CV-SALTS Executive Committee Meeting

August 14, 2014 - 9:00 AM to 3:00 PM

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

Teleconference (712) 432-0360 Code: 927571#

Go-To-Meeting Link: https://global.gotomeeting.com/meeting/join/438841357
Meeting ID: 438-841-357

Posted 08.05.14 – Revised 08.13.14

AGENDA

1) **Welcome and Introductions - Chair**
   a) Committee Roll Call and Membership Roster -5 min.
   b) Review/Approve Executive Committee Meeting Notes for June 19, 2014 – 5 min.

2) **Fertilizer Research and Education Program (FREP)** – Sandy Schubert/CDFA (15 minutes)

3) **Discuss and Finalize Key Terms to be Defined in SNMP** - Tim Moore (2 hours)
   - Definitions Handout
   - Copy of Resolution No. 68-16

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

4) **Continue Discussion of Item #3 from the morning session** - Tim Moore (60 minutes)

5) **Draft Grassland Bypass Project Waste Discharge Requirements (WDR)** – Glenn Meeks (15 minutes)

6) **Set next meeting objectives/date**
- September 12th Admin Meeting
- September 18th Policy Session

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 2014										
Voters	Category/Stakeholder Group	Name	10-Jan	13-Feb	7-Mar	13-Mar	11-Apr	24-Apr	22-May	13-Jun	19-Jun	11-Jul	14-Aug
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	Michael Mosley	✓	✓		✓	✓	✓	✓		✓		
5	Environmental Justice	Jennifer Clary				✓		✓	✓		✓		
6	Environmental Water Quality	TBD											
CV Salinity Coalition													
1	So. San Joaquin WQC	Dave Orth	✓	✓		✓		✓					
2	City of Stockton	Robert Grandberg											
3	California Cotton Growers	Casey Creamer	✓	✓			✓	✓	✓	✓	✓	✓	
4	City of Fresno	Steve Hogg											
5	CA Leaque of Food Processors	Trudi Hughes							✓				
Alt	CA Leaque of Food Processors	Rob Neenan		✓		✓					✓		
6	Wine Institute	Tim Schmelzer	✓										
Alt	Wine Institute	Chris Savage											
7	City of Tracy	Erich Delmas		✓		✓			✓		✓		
Alt	City of Tracy	Dale Klever											
8	Sacramento Regional CSD	Lysa Voight	✓		✓	✓	✓		✓		✓	✓	
Alt	Sacramento Regional CSD	Carolyn Geisler-Balazs		✓			✓	✓	✓	✓		✓	
9	San Joaquin Tributaries Authority	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	Western Plant Health Assoc.	Renee Pinel			✓	✓	✓	✓		✓	✓	✓	
15	City of Vacaville	Royce Cunningham	✓	✓		✓	✓	✓	✓	✓			
16	Dairy Cares	Paul Sousa											
Alt	Dairy Cares	J.P. Cativiela		✓		✓	✓	✓	✓	✓	✓		
17	Westlands Water District	Jose Guiterrez	✓										
Comm. Chairs/Co-chairs													
1	Chair Executive Committee	Parry Klassen, ESJWQC		✓	✓	✓	✓	✓		✓	✓		
2	Vice Chair Executive Committee	Debbie Webster CVCWA	✓	✓	✓	✓	✓	✓	✓		✓	✓	
3	Technical Advisory Committee	Roger Reynolds, S Engr.	✓	✓	✓		✓		✓	✓		✓	
	Technical Advisory Committee	Nigel Quinn, LBL		✓	✓	✓	✓		✓	✓		✓	
4	Public Education and Outreach	Joe DiGiorgio	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5	Economic and Social Cost Committee	David Cory, SJVDA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
6	Lower San Joaquin River Committee	Karna Harrigfeld, SEWD		✓		✓	✓	✓	✓	✓	✓	✓	

CV-SALTS Committee Rosters

Participant Names			CV-SALTS Executive Committee Meetings During 2014										
Last	**First**	**Organization**	10-Jan	13-Feb	7-Mar	13-Mar	11-Apr	24-Apr	22-May	13-Jun	19-Jun	11-Jul	14-Aug
Archibald	Elaine	CUWA											
Ashby	Karen	LWA	✓	✓	✓	✓	✓	✓	✓		✓	✓	
Ashley	Joe	Oxley Oil	✓		✓								
Barclay	Diane	SWRCB				✓		✓	✓		✓		
Buford	Pam	CVRWQCB		✓	✓	✓	✓			✓	✓	✓	
Carlo	Penny	Carollo Engineers											
Carlton	Gary	Kennedy/Jenks											
Clancy	John										✓		
Clark	Les	Independent Oil Prod.											
Clary	Jennifer	CWA				✓	✓	✓	✓			✓	
D'Adamo	Dee Dee	SWRCB							✓				
Dalgish	Barb	LSCE											
Dickey	John	Plantierra		✓		✓		✓			✓		
Dunham	Tess	Somach Simmons		✓		✓		✓	✓		✓		
Dutton	Maggie	DWR							✓				
Firestone	Laurel	CWC							✓		✓		
Glotzbach	Ken	City of Roseville											
Gowdy	Mark	SWRCB,Water Rights											
Grovhoug	Tom	LWA		✓	✓	✓		✓	✓		✓		
Gryczko	Stan	City of Davis											
Herr	Joel	Systech											
Houdesheldt	Bruce	NCWA/Sac Valley WQC		✓	✓			✓	✓	✓	✓	✓	
Johnson	Michael	LSJRC		✓	✓	✓	✓	✓	✓		✓	✓	
Kretsinger Grabert	Vicki	LSCE			✓	✓		✓	✓		✓	✓	
LeClaire	Joe	CDM Smith											
Leach	Joe	City of Dixon								✓			
Lewis	Bill	City of Live Oak											
Liebersbach	Debbie	Turlock Irrig Dist											
Longley	Karl	CVRWQCB		✓		✓		✓	✓				
Meyerhoff	Richard	CDM Smith	✓				✓	✓	✓	✓	✓	✓	
Moore	Tim	Risk-Sciences		✓		✓		✓	✓				
Olson	Anne	CVRWQCB				✓				✓			
Parsons	Rob	CDM Smith								✓			
Pirondini	Tony	City of Vacaville											
Quasebarth	Tom	CDM Smith		✓	✓	✓							
Reyes	Tom	City of Vacaville											
Rodgers	Clay	CVRWQCB				✓		✓	✓		✓		
Sawyer	Steve	City of Vacaville											
Seaton	Phoebe	CRLA				✓		✓	✓				
Sesko	Michael	Woolf Farming											
Tapia	Joe	DWR							✓				
Tellers	Josie	City of Davis	✓	✓	✓	✓		✓	✓	✓	✓		
Thorme	Melissa	Downey Brand(Tracy)											
Tristao	Dennis	J.G. Boswell	✓		✓	✓							
Wilson	Fern	City of Vacaville	✓	✓		✓							
Witty	James	Stantec					✓						
Yee	Bettty	CVRWQCB					✓		✓				

CV-SALTS Executive Committee Meeting - Summary Action Notes

For June 19, 2014 - 9:00 AM to 3:00 PM

Attendees are listed on the Membership Roster

AGENDA

1) Welcome and Introductions
   a) Committee Chair Parry Klassen brought the meeting to order, and roll call was completed.
   b) Debbie Webster moved to approve, and Rob Neenan seconded, and by general acclamation the May 22nd action notes were approved.
   c) Daniel Cozad provided a summary of the Salinity Agronomist Expert Discussion held during the International Salinity Forum, June 16-18. Detailed notes of the discussion will be forwarded to the committee at a later date.

2) Review and Discuss Draft SNMP Document entitled: Proposed Approach for Evaluating and Regulating Nitrate Discharges to Groundwater in the Central Valley Region
   - The morning session was spent in discussion of items 1-11 from the following sections of the Draft SNMP Document:
     - Applicable Water Quality Standards
     - Water Quality Conditions and Permitting Considerations
     - Regional Board's Priorities When Permitting Nitrate Discharges

3) Continue Discussion of Item #2 from the morning session
   - The committee continued discussion of the Draft SNMP Document for the afternoon session. Items 12-19, (excluding item 18), from the following sections were discussed:
     - Minimum Baseline Requirements for ALL Nitrate Discharges to Groundwater
     - Proposed Permitting Strategy for Nitrate Discharges to Groundwater
   - Tim Moore will revise the Draft SNMP based on discussions during the meeting.

4) Homework Assignment: Key Terms to be Defined in SNMP
   - Tim Moore provided a list of high priority, and other key phrases, to define in the SNMP. Committee members were asked to submit comments and suggestions on the Key Phrases by Thursday, July 10th. The key phrase definitions will be discussed and finalized at the Executive Committee Meeting on Thursday, August 14th.

5) Set next meeting objectives/date
   - The next Admin Meetings will be July 11th & August 1st. There is no Policy Session in July, the next Policy Session is scheduled for August 14th.

High Priority Phrases to Define

1) Best Practicable Treatment or Control (BPTC)
2) Best Efforts
3) Best Management Practice (BMP)
4) Available assimilative capacity
5) Existing water quality
6) First Encountered Groundwater
7) Zone-of-Influence (aka Zone-of-Contribution)
8) Cause pollution or nuisance
9) Water quality objectives are being or are threatening to be exceeded
10) Not unreasonably affect beneficial uses
11) Not reasonably feasible or practicable (infeasible, impracticable)
12) Substantial and widespread social and economic impact
13) Necessary to accommodate important social and economic growth in the region
14) Maximum benefit to the people of California

Other Key Phrases

15) Average water quality
16) Naturally-occurring background concentration
17) Receiving water
18) Groundwater basin
19) Groundwater Sub-basin (Management Zone)
20) Vadose zone
21) Saturated zone
22) Use is attained or “in attainment”
23) Use is impaired or “in non-attainment”
24) Vulnerable area
25) MUN-Limited
26) Point-of-Compliance
27) Point-of-Use
28) Imperceptible improvement in water quality
29) Reasonable progress toward attainment
30) Salt and nitrate loading on a sustainable basis

1) "Existing Quality of Water" (current water quality not "baseline" quality)

"Where the constituent in groundwater is already at or exceeding the water quality objective, the Regional Board must set limitations no higher than the objectives set forth in the Basin Plan. Exceptions to this rule may be granted where it can be shown that a higher discharge limitation is appropriate due to system mixing or removal of the constituent through percolation through the ground to the aquifer. [FN] Where compliance with the objectives cannot be achieved by reasonable efforts, review of the appropriateness of the water quality objective may be required." [SWRCB WQO #1981-0005; In re: Petition by City of Lompoc; See also SWRCB WQO #2002-0012; In re: EBMUD and Bay Area Clean Water Agencies]

Related concepts…

a) Implementation Plans for basins or sub-basins where water quality objectives are being or are threatening to be exceeded [SWRCB Res. 09-11; Recycled Water Policy, §6-b-2]
b) Estimate assimilative capacity for each basin or sub-basin [Recycled Water Policy, §6-b-3-d]
c) *"For compliance with this paragraph, the available assimilative capacity shall be calculated by comparing the mineral water quality objective with the average concentration of the basin/sub-basin over the most recent five years of data available or using a data set approved by the Executive Officer."* [Recycled Water Policy, §9-c-1 @ pg. 11]

Factors to be considered…

a) Evaluated on a pollutant-by-pollutant basis
b) Should be "representative"
c) Spatial variability (3D)
d) Temporal variability
e) Excludes the "mixing zone" where one is authorized
f) Guidance for characterizing average surface water quality is in State's 303(d) Listing Policy

Range of alternatives…

← Simpler, Cheaper, Less Flexible ---------- More Complex, Costly, Flexible →				
Presume Zero Assim. Cap.	Well x Well Assessment	2D Contouring	3D Contouring	Full Fate and Transport Model

Proposed Strawman Definition for "Existing Water Quality"…

Existing water quality is the volume-weighted average (mean) concentration of a constituent in a groundwater basin, sub-basin or other approved management zone. The average concentration will be computed using all available representative and reliable data collected from wells in or adjacent to the basin, sub-basin or management zone during the most recent 10 years but excluding data from any approved mixing zone. The 10-year average will be computed independently for each well and the resulting values used to prepare an area-wide (2D or 3D) gridded contour map to estimate concentration gradients in the basin, sub-basin or management zone. Appropriate statistical transformations may be applied where necessary to normalize the data prior to computing mean values. Where long-term data for an individual well or group of wells indicates a statistically-significant trend in water quality, it may be appropriate to weight the most recent data more heavily when computing the mean concentration at such wells. Until the volume-weighted average concentration has been computed using the above method, the Regional Board will continue to estimate existing water quality on a well-by-well basis using the most recent available data. Existing water quality should be recomputed every five years. Existing water quality for a given basin, sub-basin, management zone or well may be different values.

2) "Will Not Unreasonably Affect Present and Anticipated Beneficial Use of Water"

"Whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonable affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies." [SWRCB Res. 68-16; see also CWC§13241

Related concepts…

a) A pollution or nuisance will not occur [SWRCB Res. 68-16; §2]
b) Water quality objectives are being or are threatening to be exceeded [RWP; §6-b-2]

Factors to be considered…

a) *"Pollution means an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses or the facilities which serve these beneficial uses. Pollution may include contamination."* [CWC 13050(l)]
b) *"Nuisance means anything which meets all of the following requirements: 1] Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; 2] Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; 3] Occurs during, or as a result of, the treatment or disposal of wastes."* [CWC 13050(m)]
c) *"In determining whether available assimilative capacity will be exceeded by the project or projects, the Regional Water Board shall calculate the impacts of the project or projects over at least a ten year time frame."* [Recycled Water Policy, §9-c-1]
c) Presence or absence of an authorized "mixing zone."
d) Guidance for determining whether a surface water quality objective is being "exceeded" is in State's 303(d) listing policy. [SWRCB Res. 2004-0063]

Proposed Strawman Definitions…

Beneficial uses are "not unreasonably affected" by a discharge if the average concentration of a constituent in the receiving water is not expected to exceed the applicable water quality objective for the relevant basin, sub-basin or approved management zone for a period of 20 years following the discharge.

Beneficial uses are "not unreasonably affected" by a discharge if the discharger implements measures to ensure all downgradient groundwaters under the influence of the discharge will continue to meet applicable water quality objectives when such groundwaters are extracted for use; this may include (but is not limited to) recharging additional high quality waters in the relevant basin, sub-basin or management zone to dilute and offset the discharge, installing and maintaining well-head treatment in all affected wells, or providing additional high quality surface water supplies to protect existing or anticipated uses through blending.

Beneficial uses are "threatening to be exceeded" if the average concentration of a constituent in the relevant basin, sub-basin or management zone is greater than 50% of the applicable water quality objective and there is a statistically-significant increasing trend, over the last 20 years, that indicates the objective is likely to be exceeded in the next 20 years or the average concentration of the constituent is greater than 80% of the applicable water quality objective (regardless of any trends).

3) "Consistent with Maximum Benefit to the People of the State"

Related concepts…

a) Necessary to accommodate important economic or social development in the area in which the waters are located *(federal; 40CFR131.12-a-2)*

b) Would result in substantial and widespread economic and social impact *(federal; 40CFR131.10-g-6)*

Factors to be considered…

a) Maximum Benefit is determined on a case-by-case basis

b) Past, present and probable future beneficial uses of the water; esp. including use for water supply

c) Economic and social costs, tangible and intangible, of the proposed discharge compared to the benefits

d) Ability to pay for the necessary treatment and whether imposing such costs will result in significant adverse impact on the community (several federal tools and templates are available for surface waters)

d) Environmental aspects of the proposed discharge (esp. net effects on water quality in the region; example: preventing seawater intrusion or preserving critical habitat)

e) Implementation of feasible alternative treatment or control measures to abate social costs of lower water quality

f) Must consider "costs" to both the discharger and others affected by the discharge

g) Cost savings "alone" are not an adequate justification; must also demonstrate how the savings are necessary to accommodate important social and economic development (note reference to federal regulations in interpreting state antideg policy; presumably applies to surface waters only)

h) Reduction in water quality is spatially localized or limited (e.g. confined to the mixing zone)

i) Reduction in water quality is temporally limited and will not result in any long-term deleterious effects on water quality

j) Proposed discharge will produce only minor effects which will not result in a significant reduction of water quality (e.g. a single project uses less than 10% of available assimilative capacity or the cumulative effect of all projects uses less than 20% of available assimilative capacity in a given basin, sub-basin or management zone).

k) The proposed activity has been approved in the General Plan of a political subdivision and has been subjected to adequate environmental and economic analysis in an EIR prepared as required under CEQA.

l) EPA's Water Quality Standards Handbook (Chapter 5) provides additional guidance for evaluating socio-economic impacts related to meeting water quality standards in surface waters

Primary reference sources: 1) SWRCB's Guidance on Resolution 68-16, 1995; 2) SWRCB's Administrative Procedures Update 90-004; 3) SWRCB's Recycled Water Policy, 2009; 4) CWC §13241; 5) Asociacion de Gente Unida Por El Agua v. Central Valley Board, 210 Cal. App. 4th 1255

3) "Consistent with Maximum Benefit to the People of the State" *(continued)*

Proposed Strawman Decision Criteria for Demonstrating "Maximum Benefit to the People of the State"…

A) Lower water quality is spatially-limited and/or a temporary condition. Example: deep-well injection projects where recycled water is stored for later extraction or providing additional recharge that will ultimately blend with and offset the discharge.

B) Lowering water quality at one location will result in higher water quality in the same or another location such that there is a net improvement in water quality and beneficial use protection in the receiving water, watershed, region or state as a whole. Example: a groundwater clean-up project removes TCE, but the air stripping process increases the concentration of TDS.

C) Lowering water quality will result in more effective protection of actual beneficial uses than would occur by imposing more stringent effluent limitations or prohibiting the discharge. Example: the discharge is coupled with a project to provide well-head treatment or alternate drinking water supplies where the MUN use is severely impaired.

D) Lowering water quality would facilitate increased use of recycled water (particularly by displacing demand for potable water) and thereby increase the overall water supply in the watershed, region or state. Example: using recycled water for landscape or agricultural irrigation.

E) Lowering water quality would facilitate increased recharge and storage to groundwater basins and particularly where the underlying aquifer is in an overdraft condition.

F) Lowering water quality is necessary to accommodate important social and economic growth in the region particularly where more stringent effluent limitations or discharge prohibitions would result in widespread and substantial adverse socioeconomic impacts in the area.

G) Lowering water quality would produce less adverse environmental impact than imposing more stringent effluent limitations or discharge prohibitions. Example: additional treatment results in significant cross-media waste streams (e.g. brines, greenhouse gases, etc.) or requires significant energy consumption without any corresponding reduction in risk to public health or the environment.

H) Lowering water quality is necessary to preserve beneficial uses that may otherwise be lost if discharge flows are significantly diminished in order to comply with more stringent effluent limitations. Example: preservation of aquatic habitat or recreational resources in an ephemeral/intermittent stream.

I) Allowing lower water quality in the discharge will reduce the rate at which water quality is already degrading (or is expected to degrade) in the receiving water. Example: creating barriers to groundwater migration or diluting contaminants in the vadose zone.

J) Allowing lower water quality, in relation to the baseline condition, would actually improve existing water quality.

K) Allowing lower water quality is necessary to prevent widespread and substantial adverse social or economic impact or to accommodate important social and economic development in the nation, state or region.

L) Allowing lower water quality is necessary to protect infrastructure or industries deemed vital to national security, public safety, public health, or the environment.

STATE WATER RESOURCES CONTROL BOARD

RESOLUTION NO. 68-16

STATEMENT OF POLICY WITH RESPECT TO
MAINTAINING HIGH QUALITY OF WATERS IN CALIFORNIA

WHEREAS the California Legislature has declared that it is the policy of the State that the granting of permits and licenses for unappropriated water and the disposal of wastes into the waters of the State shall be so regulated as to achieve highest water quality consistent with maximum benefit to the people of the State and shall be controlled so as to promote the peace, health, safety and welfare of the people of the State; and

WHEREAS water quality control policies have been and are being adopted for waters of the State; and

WHEREAS the quality of some waters of the State is higher than that established by the adopted policies and it is the intent and purpose of this Board that such higher quality shall be maintained to the maximum extent possible consistent with the declaration of the Legislature;

NOW, THEREFORE, BE IT RESOLVED:

1. Whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies.

2. Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.

3. In implementing this policy, the Secretary of the Interior will be kept advised and will be provided with such information as he will need to discharge his responsibilities under the Federal Water Pollution Control Act.

CV-SALTS Executive Committee Meeting, 14 August 2014

Item 5: Draft Grassland Bypass Project Waste Discharge Requirements (WDR)

Background

New waste discharge requirements (WDRs) are currently being prepared for Phase III of the Grasslands Bypass Project (GBP) in the Grasslands watershed sub-basin of San Joaquin River Basin. Initiated in 1996, the GBP has prevented subsurface drainage discharges with elevated levels of selenium, salt and boron from entering channels supplying wetland habitat by consolidating and then discharging the drainage via a portion of the San Luis Drain to Mud Slough and then to the Lower San Joaquin River (LSJR). In addition, the GBP has progressively reduced the loads of these constituents entering the LSJR by approximately 80%, 63% and 63%, respectively. Some of the activities that have led to these reductions include: in-valley treatment via drainage reuse at the San Joaquin River Improvement Project (SJRIP) facility; utilizing and installing a drainage recycling system to mix subsurface drain water with irrigation supplies under strict limits; continuing current land retirement policies; an active land management program to utilize subsurface drainage on salt-tolerant crops; and a no-tailwater policy to reduce overall volume of drainage needing control and also to prevent silt from being discharged into the Drain.

Phase I of the GBP was covered by a 1998 WDR and Phase II was covered by a 2001 WDR update. In 2010, an updated Use Agreement between the U.S Bureau of Reclamation and the San Luis & Delta-Mendota Water Authority specified terms and conditions that address continued use of the San Luis Drain, GBP longevity and water quality.

A Draft Order implementing the WDRs for Phase III of the GBP was circulated by the Central Valley Water Board in May 2014 with comments due by 30 June 2014. The Draft Order continues to support the requirements for the selenium control program, but also incorporates new requirements under the Irrigated Lands Regulatory Program (ILRP).

In regards to salinity, the Draft Order references salt load requirements specified in the Control Program for Salt and Boron Discharges into the Lower San Joaquin River contained in the Water Quality Control Plan for the Sacramento-San Joaquin River Basins (Salinity Control Program). The Salinity Control Program requires that dischargers meet monthly salt load allocations specified in the Basin Plan or participate in a Central Valley Water Board approved Real Time Management Program (RTMP). The RTMP is currently scheduled for Regional Board consideration in October 2014.

A workshop to discuss the draft Order is schedule at the Central Valley Water Board meeting on Friday 8 August 2014, with the tentative order anticipated for public release in mid-September 2014.

Since the draft Order contains requirements for salinity control, Central Valley Water Board staff requests review by CV-SALTS to provide consistency with the initiative's overall goals and objectives. Please note that the salinity related requirements for the draft GBP WDR are the same requirements as listed in the recently adopted WDR for the Westside Coalition. The GBP draft Order and the comments received can be accessed at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/1408/index.shtml#19

The following highlights the key salinity requirement.

Pg.15, V.E. Total Maximum Daily Load (TMDL) Requirements
"Approved TMDLs in the Basin Plan that apply to surface water bodies downstream of the San Luis Drain discharge and have allocations for irrigated agriculture shall be implemented in accordance with the applicable Basin Plan provisions. Where applicable, SQMPs shall be developed or the Drainage Management Plan shall be updated to address TMDL requirements.

TMDL requirements include, but are not limited to, Basin Plan provisions for the Control Program Salt and Boron Discharges into the Lower San Joaquin River. To meet the requirements of the Control Program for Salt and Boron Discharges into the Lower San Joaquin River, the Discharger must, by 30 June 2014, 1) participate in a Central Valley Water Board approved real-time management program; or 2) submit a surface water quality management plan that includes the required elements identified in the Monitoring and Reporting Program, Appendix MRP-1 and is designed to meet the Base Salt Load Allocations identified in Table IV-4.4 *Summary of Allocations and Credits* within the applicable compliance schedule for compliance in Table IV-4.3."

The Board also received comments that salt load limits included in the San Luis Drain Use Agreement between the Bureau of Reclamation and the San Luis & Delta-Mendota Water Authority should be included in the draft Order. Appendix E, pages 34 and 35 of the Use Agreement include the applicable salt load values:

http://www.waterboards.ca.gov/centralvalley/water_issues/grassland_bypass/gbp_2010_2019_use_agree.pdf

Questions

1. Is the incorporation of the Salt/Boron Control Program, as referenced in the draft Order, consistent with CV-SALTS goals and objectives?

2. Should the salinity load values contained in the Use Agreement be incorporated into the draft Order?

3. The draft Order requires compliance with water quality objectives (including MCLs, where applicable) in the receiving waters and includes nitrate monitoring. Are any further provisions related to nitrate needed in the draft Order to be consistent with CV-SALTS goals and objectives?

4. Are there any specific recommended changes to the draft Order that are needed to provide consistency with CV-SALTS goals and objectives?

5. Is there a need to schedule a conference call for interested CV-SALTS members during the week of August 18th for a more thorough discussion of the salinity and nitrate components of the draft Order?

If changes are proposed, please provide suggested language and rationale for the changes.

CV-SALTS Meeting Calendar

2014

1 January

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
1				1	2	3	4
2	5	6	7	8	9	10	11
3	12	13	14	15	16	17	18
4	19	20	***21***	22	**23**	24	25
5	26	27	28	29	30	31	

2 February

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
5							1
6	2	3	4	5	6	7	8
7	9	10	11	12	13	14	15
8	16	17	18	19	20	21	22
9	23	24	25	26	**27**	28	

3 March

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
9							1
10	2	3	4	5	6	7	8
11	9	10	11	12	13	14	15
12	16	**17**	18	19	20	21	22
13	23	24	25	26	27	**28**	29
14	30	31					

4 April

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
14			1	2	3	4	5
15	6	7	8	9	10	11	12
16	13	14	**15**	16	17	18	19
17	20	21	22	23	24	25	26
18	27	28	29	30			

5 May

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
18					1	2	3
19	4	5	6	7	8	9	10
20	11	12	13	14	15	16	17
21	18	19	20	21	22	23	24
22	25	26	27	28	**29**	**30**	31

6 June

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
23	1	2	3	4	5	6	7
24	8	9	10	11	12	13	14
25	15	16	17	18	19	20	21
26	22	23	24	25	**26**	27	28
27	29	30					

7 July

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
27			1	2	3	4	5
28	6	7	8	9	10	11	12
29	13	14	15	16	17	18	19
30	20	21	22	23	24	**25**	26
31	27	28	29	**30**	31		

8 August

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
31						1	2
32	3	4	5	6	7	8	9
33	10	11	12	13	14	15	16
34	17	18	19	20	21	22	23
35	24	25	**26**	27	**28**	29	30
36	31						

9 September

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
36		1	2	3	4	5	6
37	7	8	9	10	11	12	13
38	14	15	16	17	18	19	20
39	21	22	23	24	**25**	26	27
40	28	29	30				

10 October

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
40				1	2	3	4
41	5	6	7	8	9	10	11
42	12	13	14	15	16	17	18
43	19	20	21	22	**23**	24	25
44	26	27	28	29	30	31	

11 November

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
44							1
45	2	3	4	5	6	7	8
46	9	10	11	12	13	14	15
47	16	17	18	19	**20**	21	22
48	23	24	25	26	27	28	29
49	30						

12 December

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
49		1	2	3	4	5	6
50	7	8	9	10	11	12	13
51	14	15	16	17	**18**	19	20
52	21	22	23	24	25	26	27
53	28	29	30	31			

Notes

2nd or 3rd Thursdays

Dark Green Exec Comm Policy

RWQCB Update ***Bold Underline***

Light Red conflicts

Lt. Green Hatch Exec Comm Admin

First or Second Friday

Yellow Salty 5

Lower San Jaquin River Committee

TAC Meeting

Dark in July & December for Policy

State Board Presentation 1/21/14

May 15 move to 22nd for CVCWA

Nov 13 vs 20 due to Thanksgiving