

*City of*  
**SACRAMENTO**  
Department of Utilities

December 21, 2017  
170759:EC



Sent via e-mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comments to A-2239(a)-(c)

Attn: Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor (95814)  
P.O. Box 100  
Sacramento, CA 95812-0100

Dear Ms. Townsend:

On behalf of the Sacramento River Source Water Protection Program (SRSWPP), thank you for the opportunity to provide comments on the Second Staff-Proposed Order for the Review of Waste Discharge Requirements General Order No. R5-2012-0116 for Growers within the Eastern San Joaquin River Watershed that are Members of the Third-Party Group. The SRSWPP is sponsored by the City of Sacramento, City of West Sacramento, the Sacramento County Department of Water Resources and East Bay Municipal Utility District; this program is coordinated with other agencies that draw their drinking water directly from the Sacramento River, including the Woodland-Davis Clean Water Agency. We serve drinking water to more than 1,000,000 people in Northern California.

Watershed management programs are essential for preserving the high quality of the surface water in the Sacramento River watershed. We are providing comment on this Order due to the potential precedential nature of the order towards surface receiving water monitoring programs in other Irrigated Lands Regulatory Program (ILRP) orders in the Sacramento Valley.

Our comments are based upon a review of Second Staff-Proposed Draft Order with focus on Section II.A.7., the surface receiving water monitoring component. This Second Staff-Proposed Order includes specific direction to the State Water Board staff to convene an expert panel process to make recommendations on a framework for surface receiving water monitoring to inform irrigated lands programs statewide.

We support this finding; however, we request that there be some clarifications added to

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the Proposed Order. We request that the State Water Board consider clarifying the text with the following items: identify a reasonable timeline for the expert panel process, and state that drinking water quality impacts will be specifically included in the panel process and framework development.

We recommend that the State Water Board Order include a specific timeline for implementation of the Expert Panel and its determinations, and we recommend that the timeline begin soon to ensure that any revisions to a monitoring program framework can be developed in a timely manner.

We request that municipal drinking water and human health experts be specifically included in the Expert Panel process. This process will be the primary mechanism for stakeholder input, and the municipal beneficial use is potentially impacted by a wide variety of constituents associated with agricultural discharge (i.e. solids, organic matter, microbiological constituents, nutrients, and pesticides). It is essential that a surface water monitoring framework developed through the Expert Panel process be sufficiently robust to ensure detection of degradation in water quality (as required for compliance with Antidegradation requirements) and in order to address both cumulative effects and drinking water-specific water quality issues.

We have previously participated in the ILRP regulatory process and provided input on the importance of the sufficiency of the monitoring programs' spatial and temporal densities, as well as the list of constituents included in monitoring, in determining the protection of the municipal beneficial use. Monitoring programs are essential to providing the information that allows for identification of type, severity, and potential sources of contamination that management programs would be targeting. The monitoring program must be designed to protect the safety of drinking water (e.g., MUN beneficial use) from the watershed receiving agricultural discharges. This entails a different focus than monitoring focused solely on aquatic life protection. Key questions for the Expert Panel to answer should be expanded to specifically include the MUN beneficial use as a driver in constituent selection, spatial and temporal density, and long-term data evaluation processes.

If you have any questions regarding these comments, please feel free to contact Elissa Callman directly at 916-808-1424.

Sincerely,



Sherill Huun  
Supervising Engineer

Cc: Bill Busath, City of Sacramento  
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