

Commenter	Category /Alternative	Summarized Comment -see comment letters: www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development	Changes Made?	General Notes
Ag Commissioner (Nevada County)	SW 2	Remove: "Individual growers will report compliance with management objectives."	y	This optional "low threat" component under Alternative 2 requires that the third-party group develop an evaluation program to ensure that management objectives are implemented, and perform water quality monitoring one year every five years to provide additional feedback. Because the third-party groups would be responsible for verifying that implementation of management practices meets plan objectives, the requirement for individual growers can be removed. This requirement was removed from Alternative 2 of the Second Draft Long-Term Irrigated Lands Regulatory Program (ILRP) Alternatives Document (draft alternatives document).
Ag Commissioner (Nevada County)	SW 2	Supports SW2 for foothill agriculture operations.	n	Comment noted.
CA Sportfishing	Monitoring	Sufficient feedback mechanisms are necessary, see Element 4 of the State Water Resource Control Board's <i>Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program</i> (NPS Policy).	y	All alternatives have some form of monitoring for feedback.
CA Sportfishing	Monitoring	Edge of field monitoring should be required monthly during irrigation season and during at least two wet weather events for problem areas. Monitoring may be relaxed where applicable water quality standards are being met.	y	Alternative 5 includes this monitoring. Provisions for relaxing monitoring where applicable are also addressed in Alternative 2 and in the tiered Alternative 4.
CA Sportfishing	Program	Key Element 3 of the NPS Policy requires that time schedules for compliance be developed where the Central Valley Water Board determines that time is necessary to achieve applicable water quality objectives.	y	Any staff-recommended alternative will contain requirements to meet Key Element 3 and other statutory requirements. As stated in the Alternatives Screening section of the Second Draft, Long-term ILRP Alternatives Document (draft alternatives document), the Central Valley Water Board will be conducting a policy analysis, concurrent with the EIR and economics analysis, to determine whether and how effectively each alternative would meet statutory requirements. During this analysis, the Board will make determinations on whether and what type of changes need to be made to ensure alternatives meet minimum statutory requirements.
CA Sportfishing	Program	Require electronic submission of information. Report of Waste Discharge (ROWD) or Notice of Intent (NOI) forms must require: discharger, general description of lands and activities, receiving waters, location of discharge points, constituents likely to be discharged, existing management practices, and coalition membership information.	y	The ILRP alternatives document has been modified to require that information be submitted in an electronic format whenever feasible, and where the information does not need to be kept confidential (see the Alternatives section). Attachment E of the draft alternatives document specifies minimum information requirements for ILRP application to discharge (ROWD or NOI). This information would be required under Alternatives 3, 4, and 5 (the Central Valley Water Board implemented alternatives).
CA Sportfishing	Program	It is technically impossible to protect water quality without knowing: who is discharging, location, constituents discharged, concentration and mass of discharge, impacts to local receiving water, whether management practices are adopted, and effectiveness of management practices.	y	Attachment E of the draft alternatives document requires much of the commenter-specified information as minimum information requirements for ILRP application to discharge (ROWD or NOI). This information would be required under Alternatives 3, 4, and 5 (the Central Valley Water Board implemented alternatives). Also, monitoring requirements for Alternatives 2-5 are aimed at determining what management practices are in place, and the associated effectiveness of those practices (through inspections, monitoring, and tracking).
CA Sportfishing	Program	Individual WDRs are the most direct and efficient means of ensuring compliance with water quality standards where exceedances of standards have been identified. A General Order incorporating both standards and plan-based requirements prioritized on the basis of identified water quality problems or impairments would provide flexibility and maximize limited resources.	y	Alternative 5 includes the concept of a General Order. Also, all alternatives require that growers not meeting specified regulatory requirements work directly with the Central Valley Water Board under an individual waiver or waste discharge requirements.
CA Sportfishing	Program	General Order would be most effective. Waivers should be reserved for waterways with no impacts.	n	Alternative 5 includes the concept of a General Order.
CA Sportfishing	Program	Water quality management practices must be described along with the process to be used to select or develop them and a process to ensure and verify proper implementation.	y	This will be done through the development of water quality management plans and tracking implementation and monitoring.
CA Sportfishing	Program	Board must make clear the potential consequences for failure.	y	One potential consequence for failure to meet requirements is stated in the Regulatory Requirements section of each alternative. Growers not meeting program requirements would be targeted for an individual waiver or waste discharge requirements. Also, Central Valley Water Board enforcement action under the California Water Code is a potential consequence; also a requirement of Key Element 5 from NPS Policy.
CA Sportfishing	Program	Program should universally apply to irrigated agricultural practices that result in discharge of waste to surface or groundwater.	y	The Goals and Objectives section of the draft alternatives document provides a definition for irrigated agricultural lands as "lands where water is applied to produce crops, fiber, or livestock for commercial sale or use." Also, the Goals and Objectives would require that growers minimize waste discharge from irrigated agricultural lands to state waters (which includes surface and groundwater).
CA Sportfishing	SW/GW 4(a)	Include random statistically significant monitoring of groundwater.	y	This alternative (Alternative 4) allows for regional monitoring designed to "provide baseline groundwater information and track trends in groundwater quality over time." Statistically significant sampling must be considered in order to track trends and collect baseline information.
CA Sportfishing	SW/GW 4(b)	Allow for indicator, or statistically significant sampling of discharges, otherwise costs are likely to be prohibitive.	n	This alternative, now Alternative 5, is a farm-level alternative. Regional monitoring of irrigated agriculture-dominated waterways, which could be statistically based, is considered in Alternative 4. Having differing approaches in Alternatives 4 and 5 will allow comparison in the EIR, economics, and policy analyses. Also, in the development of a staff-recommended alternative, costs will be considered in the selection of appropriate farm-level or regional monitoring.
Coalitions	Goals	Specific edits, page 2, lines 7, 11, and 14 (see Coalitions comment letter).	y	See edits to Goals and Objectives section of the draft long-term ILRP alternatives document.

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Coalitions	GW 3(a)	Revise "Implementation and Lead Entity" section to provide clarity on how program responsibilities will be assigned.	y	GW 3(a) was merged with GW 3(b), and is now the groundwater portion of Alternative 4. See edits to the Implementation Mechanism and Lead Entity Responsibility section.
Coalitions	GW 3(b)	Soil types should be used for threat-based tiering system.	n	Note that the tiered groundwater alternatives [GW 3(a) and (b)] have been combined into Alternative 4. The tiering system is based on pesticide/fertilizer use and real data collection. Soil types and other physical factors could be used to establish threat levels, provided sufficient groundwater monitoring information is available to establish correlations between groundwater degradation and such physical factors. This work has been done in California for pesticides (DPR's Groundwater Protection Program) and on a national level for nitrate (Nolan and Hitt 2006). In follow-up conversations with Dr. Nolan, Central Valley Water Board staff have concluded that the national modeling effort for nitrate needs to be run specifically for the Central Valley if it is to be used to establish regulatory requirements. As more groundwater monitoring data is collected, the Central Valley Water Board may look into developing such a model to help provide additional understanding.
Coalitions	GW 3(b)	Specific edits, page 23, lines 14-15.	y	This portion of the alternative, now Alternative 4, was included to summarize the goals of the alternative. This portion of the alternative has been removed. The goals for all alternatives are now the same, and have been included under the Goals and Objectives section of the draft alternatives document.
Coalitions	GW 3(b)	Clarify whether nitrate levels will be measured to determine tiering.	y	See Criteria for Tier System section of Alternative 4. The tiering scheme would be dependent upon pesticide/nutrient use and water quality monitoring data.
Coalitions	Process	Document should indicate whether the Board intends to evaluate all alternatives with equal weight in the EIR. CEQA requirements section should be revised to better reflect the anticipated CEQA process for review and the anticipated process for selecting a preferred alternative. This section should also be revised to recognize the Board's obligation to discuss its rationale for selecting alternatives to be evaluated in the EIR as well as identifying those alternatives that were rejected.	y	See edits to the CEQA Requirements and Alternatives Screening sections of the draft long-term ILRP alternatives document.
Coalitions	Process	The document should be revised to indicate how and when staff intends to evaluate economic impacts.	y	The draft alternatives document has been revised to indicate that an economics analysis will occur during the EIR process (see edits to the Alternatives Screening section).
Coalitions	Program	"No project" should be no program instead of continuation of the current program.	n	The current ILRP is considered the "no project" alternative per CEQA guidance at Title 14, California Code of Regulations, Section 15126.6(e)(3)(A): "When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future."
Coalitions	Program	Combine SW/GW 4(a) and (b) and tiered groundwater programs into one or two alternatives. Also combine the two Coalition groundwater approaches.	y	The tiered groundwater alternatives [GW 3(a) and 3(b)] have been combined with SW/GW 4(a), and are now Alternative 4. The two Coalition groundwater alternatives were combined to form the groundwater portion of Alternative 2.
Coalitions	SW 2	Presumption of compliance should be linked to good- faith implementation of water quality management practices. Specific edits, page 10, line 21 (see Coalitions comment letter).	n	Note that SW 2 is included as a component of Alternative 2. Implementation of management practices is one of the required components of each of the ILRP alternatives, but not the only component. Other components include tracking/monitoring and reporting, along with other informational requirements. Essentially, program compliance for growers would be meeting the regulatory requirements for a particular alternative.
Coalitions	SW 2	Specify that this program alternative could also apply to groundwater.	y	Alternative SW 2 is now included as a "low threat" surface water component of Alternative 2. Alternative 2 also has a groundwater component.
Coalitions	SW/GW 1	Revise the description of the current program to indicate that growers are expected to work toward compliance with applicable water quality standards.	y	The introduction of this alternative, now Alternative 1, was revised as suggested (see Surface Water section of the introduction).
Coalitions	SW/GW 1	Specific edits regarding Surface and Groundwater introductory sections of this alternative (now Alternative 1).	y	See changes to the Surface Water and Groundwater introduction sections of this alternative. Suggested changes regarding specifying that the current program requirements would not be continued after 2011 were not made because, in the absence of a new program, the current program would be continued. Also, suggested changes regarding removal of the discussion of local groundwater management efforts were not made. It is important under Alternative 1 to recognize that, absent any Central Valley Water Board program for groundwater, a number of local efforts to manage the quality of groundwater would continue.
Coalitions	SW/GW 4(a)	Specific edits, page 13, lines 32-33 (See Coalitions comment letter)	n	This portion of the alternative, Alternative 4, was included to summarize the goals of the alternative. This portion of the alternative has been removed. The goals for all alternatives are now the same, and have been included under the Goals and Objectives section of the draft alternatives document.
Coalitions	SW/GW 4(a)	Specific edits, page 14, lines 34-36 (See Coalitions comment letter)	y	See edits to Regional Monitoring section of Alternative 4.
Coalitions	SW/GW 4(b)	Combine SW/GW 4(b) with GW 3(b).	n	Alternative SW/GW 4(b), now Alternative 5, is a farm-level program. Alternative GW 3(b) allows for regional monitoring. Instead, GW 3(b) and SW/GW 4(a) were combined into Alternative 4 because both allow for regional monitoring.
Coalitions	SW/GW 4(b)	The "Nutrient and Pesticide Monitoring" should be changed to "Reporting." Specific water quality monitoring is not being required.	y	The Monitoring Provisions section of this alternative, now Alternative 5, has been changed to specify "Nutrient and Pesticide Tracking" instead of "Monitoring."
CWA/ CRLAF/ CWF	Goals	The first objective should read: "restore and maintain"	y	Changed to "Restore and/or maintain." See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.

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CWA/ CRLAF/ CWF	GW 2	Specify the Department of Public Health (DPH) Drinking Water Program as a coordinating agency.	y	Ensuring that Central Valley communities have a sustainable source of drinking water is a goal of the long-term ILRP (see Goal number 4). Coordination with the Department of Public health will be an important goal for any of the long-term program alternatives; therefore, coordination with DPH was specified as an overall program objective (see long-term ILRP Objective 6).
CWA/ CRLAF/ CWF	GW 2	Oppose implementing this alternative through a Basin Plan amendment.	n	Comment noted.
CWA/ CRLAF/ CWF	GW 2	The Central Valley Water Board should approve local groundwater management plans (AB 3030, SB 1938, Integrated Regional Water Management Plans).	y	Alternative GW 2 has been included as a component of Alternative 2. See edits to the Implementation Mechanism and Lead Entity Responsibility section. The Central Valley Water Board may approve the implementation of local groundwater management plans in place of third-party-developed groundwater quality management plans if the local plan meets the requirements in Attachment D.
CWA/ CRLAF/ CWF	GW 2	Clarify legal relationships between dischargers, groundwater management agency, and the Central Valley Water Board and how enforcement will work.	y	GW 2 has been included as a component of Alternative 2. See edits to the Implementation Mechanism and Lead Entity Responsibility section. Changes included specifying that growers would be required to be a member of a Central Valley Water Board-approved third-party group. This section also specifies third-party responsibilities and requirements.
CWA/ CRLAF/ CWF	GW 2	It is unclear whether a local groundwater management agency has authority to require management practices.	n	Comment noted.
CWA/ CRLAF/ CWF	GW 3(a)	It is unclear whether and under what circumstance the Board would require pesticide monitoring and control measures in excess of DPR's program. Clarify.	y	This alternative is now a part of Alternative 4. Changes were made to include requirements for developing pesticide management practices under high threat circumstances (see Regulatory Requirements section, Additional Requirements-Tier 3 Operations). Also, regional monitoring is specified for constituents of concern. Where a particular pesticide is a concern, monitoring may be required.
CWA/ CRLAF/ CWF	GW 3(a)	Should include statistically significant site reviews to ensure that practices to protect groundwater are continued.	y	Alternatives GW 3(a) and 3(b) have been merged and included as the groundwater component of Alternative 4. Alternative 4 includes a requirement for Central Valley Water Board-conducted site reviews. The exact frequency of site reviews has not been specified at this time.
CWA/ CRLAF/ CWF	GW 3(b)	Nutrient management plans (NMPs) should be signed by a nutrient specialist from UC Extension, National Resource Conservation Service, or another source that does not have a conflict of interest in selling fertilizers.	n	Note that the tiered groundwater alternatives [GW 3(a) and (b)] have been combined into Alternative 4. Alternative 4 includes a requirement for certification of NMPs; however, the certification requirement does not specify that the agent may not be associated with fertilizer sales. The NMP certification requirements (American Society of Agronomy and NRCS), along with Central Valley Water Board inspection and review of a select number of NMPs, would ensure that NMPs protect surface and groundwater quality.
CWA/ CRLAF/ CWF	SW 2	Include mandatory data reporting for monitoring results, fertilizer use, pesticide use, and irrigation practices.	n	This type of data reporting is included in Alternatives 4 and 5. Alternative SW 2 is now a "low threat" component under Alternative 2 that does not specify this level of reporting, although there is a requirement to report management practices and conduct water quality monitoring. The inclusion of mandatory data reporting for monitoring results, fertilizer use, pesticide use, and irrigation practices in Alternatives 4 and 5 will insure that the concept is evaluated in the EIR, economics, and policy analyses for comparison against Alternatives that do not contain this level of monitoring and reporting.
CWA/ CRLAF/ CWF	SW 2	Clarify whether this alternative applies to surface and/or groundwater.	y	Alternative SW 2 is now included as a "low threat" surface water component of Alternative 2. Alternative 2 also has a groundwater component.
CWA/ CRLAF/ CWF	SW 2	Under General Central Valley Water Board Role and Responsibilities, change "Seeking 100% ILRP representation" to "Enforce full compliance."	y	This requirement was changed in every alternative to: "Require 100% ILRP participation." Also each alternative includes the Central Valley Water Board responsibility to "[e]nforce ILRP requirements."
CWA/ CRLAF/ CWF	SW 2	ILRP eligibility requirements are specified in "Regulatory Requirements," it would be helpful to specify the eligibility requirements.	y	Alternative SW 2 is now included as a "low-threat" surface water component of Alternative 2. The eligibility/regulatory requirements are specified as bullets 1-4 under the Regulatory Requirements section of Alternative 2.
CWA/ CRLAF/ CWF	SW 2	Alternative SW 2 needs a feedback mechanism for problem identification and program adaptation.	y	Alternative SW 2 is now included as an optional "low-threat" surface water component of Alternative 2. Monitoring under this alternative includes reduced water quality monitoring (1 year monitoring out of 5 years), and a verification program for management objectives. See the Monitoring Provisions section of Alternative 2.
CWA/ CRLAF/ CWF	SW 3	Without monitoring, this alternative is less restrictive than the "no project" alternative and should not be included.	n	Alternative 3 does require monitoring. This monitoring would be grower evaluation of offsite discharge and effectiveness of management practices (e.g., inspection of erosion control measures, visual inspection of discharge turbidity). The alternative also includes Central Valley Water Board site inspections as another feedback mechanism. While chemical water quality monitoring is not included, the inspection and evaluation, coupled with the enforceability of working directly with the growers, makes it very difficult to say whether this program is more or less restrictive than the current program (no project alternative). This alternative is very similar to the Water Board's Stormwater Program, and should be evaluated.
CWA/ CRLAF/ CWF	SW 3	Clarify whether program applies to surface and/or groundwater.	y	This alternative, now Alternative 3, has been edited to clarify that it applies to both surface and groundwater.
CWA/ CRLAF/ CWF	SW 3	Clarify whether this alternative is meant to work alone or with another alternative.	y	This alternative, now Alternative 3, has been edited to clarify that it can be a 'stand-alone' alternative (see Alternative 3 introduction).
CWA/ CRLAF/ CWF	SW/GW 4(a)	This alternative should include groundwater monitoring by agricultural operations.	y	The tiered groundwater alternatives [GW 3(a) and 3(b)] have been combined with SW/GW 4(a), and are now Alternative 4. Alternative 4 includes regional and farm-based groundwater monitoring.

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CWA/ CRLAF/ CWF	SW/GW 4(b)	Support this alternative.	n	Comment noted.
Ei Dorado	Goals	Clarify that the program applies only to water districts that receive tailwater or discharges from irrigated agriculture.	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.
Ei Dorado	Goals	First goal: Change "restore and maintain" to restore and/or maintain.	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.
Ei Dorado	Goals	Define incentives.	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.
Ei Dorado	GW 3(a)	How would site-specific evaluations be conducted for Tier 1?	y	See Additional Requirements-Tier 1 Operations Only, under the Regulatory Requirements section of Alternative 4.
Ei Dorado	GW 3(b)	Specific edits, pages 23 and 25, lines 25 and 6, respectively. Commenter does not support limiting nutrient application rates. Also, the specified numbers do not consider loss to the atmosphere. Too many variables affect the ability of a crop to take up nitrogen, including the presence of critical trace elements and micronutrients. Approach would not work to reduce nitrogen losses to either groundwater or surface water.	y	Specific limits on nutrient applications have been removed from this alternative, now Alternative 4. Nutrient use is still considered in the tiering system, but higher application rates would only be used as a trigger for the development of a nutrient management plan and additional monitoring, not as a limitation. Essentially, under the "lower-threat" tier, growers would have "fertilizer application rates that are not expected to result in nitrogen exceedances in a groundwater basin."
Ei Dorado	Program	Production area needs to be defined with respect to whether water quality management plans need to be defined for each parcel.	n	Farm water quality management plans would be developed on the "farm level" to minimize discharge of waste from irrigated agricultural operations to surface and groundwater. The plan would not be specific to the number of fields. The plan would be specific to the discharges associated with irrigated agricultural operations in a grower's fields. See Attachment F of the draft alternatives document.
Ei Dorado	Program	Who would be ultimately responsible on leased parcels?	n	The owner and the leasee would be responsible. This will be specified in any waiver or waste discharge requirements.
Ei Dorado	Program	Program alternatives should address changes in third-party entities over time.	y	Specific informational requirements for third-party transparency and management structure have been added to Alternative 2 (see bullets 2-4 in the Implementation Mechanisms and Lead Entity Responsibilities section).
Ei Dorado	Program	The groundwater portion of the alternatives needs to be defined (e.g., do they apply to the entire Central Valley Water Board area or identified basins). The Nitrate Hazard Index does not have all soil types.	y	The Nitrate Hazard Index is no longer used in the tiered groundwater alternative (now Alternative 4). The Nitrate Hazard Index would be a useful tool, but at this time it does not contain all soil or crop types seen across the Central Valley Region. The groundwater portion of each alternative would apply throughout the Central Valley Region; however, implementation of the requirements may be significantly different due to local conditions (i.e., certain management practices may be necessary only under specific local conditions).
Ei Dorado	SW 3	How is this option different from the Stormwater Program or other programs in which a discharger would work directly with the Board?	n	This alternative, now Alternative 3, is similar to the Stormwater Program. One of the main differences is that Alternative 3 would require the Central Valley Water Board to review and approve farm water quality management plans, while management plans are not individually approved under the Stormwater Program.
Ei Dorado	SW 3	Specific edits, page 11, line 38, replace "operations" with "irrigated production area(s)"	y	This alternative, now Alternative 3, was edited as suggested (see bullet 3 of the General Central Valley Water Board Role and Responsibilities section).
Ei Dorado	SW/GW 1	Define irrigation districts consistently throughout document.	y	The Goals and Objectives section of the draft alternatives document was revised to include a definition for irrigation districts that would apply for all alternatives.
Ei Dorado	SW/GW 1	The monitoring table does not reflect cases where reduced monitoring has been approved.	y	A footnote has been added to the Monitoring section of this alternative, now Alternative 1, to clarify that there is flexibility to reduce monitoring.
Ei Dorado	SW/GW 4(a)	Specific edits, page 14, line 7; add "or appropriate representative" since Executive Officer will not be making site visits.	y	This requirement in the alternative, now Alternative 4, has been changed to be less specific. The Central Valley Water Board was referenced instead of specifically the Executive Officer. If this alternative were selected, the regulatory mechanism adopted would specify the agent within the Central Valley Water Board designated as responsible for site review and information requests.
Ei Dorado	SW/GW 4(a)	Specific edits, page 14, lines 6-7. Clarify whether plans will be submitted by mail, or checked onsite.	y	Bullet 2 in the Regulatory Requirements of this alternative, now Alternative 4, has been clarified to indicate that farm water quality management plans will be kept onsite and submitted to the Central Valley Water Board upon request.
Ei Dorado	SW/GW 4(a)	Specific edits, page 14, line 19. The current program requires two exceedances within three years to trigger a management plan. Requiring grower response to "any" exceedance would greatly increase the burden.	y	This specific requirement is not included in the revised alternative, Alternative 4.
Ei Dorado	SW/GW 4(b)	Specific edits, page 16, line 25. define "certified."	y	Bullet 4 of the Regulatory Requirements section of this alternative, now Alternative 5, has been changed to include a definition for a "certified crop specialist."
Ei Dorado	SW/GW 4(b)	Include proposed frequency of monitoring.	y	The Monitoring section for this alternative (Alternative 5) has been modified to include frequencies for monitoring.
Ei Dorado	SW/GW 4(b)	Specific edits, page 17, line 7. How is this requirement applied to permanent planting when only a portion of the plant is removed at harvest?	y	This requirement was removed from the Monitoring section of this alternative (Alternative 5), because it would not apply to permanent crops.
Ei Dorado	SW/GW 4(b)	Specific edits, page 17, line 16; what is the threshold requirement for the request to install a monitoring well?	y	Monitoring Provision 3(b) of Alternative 5 provides additional information on determining where monitoring well installation will be required. The factors considered are similar to those that have been adopted under the Central Valley Water Board's Dairy Program.

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EI Dorado	SW/GW 4(b)	Specific edits, page 16, line 9. Clarify what is necessary under a water quality management plan.	y	Requirements for water quality management plans (or farm water quality management plans), have been clarified and are included as Attachment F of the draft long-term ILRP alternatives document.
EI Dorado	SW/GW 4(b)	Specific edits, page 16, line 33. Clarify that the Central Valley Water Board Executive Officer does not regulate pesticide use in the State.	y	This requirement has been modified to state, "Develop and implement management practices to minimize the potential discharge of pesticides to surface water and groundwater." The Central Valley Water Board regulates the waste discharge to state waters, not the use of pesticides.
EPA	Coalition Groundwater	Groundwater supply must be considered in this alternative because quality and quantity are connected.	n	Groundwater supply cannot be considered in any alternative for the Long-Term Irrigated Lands Regulatory Program (ILRP) because the Central Valley Water Board does not have the authority to regulate groundwater supply.
EPA	Goals	Include promoting adaptive watershed management monitoring, assessment, and effectiveness of water quality management practices.	n	This type of management is required by the State Water Resources Control Board's <i>Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program</i> (NPS Policy) (see Key Elements 2 and 4). All alternatives must meet these requirements to be considered in the EIR (see the Alternatives Screening Section of the Draft Long-Term ILRP alternatives document). In essence, this is not a goal, but a statutory requirement that must be met.
EPA	Goals	Provide flexibility to address differences in crop types, geography, etc.	n	This flexibility is required in order to meet the first two long-term program objectives. These objectives establish that beneficial uses be restored and/or maintained and that management practices be implemented without jeopardizing economic viability of irrigated agriculture. All of the alternatives include the development of management plans/practices to protect water quality. Development of these management plans and practices are expected to consider local conditions (e.g., crop types, geography, geology, water quality concerns).
EPA	Goals	Expand program coordination with other entities associated with agriculture (NRCS, USDA, Farm Bill).	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.
EPA	Goals	More clarity is needed on "structural and organizational" requirements for third-party groups.	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document (language was removed).
EPA	Goals	Be more explicit about protecting drinking water and public health.	y	See edits to Goals and Objectives section of the Draft Long-Term ILRP alternatives document.
EPA	Monitoring	Monitoring management practice implementation must be more than "tracking" implementation. Ambient monitoring must be included to inform whether the practices are effective.	y	All alternatives, except for Alternative 3, would require ambient water quality monitoring. While Alternative 3 would not specifically require ambient monitoring, it would require Central Valley Water Board approval of management plans, inspection, and monitoring for parameters such as discharge turbidity, erosion, and other visual parameters.
EPA	Monitoring	Monitoring must be coordinated with other programs (TMDL).	y	Coordination with other programs has been included as a specific program objective (see the Goals and Objectives section of the draft long-term ILRP alternatives document).
EPA	Program	Nexus between surface and groundwater must be recognized.	n	This nexus was recognized in the Existing Conditions Report, and will be considered when evaluating potential impacts in the EIR (e.g., management practices that protect surface water, but may impact groundwater). Also, under Alternatives 2-5, when developing management practice plans, third-party groups, growers, and the Central Valley Water Board will need to ensure that recommended management practices do not cause unintended impacts to ground or surface waters.
EPA	Program	Each alternative must be analyzed with respect to intended accomplishments and total cost.	y	This will be done during the EIR process and associated economics and policy analyses to determine a staff-recommended alternative (see changes to the CEQA Requirements and Alternatives Screening sections of the Draft Long-Term ILRP alternatives document).
EPA	Program	Consider coordination with TMDLs and Stormwater Programs.	y	Coordination with other programs has been included as a specific program objective (see the Goals and Objectives section of the Draft Long-Term ILRP alternatives document).
EPA	Program	Consider a tiered program for surface water.	y	The tiered groundwater alternatives [GW 3(a) and 3(b)] have been combined with SW/GW 4(a), and are now Alternative 4. Alternative 4 contains a tiered approach for regulating discharge of waste from irrigated agriculture to surface and groundwater.
EPA	SW/GW 4(a)	Support, but should be watershed based.	y	This alternative, now Alternative 4, is both a surface and groundwater alternative. A watershed-based approach would be ideal for the surface water component, but not for the groundwater component. Alternative 4 contains a threat-based system for surface and groundwater, with the management units for surface water at the watershed and subwatershed levels. This will allow for a watershed-based approach, even if the program administration is on another level.
Southern San Joaquin Water Quality Coalition	Program	Support developing general waste discharge requirements for the Southern San Joaquin Valley Water Quality Coalition.	y	Comment noted. Flexibility in implementation mechanism has been maintained for all of the alternatives.
Southern San Joaquin Water Quality Coalition	Program	Supports current program plus the Coalition's proposed groundwater program with the option for local groundwater management plans (AB 3030, SB 1938, Integrated Regional Water Quality Management Plans) to be substituted for Coalition-developed management plans.	y	Comment noted. Alternative 2 contains the commenter's supported elements.