

Colusa Glenn

Subwatershed Program

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November 9, 2012

Ms. Anne Littlejohn
Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

RE: CEQA Scoping Comments for MUN

Dear Ms. Littlejohn:

Thank you for holding the “*Evaluation of the Municipal and Domestic Supply Beneficial Use (MUN) in Agriculturally Dominated Water Bodies Public Workshop and CEQA Scoping Meeting*” in Willows on October 24, 2012. We appreciate the opportunity to learn more about Regional Board efforts prior to formulating this comment letter. Hopefully, the Regional Board’s efforts will bring to a conclusion 20 years of work to establish water quality objectives based on water body type.

As identified at the workshop, the decision on how to treat agriculturally dominated water bodies is complex, given that the Central Valley region is different from the north to the south; for example, more rain tends to fall here in the Sacramento Valley than in the southern Central Valley. This is an exceptional part of California, where efficiently managed water is essential to the economic and environmental sustainability of family farms that for generations have provided habitat for waterfowl and wildlife as well as feeds the nation. The 1,600 + growers we represent in the Colusa Glenn Subwatershed Program, part of the Sacramento Valley Water Quality Coalition (SVWQC), have successfully and proactively advanced solutions to improve water quality. As the local subwatershed to help growers meet water quality regulations, we have secured funding programs to protect surface water quality and implement Best Management Practices (BMPs). As well as, some of the growers are also ratepayers of the Willows and Colusa waste water treatment operations. Therefore, it is important to find the appropriate balance between regulation and protecting water quality.

For the Sacramento Valley Alternative 5 – De-designate the MUN (drinking water) beneficial use in all Ag dominated water bodies is the appropriate approach. This would correct an oversight that occurred when the Basin Plan was originally adopted. Also, it would most effectively remedy the current situation that the cities of Willows, Colusa, Biggs, and Gridley are facing. The Regional Board’s water quality sampling results from April to June clearly demonstrate this would be the best alternative. On a broader, more regional scale Alternative 3 – Adopting a framework for categorically evaluating the MUN beneficial use, water quality objectives and implementation program for Ag dominated water bodies is the appropriate approach. The framework would allow for a process for changes to the Basin Plan in the future. This alternative would not allow a “one-size-fits-all” approach which has never been an efficient way of developing regulation.

We respectfully recommend an approach that combines the best of both Alternative 3 -for a long term solution framework and Alternative 5 -correcting a past oversight that should not have occurred and should be remedied immediately. Thank you for this opportunity to comment. If you have further questions on these comments, please contact our office at (530) 934-8036.

Sincerely,



Larry Domenighini
President