

SOTOYOME



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CONSERVATION DISTRICT

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December 5, 2011

Geoffrey Hales, Chair

North Coast Regional Water Quality Control Board

5550 Skylane Boulevard, Suite A

Santa Rosa, CA 95403

Re: Order No. R1-2012-0002 and Order No. R1-2012-0003

Dear Mr. Hales,

The Sotoyome Resource Conservation District (RCD) has been working with dairies in Sonoma County since the mid-1990's to implement voluntary management practices that protect water quality. RCD representatives have met with Regional Board staff, local dairy producers, and other stakeholders throughout the development of these General Waste Discharge Requirements and the Conditional Waiver of Waste Discharge Requirements. After reviewing the draft permit language, we submit the following comments for your consideration:

*Orders No. R1-2012-0002 and -0003, Attachment C, Definitions*

Nutrient Management Plan definition is inconsistent with Appendix 2, Nutrient Management Plan. Definition indicates that "NMPs must be prepared and signed by a specialist who is certified in developing nutrient management plans," while Appendix 2 states that NMPs must be developed with assistance of specialists, but does not indicate that specialists are required to be certified. Due to the limited availability of professionals that are certified in nutrient management planning, and the abundance and diversity of local knowledge and professional resources, we suggest that the language in the definition is altered to be consistent with the language in Appendix 2.

*Orders No. R1-2012-0002 and -0003, Monitoring and Reporting Program*

Item IB1 - Language requires dairies that are not directly adjacent to waterways to take grab samples upstream and downstream of the areas closest to the property. This requirement may not be feasible for all producers, as access to the waterway in these locations may require passage through private property to which the producer may not have legal access.

Item IB3(f) – "If sample results exceed Basin Plan water quality objectives or public health standards, the Discharger shall note the noncompliance in the Annual Report." Water samples that exceed water quality objectives of standards may not be indicative of permit noncompliance, but rather may be the result of contamination from other sources. Suggested change to language: "If sample

results exceed Basin Plan water quality objectives or public health standards, the Discharger shall note the ~~noncompliance~~ exceedence in the Annual Report.”

We appreciate your consideration of these comments, and look forward to continuing to work with local dairies, stakeholders, and your staff to protect water quality.

Sincerely,

A handwritten signature in cursive script, reading "Kara Heckert".

Kara Heckert, Executive Director  
Sotoyome Resource Conservation District