

**STAFF RESPONSE TO COMMENTS
REGARDING
TENTATIVE COALITION GROUP MRP**

Commenter	Document	Comment	Response to Comment
#1 S. Clark, Pacific EcoRisk 11/28/07 by phone	Tentative QAPP	In the QAPP, specifically, the analytical laboratory must be accredited by the California Department of Health Services for the analytical method performed.	The requirement for accreditation has been added to the Tentative QAPP.
#2. P. Halpin CalTest Analytical Laboratory 11/29/2007 by email at 1240	Tentative QAPP	Request that GC/MS methods (EPA method 625 and 8270) be added to acceptable methods tables for organochlorine pesticides since equivalent reporting limits have been met.	EPA Methods 625 and 8270 have been added to acceptable methods table for organochlorines.
#3a. W.J. Thomas So. San Joaquin Valley Water Quality Coalition 12/12/2007 by email at 1152	Tentative MRP	"There is some confusion over the term of locating monitoring sites based on the site being "probabilistic." It seems like the intention here is to have random site selection and not necessarily require the sites to be at places where there are problems."	With the flexibility that is being made available to Coalitions for their MRP Plan development, there is an option to use a probabilistic approach. It is not a requirement.
#3b.	Tentative MRP	"As stated throughout the Focus Group and TIC meetings, we resist the requirement of 12 monthly monitoring events. We will monitor (as the MRP now requires) for storm water at two storm events and we will monitor irrigation run off during the irrigation delivery season. But we resist monitoring in every month, particularly when there is no waiver purpose for such monitoring. (Pg. 9)" "We remind that the original and everlasting premise of the waiver is to require monitoring but it would <u>not</u> involve two characteristics. One, this would <u>not</u> be considered a scientific, educational survey mission. Secondly, it would <u>not</u> constitute monitoring for enforcement purposes. Instead, it would be representative of monitoring irrigation return flow of the surface water irrigation. Requiring monthly monitoring throughout the entirety of the year goes beyond this purpose and gets into the forbidden zone of monitoring for other purposes or for mere information."	Coalition Groups have the opportunity to provide technical and scientific justification for deviations from the monitoring approach outlined in the Tentative MRP, which must include the capability of answering the five Program Questions identified in the Tentative MRP. MRP Plans must meet the requirements of Water Code section 13269 "to support the development and implementation of the waiver program, including, but not limited to, verifying the adequacy and effectiveness of the waiver's conditions."

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#3c. W.J. Thomas, continued	Tentative MRP	"What is the purpose of requiring E-coli monitoring. There is no basin plan standard for E-coli such that there are no 'exceedances' that are compelled to be reported for E-coli monitoring? (Pg.12)"	Basin Plan Standards include narrative objectives, which are implemented using appropriate numbers from valid studies. In this case, <i>E-coli</i> is evaluated using the USEPA ambient water quality criteria for <i>E-coli</i> of 235 MPN/100 ml. The Coalition has the option to propose instead in their MRP Plan to use the Tulare Lake Basin Plan numeric limit of 200 MPN/100 for fecal coliform and conduct monitoring for that parameter as the indicator of bacteriological contamination.
#3d.	Tentative MRP	"The language under sediment testing is confusing. It indicates that if at a monitoring event there is no sediment available at that site, that folks would shift positions to monitor some other location. Negative results are data. If there happens to be no sediment, quite like if there happens to be no water, that is recorded, and that is data. We do not go all around the coalition area looking for some other place where we may be able to record a "positive" find when the official monitoring site would have a "negative find. (Pg. 16)"	The MRP language had been modified to clarify that if needed, alternative sediment monitoring sites shall be designated for all sediment sampling events. Alternative sites are needed only if the designated water testing site does not contain the appropriate silt-clay size substrate. In order to select a site to test sediment quality, one must select a site where there is sediment. Good sites for water testing do not always have enough sediment to collect for testing. Therefore, when Coalitions designate sites to measure sediment quality in their MRP Plans, they may or may not be the same site chosen for water testing.
#3e.		"It has been our position that bifurcating the year and reporting some partial data twice during the year has taken away from some of the analytical merit in reporting. A single annual report (as originally required) is far preferable over the two semi-annual reports now required.	One Annual Report is proposed in the Tentative MRP.

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#3f.	Tentative MRP	This proposed MRP worsens the situation even further by requiring quarterly reports and an annual report. We recognize that three of the quarterly reports can be somewhat less onerous than the annual report, but there is no real purpose in again increasing the obligation of coalitions to file four separate reports a year."	The quarterly data reports are simple data submittals and require no evaluation or report writing on the part of the Coalition. The intent is to assist Coalitions and the Regional Board in keeping abreast of the data as it is being generated by laboratories.
#3f, cont. W.J. Thomas		The three proposed additional quarterly coalition obligations serve no need, detract from report continuity and needlessly increase expenses, obligations, as well as amount to a deflection of time from doing meaningful water quality work. Moreover, the coalitions never hear back from the staff for months relative to any exceedance report and, certainly, it is more than half a year to hear back on an annual report. Thus, there is no timeliness argument to support these quarterly reports."	Submittal of the quarterly data reports in electronic format will help ensure that Regional Board Staff can respond much more rapidly and reliably to Coalition submittals.
#3g.	Tentative MRP	Presently, exceedance reports are required soon after results are known. Subsequent thereto, communication reports are to be filed. If there are multiple exceedances at the same spot within a fixed period of time monitoring plans are also required. Annual reports, on top of these other three categories of reports, are more than sufficient.	Communication reports are not included in the Tentative MRP. They were removed from the requirements to avoid redundancy. Exceedance reports and Annual reports are included.
#3h.	Working Draft MRP	Mr. Thomas quotes an email from Lloyd Fryer's of Kern County Water Agency, sent 31 October 2007: "It should be stated that the MRP only applies to surface waters of the state. This will avoid a number of ambiguities which would otherwise arise on page 3 of the MRP regarding its scope." "Page 7 suggests this MRP is aimed at characterizing water quality 'all waters of the State within the Coalition Group's boundaries.' The Agency has consistently argued against the agricultural waiver program in a wide-ranging water quality monitoring program. The language should be modified to clearly indicate that the characterization of water quality is <u>only</u> for waters of the State which receive discharges from irrigated lands."	In his email of 31 October 2007, Mr. Fryer was providing comment on a previous working draft version of the MRP. Clarifying language regarding surface waters, and rewording of the Program Questions had already taken place.

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		"Question 1 on page 3 does not make sense. Consider rewriting it as follows: Are beneficial uses in waters of the State within Coalition Group boundaries adequately protected against diminution by discharges of wastes from irrigated agriculture activities?"	
#3i. W.J. Thomas, cont.	Working Draft MRP	Mr. Thomas quotes an email from Lloyd Fryer's of Kern County Water Agency, sent 31 October 2007: "Page 6 specifies that a description of the study area would include nutrients being applied. Because nutrient use for agricultural purposes is generally not regulated there is no reliable method providing this information. Some nutrient uses can be quantified and reported, such as use of sewage sludge for fertilizer, while others cannot. The Central Valley Regional Water Quality Control Board must understand the limitations of available nutrient data. There is no benefit to requiring a task which cannot be performed. It needlessly opens the door to unjustified criticisms."	Nutrient information to be provided by Coalitions in their MRP Plans must be reported when known and described generally. The Regional Board understands the limitations of this information base, and more detailed data will only be expected through the implementation of nutrient-related Management Plans, when necessary.
#3j.	Working Draft MRP	Mr. Thomas quotes an email from Lloyd Fryer's of Kern County Water Agency, sent 31 October 2007: "The concept of assessment monitoring, core monitoring and special project monitoring is financially troubling. These multiple levels of monitoring could take place simultaneously, greatly increasing overall monitoring costs without necessarily generating useful information. For instance, repeating the assessment monitoring every three years may or may not be useful in areas dominated by permanent crops (no change in cropping patterns). The MRP should be modified to provide the Executive Officer, in consultation with individual Coalition Groups, the flexibility for determining the frequency of assessment monitoring."	The tentative MRP allows for flexibility as long as program questions are being addressed, although Coalitions must present technical and scientific rationale to the Regional Board in the MRP Plan and obtain approval for variations to the design details. These changes could include site-specific changes to required frequency of monitoring. However, even in areas where crops are permanent, agricultural practices can change – such as use of different pesticides and/or application amounts and timing. These types of factors would need to be taken into consideration.

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#4a. Lloyd Fryer Kern County Water Agency 12/19/2007 by letter	Working Draft MRP	"The Agency still feels it is appropriate and necessary for the MRP to state that the working draft MRP only applies to surface waters of the state. This will avoid a number of ambiguities which would otherwise arise throughout the working draft MRP regarding its scope. The Regional Water Quality Control Board (Regional Board) has not yet responded to previous comments from the So. San Joaquin Water Quality Coalition on this matter. The Regional Board may prefer to be silent on this matter because it has in mind its interest in extending the irrigated lands program to groundwater. The draft MRP now being considered, however, is <u>not</u> intended to apply to groundwater in any way. Therefore, there is no compelling reason for the current draft MRP to not state its intent to only apply to surface water. In fact, the conditional waiver program R5-2006-0053 states, 'The Conditional Waiver applies to discharges of waste from irrigated lands to <u>surface</u> waters of the State.' [Emphasis added.]" "A related concern is the draft MRP's requirement to characterize water quality on 'all waters of the State within the Coalition Group's boundaries.'" The Agency is concerned that such a requirement is beyond the authority of the Regional Board..."	Mr. Fryer was providing comment on the incorrect document – a working draft and not the Tentative MRP. The language that had been added includes surface water specification as well as other clarifications.
#4b.	Working Draft MRP	"Monthly sampling of assessment monitoring sites is still referenced in the draft MRP, with at least two storm events annually per site. The Agency has previously stated that there is no practical way to guarantee this in Kern County because of the lack of rainfall. Another very troubling aspect of this draft requirement is the fact that it [is] not scientifically based. The vast majority of crops grown in the Central Valley are not irrigated year-round. The scientific value which would accrue to the irrigated lands program by monitoring water quality during parts of the year when no irrigation or storm runoff is occurring is not apparent. Since its inception, the irrigated lands program has focused on monitoring runoff from agricultural lands into surface waters of the state, where downstream beneficial uses are impacted by the runoff. To now require	Mr. Fryer was providing comment on the incorrect document – a working draft and not the Tentative MRP. The tentative MRP language had been changed to say "attempt to capture" in recognition of the difficulties of this approach in Kern County.

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		monthly monitoring, even when there is no possibility of runoff occurring, smacks of requiring monitoring for monitoring's sake. This is an unnecessary, impractical and expensive data collection program for purposes other than the irrigated lands program."	
#4c. L. Fryer, cont.	Working Draft MRP	"The draft MRP continues to require that a description of the study area would include nutrients being applied. Because nutrient use for agricultural purposes is generally not regulated there is no reliable method of providing this information. Some nutrient uses can be quantified and reported, such as use of sewage sludge for fertilizer, while others cannot. If the Regional Board adopts this requirement in the new MRP, the Agency will be unable to comply because of the lack of information. Unlike pesticide use, nutrient use is not compiled by the county agricultural commissioners or anyone else. The only way to generate the information is to contact each and every farmer in the So. San Joaquin Water Quality Coalition. The Agency is unable to dedicate sufficient staff resources to such a task. Besides the tremendous work entailed, it is not at all clear how this information would help the Regional Board characterize water quality." "The Agency suggests that draft MRP drop the requirement for reporting nutrients being applied in favor of a simple statement that the description of the study area should <u>characterize</u> nutrient applications from animal sources. The Regional Board already has nutrient information from dairies and the county agricultural commissioners typically report the number of head of livestock and poultry. Kern County's agricultural commissioner also reports tons of animal manure generated. This information is relatively simple to gather and is acceptable to the Agency."	Nutrient information to be provided by Coalitions in their MRP Plans must be reported when known and described generally. The Regional Board understands the limitations of this information base, and more detailed data will only be expected through the implementation of nutrient-related Management Plans that become necessary because of nutrient-related exceedances.

Commenter	Document	Comment	Response to Comment
#4d. L. Fryer, cont.	Working Draft MRP	"The concept of assessment monitoring, core monitoring and special project monitoring continues to be a problem for the Agency. These multiple levels of monitoring could take place simultaneously, greatly increasing overall monitoring costs without necessarily generating useful information. For instance, repeating the assessment monitoring every three years may or may not be useful in areas dominated by permanent crops (no change in cropping patterns). The working draft MRP should be modified to provide Coalition Groups with flexibility in determining the frequency of assessment monitoring. The history of monitoring data already collected can serve as an excellent reference in determining frequency. For the Kern River sub basin, which has experienced only a few exceedences of short duration and has only limited opportunities for discharges to impact beneficial uses, multiple levels of monitoring is of little practical or scientific value."	The monitoring design details will be worked out in the MRP Plan development, pending appropriate technical and scientific justification. It should be noted, however, that the two different types of monitoring – Assessment and Core will not take place at the same monitoring site simultaneously. Special Project monitoring may, or may not, override the Assessment and Core regimens identified in the Coalition Group MRP Plan, depending on the Coalitions' approved Management Plan design.
#4e.	Working Draft MRP	"Current language in the working draft MRP requires, if no sediment is available at the monitoring site, the water quality coalitions would need to take a sediment sample at some other location where sufficient sediment was available for sampling. The Agency wishes to point out that this requirement is unnecessary. The working draft MRP requires the water quality coalitions to update their existing MRPs. As part of that effort, monitoring sites will require justification. If a Coalition Group recommends a monitoring site where no sediment is available (i.e., in a lined section of canal), the Regional Board already has authority to disallow the site. Once monitoring stations are agreed to by the Regional Board, it is scientifically unwise to uncouple water column sampling sites from sediment sampling sites. Under the existing irrigated lands program, if a water column sampling site is dry, Coalition Groups are not required to move somewhere else to find enough water sample; there may be no relationship between the established sample site and the alternative site. It likewise makes no sense to require such for sediment sampling. In fact, lack of water or sediment for sampling is a	What may be a good site to test for water quality may not be a good site to test for sediment quality. The design details will be worked out in the MRP Plan development, including appropriate locations for sediment toxicity monitoring.

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		significant datum which should be respected by the Regional Board."	
#4f. L. Fryer, cont.	Working Draft MRP	"The working draft MRP requires an annual report and three original quarterly reports. The existing irrigated lands program requires semi-annual reports. The Agency may have difficulty dedicating sufficient staff resources to produce two additional reports per year. The Agency recommends the recommendation for an annual report be retained, but the quarterly reports are simple data dumps without analysis. From a practical perspective, when the Coalition Groups submit reports currently it may take many months before your staff provides comments."	An Annual Report is proposed in the tentative MRP. In fact, the Tentative MRP quarterly requirement for data are essentially simple data dumps, as Mr. Fryer recommends, and no evaluation on the part of the Coalition, other than at the Annual Report, is required.
#5a. J. Atherstone, South San Joaquin Irrigation District 12/27/2007 by email at 1357	Tentative MRP	"There is no rational way to track nutrients being used in a watershed; natural manures, fertilizers, etc.....are not reported to any organization from which this information can be obtained. The rational[e] to obtain this information is not practical; the staff time for the Coalition to try to obtain any portion of this information would be better spent on other requirements of the proposed Monitoring & Reporting Program (MRP)"	Nutrient information to be provided by Coalitions in their MRP Plans must be reported when known and described generally. The Regional Board understands the limitations of this information base, and more detailed data will only be expected through the implementation of nutrient-related Management Plans that become necessary because of nutrient-related exceedances.
#5b.	Tentative MRP	"The second point relates to Page 9; Table II.A, Assessment Monitoring Schedule. ...Monthly monitoring year round will be excessive. Some Irrigated Lands are only irrigated for three to four months out of the year while some Irrigation Districts may be able to supply water for irrigation eight months out of twelve. In the off months there is no water available, thus no runoff, until the rains come at which time the Coalition Groups would proceed with Storm Water monitoring events. Each Coalition knows when there is irrigation water available for their watersheds and should be given the opportunity to schedule monthly monitoring during those months of the year. In order to have an effective program there must be some flexibility and rational[e] behind the monitoring strategy."	The monitoring plan design details regarding monitoring frequency as it relates to frequency of crop irrigation pre-planting irrigation, and winter time management practices will be worked out in the Coalitions' MRP Plan development, utilizing appropriate technical and scientific facts. Coalition Groups have the opportunity to provide justification for some variations in a monitoring approach, which must include the capability of answering the five Program Questions identified in the Tentative MRP.
#5c.	Tentative MRP	"For Storm Water Monitoring there is a definite probability that a false positive will occur during a first flush Storm Water event. This event is a cleansing sweep of water that picks up everything that has accumulated from industrial air	The first flush is important precisely because there is a higher likelihood of adverse water quality impacts. Whether the problem is related to agricultural practices or not is a

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		particles, urban influence, and any number of other sources not related to agriculture. This program should be designed to represent Agricultural Drainage and as such the First Flush Rain Event should not be included in this program."	separate question, but it does not eliminate the need for obtaining storm samples.
#5d. J. Atherstone, cont.	Tentative MRP	"On page 10 it states 'If monthly sampling does not, or is not expected to represent at least two storm events per year, then the Coalition Group shall identify and implement a logistically feasible approach in the MRP Plan to attempt to capture at least two storm events annually per site.' This is not a reasonable request for many watersheds in the Coalition areas. As mentioned before, the 'First Flush Storm Event' [is] not a realistic representation of natural Agricultural drainage in any watershed. The lower San Joaquin Valley may only have one storm water event that meets the parameters (definition) of a true 'Storm Water Event'. In this situation there would not be a second Storm Water Monitoring Event to meet the requirements of the proposed MRP."	The Regional Board would not expect to see a storm monitoring event take place if there is no storm. A practical example occurred in 2007, when the very low rainfall in California made it impossible for some Coalitions to achieve the two-storm event monitoring requirement. This was not considered to be a failure to comply.
#5e.	Tentative MRP	"Our third point concerns the constituents on page 14; Molybdenum (total) has no standard for Agricultural use? It would be irresponsible to use this element as an indicator for Nutrients or Fertilizers because it is not used in all fertilizers but it is found in several ground water basins. Is there a good reason to include this in the MRP?"	Molybdenum is a nutrient that is applied to certain crops such as alfalfa and melons. It is also a metal for which health advisory limits have been identified. There is at least one water body in the Central Valley that is CWA 303(d) listed for Molybdenum. However, the tentative MRP allows for flexibility as long as the Coalition Group can justify why the requirement is not appropriate at a particular location.
#5f.	Tentative MRP	"Is there a Standard for TOC, Selenium (total), or copper? Are these reported for reference only, not exceedences? Splitting out three; Nitrate plus Nitrite as Nitrogen, Total Ammonia, and Unionized Ammonia (as a calculated value), are completely different than 'Total N'. Why is this extra expense necessary? We would also note that pH and DO should not be subject to exceedences, they should be reported for reference only."	There are numeric water quality standards for selenium, copper, and for nitrate, nitrite, nitrate plus nitrite, pH and DO. TOC is an indicator of drinking water quality. TOC also is a precursor to disinfection by-products (trihalomethanes). There are recommended criteria from EPA to protect aquatic life from ammonia. The ammonia criteria vary with pH and temperature, so it is important to monitor ammonia, pH and temperature simultaneously. Copper criteria to protect aquatic life also varies with pH.

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			Additionally, there are big differences in health effects and toxicity for the different oxidation states of nitrogen such as nitrate, nitrite, and ammonia, and the difference in these oxidation states can explain different results for certain toxicity tests. Unionized ammonia reporting is a simple calculation and does not require additional expense.
#5g. J. Atherstone, cont.	Tentative MRP	"Our fourth point concerns Tentative Attachment B, Definitions; '73. Receiving Waters -- Surface waters that receive or have the potential to receive discharges from irrigated lands.' This program should reflect true Agricultural Drainage. Monitoring should be restricted to those waters that do receive Agricultural Drainage. Not include any waters that might have the potential to receive agricultural drainage. This definition does not reflect the MRP for Ag Discharges from Irrigated Lands."	The Conditional Waiver defines "receiving waters" as "Surface waters that receive or have the potential to receive discharges of waste from irrigated lands." The MRP definitions must be consistent. Where runoff to a waterbody has the potential to occur, monitoring may be necessary to ensure that the receiving water is adequately protected. However, since monitoring locations will be selected based on their ability to provide representative information about water quality impacts, monitoring in water bodies that do not receive any agricultural discharges is unlikely to occur.
#5h.	Tentative MRP	Tentative Attachment B, Definitions; "'95. Waters of the State -- As defined in Water Code Section 13050. Any surface water or groundwater, including saline waters, within the boundaries of the State.' We object to the inclusion of groundwater into this program."	Clarifying language has been added to this definition on Attachment B as a result of this comment.
#5i.	Tentative MRP	"The last point is in reference to the use of any reference to any 303D listed water bodies in this MRP. The original Ag Waiver, Discharges from Irrigated Lands Program, did not reference the 303d listed water bodies and this is a continuation of the original Ag Waiver. Adding any 303d listed water bodies to this program is unethical."	The Regional Water Board has a primary responsibility to preserve, protect and enhance water quality for waters of the State. Attachment B to the Conditional Waiver requires compliance with TMDLs and implementation plans; and requires compliance with standards and protection of beneficial uses. If a water body is on the CWA 303(d) list, it is an impaired water body and attention should be paid to that. It should also be noted that CWA 303(d) listed water bodies are also referenced in the Conditional Waiver, Finding 5, and in the existing Coalition Group MRP Order No. R5-2005-0833.

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#6a. C.C. Scheuring, Managing Counsel, California Farm Bureau Federation 12/27/2007 by email at 1535	Tentative MRP	"With regard to the 'tributary statement,' the Regional Water Board has previously stated that it does not intend to not use the tributary statement to determine beneficial uses for constructed agricultural drains and other non-stream tributaries. However, Farm Bureau finds little comfort in this position considering the Regional Board's narrow interpretation of what constitutes a constructed agricultural drain. (See Regional Board Resolution No. R5-2005-0137 Information Sheet.) It is our understanding that the Regional Water Board limits its definition of what constitutes a 'constructed agricultural drain' to a 'main-made agricultural drainage facility designed for drainage purposes' and does not consider modified stream corridors as being 'constructed agricultural drains.'...Farm Bureau is fundamentally opposed to the Regional Water Board's interpretations and application [of] the 'tributary statement' as it most certainly will result in massive burdens being foisted on its members as implementation of the Irrigated Lands Program continues to expand."	The MRP and supporting documents do not interpret or modify the tributary statement. This comment appears to be addressed to the Basin Plans or the Conditional Waiver, and not the MRP. Appropriate monitoring sites will be selected with the development of each MRP Plan, and it is not anticipated that Coalitions will select constructed agricultural drains as part of their monitoring design. The commenter is correct that modified stream corridors are not considered constructed agricultural drains. The basin plan would need to be amended to designate uses other than the uses assigned by the tributary statement. The rationale for a basin plan amendment would need to be based on the factors described in the federal Use Attainability Analysis process.
#6b. C.C. Scheuring, cont.	Tentative MRP	"Also, Farm Bureau disagrees with the Regional Boards refusal to apply the agricultural exceptions that are part of Resolution 88-63 without a formal Basin Plan amendment. Because of this interpretation, thousands of miles of agriculturally dominated waterways are considered to be potential sources of municipal and domestic drinking water (i.e. MUN)." "Second, the designation of beneficial uses drives the application of water quality objectives to the water bodies in question...To the extent that inappropriate beneficial use designations trigger the improper application of limits and water quality objectives, the Coalition Groups are required to expend time and resources on preparing and implementing Management Plans that may not be appropriate."	State Water Board Resolution 88-63 required that the Regional Boards add it to their Basin Plans. The manner in which Resolution 88-63 was added to the Central Valley Region's Basin Plans formally designated MUN for all waters not specifically listed in the beneficial use tables. Once a beneficial use has been designated for a water body, a formal Basin Plan amendment is needed to remove or modify it. The exceptions in 88-63 can be used to justify removal of MUN from a water body that meets the language of the exception.

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#7a. H. George, County Director, Livestock & Natural Resources Advisor Plumas- Sierra Counties UCCE 12/272007 by email at 1733	Tentative MRP	"It appears like more time and money is going to be spent by agricultural landowners on additional monitoring and reporting leaving landowners with less time and money for on-the-ground implementation of management practices to mitigate water quality concerns... It doesn't appear that there is going to be a reduction in required monitoring regardless of what the producers do."..... Has the board considered any sort of incentive based program, (ie: reduced monitoring costs) for producers who have and are implementing irrigation and/or livestock management measures known to help reduce water quality problems?"	The Tentative MRP does in fact allow for the ability to reduce monitoring, once water bodies are assessed. It does this in multiple ways, including; 1. Allowing for selection of 'representative' monitoring sites, rather than requiring that all water bodies or all discharges be monitored. 2. Allowing for reduced number of tests to be conducted in Core Monitoring. 3. Allowing for flexibility of monitoring strategy, upon Regional Board approval of an MRP Plan.
#7b.	Tentative MRP	"Like many places across the region, we have seen some problems mid-late season with dissolved oxygen levels. At this point, it is unclear how much of that is due to reduced flows from allowable irrigation diversions vs. contributions from tailwater. We are going to do some research this coming irrigation season aimed at better understanding the dynamics of dissolved oxygen. Like other sub-watersheds, we have also seen some elevated levels of indicator E-coli below irrigated agriculture; but we are also seeing high E. coli levels at some sites above irrigated agriculture. Additional research needs to be done to find out if this generic E. coli is pathogenic and a real human health concern.	The Subwatershed is conducting appropriate activities by doing research to better understand the dynamics of dissolved oxygen in your specific area. With respect to DO, E-coli and any exceedances that require a Management Plan, the first step is the determination of source, and it appears that this subwatershed is working in this direction. In addition, the ILRP Technical Issues Committee has formed a Bacteriological Focus Group to begin to discuss some of the issues related to pathogens in irrigated agriculture.
#7c.	Tentative MRP	"The cost/benefit of some of the detailed SWAMP reporting is unclear to me, nor have I seen how laypeople can access this information to aid them in management decisions.	SWAMP reporting allows data from a variety of sources to be used in integrated water quality assessments. There is a learning curve in terms of utilizing any electronic data reporting. In the past, Program Staff has assisted dischargers in learning how to use the SWAMP format, and that can still be arranged for appropriate parties. The benefits of being able to access a database that ultimately will house information from a variety of different programs can include a streamlined approach to using monitoring data from existing programs to reduce or enhance Coalition monitoring. It is also a requirement of the SWRCB to record

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			monitoring data in a SWAMP comparable format.
#7c. H. George, cont.	Tentative MRP	"It appears that this MRP is more prescriptive and cumbersome particularly for seasonal operators like those across the UFRW....Since there is very little and in many places no pesticide or fertilizer use on irrigated agriculture in the UFRW, it makes no sense to me to require monthly monitoring." "It seems that the list of Core constituents should be more flexible on a sub-watershed basis based on past monitoring results.....If there are no detected problems and pesticide/fertilizer use is low (like in the UFRW), could this monitoring be done every 5 years vs. every 3 years?" "I would urge the board to incorporate more flexibility into the development of sub-watershed MRPs as well as the development of 'Management Plans' which as described in this tentative MRP actually appear to be more comprehensive monitoring plans."	The design details will be worked out in the MRP Plan and Management Plan development and factors such as the non-use of certain pesticides or fertilizers, as well as appropriate justification for assessment monitoring frequency, should be part of the monitoring plan design. Even where no pesticides or fertilizers are used, irrigation can contribute to erosion or sedimentation that can impact water quality. Because Management Plans are only required in response to exceedences, a Management Plan would not require monitoring for constituents that were not present, detected, and exceeded trigger levels.
#8a. G. Fred Lee G. Fred Lee & Associates 12/27/2007 by email at 2025	Tentative MRP	MRP Objectives: "This section contains the Five Questions that must be addressed as part of developing the Coalitions' MRPs...[I]n order to meet those objectives and answer these questions it will be necessary to expand the MRP to include focused, event-based, upstream edge-of-the-field monitoring...[M]onthly grab samples cannot provide the data needed to meet the MRP Objectives and answer the Five Questions."	The tentative MRP allows for flexibility as long as program questions are being addressed. It may be that where exceedences have been observed and Management Plans are being developed a more focused, event-based, upstream edge-of-the-field monitoring approach will have to take place. The design details will be worked out in the MRP Plan and Management Plan development.
#8b.	Tentative MRP	"...it would be appropriate for the CVRWQCB to appoint an independent advisory panel that would have the responsibility of advising the Board on whether a coalition's proposed MRP can be expected to develop the needed information in a reasonable period of time. That advisory panel should consist of individuals who are experts in water quality evaluation/management issues."	The Regional Board has staff with sufficient expertise to perform these evaluations and the legal obligation to do so. The use of an advisory panel to evaluate different MRP Plans is an option that the Regional Water Board may consider.

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#8c.	Tentative MRP	"One of the most significant deficiencies in the current (November) draft MRP is that it repeatedly specifies that the requirements of the MRP apply to agricultural discharges and runoff in the "Coalition Group Boundaries." This approach could result in the failure to evaluate the impact of agricultural runoff/discharges that occur downstream of the coalitions' boundaries. As discussed in previous comments to the CVRWQCB on deficiencies in the agricultural conditional waiver program, several of the pollutants discharged by irrigated agriculture in the Central Valley are adverse to water quality at considerable distances downstream of the monitoring location."	If approved and implemented, the Tentative MRP will use the MRP Plan development to identify trigger limits for each monitoring site that relate to Basin Plan numeric and narrative water quality standards. Accumulations of pollutants from multiple sources may be addressed through TMDLs at downstream locations and appropriate load allocations could be applied to upstream contributors such as agriculture in the Central Valley. Where Irrigated Agriculture in the Central Valley is identified as a nonpoint source contributor to a TMDL pollutant, appropriate limits will be applied to Coalitions' monitoring requirements
#8d. Dr. Lee, cont.	Tentative MRP	Table II.D Monitoring Parameters: "In addition to monitoring TOC, DOC should be monitored since it is an important drinking parameter."	The Program will utilize only TOC as part of the Assessment Monitoring stage, although it may incorporate DOC for Special Project Monitoring when drinking water-related Management Plans become necessary. Management Plan development will be specific to exceedance type, and monitoring location, and the analytes to be measured will be Management Plan specific.
#8e.	Tentative MRP	Table II.D Monitoring Parameters: "The monitoring for organochlorine legacy pesticides should focus on once-a-year sampling of fish from the coalition groups' boundaries and measuring the concentrations in the edible fish tissue....Also, since PCBs are being found in excessive concentrations in edible tissue of fish in areas dominated by agricultural discharges, PCBs should be added to the list of chemicals that should be measured in fish tissue in the once-a-year sampling."	At this time, the Regional Water Board does not incorporate fish tissue analyses in regulatory monitoring programs, and numeric fish tissue standards do not exist in the Basin Plan. Fish tissue analyses may be considered at some point in the future, but it will be at that time that appropriate constituents for tissue analysis monitoring can be evaluated.
#8f.	Tentative MRP	Table II.D Monitoring Parameters: "Some agricultural coalitions use irrigation water that contains mercury from upstream sources. Conditions within a coalition's area can result in mercury's being converted to methyl mercury. Mercury should be added to the list of metals that are measured. Methyl Mercury should also be measured since that is the form that	Methyl and/or total mercury monitoring may be considered based on the outcome of the Board's TMDL efforts.

Commenter	Document	Comment	Response to Comment
		bioaccumulates."	
#8g.	Tentative MRP	Table II.D Monitoring Parameters: "There is a need for the CVRWQCB to provide guidance on how to interpret nutrient concentration data relative to the Basin Plan objective for Biostimulatory Substances."	It is agreed that there is a need for more guidance on the interpretation of nutrient data relative to Basin Plan objectives. Recently developed nutrient guidelines from EPA should help this effort. EPA has also published recommended criteria to protect aquatic life from ammonia. Additionally, there are numeric limits identified in the Basin Plan for nitrate, and nitrite.
#8f. Dr. Lee, cont.	Tentative MRP and Attach. A	"The <u>SEDIMENT SAMPLING</u> section includes pyrethroid-based pesticides. It is well-known that those pesticides cause water column toxicity at the time of runoff. Such runoff toxicity may not be found in sediments if the stream contains large amounts of erosional sediments that dilute the pyrethroids in the sediments. Lee and Taylor, DPR, and Weston have found water column toxicity due to pyrethroid-based pesticides." "Page 9, last paragraph in VII. OTHER CHANGES IN MRP MINIMUM MONITORING REQUIREMENTS regarding pyrethroids in water: "As I have pointed out in the past to the CRVWQCB staff, this approach is technically invalid because pyrethroid-based pesticides are typically present in toxic amounts in runoff from urban and agricultural areas in which they have [been] used. The statement quoted above that pyrethroids 'are detected relatively infrequently.' is more a reflection of the poor quality of the monitoring programs that have been used thus far by the coalitions than an indication of their absence. If the monitoring had been event-based at the end of the field, pyrethroid-based pesticides would likely have been detected."	Regional Board staff agrees that pyrethroids can cause water column toxicity at the time of runoff, although there have been few results of pyrethroids in water column over the past three years of monitoring. So, although the Tentative MRP does remove the requirement to monitor routinely for pyrethroids in water column, the Toxicity analyses still remains, as well as the TIE which can identify pyrethroids when toxicity occurs. Additionally, pyrethroid analyses have been added to sediment samples when they are toxic, which is a measurement that is not in the current MRP Order.
#8g.	Tentative Attach. A	Page 3, second paragraph: "What is meant by 'relevant' stakeholders? These discussions should be noticed so that anyone interested can participate."	Regional Board agrees that there should be transparency in MRP Plan development. Efforts will be made to ensure that this occurs, although the

Commenter	Document	Comment	Response to Comment
			format is not known at this time.
#8h. Dr. Lee, cont.	Tentative Attach. A	Page 4, third paragraph: "It has been my experience that it will be very difficult to reliably detect trends in data of the type that will be generated in the MRP. Because of the typically high variability in concentrations in such systems, a much more comprehensive monitoring program will be needed to detect trends in the data. The coalitions should be required to determine how great a change will have to occur in the concentration of a parameter in order to reliably see a change in its concentration over time."	Regional Board agrees that there will need to be a consideration of variability and margin of error in any trend analysis.
#8i.	Tentative Attac. A	MRP Part III. Reporting Requirements:"...the US EPA staff has determined that a three-year period for exceedances is inappropriate for bacterial indicators of sanitary quality."	When the Regional Board renewed the Conditional Waiver in 2006, they added the requirements that a Management Plan would need to be developed when more than one exceedance occurs within a three year period. That is the requirement that is being referenced in the Tentative MRP Part III.
#8j.	Tentative Attach. A	Page 5, first paragraph: "Because some of the impacts of contaminants in irrigated agricultural runoff/discharges (such as nutrients and organochlorine pesticides) can occur downstream of a coalition group's boundaries, the assessment monitoring should be expanded to include any location where irrigated agricultural discharges impact the state's water quality."	Responsibility for monitoring outside of a coalitions' boundary can be assigned as part of a Board adopted TMDL or an approved Management Plan. However, it should not be appropriate to assign such a responsibility as part of this more general MRP.
#8k.	Attach. A	Page 10, first paragraph regarding monitoring for color: "As discussed previously in comments on draft MRPs, that statement is technically invalid. Color is an independent, drinking water and ecological parameter that is not measured by Total Suspended Solids and turbidity."	Color is a treated drinking water quality measure, and is a parameter that can be used to evaluate water purity. However, the Regional Board has not yet found an instance in the past three years of Coalition monitoring where there is a need to address exceedances of color and color alone. In the majority of cases, where there are color exceedances, management practices need to be implemented to address higher priority contaminants. It is anticipated that practices to address suspended solids, or nutrient loads, may very well also improve water color.

Commenter	Document	Comment	Response to Comment
#8m. Dr. Lee, cont.	Attach. A	Page 10, last paragraph regarding unionized ammonia monitoring: "Hardness is not a parameter in determining ammonia toxicity."	That is an error that has been fixed as a result of this comment.
#9a. Group Letter with Several Signatures: T. Johnson (CRC), P. Klassen (ESJWQC), L. Ryan Broddrick (SVWQC), J. Meek (SJDQQC), O. McKinnis (Westlands), B. Bedwell, (CA. Grape & Tree Fruit League), J. McGahan, (Westside WQC), D. Orth (SSJWQV), 12/28/2008 by email at 1142	Tentative MRP	"The proposed MRP states 'Monitoring site information shall include a description of the study area, GPS coordinates, crops and land use in the watershed, and the pesticides, chemicals, and nutrients being applied.' (Draft Order at p. 6.) This is not possible without a survey of all growers as nutrient applications are not reported. Some manure applications could be traced, but would require that the Coalitions search through yearly reports from the dairy program. At this time, nutrient applications are essentially impractical, if not impossible to report. The Coalitions suggest removing nutrients from the paragraph."	Nutrient information to be provided by Coalitions in their MRP Plans must be reported when known and described generally. The Regional Board understands the limitations of this information base, and more detailed data will only be expected through the implementation of nutrient-related Management Plans, when necessary.
#9b.	Tentative MRP	"The proposed MRP states '...monitoring site selection must include water bodies already on the Clean Water Act section 303(d) list (when the listing is due to an agriculture-related contaminant), particularly where the Coalition Group or another entity is implementing an applicable Total Maximum Daily Load (TMDL). '(Draft Order at p. 6.) The Coalitions believe the line should be removed or at the very least clarified. It's not clear whether the Regional staff mean that all 303(d) sites listed for agricultural sources must be monitored for the ILRP, or if all these sites must be <u>considered</u> in the selection process...If the MRP is read literally without qualification, a significant number of additional sites would have to be added to the coalitions' monitoring programs. If the intent is that all of these sites are considered for monitoring, then we believe that it is a reasonable request, but it needs to be made clear in the MRP..."	The language on page 6 has been modified to reflect the fact that Coalitions must consider these sites in the development of their monitoring design. CWA 303(d) listed water bodies that are listed due to agriculture-related contaminants will need to be actual monitoring sites or otherwise acknowledged and represented in the monitoring design.

Commenter	Document	Comment	Response to Comment
#9c. Group Letter, cont.	Tentative MRP	"The proposed MRP states that '[m]onitoring sites must be established on water bodies that carry, or that directly or indirectly receive agricultural drainage.' (Draft Order at p.6.) The Coalitions are concerned that the referenced language could be interpreted to require monitoring sites on water bodies (i.e. drainage ditches, tail water return systems, etc.) that are not considered waters of the state...Because the Regional Board's authority is limited to discharges that may affect waters of the state, the Coalitions presume that the language regarding monitoring site selection is also limited to monitoring on waters of the state. Consequently, the Coalition Groups will only put forward proposed monitoring site locations on water bodies that are considered waters of the state."	Drainage ditches, tail water return systems, and all other surface waters or groundwater are "waters of the State" over which the Water Boards have jurisdiction. (Water Code section 13050(e).) "Waters of the State" include waters that are not "waters of the US" subject to the Clean Water Act. However, selection of drainage ditches and tail water return systems as monitoring locations is unlikely due to the "representativeness" criterion for monitoring site selection..
#9d.	Tentative MRP	"The requirement to monitor for molybdenum should be removed from the list of water quality parameters in Table II.D (Draft Order at p.14) and, if desired by staff, reviewed through the Technical Issues Committee process. Contrary to the information presented by Regional Board staff in the 'Information Sheet' (Attachment A to the Draft order), molybdenum is not a constituent of concern that is necessarily added to waters of the state through agricultural activities...Thus, it should be removed from Table II.D."	Molybdenum is a nutrient that is applied to certain crops such as alfalfa and melons. It is also a metal for which health-based and agricultural use advisory limits have been identified. There is at least one water body in the Central Valley that is CWA 303(d) listed for Molybdenum. However, the tentative MRP allows for flexibility as long as the Coalition Group can justify why the requirement is not appropriate at a particular location. The design details will be worked out in the MRP Plan development.
#9e.	Tentative MRP	"For most Coalition members, 12 monthly sampling events would not be possible or unnecessary for several reasons. Reason include, but are not limited to a lack of water during part of the year, snowed or iced over streams, and the lack of agricultural activities, which makes sampling unnecessary...[S]ome of the wording on p. 10 of the Draft Order could be interpreted as requiring more than one sample per month during the storm season if a storm event is not captured in the initial monitoring...[W]e suggest removing, 'If monthly sampling does not, or is not expected to represent at least two storm events per year, then the Coalition Group shall identify and implement a logistically feasible approach in the MRP Plan to attempt to	Language has been added to the Tentative MRP based on comments so that it is clear that the requirement is limited to one time per month.

Commenter	Document	Comment	Response to Comment
		capture at least two storm events annually per site.' (Draft order at p. 10) and replacing it with, 'Storm event sampling, for at least two storm events per year, is also an option that may replace or reduce monthly sampling for Coalitions that have dry water bodies during much of the year.'"	
#10a. N. Dean Director, Environmntl & Regulatory Affairs Western Plant Health Association 12/28/2007 by email at 1356	Tentative MRP	"[I]t would be judicious for Region 5 to afford adequate flexibility within this regulatory document...to ensure that Coalitions have the opportunity to successfully address water quality issues and concerns without incurring additional restrictions and penalties. This includes affording any reasonable adjustments merited on the local conditions (hydrology, typography, soil conditions, cropping patterns and other characteristics) within each Coalition's geographic boundary....WPHA encourages cooperative dialogue with the respective Coalitions when triggers are to be established and exceedances have been identified."	The tentative MRP allows for flexibility as long as program questions are being addressed. The design details will be worked out in the MRP Plan development.
#10b.	Tentative MRP	"WPA remains quite concerned over the duplicative efforts in pesticide water monitoring conducted by the Department of Pesticide Regulation (DPR) and the Regional Water Quality Control Boards. DPR has long been recognized by California statute to have primacy in pesticide regulatory actions. As such, WPHA would encourage DPR water program protocols and results to be regularly communicated and reviewed by both Region 5 and the Coalitions on a timely basis."	The Regional Board encourages Coalitions to incorporate monitoring information from other programs in their MRP Plan development and in ongoing analysis of results. This is a collaborative approach that is highly encouraged.
#10c.	Tentative MRP	"WPHA is quite concerned that Region 5 is proposing to have Coalitions monitor for Molybdenum (Mo) as constituent from the the list of water quality parameters identified within Table II.D. In consultation with our members, Mo is rarely added as a micronutrient to anthropogenic fertilizers, expecially based on the cropping patterns within Region 5. Should on rare occasions that Mo is utilized, the concentration levels are negligible and highly unlikely to cause an adverse impact to water quality...It is an erroneous supposition...that Mo is a constituent of concern to waters of the State through agricultural activities. Therefore, WPHA recommends Mo be removed from Table II.D for additional monitoring."	Molybdenum is a nutrient that is applied to certain crops such as alfalfa and melons. It is also a metal for which health-based and agricultural advisory limits have been identified. There is at least one water body in the Central Valley that is CWA 303(d) listed for Molybdenum. However, the tentative MRP allows for flexibility as long as the Coalition Group can justify why the requirement is not appropriate at a particular location. The design details will be worked out in the MRP Plan development.

Commenter	Document	Comment	Response to Comment
#10d. N. Dean, cont.	Tentative MRP	"The tentative MRP order states that monitoring sites must be established on water bodies that carry, or that directly or indirectly receive agricultural discharge. This document also states that monitoring locations should not be limited to sites where there is substantial dilution, but shall also include sites that represent contaminant concentration levels in tributary streams and drainages, and should be focused on agriculturally dominated water bodies. The inference that is being drawn is Region 5 contemplating to require monitoring sites on water bodies such as drainage ditches and tail-water return systems that are not recognized as meeting the legal definition as 'waters of the State'?...WPHA recommends that the foregoing proposed text be clarified to reconcile the site and monitoring parameters be restricted to the legally recognized 'waters of the State'."	The intent of the MRP is not to characterize tail-water return systems or drainage ditches, but is intended to ensure that waters of the State are protected for all applicable beneficial uses. The language in the MRP regarding location of monitoring sites is intended to ensure that Coalitions do not expend their resources on monitoring waters of the State where there is no potential for influence from agriculture drainages. It would not be appropriate to monitor waters of the State at river headwaters, upstream of agricultural activities, for example, even if it is a water body that is located within the Coalition boundaries. Appropriate sample site selection will take place with Coalition group MRP Plan development.
#10e.	Tentative MRP	"The issue of requiring additional Total Maximum Daily Load (TMDL) monitoring by respective Coalitions when the Clean Water Act (CWA §303(d) listing is due to an agricultural related contaminant is very problematic. It is unclear as to the rationale and justification to require additional monitoring if the §303(d) listed water bodies are already being monitored by other entities as part of an approved TMDL...WPHA cannot support this proposal, and recommends that the additional TMDL monitoring text found on page 6, par. 2 of the tentative MRP Order be removed."	TMDLs are implemented by the entities that cause discharge of the pollutant in question, both point sources and non point sources. TMDLs will only need to be implemented by Coalitions where irrigated agriculture in the Central Valley is identified as a 'source'.
#10f.	Tentative MRP	"Capturing the results of a 'representative' sampling of 2 storm events at each monitoring site annually would impose a tremendous expense on the Coalitions. What would be the contingency plan if there was no measureable amount of precipitation within the respective Coalition's boundary? This issue clearly demonstrates the need for flexibility and consideration of local conditions when developing an effective monitoring strategy. Accordingly, WPHA recommends that the referenced text on page 10, par. 1 be removed."	The Regional Board would not expect to see a storm monitoring event take place if there is no storm. A practical example occurred in 2007, when the very low rainfall in California made it impossible for some Coalitions to achieve the two-storm event monitoring requirement. This was not considered to be a failure to comply.

Commenter	Document	Comment	Response to Comment
#11. J. Nelsen President California Citrus Mutual 12/28/2007 by email at 1440	Tentative MRP	"...[W]e believe the tentative Monitoring & Reporting Program Plan must take into consideration and therefore avoid a duplication of effort by another agency of government. Specifically the Department of Pesticide Regulation of EPA has an ongoing and thorough water monitoring program for pesticides...A duplication of this program is ill advised and a waste of resources in our opinion. We would hope that the Board would consult with DPR for program information and data exchange."	The Regional Board encourages Coalitions to incorporate monitoring information from other programs in their MRP Plan development and in ongoing analysis of results. This is a collaborative approach that is highly encouraged.
#12a. A. Vargas Staff Environmntl. Scientist CA. Dept. of Food & Agriculture 12/28/2007 by email at 1700	Tentative MRP	"One point...is the issue of the appropriate beneficial uses for agricultural conveyance channels and the corresponding water quality objectives to protect these uses...Our concern is with the burdens placed on the agricultural industry to comply with standards that are inappropriate and overly protective due to the failure of the Board to conduct the fundamental water quality planning before initiating regulation...[A]gricultural water bodies were created and modified for the purpose of conveying agricultural water supplies and drainage. We acknowledge that agricultural operations must not impair beneficial uses of downstream natural bodies. However, in protecting these uses, the uses for which these agricultural conveyances were created for should not be prevented. We believe it is possible to protect the aquatic life, recreational, industrial, municipal and agricultural water supplies uses of natural water bodies without having to ascribe the downstream uses of the natural water bodies to agricultural conveyance channels." "With respect to the questions that the tentative MRP is structured to address, questions 1, 2, and 3 require judgment as to the level of the beneficial uses attainment or degree of impairment as a result of agricultural operations. No where in this tentative MRP or in the Coalition Group Conditional Waiver from Waste Discharge Requirements (Amended Order No. R5-2006-0053) is it spelled out what are the beneficial uses that are to be considered in this evaluation...[A] the very least the CRVWQCB should provide some guidance as to how the Coalitions are to accomplish to [do] this."	The MRP and supporting documents do not interpret or modify the tributary statement. This comment appears to be addressed to the Basin Plans or the Conditional Waiver, and not the MRP. Appropriate monitoring sites will be selected with the development of each MRP Plan. The Basin Plan designates beneficial uses for all water bodies in the Region, either specifically in Basin Plan Table II-1, or through a tributary statement that assigns the beneficial uses of the specifically identified water bodies to their tributaries and through the incorporation of State Water Board Resolution 88-63, "Sources of Drinking Water Policy" into the Basin Plans. The USEPA considers these uses to have been designated for these water bodies pursuant to the federal Clean Water Act. The Basin Plan acknowledges that there may be instances where uses assigned by the tributary statement and by Resolution 88-63 may not be applicable to a particular water body. For these situations, special basin planning studies (equivalent to a federal Use Attainability Anaysis) are needed to remove these uses and to determine exactly what uses are appropriate.

Commenter	Document	Comment	Response to Comment
#12b. A. Vargas, cont.	Tentative MRP	"The tentative MRP requires the Coalitions to gather a report on a large amount of information including chemical usage, management practices, nutrients usage and locations where these are applied... Additionally, the assessment phase of the tentative MRP requirements the screening of a broad range of chemical including general water quality parameters, pesticides, toxicity testing, and metals...We fail to see the logic in such a broad inventory of chemical usage, especially nutrients usage which are not readily attained and the location of usage prior to establishing if a water quality concern exists. It would seem that if the coalitions are to undertake such comprehensive water quality characterization, that any inventory of chemical usage should be delayed until it is established if a water quality concerns exists. If so, follow-up surveys should be limited to the chemicals of concern and to their place of use in the affected sub-watershed." "The inventorying of nutrient usage is of no value in the evaluation of nutrient related water quality concerns...Additionally, it should be noted that interpretive guidance has not yet been developed by the State Water Resources Control Board (SWRCB). Presently, the only interpretive guidance is for unionized ammonia for which irrigated agriculture is an unlikely contributor and nitrate, which the Maximum Contaminant Level (MCL) for drinking water is available but unlikely to be exceeded."	Information to be provided by Coalitions in their MRP Plans must be reported when known and described generally. The Regional Board understands the limitations of this information base, and more detailed data will only be expected through the implementation of nutrient-related Management Plans, when necessary. Ammonia is not an unlikely source to originate from irrigated agriculture, as ammonia is in fact applied to irrigation water as a nutrient, and it quickly converts to nitrate as it is exposed to oxygen.

Commenter	Document	Comment	Response to Comment
#12c. cont. A. Vargas, cont.	Tentative MRP	"The tentative MRP requires Coalitions to establish monitoring locations for water bodies that have been listed as impaired as per the Clean Water Act Section 303(d) when the listing is due to an agricultural related contaminant and additionally when a TMDL has been establish[ed] for which the Coalition or another entity is implementing the TMDL. First, the CVRWQCB needs to recognize that there are contaminants that may be associated with agricultural operations but that may not necessarily originate from irrigated agriculture...For example, ammonia is unlikely to originate from irrigated agriculture but from wastewater treatment plants and/or animal agriculture." "With respect to TMDL monitoring, it is not clear why Coalitions would want to duplicate existing monitoring programs...What purpose would it serve to duplicate the monitoring that is already taking place? For TMDL that have not yet been developed or implemented, haphazard data collection by the Coalitions is unlikely to yield meaningful data to be utilized in the TMDL."	TMDLs and associated monitoring are implemented by the entities that cause the pollutant in question, both point sources and non point sources. TMDLs will only need to be implemented by Coalitions where irrigated agriculture in the Central Valley is identified as a 'source'. Regional Board staff does not agree that ammonia is an unlikely source to originate from irrigated agriculture, as ammonia is in fact applied to irrigation water as a nutrient.

Commenter	Document	Comment	Response to Comment
#12d.	Tentative MRP	"Under assessment monitoring design...calls for demonstrating the effectiveness of management practices. This is a research oriented project that should be undertaken where variables can be controlled or accounted for...In a field environment, there are many variables that cannot be controlled such as climate (droughts and floods), shifting agricultural patterns such as fallowing, crop rotations that result in high variability and make it difficult to discern changes in water quality from the implementation of a particular management practice. Coalitions can undertake trend monitoring over the long-term but it is difficult to draw conclusions regarding one particular management measure under this highly variable environment..." "Similarly, the limitations of trend monitoring need to be recognized. Due to the large variability in a field [sic] environment, long-term evaluations need to be undertaken to establish a trend. As was noted previously, agriculture is not static...[F]actors produce a lot of variability in water quality conditions that cannot be readily accounted for and thus require long-term evaluations to establish trends. Long-term information does not exist prior to the implementation of the irrigated lands program and thus, it is difficult to conclude what impact the irrigated lands program activities may be having as opposed to management shifts in response to economic factors."	Regional Board staff agrees that some management practices will be more difficult to evaluate than others. In some cases, it may not be necessary to specifically identify one particular management practice and its specific effectiveness if it can be shown that water quality is improving in concert with facts provided by the Coalition in their Management Plan reports that detail the implementation of one or more types of management practice.
#12e.	Tentative MRP	"Monitoring for Molybdenum: Molybdenum is rarely applied to crops in the San Joaquin Valley. When it is applied it is applied in very small quantities as it is a trace nutrient."	Molybdenum is a nutrient that is applied to certain crops such as alfalfa and melons. It is also a metal for which health-based and agricultural advisory limits have been identified. There is at least one water body in the Central Valley that is CWA 303(d) listed for Molybdenum.