

**From:** Elissa Callman <ECallman@cityofsacramento.org>  
**To:** "AWLaputz@waterboards.ca.gov" <AWLaputz@waterboards.ca.gov>  
**CC:** Marty Hanneman <MHanneman@cityofsacramento.org>, Dave Brent <DBrent@city...>  
**Date:** 03/31/11 1:05 PM  
**Subject:** Comments on Recommended Framework for the IRLP  
**Attachments:** Sacramento River Source WaterProtection Program Comments on Recommended IRLP Framework - March 2011.pdf

Dear Adam,

Please find attached comments from the Sacramento River Source Water Protection Program on the Recommended Framework for the Irrigated Lands Regulatory Program. We appreciate this opportunity for stakeholder input, and the efforts of Central Valley Water Board on this important program.

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

Sincerely,  
Elissa Callman  
Senior Engineer  
City of Sacramento Dept of Utilities  
Program Manager for Sacramento River Source Water Protection Program  
916-808-1424  
ecallman@cityofsacramento.org<mailto:ecallman@cityofsacramento.org>



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March 31, 2011  
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ILRP Framework  
Mr. Adam Laputz  
Central Valley Regional Water Quality Control Board  
630 K Street, Suite 400  
Sacramento, CA 95814

**VIA EMAIL: [AWLaputz@waterboards.ca.gov](mailto:AWLaputz@waterboards.ca.gov)**

**Subject: Comments on Recommended Irrigated Lands Regulatory Program Framework**

Dear Mr. Laputz:

The Sacramento River Source Water Protection Program appreciates the opportunity to provide comments on the Recommended Irrigated Lands Regulatory Program Framework (ILRP Framework). We appreciate the thoughtful responses to our comments on the Program EIR.

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 have a few comments at this time on the ILRP Framework to support the need for stakeholder involvement, source water protection verification, and flexibility in the long-term management of agricultural discharges.

We appreciate that the Regional Board has included much opportunity for public involvement in the Framework. We encourage the opportunity for stakeholder input whenever practical, and we intend to participate as a stakeholder in the development of specific Orders.

A crucial part of a management program is a monitoring component to verify that the practices are effective and determine if there are any new or varied conditions. In the general goals section of the Monitoring and Assessment Requirements, the Board commits to that concept for all three tier areas. The document states that the Board will periodically review available data to determine whether any adjustment to the tiers needs to be made. We recommend that the Board staff be provided the flexibility to require focused monitoring for specific Tier 1 areas, to support the Tier re-evaluation process and verify that the water quality threat remains low.



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It is important that the tier designations include a sufficient data period to identify threats to water quality. Due to the California climate, hydrology, and yearly variability in watershed conditions, we believe it is important that the tier designations consider a sufficiently long horizon to capture wet and dry years. There can be changes in human activities, such as agricultural management practices and availability of pesticide products; a longer horizon of review may support the necessary water quality protection.

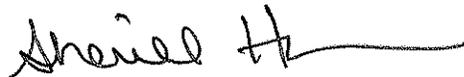
We believe that in order to provide sufficient long-term management, especially through the Waste Discharge Requirements program, there must be a clear mechanism to address new constituents of interest. We are pleased to see that the Tier designations can be revisited, if additional evidence of change in water quality threat is available. Examples include changes in agricultural types or practices within a designated area, monitoring data, new regulatory standards, and identification of new constituents of interest.

We understand that the Board intends to develop a system that will allow for electronic submittal of information, and that prior to the system being in place, the Board may allow dischargers to retain Farm-specific evaluations on-site and available for review. We request that this information be available in a timely manner if requested by other stakeholders.

We appreciate the concept of the Optional Certified Farm Water Quality Management Plan (FWQMP) to provide flexibility for individual farmers to address water quality. We recommend that the Framework be amended to specify that these plans will only be awarded to areas designated as Tier 1 threats.

Thank you for the opportunity to provide comments on the Recommended Framework. We appreciate Regional Board staff's efforts, and 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  
Bill Busath, City of Sacramento Dept of Utilities  
Mike Yee, City of Sacramento Dept of Utilities  
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