

CV-SALTS Executive Committee Meeting

January 24, 2013 9:00 AM – 3:00 PM

Sacramento Regional Sanitation District Offices – Sunset Maple Room
10060 Goethe Rd, Sacramento 95827

Teleconference (218) 339-4600 Code: 927571#

Posted 01.15.13 – Revised 01.21.13

AGENDA

- 1) **Welcome and Introductions** - Chair
 - a) Committee Roll Call and [Membership Roster](#) - 5 min.
 - b) Review/Approve Executive Committee [Meeting Notes](#) for November 8, 2012 – 5 min.

- 2) **Alternate Compliance Demonstrations: What Role for "Offsets" in the SNMP?**
 - a) Overview - Tim Moore (20 minutes)
 - Offsets Issues [White Paper submitted by EJ groups](#) – Clean Water Action, Community Water Center & CRLA
 - b) Group Discussion of [Handout](#) (2 hours)

11:30 pm to 1:00 pm - Lunch on your own

- 3) **Review Priorities for 2013 Policy Discussions and SNMP Development Schedule** (60 minutes)

- 4) **Status Update on Technical Studies/Projects – Richard Meyerhoff/Nigel Quinn** (15 minutes)

- 5) **CEQA/Economics Consultant Proposal Request to Include CEQA Scoping & Related Work** – Jeanne Chilcott – 5 minutes

- 6) **Set next meeting objectives/date – February 8th Admin Call, February 21st Policy Session**
 - Rescheduling of March 21 Policy Session due to scheduling conflict with workshop

CV-SALTS meetings are held in compliance with the Bagley-Keene Open Meeting Act set forth in Government Code sections 11120-11132 (§ 11121(d)). The public is entitled to have access to the records of the body which are posted at <http://www.cvsalinity.org>

One or more Central Valley Regional Water Quality Board members may attend.

CV-SALTS Committee Rosters

Executive Committee Membership			CV-SALTS Executive Committee Meetings During 2013																						
Voters	Category/Stakeholder Group	Name	11-Jan	24-Jan	8-Feb	21-Feb	8-Mar	21-Mar	5-Apr	18-Apr	10-May	16-May	14-Jun	20-Jun	12-Jul	9-Aug	15-Aug	13-Sep	19-Sep	11-Oct	17-Oct	8-Nov	14-Nov	3-Dec	13-Dec
Leadership Partners																									
1	Central Valley Water Board	Pamela Creedon																							
Alt	Central Valley Water Board	Jeanne Chilcott																							
2	State Water Resources Control Bd.	Darrin Polhemus																							
3	Department of Water Resources	Jose Faria																							
Alt	Department of Water Resources	Ernie Taylor	✓																						
4	US Bureau of Reclamation	Jobald Kabir																							
5	Environmental Justice	TBD																							
6	Environmental Water Quality	TBD																							
CV Salinity Coalition																									
1	CASA	Bobbi Larson																							
2	County of San Joaquin	Mel Lytle																							
Alt	County of San Joaquin	Brandon Nakagawa																							
3	CVCWA	Debbie Webster	✓																						
4	City of Fresno	Steve Hogg																							
5	CA League of Food Processors	Trudi Hughes																							
Alt	CA League of Food Processors	Rob Neenan																							
6	Wine Institute	Tim Schmelzer																							
Alt	Wine Institute	Chris Savage																							
7	City of Tracy	Steve Bailey																							
8	Sacramento Regional CSD	Linda Dorn																							
9	San Joaquin River Group	Dennis Westcot																							
10	City of Modesto	Gary DeJesus																							
11	California Rice Commission	Tim Johnson																							
12	City of Manteca	Phil Govea																							
13	Tulare Lake Drainage/Storage District	Mike Nordstrom	✓																						
14	Stockton East Water District	Karna Harrigfeld	✓																						
15	Western Plant Health Association	Renee Pinel																							
16	City of Vacaville	Royce Cunningham																							
17	Dairy Cares	J.P. Cativiela	✓																						
Comm. Chairs/Co-chairs																									
1	Chair Executive Committee	Parry Klassen	✓																						
2	Vice Chair Executive Committee	Jeff Willett																							
*	Technical Advisory Committee	Roger Reynolds	✓																						
3	Technical Advisory Committee	Nigel Quinn, LBL	✓																						
4	Public Education and Outreach	Joe DiGiorgio	✓																						
5	Economic and Social Cost Committee	David Cory	✓																						
5	Lower San Joaquin River Committee	Karna Harrigfeld																							

* = Already votes as Leadership or Coalition member

Participants also identified for 01/11:

- _____ Pam Buford, CVRWQCB
- _____ John Dicke, Plantierra
- _____ Tom Grovhoug, LWA
- _____ Richard Meyerhoff, CDM
- _____ Michael Mosley, USBR
- _____ Les Chau, Kennedy/Jenks
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|-----------------------------------|--------------------------------------|--|
| Claus Suverkropp, LWA | Tom Griffith, Envirotech | Cindy Paulson, CUWA |
| Laurel Firestone, CWC | John Herrick | Geoff Anderson, DWR |
| Paul Sousa, Cares/WUOD | Katy Walsh | Dan Odenweller, RWQCB |
| Gary Carlton, Kennedy/Jenks | Mark Gowdy, SWRCB, Water Rights | Danny Merkely, California Farm Bureau |
| Stan Gryczko, City of Davis | Betty Yee, RWQCB | Emily Alejandrino/Jim Martin, CVRWQCB |
| Clay Rogers, CVRWQCB | Jamil Ibrahim, MWH Global | Rik Robidart Rooney, Ag Council |
| Penny Carlo, Carollo Engineers | Rik Rasmussen, SWRCB | Gail Cismowski, CVRWQCB |
| Tony Pirondini, City of Vacaville | Jodi Pontureri, SWRCB | Jenny Skrel, Ironhouse Sanitary District |
| Roberta Tassey, USBR | Mark Felton, Culligan Water and PWQA | Erick Althorp SSIWQC |
| Karl Longley, CVRWQCB | Adam Maskal, Provost & Pritchard | Mark Dorman, Rainsoft Water PWQA |
| Jennifer Clary, CWA | Stan Dean, SRCSD | Rick Staggs, City of Fresno |
| David Orth, SSWVWQC | Melanie Thomson, CUWA | Robert Chrobak and Stuart Childs Kennedy/Jenks |
| Fern Wilson, City of Vacaville | Gene Lee, Reclamation | Jim Strandberg, EKI |
| Tim Moore, Risk-Sciences | Paul Martin, WUD | Mary Junqueiro, Western Plant Health Assoc. |
| | Karen Ashby, LWA | Mark Larsen, Kaweah Delta WCD |

Past Participants:

CV-SALTS Executive Committee Meeting - Summary Action Notes

For November 8, 2012 9:00 AM to 3:00 PM

Attendees are listed on the Membership Roster

Meeting Objectives for November 8th:

- Affirm, Revise or Reject Draft Recommendations for Proposed SNMP Implementation Policies
- Identify Technical Support Tasks Needed to Prepare SNMP and Related Basin Plan Amendment

AGENDA

1) Welcome and Introductions

- a) Chair Parry Klassen brought the meeting to order, and roll call was completed.
- b) Karna Harrigfeld moved to approve, and Rob Neenan seconded, and by general acclamation the October 18th action notes were approved.

2) Review SNMP Policy Development Map

- a) How and where do all the policy issues fit together?
- b) What's done and what's left to do?
 - To address the questions posed in a & b above, the committee spent the morning session discussing the following documents provided by Tim Moore:
 - a. SNMP Policy Development Map (Figure 1)
 - b. Salt & Nitrate Management Plan for Groundwater (Figure 2)
 - c. Salt and Nitrate Management Plan for Surface Water (Figure 3)
 - Tim will have the diagram replaced with an Excel PivotTable to more effectively illustrate the current status, and track the progress of, all regulatory "nodes" being addressed in the SNMP process.
 - Tim requested committee members email him with specific industry priorities to ensure those issues are addressed and that the CV-SALTS priorities are aligned with impending regulatory actions.

3) Policy Discussion: Review Draft Recommendations

- The committee reviewed the Proposed Revisions to the Water Quality Objectives for the Secondary MCLs.
- Based on discussions a revised draft of the document will be provided for the next Policy Session. Revisions to include, but not limited to:
 - Replace SF basin plan amendment language.
 - Incorporate citations suggested by Tess Dunham.
 - Create a factor list for justification #4.
 - Split surface and groundwater.
- It was requested these edits be provided to the committee in a Word document prior to the next meeting.

4) Continue Policy Discussion re: Draft Recommendations

- The afternoon policy discussion centered on review of revised draft recommendations for demonstrating "reasonable protection" of AGR uses dependent on surface water sources for irrigation supply.
 - Jeanne Chilcott presented a summary of key points from policy discussions during 2012.
- After discussion it was agreed that an archetype is needed and the policy should be referred to the Technical Advisory Committee.
- The question of "offsets" will be the main topic of the next Policy Session.

5) Status Update on Technical Studies/Projects

- The ICM Project Workshop will be held on Monday, November 26th.
- The committee directed Richard Meyerhoff to complete a scope of work for the “detailed mass-balance analysis” referenced in #7 of the Justification for the Proposed Revisions to the Water Quality Objectives for the Secondary MCLs.

6) Future Items

- A combined Administrative/Policy Meeting is tentatively scheduled for Thursday, December 13th.

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OFFSETS AND EJ IN THE CONTEXT OF REGION 5 SALINITY AND NITRATE MANAGEMENT

December 4, 2012

Clean Water Action, California Rural Legal Assistance Foundation, Community Water Center

Offsets have been used by regulators to provide dischargers a more cost-effective option for complying with mandated reductions of specific pollutants - generally where high costs or technological constraints present barriers to full compliance. The discharger is given the option of complying with the unmet portion of the reduction goal by paying for more cost-effective pollutant removal elsewhere. As an example, the AB32 program relies on offsets to meet its greenhouse gas reduction goals, and the Central Valley Board's Delta methylmercury TMDL is studying an offset plan which would begin in 2020 and allow dischargers to employ offsets to meet their load allocations.

The components of an effective and enforceable offset program are

- That the discharger make all reasonable efforts to meet water quality objectives through implementation of industry best practices;
- That the discharger demonstrate why additional reductions are not feasible;
- That the amount of pollution removal at the alternative site be equal to or greater than the amount of unmet reduction at the permitted site;
- That both the on-site and off-site reductions can be verified.

Common Environmental Justice Concerns

The most common EJ issue related to offsets is that the location for the off-site reduction program is seldom proximate to the site holding the permit. For example, in the case of reducing greenhouse gases, the Air Board allows polluting factories to continue their emissions unabated provided they pay to reduce emissions elsewhere. The communities living near those factories –which are disproportionately likely to be low-income communities of color – therefore receive little or no benefit from the program, because pollution continues to be permitted in their neighborhood.

Enforcement is another EJ issue, as the employment of offsets multiplies the number of sites that regulators must monitor to ensure that reductions actually occur. Any shortfalls in enforcement result in additional or continuing impacts from pollution.

An EJ issue relevant to this discussion is that offsets may not be assessed at a sufficient level to accomplish the goal of achieving water quality objectives, subjecting communities to high levels of contamination for a longer period of time.

Finally, an ongoing concern is that communities that are organized will receive assistance, while those that find out about their water quality and the program later will be out of luck because the money will be fully allocated. This is a common problem for low income communities of color and is one reason why many groups have advocated for some amount of funding to be set aside for disadvantaged communities.

Offsets under the CV Salts Program

Our understanding is that offsets in the context of CV Salts would allow farmers to address some portion of their nitrate reduction responsibilities by providing wellhead treatment to drinking water wells that exceed the nitrate standard. In a general sense, this seems like a good tradeoff – at-risk communities will get treatment they can't otherwise afford or obtain, and farmers will be able to maintain some cost certainty under the regulatory program. Several questions must be answered in order to determine whether or how this can be a feasible alternative.

1. What are the pollution reduction targets?

In a TMDL process, each discharger is assigned a load allocation that generally represents a reduction from their current discharges. In the Irrigated Lands Program, farms are required to meet the water quality objective for nitrogen (10ppm) in their discharges, but individual load allocations are neither assessed nor measured. Without that information, how can we identify reduction targets and potential offset requirements?

In addition, there is the issue of “legacy” pollution, nitrate contamination attributable to a party that is no longer in the picture. Should today's farmers be required to reduce their nitrate usage to help clean up pollution that they didn't cause? Under Porter-Cologne, the answer to that is yes.

Mercury is a good example of a legacy contaminant; the vast majority of the pollution occurred in the 19th century, and the responsible parties are long gone. But load allocations for mercury TMDLs are based on all current contamination in a water body – including legacy contamination- in order to ensure the achievement of water quality targets.

In order to move forward with this proposal, it would seem that some justifiable target would need to be selected. In the case of nitrates, the difference between the ILRP target and the remediation target might be an appropriate focus of an offsets program.

2. How would an offset program work?

In a typical offset program, a grower would be assigned a load allocation, and would contribute to an offset fund a dollar amount commensurate with the unmet portion of the mandated load reduction. The fund would be administered by the Board as the regulator of the program, and they would be responsible for dispersing the funds and ensuring that fees are set at a sufficient level to run the program.

Could the CV Salts organization run such a program? Potentially yes, with sufficient safeguards.

3. What are the pitfalls?

There are some major issues in contemplating such a program;

A. The program may not provide sufficient assistance to current or future residents who are disproportionately impacted by nitrate contamination.

1) If the program is merely a band-aid, it will not be able to keep up with the increasing number of impacted communities.

It's unclear what level of funding could or should be generated by this program. The \$20-\$36 million in annual costs assigned by the UC Davis nitrate report might be a good place to start in terms of need, as the authors attempted to estimate costs for residents served by both public water systems and private wells. On an individual community basis, a wellhead treatment unit for a small water system varies dramatically based upon water quality and the size of the community (smaller communities pay more per capita). Cost estimates of \$500-\$900 per acre-foot of water treated are common (an acre-foot would serve a family of five using about 175 gallon/person/day for one year).

As stated early, there is a concern is that charges assessed for nitrate discharges would be too low to provide anything close to the amount of assistance needed. Any offset program must allocate sufficient funds to meaningfully and substantially address nitrate-contaminated drinking water for this program to be worthwhile.

2) Identifying which communities should benefit will be difficult and could exacerbate the disproportionate impact of nitrate contamination.

If farmers are simply paying into a fund, it will be up to the water board to decide who gets this treatment subsidy and how much each community should receive.

The Tulare Basin pilot project demonstrates just how challenging it will be to identify impacted communities, much less help those that require assistance. Particularly challenging is the high number of rural residents served by state small systems or domestic wells; county records are generally inadequate to identify these, many (if not most) of these residents have no idea of their water quality, and an argument could be made that nitrate contamination in some of these wells is due to the residents' own septic systems rather than local agriculture.

B. The program will not reduce growers' regulatory burden or costs sufficiently to make participation worthwhile

The use of offsets is meant to provide a degree of both regulatory and cost certainty to the permit holder. However, it is very possible that the cost of an effective wellhead treatment program will be more expensive than implementing a higher level of best practices, in which case farmers would be unlikely to participate.

C. The program does not require adequate reductions in nitrate loading, allowing degradation to continue.

If nitrate levels continue to increase, more communities will be impacted. Will this program be flexible enough to allow the nitrate assessment to increase or nitrate targets to change to reflect actual changes in water quality and address changing community needs?

Potential Next Steps

1. Find or establish an appropriate fund for the purpose. Our organizations have advocated for the establishment of a Supplemental Environmental Program account within the Water Board for the purposes of funding nitrate mitigation efforts. This could house funds provided by ag as well as other sources. There has also been some discussion of establishing a regional water quality authority for areas of the valley impacted by nitrates, started with the Tulare Lake Basin. The advantage of establishing a separate fund is that it could potentially attract funding from a variety of sources - ag could serve as a catalyst for such an effort.
2. Make an initial financial commitment – set aside some amount of funding to test the theory.
3. Invest in a community – There are about 3 dozen Central Valley communities impacted by nitrates that have been identified as priorities for assistance by CDPH (and about twice as many with arsenic contamination). A partnership with Fresno’s Water Institute, which is working with US EPA to develop a program to address small communities without safe water, might yield a pilot project.
4. Think about funding gaps. If you spend money where no other options exist, you earn more brownie points. Some examples would be funding Self-Help Enterprise’s revolving loan fund for domestic well retrofits; providing grants or loans to communities that don’t qualify for state funding because they’re not a public water system; engaging a technical assistance circuit rider to provide as-needed services (engineering, water quality testing, mandatory reporting) to bring down community costs.
5. Discuss governance. If farmers were to provide funding for a mitigation bank, how would fees be assessed? Who should administer it? Who makes decisions on expenditures?
6. Identify data gaps. While information is readily available about most public water systems, there are significant gaps for residents in very small communities or those reliant on domestic wells.
7. Discuss eligibility criteria and funding levels. It is obviously not reasonable to subsidize every community with a nitrate contaminated well. Nor is it necessarily reasonable to limit the contaminants of concern to nitrates, since many communities are now struggling with arsenic contamination because a shallower well became contaminated with nitrate. These are tough questions that need to be discussed.



Discussion Outline for CV-SALTS Executive Committee Meeting (1/24/2013)

ISSUE: What role, if any, can/should water supply projects (incl. treatment or alt. sources) play in a BMP-based compliance strategy to address excess nitrate concentrations in groundwater?

I. Background and Context

- A) The Problem
 - 1. Excess nitrate levels in groundwater impairs drinking water supply wells
 - 2. Existing nitrate load in the vadoze zone will continue to contaminate groundwater
 - 3. Human activities will continue to contribute new nitrate loads at the surface
- B) Desired Outcome (co-equal and co-dependent)
 - 1. Assure safe drinking water supplies throughout the region ASAP
 - 2. Preserve economic viability of business and industry in the region
 - 3. Collectively, these outcomes constitute "sustainable salt management"

II. Regulatory Options Using the Traditional Water Quality Standards Toolkit

- A) What is the applicable water quality standard?
 - 1. All waters of the state are initially presumed capable of supporting MUN
 - 2. Water quality objective (WQO) for nitrate-nitrogen is ≤ 10 mg/L
 - 3. Compliance with WQO is evaluated at "first encountered groundwater"
- B) For Existing Discharges: Waste Discharge Requirements Address New Loads
 - 1. Discharge Prohibitions (based on pollutant concentration or discharge flow)
 - 2. Load and Wasteload Allocations (e.g. numeric effluent limitations)
 - 3. Technology-based Controls (minimum treatment or percent removal)
 - 4. Best Management Practices (iterative and adaptive control process)
 - 5. Limitations on Effectiveness of WDRs
 - i. Does not directly address existing use impairments
 - ii. Does not directly address non-attainment caused by prior discharges
 - iii. It may not be possible for dischargers to fully comply with WQOs/WDRs
 - * Technically infeasible
 - * Economically infeasible
 - iv. Limited regulatory options for dealing with partial non-compliance
 - * Cease and Desist Orders (CDO)
 - * Compliance Schedules or Time Schedule Orders
 - * Civil and Criminal Enforcement Actions
 - * Variances
 - * Cleanup and Abatement Orders (CAO)

C) For Prior Discharges: Cleanup and Abatement Orders to Address Legacy Pollution

1. Remediation Requirements: Pump and Treat Contaminated Groundwater
2. Mitigation Requirements: Providing Alternate Water Supply
3. Barriers to Implementing CAOs
 - i. Difficult to establish legal responsibility for prior discharges
 - * Large number of disparate sources over a long-period of time
 - * Complex questions of fate and transport
 - * Current status of prior dischargers
 - ii. Significant staff resources required
 - * Enforcement actions must be made case-by-case
 - * Number and scale of enforcement actions needed
 - iii. Very long appeals process delays final resolution

D) The existing regulatory toolkit is not the most efficient or effective means to achieve the dual outcomes desired.

1. The current toolkit evolved to:
 - * Prevent water quality impairment from...
 - * Discrete and readily identifiable point-source discharges...
 - * To surface waters (where significant flushing flows are the norm)
2. Consequently, the toolkit is ill-adapted to:
 - * Remediate existing water quality impairments...
 - * Due to legacy pollutants and prior (unregulated) discharge activities...
 - * From defuse and widely-distributed non-point sources...
 - * To groundwaters...
 - * With complex and poorly defined fate and transport mechanisms
3. Nevertheless, the Regional Board has a legal duty to protect beneficial uses and must rely on whatever authorized regulatory tools are available regardless of the aforementioned limitations.
4. If the existing regulatory toolkit is likely to produce inferior outcomes, it is up to the stakeholders to offer a more effective alternative.
5. The Regional Board can approve an alternative implementation program provided:
 - * It does not waive any statutory authority
 - * It does not violate or nullify any statutory duty
 - * It does not exceed existing regulatory authority
 - * It fully protects the beneficial use (e.g. provides safe drinking water)
 - * It is enforceable (e.g. recourse for non-compliance)
 - * It is implementable (e.g. reasonable administrative burdens)

III. Strawman Conceptual Alternative: "Direct Protection at the Point-of-Use"

- A) Discharger offers to mitigate the adverse effects of excess nitrates by agreeing to provide clean, safe drinking water to well owners within their zone-of-influence.
- B) The alternate drinking water supply must meet all state and federal requirements.
- C) The specific means used to provide an alternate drinking water supply is at the discretion of the Discharger. Such means may include, but is not limited to:
 - * New (relocated) or deeper wells
 - * Well-head treatment
 - * Connection to municipal water supply service
 - * Bottled water delivery
 - * In-lieu surface water exchanges
- D) The alternate source must be able to supply the needs of all persons currently dependent on the impaired groundwater wells and must be able to expand to accommodate future population growth at rate at least equal to that which is occurring in the county in which the project is located.
- E) The Discharger must agree to bear the full marginal cost of the alternate supply project (incl. capital and O&M) over and above what well users are currently paying.
- F) Direct Use Protection obligations are transferrable with title to the property where the discharge occurred.
- G) The Discharger must continue to implement Best Management Practices designed to minimize new nitrate loads.
- H) Initially, proposals for Direct Use Protection will operate as Pilot Demonstration Projects intended to serve as archetypes for proof-of-concept.
- I) Pilot Demonstration Projects will be entitled to Safe Harbor Agreements whereby participation in the project cannot be used as evidence establishing liability for past acts.
- J) Eligibility Restrictions:
 - * Groundwater basin already exceeds WQO for nitrate (e.g. no assimilative capacity)
 - * Significant nitrate load in vadoze zone precludes cost-effective remediation
 - * Prohibiting discharge would not provide meaningful relief from use impairments
 - * Near-term compliance with the WQO is not economically or technically feasible
 - * No technical or economically feasible alternative means of disposal
- K) Pilot Demonstration Project may need to operate under a Conditional Variance structure
 - * Allows limited exceedances of water quality objectives
 - * Reviewable and renewable; subject to meeting conditions of the variance
 - * Most appropriate where traditional compliance is infeasible
 - * Still requires reasonable best efforts (e.g. BMPs)
- L) This is NOT an "Offset" or "Pollutant Trading" program
 - * Such programs usually require a Wasteload Allocation or Load Allocation first
 - * Such programs assess compliance as "net" mass loads (e.g. pound-for-pound)
 - * Such programs are designed to achieve the WQO in the receiving water
 - * Direct Use Protection is designed to mitigate potential adverse impacts at the point-of-use not the point-of-discharge

IV. Advantages

- A) Direct Use Protection achieves many of the same outcomes expected from CAOs without the protracted legal battle because it is proposed by the discharger rather than imposed by the regulator.
- B) Direct Use Protection is the only way to achieve the co-dependent and co-equal outcomes described above.
- C) Direct Use Protection is the least cost alternative but it is not a zero-cost option.
- D) Direct Use Protection is the only mechanism that legally avoids imposition of regulatory requirements where compliance is both technically and economically infeasible.
- E) Direct Use Protection preserves all parties' legal options should it prove a failure.
- F) Direct Use Protection does not preclude continued reliance on traditional regulatory tools and traditional regulatory defenses for those who do not wish to participate in such initiatives. It is an option not an obligation.
- G) Direct Use Protection offers a higher level of business certainty by providing an option to demonstrate compliance for a defined period of time at a defined cost.
- H) Direct Use Protection will work best for point-source dischargers to groundwater where the zone-of-influence is relatively well-defined and the cost of providing alternative water supply is bearable. CV-Salts should actively seek-out such situations to serve as "archetypes" for this approach.
- I) Conceptually, Direct Use Protection may provide a superior option for addressing nitrate loads from diffuse non-point sources by developing a "mitigation bank" strategy similar to that used to preserve wetlands.
- J) Direct Use Protection is "outcome-oriented" and focuses on "sustainable salt management" as the primary decision paradigm.
- K) Direct Use Protection is consistent with the "zoning" metaphor previously set forth as a critical mechanism for implementing a successful Salt and Nitrate Management Plan.
- L) Direct Use Protection recognizes and reinforces the need to protect beneficial uses but does not presume that the only or best way to do so with through inflexible application of traditional water quality standards mechanisms.

CV-SALTS Meeting Calendar

2013

1 January						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
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6	7	8	9	10	11	12
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2 February						
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3 March						
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5 May						
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7 July						
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8 August						
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9 September						
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29	30					

10 October						
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11 November						
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12 December						
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Notes

2nd or 3rd Thursdays

Dark Green Exec Comm Policy

CEQA Scoping in **Dark Green**

2nd or 3rd Tuesdays

Lt. Green Hatch Exec Comm Admin

First Monday except conflicts

Yellow Salty 5

Lower San Jaquin River Committee

Light Red conflicts

Third Thursday Exceptions

January 24 vs 17th due to CASA

Dark in July & December for Policy

Nov 14 vs 21 due to Thanksgiving

Second Friday Exceptions

April due to RWQCB meeting

December 3 State Board Presentation