

## Cherie Blatt - public review statements for the Conditional Waiver of WDR Order No. 2012-0003

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**To:** Cherie Blatt <CBlatt@waterboards.ca.gov>  
**Date:** 12/5/2011 10:18 AM  
**Subject:** public review statements for the Conditional Waiver of WDR Order No. 2012-0003

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Hi Cherie,

Here are my questions reformatted for the public review. Is there a forum to log on to see comments throughout the day? I tried to contact some of the dairy farmers up in this area so that they would add in their input too.

1. Regarding the Conditional Waiver of WDR Order No. 2012-0003 Appendix 1 (Water Quality Requirements) Sections B & D: There is no published data for 20 and 25-year storm data and peak stream flow for this area. There should be available data through the Regional Water Board or another agency for dairy operators to comply with this data requirement.
2. Regarding the Conditional Waiver of WDR Order No. 2012-0003 Monitoring and Reporting Program Section II A 1: Please define the purpose of cleaning the ponds. Hiring an excavator to clean out the last remaining sludge every year is much more costly than only pumping out the liquids to a certain percentage of holding capacity. If the purpose is only to regain storage area every year, then cleaning out the remaining sludge should be required at a longer duration, especially since some dairy producers use a separator to keep the majority of solids off the bottom. Perhaps cleaning out the bottom sludge should only be mandated when a certain percentage of the pond's holding capacity is diminished, and only the draining of the liquids an annual event.
3. Regarding the Conditional Waiver of WDR Order No. 2012-0003 Appendix 2 Nutrient Management Plan (NMP) Section A: It states that the NMP must be developed by the Dischargers with the assistance of certain specialists such as a Soil Scientist, Agronomist, and Crop Specialist. Would you define the qualifications for these titles? There should be a degree associated with these titles, or should state to be a Certified Professional Soils Scientist, Certified Professional Agronomist, or Certified Professional Crop Specialist. This section also mentions that a Technical Service Provider be employed at the Natural Resources Conservation Service (NRCS). Since the NRCS is training professionals from the private sector to be a TSP, I petition that this be restated to NRCS *trained and certified* TSPs be eligible to assist in the NMP in all sections of the Orders No. 2012-0001, 2012-0002, and 2012-0003.

Thank your for your help!

Cindy Wilcox

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