

# Coachella Valley Irrigated Lands Coalition, Inc

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PO Box 645, Indio, California 92202

April 22, 2019

Ms. Paula Rasmussen  
Executive Officer  
CRB-RWQCB  
73-720 Fred Waring Dr., Ste. 100  
Palm Desert, CA 92280

Re: **Short Term Renewal of Order R7-2014-0046**  
E-mail Only Today

Ms. Rasmussen,

Thank you for the opportunity to review and respond to your recent Draft Short Term Renewal Order R7-2014-0046. We agree with your Proposed Short Term Renewal and support it as a means to allow time to address the many questions as a result of the proposed Palo Verde General Order. Renewing the existing Conditional Waiver is a prudent approach to allow resolution of current legal challenges to the precedential East San Joaquin Valley General Order. Per your Item 6., 2<sup>nd</sup> sentence, The State Water Quality Control Board (SWQCB) “...*specifically directs regional water boards to revise their irrigated lands regulatory programs within five years.....*”. According to this edict by SWRCB, it is my understanding CRRWQCB has 5 years to comply with this direction.

For the above reasons and salient points detailed below, we respectfully request the Renewal be granted to CVILC for **5 years, until June 26, 2024**:

- CVILC has cooperated with the Regional Water Quality Control Board (RWQCB) Staff at all times during the past five years.
- CVILC has provided our membership list every year on a timely basis.
- Monitoring results over the last five years indicate agricultural discharges from the Coachella Valley are not a significant contributor of pesticides to CVSWC or drains..
- CVILC was led to believe by the previous Executive Officer and his Assistant, excellent results for over 58 months could mean no need for additional monitoring.
- CVILC Monthly and Annual Reports have been submitted on a timely basis.
- All payments to State have been on timely basis.
- CVILC Annual Payments to RWQCB have increased from 75¢/acre to 95¢/acre (27% increase) with no additional benefits or explanation from RWQCB?

- In a spirit of cooperation, CVILC provided a short list of landowners who 'may' be in Non-Compliance Violation.
- RWQCB has not had Staff available to issue Non-Compliance Violation Notices to support CVILC's efforts. It is unclear how the RWQCB proposes to enforce a General Order significantly more complex with several additional monitoring and reporting requirements.

I do not know of any other Basin or agricultural area as unique as the Coachella Valley. We are totally unique from the San Joaquin Valley, Santa Maria and Salinas Valleys. We are very different in both water application and groundwater management from anywhere in California. Regional Water Quality Control Boards were set up for different Regions for a reason. The basis for most of the "precedential" requirements from the East San Joaquin Valley do not pertain or have any consequence in the Coachella Valley

Thank you again for the opportunity to comment on the Draft Short Term Renewal of Order R7-2014-0046 for the Coachella Valley.

Respectfully,

**COACHELLA VALLEY IRRIGATED LANDS COALITION**



Ben R. Olson  
President

Cc: Jennie Snyder  
Nadim Shukry-Zewar  
Lorrie Cooper