



**EL DORADO AGRICULTURAL WATER QUALITY
MANAGEMENT CORP**

PROTECTING OUR PRECIOUS RESOURCE

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January 21, 2014

Sent via email: mcady@waterboards.ca.gov

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Attention: Mark Cady

Re: Tentative Sacramento Valley Waste Discharge Requirements (WDR)

Dear Mr. Cady,

We appreciate this opportunity to comment on the reference document which will be applicable to our members of the El Dorado County Subwatershed Coalition. Our organization is a member of the Sacramento Valley Water Quality Coalition which also represents our interests. We have reviewed the Tentative Order and provide the following comments:

- 1. Reduced Monitoring/Management Practices Verification Option.** We would like to thank the Regional Board for recognizing the need for tailoring surface water monitoring in subwatersheds "...deemed to have a lower potential for surface water quality impacts from irrigated agricultural discharges." (Attachment B, Para III.C.1.a.) The El Dorado County Agricultural Water Quality Management Corporation is in its fourth year of our successful Pilot Management Practices Program with reduced monitoring requirements based on verification of our members' practices implementation.
- 2. Inspection of facilities.** While we recognize that there may be a need to access a member's facilities (WDR, Para IV.B.13 and footnote 22) we recommend that the definition of facilities be specific to "those facilities associated with the irrigated agricultural operation". Many of our members have facilities not associated with their irrigated agricultural operations located on site and those should not be subject to inspection under this order.

We appreciate the efforts of staff in considering our previous comments and recommendations for a management practices-based approach to preserving our excellent surface water quality while providing ground water quality protections.

Sincerely,

Carolyn Mansfield, President

cc: Bruce Houdesheldt, Sacramento Valley Regional Water Quality Coalition
Pamela Creedon, Central Valley Regional Water Quality Control Board
Dr. Karl Longley, Chairman, Central Valley Regional Water Quality Control Board
Joe Karkoski, Central Valley Regional Water Quality Control Board