



CVCWA
Central Valley Clean Water Association
Representing Over Fifty Wastewater Agencies



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June 1, 2016

Via Electronic Mail

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov

Re: Comments on A-2239(a)-(c): Proposed Order for Eastern San Joaquin River Watershed Agricultural General Waste Discharge Requirements (WDRs) (Proposed Order)

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the State Water Resources Control Board's (State Board) review on its own motion of General Order R5-2012-0116 for the Eastern San Joaquin River Watershed Agricultural General WDRs (General Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comments regarding the State Board's actions that result in substantial changes to the General Order's data collection requirements and its implications for the Agricultural Coalitions.

The Proposed Order requires that the General Order remove the distinction between the requirements for high vulnerability and low groundwater areas, which would result in significantly more monitoring and reporting being required as a whole. Similarly, the Proposed Order requires field level monitoring and reporting rather than the reporting of data aggregated at the township level. CVCWA's concern with these requirements is the substantial increase in resources needed to collect and report this data without consideration for how this data will be used and, more importantly, whether the additional data will provide an improved understanding of surface and groundwater quality. Substantial resources will be expended on the part of the East San Joaquin Water Quality (ESJ) Coalition to collect, compile, and submit the data and on the part of Central Valley Regional Water Quality Control Board (Regional Board) staff to review and analyze the data. Therefore, it is imperative that there be a clear purpose for the data that is to be collected. In addition, State Board Resolution 2013-0029 directs actions to reduce the cost of compliance to dischargers subject to State and Regional Water Board permitting while maintaining water quality protection. Resolve Item 4 of State Board Resolution 2013-0029 supports identifying approaches to reducing and/or eliminating duplicative or unnecessary monitoring and reporting requirements in existing permits. CVCWA believes that, consistent with the State Board's own direction, the cost of compliance be considered prior to including additional requirements in the Proposed Order.

CVCWA is primarily concerned that the additional requirements will substantially increase the costs to the ESJ Coalition to implement the General Order, which will in turn increase the costs to the individual members of the ESJ Coalition. This may result in many growers choosing not to participate in the ESJ Coalition. Many of the water quality issues in the Central Valley, particularly with respect to salts, nutrients, and pesticides, will only be solved through collaboration on a watershed basis. CVCWA has worked effectively with the Agricultural Coalitions to address critical water quality issues and believes that the Agricultural Coalitions are a critical resource in those collaborative efforts. Representatives of the ESJ Coalition have expressed specific concern that the additional requirements could lead to the weakening or even dissolution of the ESJ Coalition, specifically. CVCWA believes this would be to the extreme detriment of the watershed.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or ecofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer