

## Comment Letter 4, email received January 23, 2013

### Rita K. Steiner

District Conservationist, Napa County  
USDA Natural Resources Conservation Service  
1303 Jefferson St., Suite 500B  
Napa, CA 94559-2472  
707-252-4189 Ext. 101

I want you to remove the reference to NRCS being able to act as a third-party group for the waiver (page 10 of 26, Third Party Groups, 44, second paragraph). NRCS is not allowed to be a third party group, so please remove that statement. NRCS can help growers with conservation plans, maps and provide technical assistance, but we may not be a 3<sup>rd</sup> party provider. If the RCD becomes a group, and they can, we can help them with the technical items they need for conservation planning and practices.

Since the advent of the Irrigated Lands Regulatory Programs, NRCS has played a role and continues to assist growers in meeting their obligations through our day to day planning and program efforts. While NRCS will continue to provide technical and financial assistance and guidance to agricultural producers, please always remember that the agency is voluntary and non-regulatory in nature.

NRCS staff cannot be part of a group or committee that certifies, or oversees certification, of growers attempting to meet Regional Board requirements. NRCS can certify its own conservation planning and practice implementation efforts, not certify any other entities' plans or efforts for regulatory purposes.

NRCS is pleased to work with our partners to:

- Ensure growers receive the technical assistance they need to maintain good water quality;
- Educate growers as to the options available technically and financially to achieve and maintain good water quality;
- Offer our technical expertise and experience to the State Board and Regional Boards to clarify aspects of planning, practices, and implementation;
- Speak at public meetings describing the services offered and how these services may assist growers in meeting ILRP goals;
- Review and comment on public Regional Board documents when they are offered for review;
- Work with growers explaining or developing conservation plans, implementation of conservation practices, and how these plans and practices may assist in meeting Regional Board guidelines;
- Offer assistance, or be added to documents and lists, as technical contacts for technical expertise;
- Be part of advisory committees or other groups offering technical or programmatic solutions to growers