

Cross, Wanda@Waterboards

From: Pat Boldt <mpboldt.53@gmail.com>
Sent: Tuesday, March 28, 2017 1:15 PM
To: Lindberg, Eric@Waterboards; Cross, Wanda@Waterboards
Cc: Bruce Scott
Subject: Re: DRAFT - Proposed changes to CWAD dates

Eric,
I think this is a step in the right direction. Agree- no reason to add AgNMP in when that is probably 1.5 years out. Comment 1

The 40 page permit is meaningless to ag operators this table will be better. Changes make sense to me with a few things to think about. Comment 2

I doubt seriously that a coalition formation will be done by 90 days beyond enrollment. Ag operators are not going to be beating down your doors to join and in fact my prediction is that most will decide that they are stopping farming. For many it will no longer be economically feasible to farm. IF the SJRCD is approached to be the Coalition- as Bruce has stated before-that would never happen until ag operators are asking for that to happen. To set up a coalition on this not coming at the request of the operators would be doomed for certain. I would phrase in such a way that a coalition could be formed in the future but not limit with days to do so- if that is possible. Comment 3

Pat Boldt

On Mon, Mar 27, 2017 at 3:24 PM, Lindberg, Eric@Waterboards <Eric.Lindberg@waterboards.ca.gov> wrote:

Bruce & Pat,

Please take a look at the attached DRAFT table of CWAD requirements with proposed changes to the due dates. I'd like to hear your thoughts.

Here are the highlights:

- Enrollment period is pushed out to Oct 2017 (+6 mos).
- Coalition Formation deadline is 90 days beyond the new enrollment deadline – (Jan 2018, +9 mos). This also moves the Compliance Program due date.
- BMP plan proposal is no longer a hard due date – I like 90 days from NOA instead. That way if we are slow in getting NOAs sent out for whatever reason, the dischargers are not stuck with a short fuse on their reporting requirements.
- BMP annual report is tied to BMP plan approval, instead of being a hard date. Again, as with the plan proposal, this change should give dischargers some flexibility in planning for their first annual report.

- Same with the WQMPP annual reports – ideally these are submitted with the BMP reports as a combined document.

I plan to ask the Regional Board to accept my proposed changes at the April meeting. I will be sending out a letter this week notifying the mailing list that there will be a revision to the CWAD. The letter will contain a version of the attached table, a map, a copy of the FY16/17 fee schedule and the hypothetical fee table that I showed you before, and a simplified summary of the CWAD that might be more approachable than the 40pg Order itself.

Thanks,

Eric Lindberg PG, CHG

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