

Comment Summary and Responses
Extension of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Agricultural
Lands within the Los Angeles Region
Comment Due Date: November 10, 2022

No.	Author
1	Ventura County Agricultural Irrigated Lands Group (VCAILG)
2	Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB)
3	Debbie Brokaw Jackson, Brokaw Ranch Company
4	Santa Barbara Channelkeeper
5	Cara Pugh, resident of Ventura County
6	Nursery Growers Association-Los Angeles Irrigated Lands Group (NGA-LAILG)
7	Chuck Carter, Channel Islands Harbor resident
8	Dave Copper, Seabridge resident
9	Andrew Kramer, Eat Sweet Farms, LLC
10	Bryan Gresser, Lanai Investors, LLC
11	Elaine Denham, Ventura County grower
12	Chris Woodard, Ventura County grower
13	Dave Borchard, Borchard Companies, Inc.
14	Katie Brokaw, Brokaw Nursery, LLC
15	Marc Saleh, Saleh Ranch
16	Scott Klittich, Otto & Sons Nursery
17	Ched Myers, Ventura County resident
18	CJ Polacek, Ventura County resident
19	Carolyn Dolen, Ventura County resident
20	Carolynn Wotman, Ventura County resident
21	David Soto, Ventura County resident
22	Dewayne Weaver, Ventura County resident
23	Josh Wernli, Ventura County resident
24	Mary Vasinda, Ventura County resident
25	Meggie Hawthorne, Ventura County resident
26	Melissa Arellano, Ventura County resident
27	Chris Bryson, Ventura County resident

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28	Elaine Enns, Ventura County resident
29	Isabelle Mandon, Ventura County resident
30	Joy Downing Riley, Ventura County resident
31	Martin Tripp, Ventura County resident
32	Vincent Carabello, Ventura County resident
33	Ryan Bowden, Ventura County resident
34	Robert Chatenever, Seabridge resident

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1.1	VCAILG	<p>Since the first Conditional Waiver in 2005, VCAILG has been committed to implementing the requirements of the original Conditional Waiver and its successors. VCAILG has also continued to assess the effectiveness of those requirements with the goal of structuring a program that supports the diversity of farming operations in Ventura County and their ability to achieve water quality standards most efficiently. VCAILG continues these commitments and efforts, and looks forward to continuing to work with Regional Board staff to develop and share proposals for an effective long-term program that appropriately integrates the precedential requirements set by the State Water Resources Control Board in Order WQ 2018-002 as applied to Ventura agriculture.</p>	<p>Comment noted. The Los Angeles Water Board looks forward to continuing our work with VCAILG.</p>

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1.2	VCAILG, VC CoLAB, D. Jackson, A. Kramer, B. Gresser, E. Denham, C. Woodard, D. Borchard, K. Brokaw, M. Saleh, S. Klittich	<p>The commenters listed to the left commented generally that individual monitoring requirements should be postponed during the one-year extension.</p> <p>VCAILG commented in part as follows, “Specifically, if the Proposed Order is adopted without modification, individual monitoring requirements will be triggered for hundreds of growers, across multiple watersheds, within the coming year. While Appendix 3, Section 1.c of the Proposed Order allows for either coalition-lead or individual grower implementation, VCAILG has consistently explained that coalition-lead compliance is simply not possible for an individual requirement at this scale. This means that Regional Board staff will need to take direct responsibility for obtaining individual grower compliance with this requirement. This would necessarily need to occur at the same time that the same Regional Board staff are trying to develop and put forward a long-term program for public input and Regional Board consideration. Further, since this would be the first time that individual monitoring would be imposed on growers in Region 4, there are likely to be significant questions and issues that would arise regarding implementation of this requirement.</p> <p>Other factors that may significantly complicate implementation of individual monitoring at this time include the following:</p>	<p>The Los Angeles Water Board agrees that during this extension while a new regulatory order is being developed, Water Board and stakeholder resources should be primarily focused on development of the new regulatory order. While VCAILG’s and the Los Angeles Water Board staff’s perspectives on implementing the individual monitoring requirements of the current Conditional Waiver may differ somewhat, both agree that time and resources are best directed toward the development of the new regulatory order in the coming year.</p> <p>As such, the Los Angeles Water Board has revised the implementation timeline in the tentative Order so that the individual discharge monitoring requirements in Appendix 3 are not required to be submitted until 12 months after a documented exceedance after a TMDL Compliance Date. See the</p>
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		<ul style="list-style-type: none">• Confusion within the grower community due to mixed messages of the work being done to develop a long-term program, the terms of which are not yet determined, versus the extension of the 2016 Conditional Waiver that would effectively trigger substantive new requirements that may not ultimately be part of the long-term program.• Significant implementation issues and questions regarding identification of growers that would be subject to individual monitoring requirements due to conflicts between the implementation language in the governing TMDL provisions in the Conditional Waiver Appendix 3. Specifically, Section 1.c of the Conditional Waiver states that “all members draining to the Discharger Group monitoring site and all members with sites in the encompassing and adjacent HUC-12 watersheds” are those that may then be subject to individual monitoring requirements. However, the areas within the two programs are not consistent and it is difficult to determine, at the field level, which members would be subject to the individual requirements.• Lack of guidance or resources available to growers to explain and inform the development of field-specific Monitoring and Reporting Plans (MRPs).	<p>revised tentative Order, Appendix 3.</p> <p>Water Quality Benchmark exceedances are documented in the Annual Monitoring Report that is submitted on December 15 of every year. By extending the implementation timeline from 3 months in the current Order, to 12 months in the revised tentative Order, no new individual discharge monitoring would be triggered during the period of this extension, meaning that no farmers in Ventura County will be subject to this requirement for the remainder of the Waiver term with the exception of one grower in the Ventura River watershed that has already submitted an individual monitoring plan related to the June 28, 2019, Ventura River Algae TMDL Compliance Date.</p>
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		<p>Considering the individual nature of these requirements and many unanswered questions about how the program would be implemented, e.g., which fields and growers would be subject to these requirements, Regional Board staff would have a daunting task in implementing this requirement during the one-year extension time frame. For example, at a minimum, we anticipate that significant Regional Board staff time would need to go towards determining the areas in which the requirements now apply, notifying growers that they are now subject to the requirements, responding to extensive grower inquiry, providing guidance to growers for the development of individual MRPs, receiving and reviewing individual MRPs, issuing MRP approval notices to individual growers, and providing ongoing guidance for the implementation of those MRPs. The time, effort, and resources that would need to be devoted to implementing this requirement over the next year seem misplaced considering the priority of needing to develop a long-term program for Regional Board consideration, and ultimately adoption.</p> <p>Accordingly, VCAILG believes that staff time and resources are better spent focusing on their efforts in this coming year to develop the long-term program and conducting the extensive outreach that will need to occur to the grower community and other interested stakeholders.</p> <p>By postponing individual monitoring requirements for at least the one-year duration of the Proposed Order's term,</p>	
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		Regional Board staff, VCAILG, and other stakeholders will have the opportunity to continue to develop and refine the long-term program requirements under an Ag Order and work together to facilitate these critical grower-specific outreach efforts.”	
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1.3	VCAILG	<p>Under the Conditional Waiver, VCAILG has submitted three Groundwater Management Practice Evaluation reports. It is likely that this report requirement will change as the long-term program is developed. Further, preparation and development of this report takes over 6 months. Specifically, the development of this report requires extensive lead time for sampling activities, which means that activities for this report must begin at least seven months prior to report submittal. Due to the impending adoption of the long-term order within the next year and ongoing work to incorporate the East San Joaquin Precedential Order's groundwater protection requirements, it is impractical to plan for and initiate sampling activities in May 2023 for a December 2023 reporting requirement, that will likely change prior to that date.</p> <p>Accordingly, VCAILG requests that the due date of the Groundwater Management Practice Evaluation Report (GMPER) be revised from "annually" to "December 15, 2020, December 15, 2021, and December 15, 2022", to acknowledge completion of this requirement through the three previous submittals. Revise Appendix 3, page 15, as follows:</p> <p>Groundwater Management Practice Evaluation Report Due: Annually, beginning December 15, 2020, December 15, 2021, and December 15, 2022</p>	<p>In order to focus resources on the development of the new regulatory order during this extension, the Los Angeles Water Board has revised the tentative Order as requested to remove the requirement for VCAILG to submit a Groundwater Management Practice Evaluation report on December 15, 2023. See the revised tentative Order No. R4-2021-0045-A02 and Appendix 3.</p>
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		<p>The results of the Management Practice Evaluation Plan shall be reported with the annual monitoring reports beginning-due December 15, 2020, 2021, and 2022, including a determination regarding the effect of management practices implemented on the land surface on underlying groundwater quality.</p> <p>Moreover, this study has now been conducted and reported three times and did not produce any new actionable information different from what VCAILG already recommends as appropriate best management practices to protect groundwater and surface water quality in its Water Quality Management Plan. Completing the monitoring and analysis for this report a fourth time is not an efficient use of time or resources that could otherwise be focused on the ongoing implementation of Nutrient Management Planning efforts, continuing education, BMP implementation and assessment, and in facilitating a robust stakeholder involvement process as an Ag Order is being developed.</p>	
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2.1	VC CoLAB	<p>The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) is writing this letter to express our support of the continued collaborative efforts between the Ventura County Agricultural Irrigated Lands Group (VCAILG), a coalition of local farmers and the Farm Bureau of Ventura County (Farm Bureau) and the Regional Water Quality Control Board staff (staff) to develop a meaningful regulatory order and monitoring program that both protects the environment and water quality and supports the local agriculture in Ventura County and to urge you to assist and support continued collaborative efforts.</p>	<p>Comment noted. The Los Angeles Water Board looks forward to continuing our work with VCAILG and the Farm Bureau.</p>
2.2	VC CoLAB, A. Kramer, B. Gresser, D. Borchard, K. Brokaw, S. Klittich	<p>Ventura County growers understand that a regulatory order must succeed the conditional waiver. The Farm Bureau, VCAILG, and local growers have been and continue to engage in collaborative efforts with Regional Board staff to develop a meaningful regulatory order and monitoring program that both protects the environment and water quality and supports the local agriculture in Ventura County. There has been impressive recent progress toward this goal. In July, Regional Board members were presented with the proposed Assessment and Implementation Program (AIP). At that workshop, Regional Board members indicated that the AIP was a promising potential solution and directed staff to work with the Farm Bureau and VCAILG to consider incorporating the AIP approach into a regulatory order. We are hopeful these ongoing efforts between the Farm Bureau, VCAILG, and staff will help create an effective, well-developed regulatory order.</p>	<p>During the one-year extension, Los Angeles Water Board staff will continue to work with VCAILG, tribes, environmental organizations, and other stakeholders, including growers on the development of the new regulatory order.</p>

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2.3	VC CoLAB	<p>The collaborative effort can only succeed if both the agricultural community and the Regional Board devote the attention and resources needed to develop an effective and efficient regulatory framework. Growers are at the table and are committed to putting in the time, effort, and work needed to seek a collaborative solution. We urge the Regional Board members to incorporate the recommendations from VCAILG and amend the conditional waiver to ensure that Regional Board staff can focus time and resources on the actual task: developing a new regulatory order.</p>	<p>See response to comments 1.2 and 1.3.</p>
3.1	D. Jackson, A. Kramer, B. Gresser, C. Woodard, D. Borchard, K. Brokaw, M. Saleh, S. Klittich	<p>Farming in Ventura County is challenging; land costs are incredibly high, specialty crop cultivation is labor intensive, and growers already contend with numerous other regulatory issues. In recent years, these challenges have been compounded by added economic uncertainty, supply chain disruption, water supply shortages, produce market impacts, labor shortages, and operational restrictions to comply with public health mandates.</p>	<p>The Los Angeles Water Board acknowledges the economic stresses faced by Ventura County farmers. The new regulatory order will include a section on economic considerations. The Los Angeles Water Board encourages farmers and stakeholders to comment on this when it becomes available. In addition, we note that there are numerous</p>

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			funds to help offset some of the costs associated with water quality protection such as the National Water Quality Initiative funding and Clean Water Act Section 319(h) grants. The Los Angeles Water Board will continue to support farmer efforts to secure funding for water quality protection measures.
4.1	SBCK	Since 2005, Channelkeeper has participated in the development of regional irrigated ag programs, and we were pleased to work in collaboration with Region 4 staff as the existing Order was developed and adopted in 2016.	Comment noted. The Los Angeles Water Board looks forward to continuing our work with SBCK.
4.2	SBCK	The most important aspect of the existing Ag Waiver, from our standpoint, is the incorporation of water quality benchmark compliance deadlines along with subsequent individual discharge monitoring requirements for growers in watersheds not achieving water quality targets. These measures, when implemented, represent the first time in history that farmers would have to individually verify that their operations are not contributing to water quality impairments. This accountability is exactly what has been so desperately missing from Region 4's irrigated lands program. This accountability is what is essential to incentivize growers to make the investments that are	The Los Angeles Water Board agrees that accountability and transparency are critical to the success of the Irrigated Lands Program and to improve water quality in the region. Whether the new regulatory order retains individual discharge limits and monitoring or incorporates a BMP-centric regulatory approach or, some combination of these approaches, the new regulatory

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		<p>needed to implement effective practices ensuring water quality targets are achieved.</p>	<p>order will ensure accountability and transparency.</p> <p>The Los Angeles Water Board intends to release tentative WDRs in early 2023, followed by public and grower workshops in spring 2023, and release revised tentative WDRs in summer 2023 based on feedback received at the workshops. Los Angeles Water Board staff look forward to working with SBCK during this extension to ensure accountability is central to the proposed approach.</p>
4.3	SBCK	<p>We are disappointed that the Region is developing a new Order by incorporating alternative compliance pathways allowing growers to avoid individual monitoring requirements just as key compliance deadlines have been reached. In October of this year, several critical deadlines were reached for critical impairments including Malibu Creek nutrients, Santa Clara River nitrogen compounds, and Calleguas Creek Watershed and Mugu Lagoon Toxicity, metals and selenium. Not only does the Region's plan to incorporate alternative compliance pathways have potential to provide growers with the ability to skirt accountability measures like individual monitoring, but the</p>	<p>The 12-month extension ensures Water Board staff will have sufficient time to develop approaches that ensure accountability and transparency, reflect Board member input and allow for additional engagement with stakeholders including SBCK. Should the new regulatory order incorporate alternative compliance pathways in addition to, or in place of,</p>

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		<p>proposed 12-month extension only further kicks the can down the road, providing growers who have known these deadlines were approaching for over 6-years with additional leeway to continue polluting without repercussion.</p>	<p>individual monitoring, individual growers will be accountable for those requirements.</p>
4.4	SBCK	<p>Though Channelkeeper understands that staffing resources are limited, and an extension is likely inevitable, we are weary of the pattern of accommodating avoidance of accountability within the agricultural sector, and we are very concerned that the outcome of the current renewal process will only further accommodate this pattern by shielding growers through anonymity and aggregation of compliance metrics. We do not support this 12-month extension, and we believe that the Region should implement the existing Order as intended when the Board adopted it in 2016. In the event that an extension is granted, we implore the Region to ensure that the eventual new Order maintains a clear pathway ensuring accountability on an individual ranch basis through individual verification monitoring, as required by non-point source policy, ensuring that farms are not contributing to water quality impairments.</p>	<p>The current waiver expires on December 31, 2022. If the 12-month waiver extension is not granted, the agricultural community will be unregulated unless and until a new order is adopted. While the Los Angeles Water Board understands SBCK's position on individual discharge limits and monitoring, it is not realistic for the Los Angeles Water Board to fully implement these provisions of the current Conditional Waiver and complete development of a new regulatory order during the next year that addresses the Board members' input from the July 2022, board workshop and the precedential requirements of State Water Resources Control Board Order 2018-0002 (In Re WDRs General Order No. R5-</p>

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			<p>2012-0116 for Growers Within the Eastern San Joaquin River Watershed that are Members of the Third-Party Group, “ESJ Order”).</p> <p>See also response to comments 4.2 and 4.3.</p>
5.1	<p>C. Pugh, C. Meyers, C. Polacek, C. Dolen, C. Wotman, D. Soto, D. Weaver, J. Wernli, M. Vasinda, M. Hawthorne, M. Arellano, C. Bryson, E. Enns, I. Mandon, J. Riley, M. Tripp, V. Carabello, R. Bowden,</p>	<p>The Regional Water Quality Board should not continue to postpone adequate controls on agricultural runoff by continuing to issue a twelve month extension to the Ag Waiver program. Farmers and ranchers must be accountable for testing their runoff for pollutants and demonstrate that they are achieving water quality standards to protect other industries and the whole of the County's livelihood.</p> <p>I don't agree with the Board's decision to postpone renewal of the updated Ag Waiver program for an additional 12 months. Key deadlines are occurring now. Farmers should be held responsible for preventing pollution to our waterways and ocean now.</p> <p>However, a temporary 6-month extension may be acceptable as long as the Board commits to ensuring that its renewal maintains individual ranch-level accountability. Farms and ranches that pollute must be accountable for</p>	<p>During the one-year extension, the requirements of the current Conditional Waiver continue, including the requirement to develop and implement a water quality management plan consisting of best management practices to address exceedances of water quality benchmarks, and to conduct water quality monitoring according to the requirements in Appendix 2 or 3.</p> <p>See, also, response to comments 4.2, 4.3 and 4.4. Regarding the proposed 6-month extension, this would not be adequate considering the input received by Board staff at the</p>

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		<p>verifying that they are achieving water quality standards to protect the environment and public health.</p>	<p>July 2022, board workshop and the necessary time for the administrative processes and public involvement associated with the development of the new regulatory order.</p>
6.1	LAILG	<p>NGA-LAILG (LAILG) supports the decision of extending the current Conditional Waiver, so development of the Waste Discharge Requirements is not rushed. However, while the Los Angeles Regional Water Quality Control Board's (Regional Board) staff is focused on developing a thoughtful Ag Order, LAILG must ask the Regional Board to instruct staff to continue enforcement under the current Conditional Waiver.</p> <p>There are numerous businesses that have either dropped out of the program or have ignored it from the beginning because they believe there are no consequences. This leaves the burden of sharing program costs on rule-abiding businesses.</p>	<p>The Los Angeles Water Board agrees that enforcement is a priority in implementing the Irrigated Lands Order. By transitioning from a Conditional Waiver of WDRs to General WDRs we will alleviate some of the administrative burden that a 5-year renewal entails and be able to focus more on implementation and enforcement of the WDRs.</p>
6.2	LAILG	<p>The Regional Board staff has undergone several staffing changes which leaves the discharger groups to explain the history of the program to new staff members with little forward progress.</p> <p>For example, LAILG provided Regional Board staff with a list of delinquent accounts on October 25, 2019. LAILG</p>	<p>The Los Angeles Water Board and its staff understand LAILG's difficulties in retaining membership. The Los Angeles Board has been issuing notices to re-enroll and Notices of Violation for over 10 years to</p>

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		<p>recognizes that the COVID-19 outbreak delayed the issuing of any violations, but more than three years later, violation letters have still not been sent. LAILG has continued to send updates of this list each year to Regional Board staff with no action.</p> <p>Another example is the decision on whether vineyards in the Malibu area that use a local consultant with an Operator Identification number for vineyard upkeep should enroll. The Conditional Waiver defines “hobby growing/gardening” as “the property owner/operator does not hold a current Operator Identification Number/Permit for pesticide use reporting.” Based on the wording of the Conditional Waiver, property owners hiring a consultant that uses an Operator ID should be required to enroll in the program. LAILG has been waiting on a decision from Regional Board staff on this particular issue since at least June 2020. The situation gives the appearance that private, wealthy landowners are being given a pass on enrolling, while small, minority-owned nurseries are bearing the brunt of the regulations.</p>	<p>assist LAILG in maintaining a successful program. While the last three years have been focused on updating the program in response to requests from discharger groups, the Los Angeles Water Board anticipates continuing to use periodic Notices of Violations to unenrolled dischargers to assist LAILG with enrollment and appreciates LAILG providing the list of delinquent accounts.</p> <p>Regarding the example of vineyards in the Malibu Area, the Conditional Waiver is for commercial agriculture only, and specifically excludes hobby growing and/or gardening (see Finding 58 of the Waiver). The criteria for determining if an operation is hobby growing/gardening are clearly defined in Finding 18 of the Waiver. Staff cannot provide a different interpretation of the criteria as requested by LAILG. Please note that Finding 18 also</p>
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			states that if the crop is sold, regardless of whether or not the owner/operator holds an Operator Identification Number, the discharger must enroll in the Waiver. Thus, it is the commercial nature of the activity, not landowner income, that determines the need for a discharger to enroll.
6.3	LAILG	In order to make the current Conditional Waiver and any future WDRs successful, enforcement must be made a priority.	See response 6.1.
7.1	C. Carter, D. Copper, R. Chatenever	I am disappointed that the Water Board wants to postpone the Ag Waiver /Waste Discharge Requirements another year. I was expecting to hear about your progress on selecting one of the options presented at the July Board meeting.	See response to comments 4.3, 4.4 and 5.1. In addition, since the July workshop, the Los Angeles Water Board has been developing tentative approaches, which will be made available for public comment in early 2023 and has met numerous times with VCAILG and other stakeholders to discuss the potential approaches and other

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			matters for inclusion in the new regulatory order.
7.2	C. Carter	<p>The Water Board’s monitoring and enforcement policies have NOT worked for over 20 years. The TMDL deadlines have past and water quality objectives have not been obtained.</p> <p>During the July 14th Water Board meeting several board members acknowledged that the Board needs to try a different approach for reducing agricultural runoff into Edison Canal, Channel Islands Harbor and other coastal waters. The bottom-line objective is to achieve improvements in water quality.</p>	<p>The Los Angeles Water Board agrees that water quality improvement and meeting water quality objectives is the purpose of the Irrigated Lands Regulatory Program.</p> <p>The new regulatory order, which will be available for stakeholder comment in early 2023, will reflect the input provided by Board members at the July workshop. It will also include additional monitoring of discharges from irrigated agriculture lands to Edison Canal in response to input from Channel Islands Harbor stakeholders.</p>
7.3	C. Carter	The Water Board’s proposal to impose “edge of field” individual monitoring will increase the costs to the growers and overwhelm the Water Board’s limited staff. Staff turnover has been a continuing problem. How can we help convince State and Federal officials to increase your staff budget?	One consideration in the development of a new regulatory order is available staff resources for oversight and implementation of the program. The Los Angeles Water Board is committed to

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			<p>using its limited staff resources as effectively as possible.</p> <p>The Los Angeles Water Board is part of the Executive Branch of State government. As such, any requests for budget changes are made through internal channels. However, stakeholder organizations can and do lobby State and federal elected officials to increase resources for agencies.</p>
7.4	C. Carter	The Farm Bureau's Assessment and Implementation Program could be successful in implementing effective BMPs (Best Management Practices) if Federal and State incentives are provided.	Comment noted.
7.5	C. Carter	Please provide a plan and timeline to effectively negotiate with all stakeholders to create new processes and procedures to "improve Water Quality".	<p>Please see finding 5 of the Tentative Order.</p> <p>The Los Angeles Water Board intends to release draft tentative general waste discharge requirements for public comment in early 2023 to be followed by a workshop at a Los Angeles Water Board meeting in Spring</p>

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			<p>of 2023. Then, the Los Angeles Water Board intends to release revised tentative general waste discharge requirements, based on stakeholder comments and Board member input, in Summer of 2023 to be followed by a Los Angeles Water Board hearing to consider adoption of the revised tentative general waste discharge requirements.</p>
8.1	D. Copper, R. Chatenever	<p>I have been participating in a water testing program sponsored by the City of Oxnard and performed by members of the Channel Islands Neighborhood Council. It is abundantly clear that the northern reaches of the harbor (closest to the ag runoff discharge) are the areas that are most impacted. The linkage of the deteriorated water quality and the ag runoff is unmistakable. The VCAILG growers are NOT meeting existing benchmarks. When we appealed to the Water Board in 2018 to keep the pumps running, we were advised that you could not order that, but that you would help us deal with the water deterioration problem.</p> <p>I appreciate that you have funded the lab testing that documents the problem. The test results indicate that the harbor water quality is facing a triple threat. First, toxicity testing identified high failure rates following rainfall.</p>	<p>Comments noted. The one-year extension will provide time for discussions with stakeholders about how best to address the lack of attainment of water quality benchmarks under the existing waiver in the upcoming general WDRs. See, also, response to comment 7.2.</p>

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		<p>Second, the dissolved oxygen level drops below the minimum of 5 ppm during the late summer as algae levels increase. We believe that the algae are benefiting from agricultural run-off. Third, bacteria levels exceed the safety standard 104 after there is rain or significant run-off from the fields.</p>	
8.2	D. Copper, R. Chatenever	<p>It is time to put our collective money where our mouth is and not extend the agricultural waivers without at least modifying them to create a significant reduction in the nutrient discharge into the Edison Canal and Channel Islands Harbor.</p>	<p>The modifications necessary to ensure improvements in water quality in Edison Canal and other waterbodies will take time to design successfully. See, also, response to comments 4.2, 4.3, 5.1, and 7.2.</p> <p>Los Angeles Water Board staff look forward to working with stakeholders, including the commenters, on the development of a new regulatory order during this one-year extension.</p>