

Revisions to Waste Discharge Requirements  
for Growers within the Eastern San Joaquin River Watershed  
that are Members of the Third-party Group  
Order Number R5-2012-0116-R2

**RESPONSE TO COMMENTS**

The California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board or "Board") has provided opportunity for the public to submit written comments on the tentative revisions to Waste Discharge Requirements for Growers within the Eastern San Joaquin River Watershed that are Member of the Third-party Group, Order R5-2012-0116-R2 (referred to as the "Eastern San Joaquin Order" or "Order"). This document contains written responses to comments that were timely received on the tentative revised Order.

The tentative revised Order was released for public review on 6 February 2015, and one additional change was released with the proposed revisions on 13 February 2015, with the comment period ending on 13 March 2015. The public notice stated that the Board would only consider adoption of proposed revisions, and would not be re-considering other aspects of the Order. One comment letter received by the deadline was submitted by East San Joaquin Watershed Coalition.

Staff responses to the comments in the received letter are below.

1-1. Video option for grower outreach event participation

**Comment summary:** Members in a designated high vulnerability area should be able to watch a video to comply with their annual outreach monitoring event requirement.

**Response:** The submitted comment is outside the scope of the proposed revisions. The public notice specifically indicated that comments would only be accepted on issues within the scope of the proposed revisions. Staff response is not required for comments outside the scope of the proposed revisions.

However, it should be noted that the goal of annual third-party outreach events is to become informed of any water quality problems and the management practices that are available to address those issues. In general, staff supports alternative options for disseminating information, as the objective of the outreach events would be met. An information item is planned for June 2015 Board meeting to discuss and receive Board direction on distance education requirements and how it may work for the Irrigated Land Regulatory Program (ILRP) as a whole.

1-2. Due date for submittal of a Comprehensive Groundwater Quality Management Plan

**Comment summary:** The proposed revisions include a modification of the due date for submission of Comprehensive Groundwater Quality Management Plan 60 days following the approval of the Groundwater Quality Assessment Report (GAR), rather than being due at the same time as the GAR. The comment letter expressed support for the proposed modification of the due date.

**Response:** Because high vulnerability designations proposed in the GAR need to be reviewed and approved by the Executive Officer, it is reasonable that development of the Groundwater Quality Management Plan that addresses the high vulnerability areas follows the GAR approval (24 January 2014 letter issued by the Executive Officer).