
From: Elissa Callman [ECallman@cityofsacramento.org]
Sent: Monday, September 27, 2010 3:00 PM
To: ILRP Comments
Cc: Marty Hanneman; Grace Garcia; Dave Brent; Mike Yee; Roland Pang; 'Forrest Williams'; 'Vicki Butler'; de la Salle. Amy; Fields. Myra (MSA); Sherill Huun; Bonny Starr
Subject: Sacramento River Source Water Protection Program's Comments on Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley
Attachments: Sacramento River Source Water Protection Program Comments on ILP Draft PEIR - Sept 27 2010.pdf

Dear Ms. Smith:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley (Draft PEIR). Please find attached our comments.

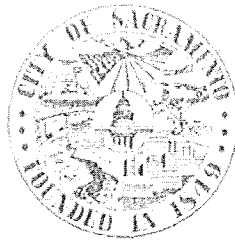
If you have any questions, please do not hesitate to contact me at 916-808-1424.

Thank you for your efforts.

Sincerely,

Elissa Callman
City of Sacramento Dept of Utilities
Program Manager of the Sacramento River Source Water Protection Program
916-808-1424
ecallman@cityofsacramento.org.

Note: The FY11 Sacramento River Source Water Protection Program is sponsored by the City of Sacramento Dept of Utilities and the Sacramento County Dept of Water Resources.



DEPARTMENT
OF UTILITIES

ENGINEERING
SERVICES DIVISION

CITY OF SACRAMENTO
CALIFORNIA

1395 35th AVENUE
SACRAMENTO, CA
95822-2911

PH 916-808-1400
FAX 916-808-1497/1498

September 27, 2010
101789:EC

ILRP Comments
Ms. Megan Smith
Central Valley Regional Water Quality Control Board
630 K Street, Suite 400
Sacramento, CA 95814

VIA EMAIL: ILRPcomments@icfi.com

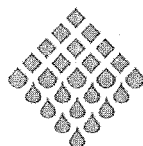
Subject: Comments on Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley

Dear Ms. Smith:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley (Draft PEIR). We are providing several general comments regarding the overall development of the Waste Discharge Regulatory Program as well as several specific comments on the published documents.

Overall, we continue to support the acknowledgment of the need to protect beneficial uses. Protection of public health and safety through protection of the quality of sources of drinking water should remain one of the State's highest priorities.

- We support the continuation of watershed groups as the primary mechanism for implementing the long term program and believe that significant progress has been made under the current Conditional Waiver Program.
- We support a reasonable monitoring program designed to continue to identify where there are problem areas, what corrective actions are needed, and to ascertain that the remedies are successful. We believe that these programs need to be flexible in nature to adjust for changes in conditions, such as agricultural management practices, regulatory standards, and identification of new constituents of interest. We believe that these monitoring programs need to include drinking water constituents of interest related to agriculture, including constituents with primary and secondary drinking water



CITY OF SACRAMENTO
DEPARTMENT
OF UTILITIES

Making a Difference in Your Neighborhood

standards and those with treatment technology requirements. This would include herbicides, pesticides, total organic carbon, bromide, and microbiological constituents.

- We support the coordination with other federal and state regulatory programs to ensure that issues are being addressed comprehensively, without duplication or conflict.

Specifically, we have several concerns related to protection of the drinking water beneficial use.

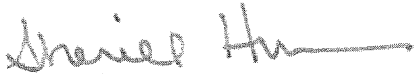
- Page 3-7, Alternative 1 Monitoring Requirements (Table 3-2): We believe that total organic carbon and bromide need to be specifically listed, given the special study conducted by the California Rice Commission indicating large amounts of carbon in rice drainage. Also, the note indicates that the current program provides flexibility to reduce monitoring. We believe this note should be expanded to allow for flexibility to expand as well if conditions change and require addition of new constituents.
- Page 3-8, Alternative 2 Optional Watershed or Area Management Objectives Plan: It is indicated that areas implementing management objective plans would be allowed to reduce surface water monitoring. We do not support the reduction of monitoring until there has been documentation of success of the management program and sufficient verification procedures have been put in place to confirm that the management practices are being successfully implemented. Without monitoring data, it will be impossible to determine whether the practices are effective. We strongly recommend that some monitoring continue as verification.
- Page 3-16, Alternative 3 Monitoring Provisions: This alternative does not include a water quality monitoring component. We strongly disagree with this philosophy as it does not allow for identification in changes to source water quality conditions, whether improvements or degradation, and does not allow for assessment of management practices. We recommend that the Regional Board modify this alternative to include at least some form of monitoring designed to assess overall watershed conditions and effectiveness of management practices.
- Page 3-17, Alternative 4 Criteria for Tier System: The criteria outlined here appear to apply to Alternatives 2 and 5 as well. Our major concern is with understanding when the Regional Board will be conducting the tier ranking and how frequently it will be updated. Agricultural use patterns (i.e. crop types, pesticides applied, fertilizer use) can vary significantly and therefore field rankings could change. It seems that there is a large discretionary interpretation on this item which could significantly affect the management of the fields. We strongly encourage the Regional Board to provide more specific information on the criteria for tier ranking and the procedures for triggering a revised ranking.
- Page 3-24, Alternative 4 Surface Water Monitoring: The individual monitoring requirements have been laid out quite specifically based on timing of discharges and storm events. We are concerned that this concise timing may reduce or eliminate the potential to capture periods of peak pesticide application with relation to discharge. Our experience with the Rice Pesticide Program strongly supports timing sampling to periods of peak pesticide use. We recommend that there should be program flexibility to allow

for determining which sample timing method is more appropriate based on crop type, irrigation practices and pesticide application practices.

- Page 3-28, Alternative 5 Monitoring Provisions: We have the same comment as above for Alternative 4.
- Appendix A, Page 31 – Malathion and Thiobencarb Evaluation: The concluding paragraph of this discussion states that malathion and thiobencarb exceedances caused by rice applications in the Sacramento River Basin are addressed through the Central Valley Water Board's Rice Pesticide Program, rather than the Irrigated Lands Regulatory Program (ILRP). Please provide clarification regarding coverage of malathion use on wild rice under the ILRP through the Sacramento Valley Water Quality Coalition.

We appreciate the opportunity to provide comments on the Draft PEIR. We sincerely believe that development of this long-term program will continue the improvements in water quality and protection of beneficial uses that have begun under the Conditional Waiver Program. Please call Elissa Callman at (916) 808-1424 if you have any questions on our comments or need additional information.

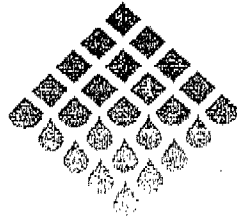
Sincerely,



Sherill Huun
Supervising Engineer

cc: Marty Hanneman, City of Sacramento Dept of Utilities
Dave Brent, City of Sacramento Dept of Utilities
Mike Yee, City of Sacramento Dept of Utilities
Roland Pang, City of Sacramento, Dept of Utilities
Forrest Williams, Sacramento County DWR
Vicki Butler, Sacramento County DWR
Amy de la Salle, Sacramento County DWR

duped
10/98



CITY OF SACRAMENTO
DEPARTMENT
OF UTILITIES

1395 35th Avenue
Sacramento, CA 95822
(916) 808-1400

Fax: (916) 808-1497
OR 808-1498

TO: Megan Smith, CV Regional Board

FAX #: 456-6724

RE: Comments on Draft PETR for ILP

FROM: Elissa Callman, Sacramento River
Source Water Protection
Program

DATE: 9/27/10

PAGES: 4 including this cover sheet

MESSAGE:

Hi Megan, I emailed you our comments. I'm also faxing a back-up, because we've been having internet problems this afternoon at my office.

Also, please let me know if you'd like me to e-mail you a searchable pdf ~~of~~ of our comments.

Thank you for your efforts.

If you have any questions, please do not hesitate to contact me at 908-424 or ecallman@cityofsacramento.org



DEPARTMENT
OF UTILITIES

ENGINEERING
SERVICES DIVISION

CITY OF SACRAMENTO
CALIFORNIA

1395 35th AVENUE
SACRAMENTO, CA
95822-2911

PH 916-808-1400
FAX 916-808-1497/1498

September 27, 2010
101789:EC

ILRP Comments
Ms. Megan Smith
Central Valley Regional Water Quality Control Board
630 K Street, Suite 400
Sacramento, CA 95814

VIA EMAIL: ILRPcomments@icfi.com

Subject: Comments on Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley

Dear Ms. Smith:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley (Draft PEIR). We are providing several general comments regarding the overall development of the Waste Discharge Regulatory Program as well as several specific comments on the published documents.

Overall, we continue to support the acknowledgment of the need to protect beneficial uses. Protection of public health and safety through protection of the quality of sources of drinking water should remain one of the State's highest priorities.

- We support the continuation of watershed groups as the primary mechanism for implementing the long term program and believe that significant progress has been made under the current Conditional Waiver Program.
- We support a reasonable monitoring program designed to continue to identify where there are problem areas, what corrective actions are needed, and to ascertain that the remedies are successful. We believe that these programs need to be flexible in nature to adjust for changes in conditions, such as agricultural management practices, regulatory standards, and identification of new constituents of interest. We believe that these monitoring programs need to include drinking water constituents of interest related to agriculture, including constituents with primary and secondary drinking water



CITY OF SACRAMENTO
DEPARTMENT
OF UTILITIES

Making a Difference in Your Neighborhood

ILRP Comments
September 27, 2010
Page 2 of 3

standards and those with treatment technology requirements. This would include herbicides, pesticides, total organic carbon, bromide, and microbiological constituents.

- We support the coordination with other federal and state regulatory programs to ensure that issues are being addressed comprehensively, without duplication or conflict.

Specifically, we have several concerns related to protection of the drinking water beneficial use.

- Page 3-7, Alternative 1 Monitoring Requirements (Table 3-2): We believe that total organic carbon and bromide need to be specifically listed, given the special study conducted by the California Rice Commission indicating large amounts of carbon in rice drainage. Also, the note indicates that the current program provides flexibility to reduce monitoring. We believe this note should be expanded to allow for flexibility to expand as well if conditions change and require addition of new constituents.
- Page 3-8, Alternative 2 Optional Watershed or Area Management Objectives Plan: It is indicated that areas implementing management objective plans would be allowed to reduce surface water monitoring. We do not support the reduction of monitoring until there has been documentation of success of the management program and sufficient verification procedures have been put in place to confirm that the management practices are being successfully implemented. Without monitoring data, it will be impossible to determine whether the practices are effective. We strongly recommend that some monitoring continue as verification.
- Page 3-16, Alternative 3 Monitoring Provisions: This alternative does not include a water quality monitoring component. We strongly disagree with this philosophy as it does not allow for identification in changes to source water quality conditions, whether improvements or degradation, and does not allow for assessment of management practices. We recommend that the Regional Board modify this alternative to include at least some form of monitoring designed to assess overall watershed conditions and effectiveness of management practices.
- Page 3-17, Alternative 4 Criteria for Tier System: The criteria outlined here appear to apply to Alternatives 2 and 5 as well. Our major concern is with understanding when the Regional Board will be conducting the tier ranking and how frequently it will be updated. Agricultural use patterns (i.e. crop types, pesticides applied, fertilizer use) can vary significantly and therefore field rankings could change. It seems that there is a large discretionary interpretation on this item which could significantly affect the management of the fields. We strongly encourage the Regional Board to provide more specific information on the criteria for tier ranking and the procedures for triggering a revised ranking.
- Page 3-24, Alternative 4 Surface Water Monitoring: The individual monitoring requirements have been laid out quite specifically based on timing of discharges and storm events. We are concerned that this concise timing may reduce or eliminate the potential to capture periods of peak pesticide application with relation to discharge. Our experience with the Rice Pesticide Program strongly supports timing sampling to periods of peak pesticide use. We recommend that there should be program flexibility to allow

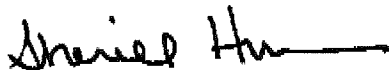
ILRP Comments
September 27, 2010
Page 3 of 3

for determining which sample timing method is more appropriate based on crop type, irrigation practices and pesticide application practices.

- Page 3-28, Alternative 5 Monitoring Provisions: We have the same comment as above for Alternative 4.
- Appendix A, Page 31 – Malathion and Thiobencarb Evaluation: The concluding paragraph of this discussion states that malathion and thiobencarb exceedances caused by rice applications in the Sacramento River Basin are addressed through the Central Valley Water Board's Rice Pesticide Program, rather than the Irrigated Lands Regulatory Program (ILRP). Please provide clarification regarding coverage of malathion use on wild rice under the ILRP through the Sacramento Valley Water Quality Coalition.

We appreciate the opportunity to provide comments on the Draft PEIR. We sincerely believe that development of this long-term program will continue the improvements in water quality and protection of beneficial uses that have begun under the Conditional Waiver Program. Please call Elissa Callman at (916) 808-1424 if you have any questions on our comments or need additional information.

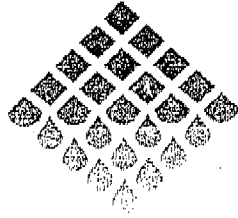
Sincerely,



Sherill Huun
Supervising Engineer

cc: Marty Hanneman, City of Sacramento Dept of Utilities
Dave Brent, City of Sacramento Dept of Utilities
Mike Yee, City of Sacramento Dept of Utilities
Roland Pang, City of Sacramento, Dept of Utilities
Forrest Williams, Sacramento County DWR
Vicki Butler, Sacramento County DWR
Amy de la Salle, Sacramento County DWR

dup
of IL 98



CITY OF SACRAMENTO
DEPARTMENT
OF UTILITIES

1395 35th Avenue
Sacramento, CA 95822
(916) 808-1400

Fax: (916) 808-1497
OR 808-1498

TO: Megan Smith, CV Regional Board

FAX #: 456-6724

RE: Comments on Draft PEIR for ILP

FROM: Elissa Callman, Sacramento River
Source Water Protection
Program

DATE: 9/27/10

PAGES: 4 including this cover sheet

MESSAGE:
Hi Megan, I emailed you our comments. I'm
also faxing a back-up, because we've been
having internet problems this afternoon at my
office.

Also, please let me know if you'd like me to e-mail
you a searchable pdf ~~of~~ of our comments

Thank you for your efforts

If you have any questions please do not hesitate
to contact me at 908-1424 or
ecallman@cityofsacramento.org



DEPARTMENT
OF UTILITIES

ENGINEERING
SERVICES DIVISION

CITY OF SACRAMENTO
CALIFORNIA

1395 35th AVENUE
SACRAMENTO, CA
95822-2911

PH 916-808-1400
FAX 916-808-1497/1498

September 27, 2010
101789:EC

ILRP Comments
Ms. Megan Smith
Central Valley Regional Water Quality Control Board
630 K Street, Suite 400
Sacramento, CA 95814

VIA EMAIL: ILRPcomments@icfi.com

Subject: Comments on Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley

Dear Ms. Smith:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Draft Public Environmental Impact Report for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley (Draft PEIR). We are providing several general comments regarding the overall development of the Waste Discharge Regulatory Program as well as several specific comments on the published documents.

Overall, we continue to support the acknowledgment of the need to protect beneficial uses. Protection of public health and safety through protection of the quality of sources of drinking water should remain one of the State's highest priorities.

- We support the continuation of watershed groups as the primary mechanism for implementing the long term program and believe that significant progress has been made under the current Conditional Waiver Program.
- We support a reasonable monitoring program designed to continue to identify where there are problem areas, what corrective actions are needed, and to ascertain that the remedies are successful. We believe that these programs need to be flexible in nature to adjust for changes in conditions, such as agricultural management practices, regulatory standards, and identification of new constituents of interest. We believe that these monitoring programs need to include drinking water constituents of interest related to agriculture, including constituents with primary and secondary drinking water



CITY OF SACRAMENTO
DEPARTMENT
OF UTILITIES

Making a Difference in Your Neighborhood

ILRP Comments
September 27, 2010
Page 2 of 3

standards and those with treatment technology requirements. This would include herbicides, pesticides, total organic carbon, bromide, and microbiological constituents.

- We support the coordination with other federal and state regulatory programs to ensure that issues are being addressed comprehensively, without duplication or conflict.

Specifically, we have several concerns related to protection of the drinking water beneficial use.

- Page 3-7, Alternative 1 Monitoring Requirements (Table 3-2): We believe that total organic carbon and bromide need to be specifically listed, given the special study conducted by the California Rice Commission indicating large amounts of carbon in rice drainage. Also, the note indicates that the current program provides flexibility to reduce monitoring. We believe this note should be expanded to allow for flexibility to expand as well if conditions change and require addition of new constituents.
- Page 3-8, Alternative 2 Optional Watershed or Area Management Objectives Plan: It is indicated that areas implementing management objective plans would be allowed to reduce surface water monitoring. We do not support the reduction of monitoring until there has been documentation of success of the management program and sufficient verification procedures have been put in place to confirm that the management practices are being successfully implemented. Without monitoring data, it will be impossible to determine whether the practices are effective. We strongly recommend that some monitoring continue as verification.
- Page 3-16, Alternative 3 Monitoring Provisions: This alternative does not include a water quality monitoring component. We strongly disagree with this philosophy as it does not allow for identification in changes to source water quality conditions, whether improvements or degradation, and does not allow for assessment of management practices. We recommend that the Regional Board modify this alternative to include at least some form of monitoring designed to assess overall watershed conditions and effectiveness of management practices.
- Page 3-17, Alternative 4 Criteria for Tier System: The criteria outlined here appear to apply to Alternatives 2 and 5 as well. Our major concern is with understanding when the Regional Board will be conducting the tier ranking and how frequently it will be updated. Agricultural use patterns (i.e. crop types, pesticides applied, fertilizer use) can vary significantly and therefore field rankings could change. It seems that there is a large discretionary interpretation on this item which could significantly affect the management of the fields. We strongly encourage the Regional Board to provide more specific information on the criteria for tier ranking and the procedures for triggering a revised ranking.
- Page 3-24, Alternative 4 Surface Water Monitoring: The individual monitoring requirements have been laid out quite specifically based on timing of discharges and storm events. We are concerned that this concise timing may reduce or eliminate the potential to capture periods of peak pesticide application with relation to discharge. Our experience with the Rice Pesticide Program strongly supports timing sampling to periods of peak pesticide use. We recommend that there should be program flexibility to allow

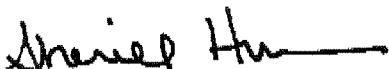
ILRP Comments
September 27, 2010
Page 3 of 3

for determining which sample timing method is more appropriate based on crop type, irrigation practices and pesticide application practices.

- Page 3-28, Alternative 5 Monitoring Provisions: We have the same comment as above for Alternative 4.
- Appendix A, Page 31 – Malathion and Thiobencarb Evaluation: The concluding paragraph of this discussion states that malathion and thiobencarb exceedances caused by rice applications in the Sacramento River Basin are addressed through the Central Valley Water Board's Rice Pesticide Program, rather than the Irrigated Lands Regulatory Program (ILRP). Please provide clarification regarding coverage of malathion use on wild rice under the ILRP through the Sacramento Valley Water Quality Coalition.

We appreciate the opportunity to provide comments on the Draft PEIR. We sincerely believe that development of this long-term program will continue the improvements in water quality and protection of beneficial uses that have begun under the Conditional Waiver Program. Please call Elissa Callman at (916) 808-1424 if you have any questions on our comments or need additional information.

Sincerely,



Sherill Huun
Supervising Engineer

cc: Marty Hanneman, City of Sacramento Dept of Utilities
Dave Brent, City of Sacramento Dept of Utilities
Mike Yee, City of Sacramento Dept of Utilities
Roland Pang, City of Sacramento, Dept of Utilities
Forrest Williams, Sacramento County DWR
Vicki Butler, Sacramento County DWR
Amy de la Salle, Sacramento County DWR