

January 21, 2014

140015:EC

Sent via e-mail to Mark.Cady@waterboards.ca.gov

Subject: Sacramento River Source Water Protection Program Comments on ILRP Tentative Waste Discharge Requirements General Order for Sacramento River Watershed

Dear Mr. Mark Cady:

On behalf of the Sacramento River Source Water Protection Program (SRSWPP), thank you for the opportunity to provide comments on the Irrigated Lands Regulatory Program (ILRP) Tentative Waste Discharge Requirements General Order for discharges from irrigated lands for growers who are members of a third-party group within the Sacramento River Watershed. The SRSWPP is sponsored by the City of Sacramento and the Sacramento County Department of Water Resources; this program is coordinated with other agencies that draw their drinking water from the Sacramento River (or have plans to do so), including the City of West Sacramento, East Bay Municipal Utility District, and the Woodland-Davis Clean Water Agency. We serve drinking water to more than 600,000 people in Northern California.

Watershed management programs are essential for preserving the high quality of the Sacramento River watershed. The Central Valley Regional Board and other regulatory agencies, regulated communities, and educational organizations have made significant strides. We appreciate the substantial efforts of the Sacramento Valley Water Quality Coalition (SVWQC) and the ILRP to protect water quality.

We have one clarification comment for the Central Valley Water Board's consideration. On page 37 of Attachment B, Monitoring and Reporting Program (MRP), there is a reference to Table 5, as follows: "Table 5 of this MRP lists Basin Plan numeric water quality objectives and NTR/CTR criteria for constituents of concern that may be discharged by Members. Table 5 does not include water quality criteria that may be used to interpret narrative water quality objectives, which shall be considered Trigger Limits." We understand that Table 5 is not meant to be a list of all the applicable water quality objectives. We recommend that a sentence be added after "... may be discharged by Members." to state that there are other constituents with numeric water quality objectives that could be present in the discharge and those objectives apply as well.

Please contact Elissa Callman at 916-808-1424 if you have any questions or would like to discuss our comment.

Thank you.

Sincerely,



Sherill Huun
Supervising Engineer

Cc:

Joe Karkoski, Central Valley Water Board
Susan Fregien, Central Valley Water Board
Ali Rezvani, CDPH
Dave Brent, Director
Joe Robinson, Senior Deputy City Attorney
Bill Busath, Engineering and Water Resources Manager
Michael Malone, Operations and Maintenance Manager
Pravani Vandeyar, Water Quality Superintendent
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