. Subwatershed Coordinators are often Farm Bureau or Resource Conservation District managers/staff or a person with considerable local knowledge of irrigated agricultural operations and credibility in the drainage watershed area.

Governance Structure Allowing Member Input - The SVWQC Management Advisory Council recently updated and agreed to a revised MOA that includes delineation of roles and responsibilities (attached) and cost sharing of surface water quality monitoring, management plan and programmatic reporting requirements, data management for member and third party reporting, groundwater quality components and sediment erosion control costs related to the General Order. The Management Advisory Council regularly meets with NCWA to discuss development of program requirements and implementation of the General Order and the associated ILRP. Several members of the Management Advisory Council participated in discussions with Regional Water Board staff to develop General Order R5-2014-0030 and presented testimony at the Public Workshop on the Administrative Draft in October 2013.

Administration and Program Management - The SVWQC Management Advisory Council delegates its day-to-day operations, and its representation before the Regional Water Board to NCWA's Director of Regulatory Affairs, Bruce Houdesheldt. Subwatershed Groups are provided copies of the Annual Monitoring Report and Management Plan Progress Report, along with more frequent updates and regular briefings from NCWA on progress in implementation.

The SVWQC is organized as follows:

**Third Party – Program Management**

David Guy  
President  
Northern California Water Association

Bruce Houdesheldt  
Director, Regulatory Affairs  
Northern California Water Association

**SVWQC Management Advisory Council (MAC)**

**Butte Yuba Sutter Subwatershed (Field/Row Crops, Olives, Nut Trees)**

Juleah Cordi, District Manager, Sutter RCD  
1511 Butte House Road, Ste. C  
Yuba City, CA 95993

**Colusa Glenn Subwatershed (Corn, Wheat, Rice)**

Larry Domenighini, President, Colusa Glenn Subwatershed  
PO Box 1205  
Willows, CA 95988

**Dixon Solano Subwatershed (Field/ Row Crops, Nut Trees)**

John Currey, District Manager  
Dixon Resources Conservation District  
1170 N. Lincoln, Ste. 110  
Dixon, CA 95620

**El Dorado Agricultural Water Quality Management Corporation (Fruit and Christmas Trees, Wine Grapes)**

Carolyn Mansfield, President  
PO Box 286  
Placerville, CA 95667

**Goose Lake Subwatershed (Irrigated Pasture, Livestock)**

Herb Jasper, Director, Goose Lake RCD  
PO Box 212  
New Pine Creek, Oregon 97635

**Lake County Farm Bureau (Wine Grapes, Pears, Walnuts)**

Marc Hopper, President, Lake County Farm Bureau  
65 Soda Bay Road  
Lakeport, CA 95453-5669

**Napa County Farm Bureau (Wine Grapes)**

Sandy Elles, Executive Director  
811 Jefferson Street  
Napa, CA 94559

**Northeastern California Water Association (Irrigated Pasture, Wild Rice)**

Myles Flourney, President  
PO Box 367  
McArthur, CA 96056

**Placer-Nevada-South Sutter-North Sacramento (Field and Row Crops, Rice, Irrigated Pasture)**

Ed Sills, President  
PO Box 1235  
Lincoln, CA 95648

**Sacramento Amador Water Quality Alliance (Wine Grapes, Field and Row Crops, Irrigated Pasture)**

Dan Port, President  
PO Box 1488  
Ione, CA 95640

**Shasta Tehama Watershed Education Coalition (Walnuts, Almonds, Prunes Olives Livestock, Irrigated Pasture)**

Bob Harris President,  
PO Box 9344  
Red Bluff, CA 96080

**Upper Feather River Watershed Group (Irrigated Pasture)**

Carol Dobbas, Executive Director,  
PO Box 7  
Sattley, CA 96124

**Yolo County Farm Bureau Education Corporation (Field and Nut Crops)**

Denise Sagara, Executive Director, Yolo County Farm Bureau  
P.O. Box 1556  
Woodland, CA 95776

*Whether the third-party has binding agreements with any subsidiary group (e.g., subwatershed group) to ensure any third-party responsibilities carried out by the subsidiary group, including the collection of fees, are done so transparently and with accountability to the third-party and its Members.*

As the third-party, NCWA, relies on subsidiary groups (e.g. Subwatershed Groups) to carry out grower outreach and educational responsibilities identified in the Roles and Responsibilities document attached and has a binding MOA with the Subwatershed Groups. This includes the collection of fees.

*2) Prepare annual summaries of expenditures of fees and revenue used to comply with this Order. The summaries shall be provided to or made readily available to Members.*

In its management role, NCWA oversees surface water quality monitoring and reporting, contractors and labs, legal counsel, and various other services needed by the Coalition and its thirteen Subwatershed Groups. In the third quarter of each water year, NCWA reviews the proposed monitoring plan and associated costs for the ensuing water year in order to prepare a draft SVWQC, Estimated Monitoring and Program Management Costs (Budget). It then reviews the draft Budget with the SVWQC Management Advisory Council, makes any necessary revisions and finalizes it. The draft Budget includes a summary of expenses for the prior year for each Subwatershed Group. Monitoring costs are apportioned to each Subwatershed Group based on the number of monitoring sites and frequency of sampling at each site. These costs are paid for by the owners and operators in each Subwatershed Group solely for their geographic area.

Program Management Costs are prorated based on the number of irrigated acres a Subwatershed Group has relative to the total irrigated acres enrolled in the Coalition and paid on this basis. This creates an equitable split of costs among Subwatershed Groups of varying sizes. For instance, a Subwatershed Group with less than 50,000 irrigated acres that monitors at one location, 7 or fewer times a year, pays less than Subwatershed Groups with over 100,000 irrigated acres, with multiple monitoring sites that are sampled 10 or more times a year.

In its management role, NCWA prepares invoices for each Subwatershed Group summarizing its annual costs as compared with the approved Budget Estimate for the year (October 1-September 30) and determines any credits/debits for each Subwatershed Group based on the final accounting for that specific year.

Annually, each Subwatershed Group holds a Member Meeting where owners and operators of irrigated lands are briefed on costs, based on the SVWQC Estimated Monitoring and Program Management Costs and any local Subwatershed Groups costs (e.g., accounting services). Subwatershed Groups are provided copies of the Annual Monitoring Report and Management

Plan Progress Report, along with regular program updates from NCWA. Financial expenditures are available to members at any time upon request.

***3) If the third-party group receives a notice of violation (NOV) from the Central Valley Water Board, the third-party must provide to Members in the area addressed by the NOV appropriate information regarding the reason(s) for the violation. The notification must be provided to all Members within the area affected by the NOV within thirty (30) days of receiving the NOV from the board. The third-party group must provide confirmation to the board of each notification. A summary of all notices of violation received by the third-party group must be provided to all Members annually.***

As the third-party, NCWA agrees that it will mail or email correspondence to all members within the area affected by the NOV within 30 days of receiving the NOV from the Regional Water Board. Further, a summary of all notices will be included in the Summary Annual Report mailed to all members at the end of each year.

***4) Develop and implement plans to track and evaluate the effectiveness of water quality management practices, pursuant to approved Surface Water Quality Management Plans and Groundwater Quality Management Plans.***

As the third party, NCWA developed and implemented between 2006 and the present, Management Plans designed to track and evaluate the implementation of management practices with the goal of reducing discharges that impair surface water quality. Since 2006, Management Plans have been effectively implemented in compliance with the Irrigated Lands Regulatory Program, including: 1) conducting additional Management Plan Monitoring, 2) additional outreach and education to targeted members, 3) documenting current and newly implemented management practices, and 4) conducting annual evaluations of the effectiveness of management practices in the annual Management Plan Progress Report. The SVWQC Management Plan developed under Order R5-2006-0053 will become the Comprehensive Surface Water Quality Management Plan under this Order and it will be updated annually.

As the third party, NCWA plans to create a Comprehensive Groundwater Quality Management Plan (GQMP) in accordance with the terms of the Order. The GQMP will utilize information developed in the Groundwater Quality Assessment Report (GAR) and will be based on GQMP requirements as listed in Appendix MRP-1 of the Order. The GQMP strategy will be similar to the SQMP strategy where the Coalition will focus on surveying members' current management practices, discussing management practices that should be implemented to protect groundwater quality. Management practices will be documented and tracked in a manner that is consistent with the current approach, and utilizing the Farm Evaluation process detailed in the General Order. Survey results will be reported in a manner similar to current surface water

monitoring and reporting program. GQMP monitoring will be designed to indicate adequate progress in achieving improvement in groundwater quality.

***5) Provide timely and complete submittal of any plans or reports required by this Order.***

As the third party, NCWA has been representing members of this region under Order R5-2006-0053, and its precursors, since 2003 and has a solid record of producing timely, complete and technically sound plans and reports. Additional contractors will be hired as necessary to assist with the development of groundwater quality specific reports. The technical contractors will be responsible for the reporting requirements in Attachment B of the Order including:

- a. Monitoring Plan Update (surface water)
- b. Groundwater Quality Assessment Report (groundwater)
- c. Management Practice Evaluation Program Reports (groundwater)
- d. Management Practices Evaluation Workplan (groundwater)
- e. Third-Party Monitoring Reports
  - i. Quarterly submittals of surface water quality monitoring results
  - ii. Annual groundwater quality monitoring results
  - iii. Monitoring report
  - iv. Surface water exceedances reports
- f. Templates
- g. Sediment Discharge and Erosion Assessment Report
- h. Water Quality Triggers for Development of Management Plans
- i. Quality Assurance Project Plan (QAPP)

Owners and operators of irrigated lands will be provided templates for Farm Evaluation, Nitrogen Management Plan and Sediment and Erosion Control Plan by NCWA. As the third-party, NCWA will fulfill reporting requirements as specified in Attachment B – Monitoring and Reporting Program Section V. C. Annual Monitoring Report.

***6) Conduct required water quality monitoring and assessments in conformance with quality assurance/quality control requirements. Provide timely and complete submittal of any reports required by this Order.***

The SVWQC has relied on environmental consulting and technical services of Larry Walker Associates (LWA) since 2004. The firm prepares annual monitoring plans, Source Evaluation Reports (SER) for surface water management plans, and subcontracts with Pacific Eco-Risk to conduct scientifically defensible surface water monitoring and assessments to evaluate the impact on beneficial uses of surface water discharge from irrigated agriculture. The SVWQC expects to continue to rely on the services of LWA in the future. Monitoring reports submitted

by the NCWA conform to quality assurance/quality control requirements and have been submitted in a timely manner and assessed as complete.

The groundwater quality assessment report is currently being undertaken by CH2M Hill. In the future NCWA will contract with other qualified technical experts to assist with the newly adopted groundwater quality and sediment and erosion control components of the General Order, and will continue to commit to conducting water quality monitoring and assessments in accordance with an approved QAPP and meeting the monitoring requirements for both surface and groundwater quality monitoring as described in Attachment B of the General Order.

***7) Within 45 days of receiving an NOA from the Central Valley Water Board (as described in section VIII.A), inform Members of this Order's requirements by providing a notice of the deadline and the process to complete a Notice of Confirmation (NOC) form and Farm Evaluation Template.***

As the third party, NCWA, will create a Member Requirements Fact Sheet and provide a means for owners and operators of irrigated lands to provide the necessary Notice of Confirmation (NOC) form for each member to ensure continued good standing. The NOC form will be mailed to all current members and any additional members requesting to join during the 120 day period after issuance of the NOA. Included with the NOC form will be a fact sheet with member and third-party responsibilities as well as information on how to access the approved General Order and supporting documentation. The NOC will include whether or not the enrolled member is the responsible party for the land enrolled and if not, will require that the member certifies that they have informed the responsible non-member party (e.g. landowner) in a written form of the requirements outlined in the General Order. The completed NOC will also list the name and contact information of any lessee that is leasing the property. Returned NOCs will be filed and recorded in the SVWQC Member Database.

***8) Conduct education and outreach activities to inform Members of program requirements and water quality problems, including exceedances of water quality objectives or degradation of water quality, identified by the third-party or Central Valley Water Board. The third-party shall:***

***a. Maintain attendance lists for outreach events, provide Members with information on water quality management practices that will address water quality problems and minimize the discharge of wastes from irrigated lands, and provide informational materials on potential environmental impacts of water quality management practices to the extent known by the third-party group.***

- b. Provide an annual summary of education and outreach activities to the Central Valley Water Board. The annual summary shall include copies of the educational and management practice information provided to the growers. The annual summary must report the total number of growers who attended the outreach events and describe how growers could obtain copies of the materials presented at these events.*

The SVWQC provides education and outreach to owners and operators of irrigated lands through annual grower/member meetings, commodity group meetings, grower outreach meetings on Management Plans and other meetings held by County Agricultural Commissioners and similar opportunities. Many Sacramento Valley meetings provide continuing education credits. As the third party, NCWA documents member attendance at meetings and documents outreach and education events in reports to the Regional Water Board. Working with UC Cooperative Extension crop specialists and commodity groups, and Subwatershed Groups, NCWA creates, publishes, and distributes management practice information to members. The Northern California Water Association and Subwatershed Groups produce materials and/or maintain websites for members that provide management practices information. The Northern California Water Association, as the third party, will continue to post on the [www.svwqc.org](http://www.svwqc.org) website Annual Monitoring Reports, Management Plan Progress Reports, and other work products developed as General Order R5-2014-0030 is implemented for members to review and download. Individual grower meetings are documented in a management practice survey database that records member information, the date of the meeting, and survey results.

The third party will continue to work with members to ensure effective outreach and education. A summary of outreach/education meetings and attendees will continue to be provided by NCWA in its annual reports to the Regional Water Board.

- 9) Work cooperatively with the Central Valley Water Board to ensure all Members are providing required information and taking necessary steps to address exceedances or degradation identified by the third-party or board. As part of the Membership List submittal, identify the growers who have: (1) failed to implement improved water quality management practices within the timeframe specified by an applicable SQMP/GQMP; (2) failed to respond to an information request associated with any applicable SQMP/GQMP or other provisions of this Order; (3) failed to participate in third-party studies for which the third-party is the lead; (4) failed to provide confirmation of participation in an outreach event (per section IV.B.4 of this Order); or (5) failed to submit required fees to the third-party.*

All the information required by the Conditional Waiver has been successfully conveyed to the Regional Water Board in a timely manner, and, thus, NCWA is well poised to convey all information as required by the General Order to its members. Member and Survey Databases are maintained that include all of the information in items 1-3, and 5 above. The appropriate database will be expanded to incorporate the information necessary to comply with item 4 above. An online system that will allow members to complete the necessary forms and document that they are fulfilling membership responsibilities through the internet may be developed. Alternative means for those that are not able to utilize online systems by mailing forms and collecting completed forms from those members will be provided.

***10) Ensure that any activities conducted on behalf of the third-party by other groups meet the requirements of this Order. The third-party is responsible for any activities conducted on its behalf.***

The SVWQC engages contractors to prepare technical reports and documents on behalf of the members. As the third party, NCWA accepts full responsibility for all information submitted to the Regional Water Board. The SVWQC does not use other third-party groups at this time to conduct any activities on its behalf. However, if another third-party group is engaged to conduct activities, the SVWQC will accept full responsibility for its actions.

***11) Collect any fees from Members required by the State Water Board pursuant to the fee schedule contained in Title 23 CCR. Such fees shall then be submitted to the State Water Board.***

The SVWQC Subwatershed Groups collect member dues that include the Waste Discharge Permit Fund fee (a.k.a. State Water Quality Fee) set by the State Water Resources Control Board for irrigated lands. As the third party, NCWA has successfully submitted member fees to the State Water Board since such a fee was required, and intends to continue to do so under the new General Order.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

Sincerely,



David J. Guy  
President  
Northern California Water Association



Bruce Houdesheldt  
Director, Regulatory Affairs  
Northern California Water Association

Cc:  
Joe Karkoski, CVRWQCB  
Susan Fregien, CVRWQCB  
Mark Cady, CVRWQCB  
Claus Suverkropp, LWA  
Summer Bundy, CH2M Hill  
Lisa Porta, CH2M Hill

Attach: Coverage Map  
SVWQC Roles and Responsibilities

# Exhibit A

<b>2014 SVWQC Organizational Roles and Responsibilities</b>			
<b>Northern California Water Association</b>	<b>Surface Water Monitoring Contractors</b>	<b>Groundwater Quality Monitoring Contractors</b>	<b>Subwatershed Groups</b>
Manage implementation of WDR and MRP Order in coordination with Subwatershed Groups	Prepare Annual Monitoring Plan for submittal to Regional Board. Summarize all water quality results for individual Subwatersheds.	Prepare Groundwater Quality Assessment Report	Maintain knowledge of Waste Discharge Requirements (WDR) and Monitoring and Reporting Program (MRP) elements.
Communicate Water Quality results to subwatersheds and/or public	Implement Monitoring and Reporting Program (MRP) Elements for Surface Water	Implement Monitoring and Reporting Program (MRP) Elements for Groundwater	Conduct outreach to growers to communicate water quality results from exceedance reports, annual water quality summaries, etc.
Track, analyze and comment on Proposed and Adopted Basin Plan Amendments (e.g., Pyrethroids) related to ILRP requirements	Manage surface water quality monitoring program, including preparation of exceedance reports, Quality Assurance Quality Control, data submittals	Prepare Groundwater Quality Management Plans as required.	Maintain membership participant list, submit annual list, coordinate outreach and enrollment of new members.
Track State Budget and Legislation related to agricultural water quality, groundwater, or discharge permits that will impact Coalition members	Prepare Sediment and Erosion Control Assessment Report		Submit Annual Outreach materials for Annual Monitoring Report
Track proposed State Water Resources Control Board Policies on Nutrients, Biological Objectives, 303(d) Impaired Waterbodies List, etc.	Prepare Surface Water Quality Management Plans as required.		Review Annual Budget for Program and Monitoring prepared by NCWA. Maintain sound fiscal standing.
Represent SVWQC at CV-SALTS Meetings			Distribute and collect Farm Evaluation, Nitrogen Management and Sediment Erosion Control template information
Manage Consultants (legal and technical) contracts and work product deliverables related to WDR/MRP			Assist in development and implementation of Surface and Groundwater Management Plans
			Provide NCWA information required in WDR/MRP in format required

Figure 2. SVWQC Subwatershed Region Boundaries



**From:** Bruce Houdesheldt <bruceh@norcalwater.org>  
**Sent:** Tuesday, May 13, 2014 5:18 PM  
**To:** Karkoski, Joe@Waterboards  
**Subject:** RE: Supplemental Information for Sac Watershed Third-party Group Application  
**Attachments:** Organizational Entities of Coalition.xlsx

Joe,

In response to our conversation about providing supplemental information related to the Northern California Water Association (NCWA) application to serve as the third party please see responses below:

- 1) Your application mentions an attached updated Memorandum of Agreement, but it was not provided with the application. Please provide us with the updated Memorandum of Agreement.

The April 10 application referenced Exhibit A of the revised Memorandum of Agreement (MOA) not the MOA itself. Exhibit A delineates the Roles and Responsibilities between NCWA as the third party and the Subwatershed Groups (i.e., subsidiary group). The MOA covers the obligations of both the third party to the Subwatershed Groups and vice versa as articulated on Page 2 of the application in the section "Governance Structure Allowing Member Input."

Essential elements of the MOA are further covered in the application on Page 2 under "Administration and Program Management", as well as, preparation of annual summaries of expenditures of fees and revenue (Page 4), development and implementation of plans to track and evaluate the effectiveness of water quality management practices (Page 5), education and outreach (Page 8) and collection of State Water Quality fees (Page 9).

The April 10 application documents the essential elements under which the Sacramento Valley Water Quality Coalition has successfully operated for a decade. Were it not for the need to add groundwater quality elements of the General Order R5-2014-0030, revisions would have not been required.

- 2) Section VIII.A.2. of the indicates that the EO will consider whether the third-party group is a legally defined entity or has a binding agreement among multiple entities. For NCWA and each of the sub-watershed groups, please identify what type of legally defined entity each group is: e.g., non-profit corporation (501(c)(3)); public agency; etc. For each organization, please provide documentation of the relevant organizational bylaws applicable to how the requirements of the Order will be fulfilled (e.g., the governance structure of each organization; how fees are collected to ensure accountability/transparency).

As a 501 (c) 6, NCWA is registered with the Secretary of State.

C1818376	04/02/1992	Active	<a href="#">NORTHERN CALIFORNIA WATER ASSOCIATION</a>	DAVID J GUY
----------	------------	--------	---	-------------

Similarly a number of the Subwatershed Groups are registered with the Secretary of State

C2562982	10/31/2003	Active	<a href="#"><u>YOLO COUNTY FARM BUREAU EDUCATION CORPORATION</u></a>	ROBERT NAKKEN
C3091976	03/07/2008	Active	<a href="#"><u>EL DORADO COUNTY AGRICULTURAL WATER QUALITY MANAGEMENT CORPORATION</u></a>	VALERIE ZENTNER
C3093126	03/21/2008	Active	<a href="#"><u>THE EL DORADO COUNTY AGRICULTURAL WATER EDUCATION CORPORATION</u></a>	VALERIE ZENTNER
C2508921	04/09/2003	Active	<a href="#"><u>NORTHEASTERN CALIFORNIA WATER ASSOCIATION</u></a>	TAMI A. HUMPHRY
C2935765	12/01/2006	Active	<a href="#"><u>UPPER FEATHER RIVER WATERSHED GROUP</u></a>	CAROL DOBBAS
C2800348	08/22/2005	Active	<a href="#"><u>SHASTA TEHAMA WATERSHED EDUCATION COALITION</u></a>	JIM EDWARDS

Attached you will find a complete list of each Subwatershed Group's organizational structure.

- 3) Under item 2 in your application, you indicate that financial expenditures are available to Members upon request. Section IV.C.2 of the Order requires the summaries of expenditure of fees and revenue be provided to or made readily available to Members. If NCWA or the sub-watershed groups are not providing this information directly to Members, then the information should be made readily available (e.g., on the NCWA or sub-watershed group web site).

Financial expenditures are provided to Members in a variety of ways (e.g., publication in Subwatershed Group newsletters) and are readily available.

- 4) Please describe any mechanisms in place between NCWA and the subwatershed groups to ensure fiscal accountability. For example, does NCWA conduct audits or have audits conducted on its behalf?

In the April 10 application on Page 4 under "2) Prepare annual summaries of expenditures of fees and revenue used to comply with the Order." the development of the annual monitoring and programmatic budget is detailed. It further explains the equitable distribution of costs among the various Subwatershed Groups.

The NCWA annual audit is performed by Chavez + Baker Associates, a certified professional accounting firm with 35 years of experience. They are members of American

Institute of CPAs, and CA Society of CPAs. The audit of NCWA includes a review of the Sacramento Valley Water Quality Coalition (Coalition) financials.

- 5) Under item 9, the application letter indicates how NCWA will track grower information. Please confirm that NCWA will provide in the Membership List the information identified in section IV.C.9 of the Order.

As the third party, NCWA will, “Work cooperatively with the Central Valley Water Board to ensure that all members are providing required information and taking the necessary steps to address exceedances or degradation identified by the third party or board. “ For the past five years, NCWA has actively worked with Regional Board outreach and compliance staff to identify owners and operators of irrigated agriculture who may need coverage under the Irrigated Lands Regulatory Program. As part of ongoing outreach done at the local level, many of our Subwatershed Group boards have reprinted the Regional Board guidance letter of June 3, 2009 entitled, “*Responsibilities of Growers in Coalitions and Potential Consequences of Non-Cooperation.*”

Management Plan surveys of management practices have printed in bold language at the top of the front page, the following language,

*This is a MANDATORY REQUIREMENT of coverage under the Irrigated Lands Program, failure to complete and return the survey COULD RESULT IN LOSS OF MEMBERSHIP in your local watershed Coalition which will result in the Central Valley Regional Water Quality Control Board contacting you.*

Participant lists submitted by NCWA as the third party will provide the information identified in Section IV. C. 9, under General Order R5-2014-0030.

Under item 10, the application states no other third-party groups are used to conduct any activities. However, the application indicates in other areas that sub-watershed groups will be conducting many of the activities. Please clarify this statement.

No other third-party groups will be used to conduct activities. The Subwatershed Groups are subsidiary groups. As Section IV. C. 10 states, “The third-party is responsible for any activities conducted on its behalf.”

*Bruce Houdesheldt*

Director Regulatory Affairs  
Northern California Water Association  
455 Capitol Mall, Suite 335  
Sacramento, California 95814  
(916) 442-8333 (office)  
(916) 852-1287 (mobile)

Subwatershed	Organizational Structure	Meeting Frequency	Staffing	Updated
Napa County Putah Creek Watershed Group	Group is supported by Napa Co. Farm Bureau; operates with a Technical Committee (NCFB, RCD, NRCS & Ag Commissioner) and a Steering Committee of 7 growers plus the Technical Committee.	Annual for the entire group; as needed for the Steering Committee (typically 3-4 times per year)	Collaborative group with no formal or legal entity. Group is supported by Napa Co. Farm Bureau; operates with a Technical Committee (NCFB, RCD, NRCS & Ag Commissioner) and a Steering Committee of 7 growers plus the Technical Committee	1/2/2014
Yolo County Farm Bureau Education Corporation	501c3 corporation. Liability insurance covered by Farm Bureau policy @ no extra charge. YC Ag Commissioner advises, Exec Board of FB are automatically the board members for YCFBEC and administer the program.	4 landowner/grower meetings held in late fall or winters in various locations in Yolo county; Meetings with YCFBEC board as needed	1 full time paid staff, another person ¾ time, part time help and Executive Director's time	12/16/2013
Goose Lake Water Quality	Managed by the Goose Lake Resource Conservation District			4/10/2014
Lake County Ag Lands Watershed Group	Lake County Farm Bureau – We have formed a 501(c)3. Currently operated as a committee of LCFB.	Monthly LCFB Board of Directors Meeting	Utilize LCFB staff for local admin. LCFB does receive admin. Fee	12/18/2013
El Dorado County Agricultural Water Quality Management Corporation	Formed as 501(c)(5) in 2008, also formed a companion 501(c)(3) Agricultural Water Education corporation, Board of directors is representative of the various commodities by bylaws	Board of Directors elected by the Members meets 6 times per year	El Dorado County Farm Bureau under an Administrative Services Cost Reimbursement Contract provides staffing needs.	12/18/2013
Shasta Tehama Watershed Education Coalition	Not-for-profit public benefit corporation. Five member Board of Directors. Technical Advisory Committee. Support from UCCE and County Agriculture Commissioners	Board meetings bi-monthly TAC meetings as required. Annual member meeting. Several education/outreach meetings annually	Management provided by Tehama Resources Conservation District	11/17/2011
Sacramento - Amador	Operated jointly by Lower Cosumnes and Amador RCDs. Amador RCD takes care of the finances. There is an advisory committee in each county.	Amador RCD meets monthly, Lower Cosumnes meets as needed.	Part-time manager	4/30/2014

Subwatershed	Organizational Structure	Meeting Frequency	Staffing	Updated
Solano	Operated jointly by Dixon and Solano RCDs. There is an advisory committee made up of Board members from each of the RCDs and members of the Coalition.	Solano and Dixon RCD meets monthly, Coalition advisory committee meets as needed	92% (2013) FTE Total (combined work from both RCDs by Conservation Program Manager, Project Technician, Administrative Assistant, and both District Managers)	12/17/2013
BYS	Formed a non-profit 501 (c)(3) organization with a Board of Directors.	As needed	Sutter County RCD – Subwatershed Coordinator, point of contact with Ag Commissioner, conducts Outreach and Education. Yuba/Sutter Farm Bureau – Administers Participant List and Invoicing;	12/12/2013
UFRWG	<b>Non-Profit 501(c)5.</b> Seven member Board of Directors. Support from UCCE.	Annual membership meeting. Board and Executive Committee meetings as needed.	Part-time manager	4/30/2104
NECWA (Pit)	501c3 corporation. Organization consists of: 4 officers 7 board members 1 member at large All volunteer members of organization. Water quality monitoring conducted 8x per year by NECWA	Bi monthly board meetings Annual meeting in March	Part-time manager	4/30/2014
Placer-Nevada - So. Sutter - No. Sacramento Subwatershed Group	Non-Profit 501c3 organization with 7 board of directors. All volunteer members of organization.	Monthly Board of Directors Meetings. Annual membership meeting held in February.	Part-time manager	11/8/2011
Colusa Glenn	<b>Non-Profit 501 (c) 6 was approved on April 8, 2008;</b> there is a five member Board of Directors.	Annual meeting w/ 2-4 general meetings <b>as needed.</b> <b>Board Meetings as needed.</b>	<b>Outreach and Education provided by</b> Glenn County RCD via MOU; <b>Technical Outreach provided by</b> Lester Messina <b>via Agreement;</b> Accounting <b>provided by</b> Kelly Kampschmidt <b>Payroll &amp; Accounting Services via Agreement;</b> Audit <b>provided by</b> Bob Gustafson, CPA <b>via Agreement</b>	1/6/2014