

Response to Comments

Comment Deadline: January 6, 2023

Tentative General Waste Discharge Requirements for Dischargers of Waste from Irrigated Lands in the San Jacinto River Watershed, Riverside County (General WDRs)

Order Number R8-2023-0006

Comment Letter #	Date	Commenter	Affiliation
TBL	December 15, 2022	Jim Klang, PE	Principal Engineer, TBL Consultants, LLC
EMWD	January 5, 2023	Alfred Javier	Director of Environmental and Regulatory Compliance, Eastern Municipal Water District

Changes proposed in response to comments are incorporated into the tentative General WDRs. A redline draft with the changes is available upon request and has been provided to all commenters. Please contact SueAnn Neal (951) 782-4468 or sueann.neal@waterboards.ca.gov with any questions.

Comments provided by all commenters came in the form of an Adobe PDF Letter attached to an email.

Comment #	Comment	Response
TBL-1	"Page 5, Beneficial Uses Table, Municipal and Domestic water supply has an "*" without further notation or explanation."	The asterisk was changed to footnote 3 in the Beneficial Uses Table, with added footnote text stating "Excepted from MUN beneficial uses."

TBL-2	Page 8, Section on Definitions, Item 21. “Non-Irrigated Lands”. The referenced Monitoring and Reporting Order R8-2020-0009 is not listed on the [Santa Ana Water Board’s] website page regarding adopted orders.”	The referenced Monitoring and Reporting Order R8-2020-0009 is available on the Santa Ana Water Board’s website at the following link: https://www.waterboards.ca.gov/santaana/public_notices/docs/2020/13267_Investigative_Order.pdf
TBL-3	[O]n Page 25 in the Prohibitions Section under Item 6 which discusses “the discharge of waste from irrigated lands onto lands not owned or controlled by the discharger.... Because many of the surface water protection evaluation methods are already present for the protection of waters of the state, WRCAC requests that the [Santa Ana Water Board] include another numbered Item in the Order to expand the discussion regarding the prohibition against discharging a Waste to also include offering a future process where the [Santa Ana Water Board] staff agrees to work with individual dischargers and Coalition Groups to develop methods for Dischargers to submit justification sufficient to obtain authorization from the Santa Ana Water Board to discharge onto lands not owned or controlled by the Discharger. This request could result in an Order Item that is similar to the Order’s Item 3. Templates for Members subitem b. on Page 39: “The Coalition Group may work with Santa Ana Water Board staff in the development of the templates below, ...”	The referenced prohibition is aimed at controlling offsite discharges of recycled water and has been revised for clarity as follows: “The discharge of recycled water onto lands not owned or controlled by the Discharger is prohibited.” However, please note that any discharge of waste that causes a condition of pollution or nuisance, including from stormwater runoff, is potentially subject to enforcement.
TBL-4	WRCAC also requests that an Item be added in either the Farm Plan Section, or elsewhere in the Order when discussing compliance evaluations, that discusses sediment and erosion control during extreme wet weather events. For instance, the Item requested could state: “When making sediment and erosion control compliance	The requested language has not been accepted for inclusion in the Order, as it could potentially limit the Santa Ana Water Board’s future exercise of discretion on enforcement matters. The Santa Ana Water Board does, however, consider site specific factors such as those mentioned when taking enforcement actions

	<p>decisions the [Santa Ana Water Board} staff will take into consideration the field’s management characteristics and the storm event magnitude and duration that may have contributed to the sediment discharges or erosion control issue.”</p>	<p>and follows the State Water Board’s <i>Water Quality Enforcement Policy</i>.</p> <p>Dischargers with the potential to cause erosion and discharge sediment that may degrade surface waters are required to implement sediment and erosion control management practices (Order, Section D.3.B). Pursuant to Water Code section 13360, the Order does not specify the design, location, type of construction, or particular manner of management practices compliance, and Dischargers can use any appropriate management practice to comply with the requirements of the Order (Order, Section D.2.b).</p> <p>Compliance with receiving water limitations is generally achieved through the implementation of appropriate management practices to prevent or control discharges of waste, and improvement of those management practices where necessary to achieve water quality objectives, including through the Water Quality Improvement Plan process outlined in Section F.</p>
<p>TBL-5</p>	<p>Concerns over the provided resource reference regarding the definition and guidance narrative for the use of Mulch. Page 45, Subsection G. Land Application of Mulch, Compost, and Manure. Item 1.a. and 1.b.</p> <p>“The term Mulch does not appear in the referenced California Code Regs tit. 14, § 17852 et seq. regarding definitions. In addition, these</p>	<p>For clarity, a definition for mulch was added as Finding 21, which includes byproducts as defined in the Title 14 description:</p> <p>“‘Mulch’ is untreated or raw landscape waste and crop production byproducts consisting of leaves, grass clippings, weeds, yard trimmings, wood waste, branches and stumps, and whole</p>

	<p>definitions in this section of the California Code in large part appear to focus on the setup of using compostable materials and composting performance protocols. The reference does not guide the conservation applications of mulch as clearly as the USDA Natural Resources Conservation Service (NRCS) does in their list of conservation practices. The NRCS defines mulch use in their conservation practice standard 484 Mulching (i.e., a Best Management Practice). Please review the attached national standard, or the NRCS California practice standard of the same number, and consider adding this to the reference list next to the California Code Regs currently referenced.”</p>	<p>plants/trees that have been chipped and ground to a reduced particle size.”</p> <p>The NRCS Code 484 resource has also been added to Section G.1.a as a resource for management practices, with the following text:</p> <p>“Dischargers are also encouraged to consult the Natural Resources Conservation Service Conservation Practice Standard for mulching (Code 484), which provides a list of management practices in the application of mulch to improve moisture management, prevent excessive erosion and improve plant productivity and health.”</p>
TBL-6	<p>“Page 48, Subitem 9. Claims for Exemption from Public Disclosure verses the multiple references to be able to submit anonymous APN IDs (Page 41, Subitems 4.c.iii.1., 4.c.iii.3., Attachment A Page 8 Item C. Annual Submittal of irrigation and Nitrogen Management Summary Data second paragraph, and Page 10: Table 1: Individual Field Level AR Data by Anonymous APN ID Table.”</p> <p>“WRCAC requests a confirmation in writing that the Claim for Exemptions protocol does not include the implicit compliance approach used for developing anonymous APN reporting.”</p>	<p>Section H.9 allows Dischargers and/or the Coalition Group to request an exemption for proprietary or trade secret information from public disclosure. Section 4.c.iii establishes a process by the Coalition Group can use anonymous identification numbers and APN identification numbers to report members’ Farm Plan and INMP data. No request is necessary under Section H.9 for the Coalition Group to use the anonymous identifiers reporting process outlined in Section 4.c.iii.</p>
TBL-7	<p>“Page A-1, Section Introduction, beginning of second paragraph infers by exclusion that the MRP does not apply to surface water discharges. “This MRP establishes specific groundwater monitoring, reporting, and electronic data deliverable requirements for the San Jacinto Coalition.” However, on page A-11 Subitem D</p>	<p>Report Component (19) of the Annual Monitoring Report is not associated with groundwater reporting requirements. WRCAC, and not the San Jacinto Coalition Group, conducts surface water monitoring and collects data through its Water Quality Index Ag Tool (WQIag Tool) on behalf of WRAC members.</p>

	<p>Annual Monitoring Report (AMR), component number 19 Summary of surface water monitoring, and the last section on page A-14 regarding Report Component (19) include surface water reporting in the groundwater monitoring, reporting and electronic data deliverables.”</p> <p>“Please confirm that WRCAC can assume that the inclusion of list Item 19. Summary of the surface water monitoring simply reflects the required AMR content; and that surface water reporting is otherwise not associated with the groundwater discussion being provided in Attachment A – Monitoring and Reporting Program?”</p>	<p>Because the WRAC report is included as an addendum to the San Jacinto Coalition’s Annual Monitoring Report, it is included in the reporting components for the Annual Monitoring Report.</p>
TBL-8	<p>“Page A-14, Section entitled: Report Component (19) – Summary of Surface Water Monitoring, last sentence: “Members of WRCAC complete an online data management tool, Water Quality Index Agricultural Tool (WQIag Tool), the data collected is provided to the Santa Ana Water Board.””</p> <p>“This sentence needs to adjust the WQIag tool discussion from being available online as an option to being a provided by WRCAC in a workbook that contains instructions and the WQIag tool, as was previously discussed in working draft comments that can be found on Page 10, Item 31.: “WRCAC provides enrollees a workbook that contains instructions and the Water Quality Index Agricultural Tool (WQIag Tool). The data was collected and provided to the Santa Ana Water Board and the San Jacinto Coalition, on behalf of the WRCAC members.””</p>	<p>The suggested change has been accepted. The last sentence of Attachment A, Report Component (19) has been changed to read, “WRCAC provides enrollees a workbook that contains instructions and the Water Quality Index Agricultural Tool (WQIag Tool). The data was collected and provided to the Santa Ana Water Board and the San Jacinto Coalition, on behalf of the WRCAC members.”</p>
EMWD-1	<p>“Page 13(17), No. 45 The burden, including costs, of preparing the technical and monitoring reports</p>	<p>The Santa Ana Water Board did not provide a specific cost analysis as part of the Order. The</p>

	bears a reasonable relationship to the need for the reports and benefits to be obtained from them. <i>Has this been assessed and if so, is it available for review and comment?"</i>	Santa Ana Water Board generally considered costs associated with the Irrigated Lands program in the Mitigated Negative Declaration adopted through Order R8-2016-0003. To the extent that there are new monitoring and reporting requirements added to the proposed Order (e.g., Irrigation and Nitrogen Management Plans and summary reports, groundwater trend monitoring, drinking water well monitoring), these are necessary to comply with precedential requirements in the State Water Board's ESJ Order. ¹ The Santa Ana Water Board acknowledges that these new requirements may impose some additional costs, but notes that many of the requirements have already been voluntarily implemented by the San Jacinto Coalition. The benefits to be obtained from these new monitoring and reporting requirements are substantial, as they will assist in preventing the overapplication of nitrogen to farmland and in tracking and preventing degradation from nitrates in groundwater and drinking water.
EMWD-2	Requested change: Page 20(25), No. 70, a. "However, there are significant societal costs associated with agricultural activity where water bodies have been allowed to degrade below <u>causing the exceedance of</u> water quality objectives through historic practices."	The requested revision has not been accepted for inclusion in the Order. This sentence is not referring to mere exceedances of water quality objectives, but historic lowering and degradation of water quality.
EMWD-3	Requested change: Pg. 30(34), D., 4., d. "The A/R ratio is the ratio of total Nitrogen Applied (from sources including, but not limited to, organic amendments, synthetic fertilizers, manure, and	The sentence of Section D.4.d that is quoted contains the definition for the Applied/Removed (A/R) ratio for nitrogen that is derived from the precedential ESJ Order.

¹ "ESJ Order" refers to State Water Board [Order WQ 2018-0002](#), *In the Matter of Review of Waste Discharge Requirements General Order No. R5-2012-0116 for Growers Within the Eastern San Joaquin River Watershed that are Members of the Third-Party Group*, dated February 7, 2018.

	<p>irrigation water) to the total Nitrogen Removed (including all harvested materials and nitrogen annually sequestered in permanent wood for perennial crops <u>if nitrogen values are available.</u></p> <p>The San Jacinto Coalition agrees to include the nitrogen annually sequestered in permanent wood for perennial crops, however, values are currently only available for almonds. There are no almonds in the coalition. Most of the perennial crops with the San Jacinto Coalition are citrus. When meaningful data is available, the San Jacinto Coalition will apply the values for reporting.”</p>	<p>Nitrogen “Removed” is determined by multiplying a Discharger’s crop yield by a crop-specific nitrogen coefficient, C_N, which represents the amount of nitrogen in the harvested crop. Section D.4.d later explains, “For some crops, the data needed to develop the C_N coefficient may not yet be available. The Coalition Group is directed to determine, through nitrogen removed testing and research, the most appropriate C_N coefficients for converting crop yield to nitrogen removed for approval by the Santa Ana Water Board’s Executive Officer.”</p> <p>The Santa Ana Water Board recognizes the concern expressed is whether A/R ratios must be calculated even when coefficients for conversion of yield to nitrogen removed values have not yet been developed. This is addressed under “Total Nitrogen Removed” on Page A-8 of Attachment A, the Monitoring and Reporting Program for the San Jacinto Coalition, which states in relevant part:</p> <p>“Until C_N coefficients have been established for a particular crop, the Member will only report the crop yield in the INMP. Nitrogen Removed includes nitrogen removal via harvest and nitrogen sequestered in permanent wood of perennial crops.”</p> <p>Note that the same section of Attachment A also provides a schedule by which the San</p>
--	---	--

		<p>Jacinto Coalition is expected to determine the C_N coefficients for crops:</p> <p>“The Coalition INMP Summary Reports shall show CN coefficients for crops that cover 95% of acreage within the Coalition’s boundaries in time to calculate Total Nitrogen Removed values based on yield values reported in the INMP Summary Reports due September 15, 2024. By September 15, 2025, an updated report shall publish CN coefficients for crops that cover 99% of acreage within the Coalition’s boundaries. For the crops that cover the remaining 1% of acreage within the Coalition’s boundaries, it is acceptable to use estimated CN coefficients based on similar crop types.”</p> <p>The above schedule, however, has been revised pursuant to the San Jacinto Coalition’s request in response to comment EMWD-15 below.</p> <p>No changes were made in response to this comment.</p>
EMWD-4	<p>Requested change: Page 41 (45), E., 4., c, ii.: <u>“1.The Coalition Group shall propose an approach, to be approved by the Santa Ana Water Board’s Executive Officer, that defines outliers from the annual INMP summary data using either:</u> <u>a.After three years of nitrogen removal coefficients C_N that have been approved by the</u></p>	<p>The requested revision is not necessary, as the language in the Order is already sufficiently flexible to accommodate scenarios where there is not statistically significant method of determining outliers. Section E.4.c.ii.2 states, “The Coalition Group shall propose an approach, to be approved by the Santa Ana</p>

	<p><u>Santa Ana Water Board’s Executive Officer; or:</u> <u>b.Academic or other reported data sources</u> <u>(e.g., Coalitions outside of the San Jacinto Watershed)</u></p> <p>There are too few data points per crop to generate any meaningful statistics to determine a statistical outlier methodology. Per year, the most data points we have for any crop is 16with the next highest only 11. Two potential alternatives are to use data from another coalition or compare N application rates to those recommended in literature (e.g., University of California recommendations). Overall, “best professional judgement” would be utilized on a case-by-case to determine outliers due to reasonableness.”</p>	<p>Water Board’s Executive Officer, that defines a set of outlier members with whom the Coalition Group will follow up.” The San Jacinto Coalition may propose any approach that is appropriate under the circumstances for consideration by the Executive Officer.</p>
EMWD-5	<p>Requested change: Page 41 (45), E., 4,c,ii: <u>“2 .After notification to the Coalition Group from the [Santa Ana Water Board] of Coalition members that have potential outliers from reported AR data due to over-applying nitrogen to their field, the Coalition Group shall inform those members with outlier reported results and shall follow up by provide them information, as appropriate.</u></p> <p>For consistence of the tentative Order, refer to Page 35 (31), D., 4., f., as stated “...Dischargers notified by the Santa Ana Water Board because of outlier conditions, individually or through the Coalition Group...”. As state above in No. 4, “best professional judgement” may be applied to outliers and, therefore, the Coalition Group would prefer concurrence by the [Santa Ana Water Board]</p>	<p>Please see response to comment EMWD-4.</p> <p>Pursuant to Section E.4.c.ii.2 as currently written in the Order, the Santa Ana Water Board’s Executive Officer will approve the method for determining outliers for different crop types. However, once an appropriate method is approved, the determination should be made the by San Jacinto Coalition, although the San Jacinto Coalition may seek additional input from Santa Ana Water Board staff as needed. Concurrence by the Santa Ana Water Board may not be necessary in every instance, and therefore the Santa Ana Water Board is declining to specify this as an Order requirement.</p>

	before notifying members of additional work for compliance is required.”	
EMWD-6	Requested change: Page 41 (45), E., 5.: The Coalition Group, on behalf of its members, may conduct testing and monitoring of drinking water supply wells present on their members’ property. The San Jacinto Coalition does not conduct this testing on behalf of its members.	This requested revision has not been accepted. The referenced language in the Order uses the term “may” and is permissive rather than mandatory. This leaves open the possibility of the San Jacinto Coalition or a different coalition conducting this monitoring in the future.
EMWD-7	Requested change: Page 42 (46), E., 6, b: “The Coalition Group must inform members who are outliers for reported AR data that they are potentially over-applying nitrogen to their fields and must follow up with members and provide them training, as appropriate. Already stated in (EMWD-5) (Page 41, E., 4., c , ii., 2.), above. The San Jacinto Coalition does not have the qualified staff to provide appropriate training.”	The requested revision has been accepted in part. At a minimum, the San Jacinto Coalition needs to notify members who are outliers that they are potentially over-applying nitrogen to their fields. Section D.4.f of the Order provides that outlier Dischargers must work with an irrigation and management planning specialist for certification of the next INMP prepared following notification. The text for Section E.6.b has been changed to read, “The Coalition Group must inform members who are outliers for reported AR data that they are potentially over-applying nitrogen to their fields and must follow up with members, as appropriate.”
EMWD-8	Requested change: Attachment A, Page A-3 (58). III: “The San Jacinto Coalition must <u>shall</u> collect sufficient data to describe Irrigated Lands impacts on groundwater quality. As stated in the following, Page A-4 (59), III. A., “The San Jacinto Coalition shall develop a groundwater monitoring of well(s)”...to be consistent with the tentative MRP.”	The requested revision has been accepted. The applicable text in Attachment A, Section III has been changed to read, “The San Jacinto Coalition shall collect sufficient data to describe Irrigated Lands...”

<p>EMWD-9</p>	<p>Requested change: Attachment A, page 59, III A: “The San Jacinto Coalition shall develop a groundwater monitoring of well(s) that will (1)be representative of the Coalition’s geographic area <u>where agriculture activities occur by Coalition members and (2) employ shallow wells (though not necessarily wells completed in the uppermost zone of first encountered groundwater).</u>”</p> <p>Currently, the San Jacinto Coalition utilized a modified DB Stephens’ Ambient Water Quality (AWQ) method for determine groundwater trends. The AWQ has been utilized by Santa Ana Water Protection Authority (SAWPA) to report the groundwater quality for each Groundwater Management Zone (GMZ)which is accepted by the Santa Ana Water Board. The AWQ looks at both vertical and horizontal groundwater areas within the GMZ to determine the GMZ water quality. The San Jacinto Coalition modified AWQ selectively looks at agricultural activities in local clusters of agricultural areas as determine with the [Santa Ana Water Board] staff and applies the AWQ method in the same way to determine groundwater quality for each of the clusters. EMWD has a local well monitoring program that sample wells both private and public and utilizes the data from the monitoring program for the modified AWQ computation as well as SAWPA’s AWQ. These wells are monitored for static levels twice a year and once for water quality. These well may be screened at different groundwater bearing zone and therefore, when pumped, will be a mixture of the various zones. To implement the specific monitoring of the shallow portion of the wells will require additional time, manpower,</p>	<p>The requested revision has been accepted. The referenced sentence in Attachment A, Section III.A has been changed to read, “The San Jacinto Coalition shall develop a network of groundwater monitoring of well(s) that will be representative of the geographic area where agriculture activities occur by Coalition members.”</p>
---------------	--	--

	<p>equipment and overall cost for complying with the proposed requirement. If additional monitoring wells are required, the cost will be burdensome to EMWD as well as the San Jacinto Coalition and its members.”</p> <p>“The San Jacinto Coalition is requesting that the current groundwater water quality evaluation using the modified AWQ be accepted as the groundwater quality trend reporting. EMWD will consider conducting isolated monitoring of the uppermost groundwater bearing zone using alternative sampling methods in the future.”</p>	
EMWD-10	<p>Requested change: Attachment A, page A-4, III, A:</p> <ul style="list-style-type: none"> a. “The variety of agricultural commodities produced by Coalition members within the Coalition’s boundaries (particularly those commodities comprising the most irrigated agricultural acreage) b. The areas contributing significant recharge to urban and rural communities where groundwater serves as a significant source of supply. <p>The San Jacinto Coalition only obtains data from its members.”</p>	<p>The requested revisions have been accepted in part.</p> <p>The text for Attachment A, Section III.A.a has been changed to read, “The variety of agricultural commodities produced by Coalition members...”</p> <p>The text for Attachment A, Section III.A.b has been changed to read, “The areas where agricultural discharges are contributing significant recharge to urban and rural communities where groundwater serves as a significant source of drinking water.” This provision is one of the factors that the San Jacinto Coalition must consider when proposing and developing a network of groundwater trend monitoring wells. If this factor has no application, the San Jacinto Coalition may so state in its Groundwater Trend Monitoring Plan.</p>

EMWD-11	<p>Requested change: Attachment A, page A-7 V. A. “2: For chemistry data, provide errors and explanation, for the following:</p> <ul style="list-style-type: none"> a. A lab narrative describing quality control failures; b. Analytical problems and anomalous occurrence; c. If any data is missing from the annual data report, the submittal must include a description of the missing data and the date it will be submitted to the Santa Ana Water Board” 	<p>The requested revision has been accepted. The text for Attachment A, Section V.A.4.c has been changed to read,</p> <p>“4. For chemistry data, provide errors and explanation, for the following:</p> <p>....</p> <p>c. <u>If any data is missing from the annual data report, the submittal must include a description of the missing data and the date it will be submitted to the Santa Ana Water Board.</u></p>
EMWD-12	<p>Requested change: Attachment A, page A-7 V, A (2,3 &4 (d,e, &f):</p> <p>“The San Jacinto Coalition recommend these items be provided “upon request”. This will be a lot of extra work to include just for reporting. EMWD will have the information on retention for 10 years. Errors and explanations are still required as recommended in” (EMWD-11).”</p>	<p>The Santa Ana Water Board agrees that the reporting items listed in Attachment A, Section V.A.4, subdivisions (d) through (f) may be provided upon request. The text “(upon request)” has been added to each of these subdivisions.</p>
EMWD-13	<p>Requested change: Attachment A, page A-7, V.B. “...the Coalition shall submit to the Santa Ana Water Board management practice implementation data from the most recently submitted Farm Plans by <u>Coalition members.</u></p> <p>The San Jacinto Coalition will provide the Farm Plans as submitted by the individual Coalition members.”</p>	<p>The requested revision has been accepted. The text for Attachment A, Section V.B has been changed to read, “ ...the most recently submitted Farm Plans by Coalition members.”</p>
EMWD-14	<p>Requested change: Attachment A, page A-8 V. C. “The Coalition shall submit Township <u>Groundwater Management Zone(GMZ)</u> AR Data Table information beginning September 15, 2024 and annually thereafter.</p>	<p>The requested revision has been accepted. The text for Attachment A, Section V.C has been changed to read “The Coalition shall submit Groundwater Management Zone (GMZ) AR Data Table...”</p>

	<p>Subdividing the data into Township for the San Jacinto Watershed is not meaningful. A better approach is to use the Groundwater Management Zones as it applies to the Basin Plan for water quality objectives.”</p>	<p>Santa Ana Water Board agrees that the use of Groundwater Management Zones is a more meaningful representation of the agricultural operations locations and possible impact on groundwater. Groundwater Management Zones are already established as subunits in the Total Dissolved Solids (TDS) and Nitrogen Management Plan contained in the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) and have their own associated water quality objectives for salts and nutrients.</p>
<p>EMWD-15</p>	<p>Attachment A, page A-8: Total Nitrogen Removed. “The Coalition INMP Summary Reports shall show C_N coefficients for crops that cover 95% of acreage within the Coalition’s boundaries in time to calculate Total Nitrogen Removed values based on yield values reported in the INMP Summary Reports due September 15, 2024. By September 15, 2025, an updated report shall publish C_N coefficients for crops that cover 99% of acreage within the Coalition’s boundaries. For the crops that cover the remaining 1% of acreage within the Coalition’s boundaries, it is acceptable to use estimated C_N coefficients based on similar crop types. The methods used to establish C_N coefficients must be approved by the Executive Officer. Until C_N coefficients have been established for a particular crop, the Member will only report the crop yield in the INMP.</p> <p>The San Jacinto Coalition consist of 20 operators with 11 categories of crops.... There are nine</p>	<p>Please see response to comment EMWD-3.</p> <p>The precedential ESJ Order gives the Santa Ana Water Board flexibility in the approach and implementation of establishing coefficients. While the requirement for use of coefficients for conversion of yield to nitrogen removed values is precedential under the ESJ Order, the Santa Ana Water Board is given discretion to determine the number of crops to be analyzed and the timeline for development of coefficients (ESJ Order, p. 41).</p> <p>In response to this comment, the referenced text in Attachment A, Section V.C has been changed to read,</p> <p>“The Coalition INMP Summary Report shall show C_N coefficients for crops that cover 86% of acreage within the</p>

	types of crops that currently do not have N removal data available (Turf, Misc. Truck Crops, and Other). This is equivalent to 13% of the crops for the San Jacinto Coalition. Because of the uniqueness of the crops grown by San Jacinto Coalition members, the San Jacinto Coalition recommends the removal of the requirement to meet 95% and 99% C _N for crop coverage. The San Jacinto Coalition will provide alternative methods for establishing C _N coefficients for ones that do not have an established data, as appropriate.”	Coalition’s boundaries in time to calculate Total Nitrogen Removed values based on yield values reported in the INMP Summary Reports due September 15, 2024. By September 15, 2027, for the crops that cover the remaining 14% of acreage within the Coalition’s boundaries, it is acceptable to use estimated C _N coefficients based on similar crop types and/or through use of appropriate scientific literature.”
EMWD-16	Requested change: Attachment A, page A-10, C. “Table 3: Township <u>Groundwater Management Zone-Level Aggregated AR Data Table:</u> a. Township and range <u>Groundwater Management Zone (GMZ)</u> ; b. Crop; c. Total acreage: sum for all the acreage for each unique crop within the township <u>GMZ(acres).</u> “	The requested revision has been accepted. The text for Attachment A, Section C, Table 3 has changed to replace “Township” with “GMZ”. Please also see response to comment EMWD-14.
EMWD-17	Requested change: Attachment A, page A-11, D (10 14, 19): “10. Discussion of data relative to water quality objectives, and where applicable, Water Quality Improvement Plan milestones <u>(as provided by Coalition members)</u> ; 14. Actions taken to address water quality exceedances that have occurred, including but not limited to, revised or additional management practices implemented <u>(as provided by Coalition members)</u> ;	The requested revisions have been accepted. The text for Attachment A, Section V.D has been changed to add “(as provided by Coalition members)” for items 10 and 14. Text has also been added to item 19 to read “(as provided by WRCAC)”. Additionally, changes have been made to the report component descriptions to correct numbering errors.

	<p>19. Summary of surface water monitoring (<u>as provided by WRCAC</u>)</p> <p>The San Jacinto Coalition is providing the recommendations for clarification of responsibility.”</p>	
EMWD-18	<p>Requested change: Attachment A, page a-12. V.D.:</p> <p>“Report Component (8) –Location Maps An accompanying GIS shapefile or geodatabase of monitoring site and monitoring well information must include Global Positioning System (GPS) coordinates <u>shall be provided upon request</u>.</p> <p>The data is retained by EMWD for 10 years and can be provided upon request.”</p>	<p>The requested revision has been accepted. The text for Attachment A, Section V.D, Report Component (8) has been changed to read, “...Global Positioning System (GPS) coordinates shall be provided upon request.”</p>
EMWD-19	<p>Requested change: Attachment A, page A-12, V.D.:</p> <p>“Report Component (17) Summary of Management Practices The summary of management practice data must include a quality assessment of the collected information by township <u>GMZ...</u>”</p>	<p>The requested revision has been accepted. The text for Attachment A, Section V.D, Report Component (17) has been updated to the corrected number (16). The text has been changed to read, “...the collected information by GMZ...” Additionally, the subsequent Report Component numbering has been corrected.</p>