

From: [Karen Newton](#)
To: [McConnell, Sue@Waterboards](#); [Fregien, Susan@Waterboards](#)
Cc: [Sherill Huun](#); [Elissa Callman](#); [Bonny Starr](#); [Armand Ruby](#); [Mark Severeid](#); [Patrick Ji](#); [David Herrmann](#); [Rod Frizzell](#); [Amy Kral](#); [Mike Ragan](#); [Keith Johnson](#); [Howard Moreland](#); [Smith, Carlos \(smithca@SacCounty.NET\)](#); [Pasterski, Tom \(pasterskit@SacCounty.NET\)](#); [Robertson, Aaron](#); [Hall, Keith](#); [Kania, Christopher](#); ["juanh@cityofwestsacramento.org"](#); [Laputz, Adam@Waterboards](#)
Subject: ILRP ESJP Expert Review Panel
Date: Friday, December 27, 2019 1:12:54 PM
Attachments: [Pesticides Reference Values Comparison Final 10-01-18v2.pdf](#)

EXTERNAL:

Dear Sue and Susan,

My name is Karen Newton and I am the City of Sacramento's Source Water Protection Manager, replacing Elissa Callman in her retirement. The Sacramento River Source Water Protection Program (SRSWPP) appreciates the efforts of the Central Valley Water Board to provide water quality management programs to protect the beneficial uses in the region, including the Irrigated Lands Regulatory Program. With nearly 2 million acres of irrigated agriculture upstream of our intakes, irrigated agriculture continues to be a key watershed activity of interest to the SRSWPP and we have been involved in the development of the interim and long-term ILRP.

We have been tracking the State Board Water Quality Order related to the East San Joaquin ILRP Order (WQO-2018-0002), and see that the Regional Board will be hosting an Expert Panel in January in compliance with the SB Water Quality Order. We understand that the Expert Panel will be focused on addressing several charge questions from the State Board related to the surface water monitoring program. Consistent with our previous comments, we want to encourage you to inform the Expert Panel on the need to consider the Municipal and Domestic (MUN) beneficial use in their evaluation and recommendations, in order to ensure protection of human health and welfare as part of the ILRP. This would include;

- The need to include specific protection of the MUN beneficial use and the subsequent consideration of drinking water impacts when developing a monitoring program (i.e. constituent selection, analytical methods, detection limits, timing, location)
- The acknowledgement that protecting aquatic life does not ensure that human health and welfare protection are occurring, since some constituents (such as pesticides) have lower thresholds for human health impacts (see Moran/Starr memo, previously shared)

Please let me know if you have any questions regarding our input or if we can be of any help.

Sincerely,

Karen M. Newton, P.E.

Senior Engineer
City of Sacramento, Department of Utilities
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