



May 19, 2006

Robert Schneider  
Chair, Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, California 95670-6114

**RE: COMMENTS ON TENTATIVE CONDITIONAL WAIVERS OF WASTE DISCHARGE  
REQUIREMENTS FOR DISCHARGES FROM IRRIGATED LANDS – PROPOSED ORDERS**

Dear Mr. Schneider:

In addition to comments submitted on May 19, 2006 by the various Central Valley coalition groups, the Sacramento Valley Water Quality Coalition (SVWQC) is requesting that the Regional Board delete paragraph 45 from the proposed Irrigated Lands Program (ILP) at this time.

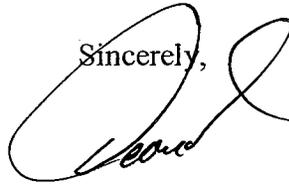
Within the SVWQC and its subwatersheds, certain areas are comfortable with paragraph 45 and have been utilizing a similar definition to guide participation in the Coalition. Other subwatersheds have been more inclusive and strongly believe that paragraph 45 would undermine both current and future participation.

If it is the intention of the ILP to effectively address water quality issues from irrigated lands, we believe paragraph 45 should be considered more thoroughly by the Regional Board. Paragraph 45 states:

“The Conditional Waiver [ILP] does not cover discharges of waste from irrigated lands used for gardens, vineyards, small orchards, small pastures, and small greenhouses that are used for the purpose of producing crops and/or animals for personal consumption or use, and the product or service is not sold commercially. Owners and operators of irrigated lands described in this finding are not required to submit a RWD or obtain WDRs.”

In addition to the legal issues this paragraph raises, many of the Sacramento Valley subwatersheds' efforts to characterize and improve water quality could be undermined. The SVWQC therefore recommends that the Regional Board postpone the inclusion of this paragraph and work with the coalition groups to clarify this issue in a manner that will help improve water quality throughout the Central Valley.

Thank you for this opportunity to comment. If you have any questions, please do not hesitate to contact Tina Lunt at 916-442-8333.

Sincerely,  
  
David J. Guy

cc: Wendy Cohen, Senior Engineer, Policy and Planning Unit