

CV-SALTS Executive Committee Meeting
Friday, April 13, 2018 – 9:00 AM to 3:00 PM - Sunset Maple Room
Sacramento Regional Sanitation District
10060 Goethe Rd, Sacramento 95827

Teleconference (641) 715-3580 Code: 279295#

Go-To-Meeting Link: <https://global.gotomeeting.com/join/627779485>

Posted 04-03-18 – Revised 04-12-18

- 1) Welcome and Introductions – Chair** – (15 mins)
 - a) Committee Roll Call and [Membership Roster](#)
 - b) Review and Approve [March 8, 2018 Meeting Notes](#)

- 2) Review of Draft Staff Report – Explanations, Issues and Comments** – Jeanne and all (2 hrs. 15 mins)
 - Explanation of change from prior drafts
 - High level questions and comments
 - [Summary of CVSC Member Comments](#)
 - Outstanding Issues for Discussion at May 31st Hearing
 - Recap timeline through June 1

11:30 am to 1:00 pm - Lunch on Your Own
--

- 3) Continuation of Morning Discussion** – (1 hr.)

- 4) Presentation Preparation for May 31st** - Jeanne Chilcott/Richard Meyerhoff (30 mins.)
 - Review Items for Draft PowerPoint
 - Discuss framework for hearing
 - Discuss presenter’s roles and any comments known

- 5) Administrative Updates** – Daniel Cozad (30 mins.)
 - Public Education and Outreach – Update
 - Insert (for 11 X 17 brochure) Approval:
 - [Drinking Water – One Page](#)
 - [Drinking Water – Two Page](#)
 - Outreach Tracking Form Entries

- 6) Review Meeting Schedule/Location**
 - Policy Meeting: May 3rd – 9:00 – 3:00 @ Sac Regional
 - Admin Meeting: May 4th – 1:30 – 3:00
 - Policy Meeting: May 24th – 9:00 – 3:00 @ Sac Regional
 - Regional Board Hearing & Adoption: May 31-June 1

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 - 2017-2018										
Voters	Category/Stakeholder Group	Name	16-Aug	17-Aug	11-Oct	12-Oct	9-Nov	14-Dec	3-Jan	11-Jan	15-Feb	8-Mar	13-Apr
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												
4	US Bureau of Reclamation	Ellwood Raley	✓				✓			✓	✓	✓	
5	Environmental Justice	Laurel Firestone											
6	Environmental Water Quality	TBD											
CV Salinity Coalition													
1	So. San Joaquin WQC	Nicole Bell	✓	✓	✓	✓		✓	✓	✓	✓	✓	
2	City of Stockton	Robert Granberg											
3	California Cotton Growers	Chris McGlothlin		✓									
4	City of Fresno	Rosa Lau-Staggs	✓	✓	✓	✓		✓	✓	✓		✓	
5	CA League of Food Processors	Trudi Hughes											
Alt	CA League of Food Processors	Rob Neenan	✓	✓		✓		✓		✓	✓		
6	NCWA/SVWQC	Bruce Houdesheldt	✓	✓	✓	✓		✓			✓	✓	
7	City of Tracy	Stephanie Hiestand									✓	✓	
Alt	City of Tracy	Dale Klever											
8	Sacramento Regional CSD	Lysa Voight	✓	✓	✓	✓	✓		✓	✓	✓	✓	
Alt	Sacramento Regional CSD	Sam Safi											
9	San Joaquin Tributaries Authority	Dennis Westcot											
10	Valley Water Management	Melissa Thorne	✓	✓	✓	✓	✓		✓	✓	✓	✓	
Alt	Valley Water Management	Jim Waldron						✓	✓				
11	California Rice Commission	Tim Johnson	✓	✓	✓	✓	✓			✓		✓	
12	City of Davis	Josie Tellers	✓	✓	✓	✓		✓	✓	✓	✓	✓	
13	Tulare Lake Drainage District	Mike Nordstrom	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
14	Western Plant Health Assoc.	Renee Pinel		✓						✓			
15	City of Vacaville	Steve Sawyer											
Alt	City of Vacaville	Tony Pirondini	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
16	Dairy Cares	J.P. Cativiela	✓	✓	✓	✓		✓		✓	✓		
Alt	Dairy Cares	Paul Sousa											
17	Westlands Water District	Jose Guterrez											
Alt	Westlands Water District	Charlotte Gallock		✓	✓	✓	✓	✓	✓	✓		✓	
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	Nicole Bell	✓	✓	✓	✓	✓						
5	Economic and Social Cost Committee	David Cory, SJVDA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
6	Lower San Joaquin River Committee	Karna Harrigfeld, SEWD	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

CV-SALTS Committee Rosters

Participant Names													
Last	First	Organization	16-Aug	17-Aug	11-Oct	12-Oct	9-Nov	14-Dec	3-Jan	11-Jan	15-Feb	8-Mar	13-Apr
Archibald	Elaine	CUWA											
Au Yeung	Cindy	CVRWQCB					✓						
Ashby	Karen	LWA											
Baptiste	Anne	Diepenbrock Elkin Gleason			✓	✓	✓	✓	✓		✓	✓	
Barclay	Diane	SWRCB	✓	✓	✓	✓							
Brown	Michelle	RBI											
Bryant	Mike	RBI											
Carlo	Penny	Carollo Engineers		✓				✓					
Cady	Mark	CDFA	✓	✓	✓	✓	✓				✓		
Claiborne	Mike	Leadership Counsel		✓			✓				✓		
Clary	Jennifer	CWA											
Dickey	John	Plantierra	✓			✓				✓	✓	✓	
Doduc	Tam	SWRCB											
Dunham	Tess	Somach Simmons	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Escobar	Juan	DWR	✓	✓									
Fink	Cody	LANDIQ							✓				
Fuentes	Robert	Leadership Counsel											
Garcia	Rick	CRC	✓	✓	✓	✓		✓	✓	✓	✓	✓	
Gonzalez	Armando	Occidental Oil & Gas											
Gleason	Nicole	Diepenbrock Elkin Gleason											
Gore	Bob	Gualco Group		✓	✓		✓	✓	✓	✓	✓	✓	
Gosling	Doug												
Grovhoug	Tom	LWA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Gudel	Casey	LANDIQ											
Horne	Randy	NAFTEX	✓	✓		✓				✓			
Johnson	Michael	LSJRC											
Kihara	Annalisa	SWRCB											
Kimmelshue	Joel	LANDIQ											
Kotin	Adam	Wine Institute		✓				✓		✓			
Krachey	Julie	Apex				✓							
Kretsinger Grabert	Vicki	LSCE				✓	✓	✓	✓	✓	✓	✓	
Kubiak	Rachel	Western Plant Health Assoc.											

ADDITIONAL PARTICIPANTS:

Participant Names			CV-SALTS Executive Committee Meetings -2017-2018										
Last	First	Organization	16-Aug	17-Aug	11-Oct	12-Oct	9-Nov	14-Dec	3-Jan	11-Jan	15-Feb	8-Mar	13-Apr
Laputz	Adam	CVRWQCB			✓								
Larson	Bobbi	CASA	✓							✓	✓	✓	
LeClaire	Joe	Daniel B. Stephens & Assoc											
Liebersbach	Debbie	Turlock Irrig Dist		✓									
Lilien	Jonathan	Chevron											
Link	Adam	CASA											
Littlejohn	Anne	CVRWQCB	✓	✓	✓	✓		✓	✓	✓		✓	
Liu	Yuan	CCWD										✓	✓
Longley	Karl	CVRWQCB	✓	✓	✓	✓	✓	✓		✓	✓	✓	
Lovley	Tim	MacPherson Oil			✓	✓		✓					
McGahan	Joe	SJVDA											
McReynolds	Scott		✓										
Meeks	Glenn	CVRWQCB	✓	✓	✓	✓	✓	✓		✓	✓	✓	
Meyerhoff	Richard	GEI Consultants	✓	✓	✓	✓	✓	✓		✓	✓	✓	
Moore	Tim	Risk-Sciences		✓		✓	✓			✓	✓	✓	
Ores	Debi	CWC		✓		✓						✓	
Peschel	Paul	KRCD						✓					
Plachta	Walt	CVRWQCB			✓	✓	✓	✓		✓		✓	
Pritchett	Gregory	Chevron											
Pulupa	Patrick	CVRWQCB	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Pitcher	Jennifer	West. States Petroleum											
Reedy	Chris	VWM					✓		✓		✓	✓	
Rempel	Jenny	CWC											
Rivera	Willie	CIPA	✓	✓		✓	✓		✓		✓		
Rodgers	Clay	CVRWQCB				✓	✓			✓	✓	✓	
Savage	Chris	Gallo								✓			
Schmidt	Andrea						✓						
Schultz	Paul	CDM Smith											
Seyfried	Scott	SWRCB			✓	✓	✓						
Seaton	Phoebe	LCJA											
Segal	Daniel	Chevron											
Silva	Megan	Aera											
Starr	Bonny	Starr Consulting					✓						
Thomas	Bill	KRCD			✓	✓	✓				✓		
Tillman	Stephanie	LANDIQ	✓	✓	✓	✓		✓		✓	✓	✓	
Tristao	Dennis	J.G. Boswell											
Wackman	Mike	SJ County/Delta Water	✓				✓				✓	✓	
Zimmerman	Christine	IOPA	✓	✓		✓		✓	✓	✓	✓		

ADDITIONAL PARTICIPANTS:

CV-SALTS Executive Committee Meeting - Summary Action Notes

For March 8, 2018 – 9:00 AM to 3:00 PM

Attendees are listed on the Membership Roster

DISCUSSION ITEMS

1) Welcome and Introductions

- a) Executive Committee Chair Parry Klassen brought the meeting to order, and roll call was completed.
- b) Mike Nordstrom moved, and David Cory seconded, and by general acclamation the February 15, 2018, Meeting Action Notes were approved. A request was made to keep future meeting notes more general, providing less detail on specific agenda items.

2) Review of SAMP Comments and Changes

- The discussion of SAMP comments and changes was covered under Agenda Items 3-4 below.

3) Review of Issues Submitted as Comments and Suggested Edits

4) Continuation of Morning Discussion

- Jeanne Chilcott summarized the current work in progress for development of the Staff Report. The Staff Report is planned to be released for public review on March 19th, followed by a 45-day public comment period which will end on May 4th. Written comments that the Regional Board receives will need to be responded to in writing before the May 31-June 1 hearing.
 - The Executive Committee meeting currently scheduled for April 19th will provide another opportunity to discuss comments on the Staff Report.
 - Committee members with major comments, or concerns regarding elements missing from the Report, were encouraged to contact Regional Board staff early, and not wait for the May 4th deadline. There will be another opportunity for group discussion of outstanding issues at the April Executive committee meeting.
- The Stakeholder Proposed Edits to Executive Summary—February 2018 was used to guide discussion of the major components of the proposed Basin Plan Amendment. This document summarized the comments that were provided from the last Executive Committee meeting.
 - The list of proposed edits showed comments received from the February meeting that had already been incorporated.
 - Additionally, the list included comments not yet been incorporated into the report. Those items were discussed, and clarification provided so they could be incorporated into the Staff Report.
 - The stated purpose of the discussion was to ensure that all comments had been received and documented in the Report.
 - Outstanding comments must be received by Regional Board staff no later than Monday, March 12th. Comments received after 3/12/18 will have to be processed during the public comment period.
 - The Word version of the individual matrices documents for each component will be distributed via email. Participants were asked to review, ensuring that discussion and comments on all options have been identified.

5) Administrative Updates

- After discussion the committee recommended the following revisions to the Drinking Water insert:
 - Change the title to the following:

**Addressing Central Valley Drinking Water Quality
New Groundwater Quality Regulations**
 - Substitute the word “contaminants” for “pollutants.”
 - Deadline for submitting additional comments on the Drinking Water insert is March 15th.
 - Daniel Cozad will forward the revised inserts to Pamela Creedon.

6) Review Next Meetings - Schedule/Location

- **4/19/2018 POLICY MEETING CHANGED TO: 4/13 Policy Meeting 9:00 – 3:00 - Location TBD**
- Policy Meeting: May 3, 2018 from 9:00 – 3:00 @ Sac Regional
- Admin Meeting: May 4, 2018 from 1:30 – 3:00 Teleconference
- Policy Meeting: May 24, 2018 from 9:00 – 3:00 @ Sac Regional

Summary of CVSC Member Comments on the Basin Plan Draft Language and Staff Report

These comments were received, and I have attempted to sort them for Discussion at the April 13, 2018 CV-SALTS Executive Committee Meeting or as informal issues mentioned to Regional Board Staff.

After the Discussion Friday, CVSC should meet to decide of any need to go forward as formal comments to the Regional Board for the Record.

Potential Items for Friday

1. In-Kind credit for P&O study in basin plan language Lysa's comment 1.
2. Conditional Prohibition issues Lysa's comment 2.
3. Direction to Other Agencies, other responsible parties Lysa and Debbie comments
4. Issues with Definitions various comments
5. MUN Supply Title 22 citation add short term 1500 Debbie's comment 4
6. Variances and exceptions Debbie's comment 5
7. Fixed Dissolved Solids and Nitrate + Nitrite Debbie's comment 6
8. Nitrate – language on ACPs “except in limited and unique circumstances Debbie's comment 10
9. SAMP – data from management zones noted elsewhere in SAMP Debbie's comment 11
10. Does improving water quality include user protection - Debbie's comment 15
11. Discussion of SAMP language see comment by Vicky
12. SMCL implementation (if materials are ready) Debbie's comment 1.
13. P&O Costs and Fee Setting, if needed.

Comments and Initial Disposition

-----Original Message-----

From: Voight, Lysa <voightl@sacsewer.com>

Sent: Tuesday, April 10, 2018 3:47 PM

To: Tess Dunham <tdunham@somachlaw.com>; dcozad@cvsalinity.org;

Jeanne.Chilcott@waterboards.ca.gov

Subject: Comments for CV SALTS Documents

Please see below my major issues related to the Executive Summary, draft staff report and basin plan amendment text. Because these items are being discussed in workgroups, in the policy meetings, and within the coalition, I'm not providing strikethrough/markups. Let me know if you have any questions. I don't think any of these issues are new:

1. In-kind services aren't mentioned consistently in the Draft Staff Report or basin plan language as a means to contribute to studies. We discussed before that these in-kind services would be similar to the actual nature of the P&O study such as new data collection, monitoring, and modeling. Minimum funding is mentioned, yet another section states: "Participation in the Phase I P&O Study may be done by providing financial, technical and policy support to the P&O Study." Make sure text is consistent/not contradictory.

YOU ARE CORRECT; WE ADDRESSED THIS IN THE JANUARY MEETING. WE ASKED THAT THE COALITION BE ALLOWED TO DETERMINE WHERE "IN-KIND" SERVICES WOULD BE ALLOWED IN THE P&O STUDY ETC. THIS IS PRIMARILY BECAUSE MY EXPERIENCE IS THAT FOLKS PROVIDE LOTS OF REPORTS AND WORK WHICH MUST BE EVALUATED TO DETERMINE IF IT IS OF VALUE AND REQUIRING IT TO BE TAKEN EQUIVALENT TO PAYMENT WILL BE BURDENSOME AND LEAD TO ISSUES. WHERE THE COALITION ASKS FOR IN-KIND WORK, OR IT IS OFFERED AND CAN BE VALUED I KNOW EVERYONE WANTS TO USE IT. WITHOUT STATING IT, "IN-KIND" CAN BE ACCEPTED BUT DOES NOT HAVE TO BE ACCEPTED. THE COMMENTS WE SUBMITTED INDICATE THIS AND RECOMMEND IT IS THE SAME IN ALL AREAS OF THE PLAN. **IT IS LIKELY THAT THE REGIONAL BOARD, OF ITS OWN ACCORD WILL BE SURE THERE IS CONSISTENCY IN THIS AREA BASED ON DISCUSSION THIS WEEK.**

2. I'm confused about the Conditional Prohibition discussed on page 14. Is this new? It isn't clear why Irrigated Lands program is excluded.

MAYBE IT IS TOO HIGHLY SUMMARIZED IN THE EXECUTIVE SUMMARY. THE ILRP PERMITS ARE BEING REVISED AS REQUIRED BY STATE BOARD ACTION SO THEY WILL JUST INCORPORATE THE SAME REQUIREMENTS INTO THEIR ORDER. THIS KEEPS AN UNINTENDED SOUNDBITE "PROHIBITING AGRICULTURE" FROM CREEPING IN. **JEANNE COULD TALK ABOUT THIS MORE IN THE FRIDAY MEETING IF NEEDED. PROVIDED THAT DISCUSSIONS THIS WEEK TAKE CARE OF THIS FOR YOU WE WILL NOT CARRY THIS AS A COMMENT.**

3. Wherever the staff report, basin plan language, or policies state that dischargers or permittees or coalition members will fund components of CV SALTS future activities (P&O Study, Nitrate management, providing drinking water, SAMP, physical and non-physical projects, etc, modify the language to add "...and other responsible parties identified that contribute to salt and nitrate loading" or something equivalent. Thank you for adding a good discussion of other stakeholders in the Executive Summary page 26.

WE WILL CARY THIS AS A COMMENT AND REFERENCE THE IMPLEMENTATION SECTION RELATED TO REQUESTS OF OTHER AGENCIES.

4. The costs for the P&O Study, SAMP, SNMP, etc should be updated. Cost proportions shouldn't be fixed or set until there is agreement in the groups.

THE P&O STUDY SCOPING (FUNDED BY THE STATE BOARD GRANT) WILL BE THE NEXT OPPORTUNITY TO REVIEW POTENTIAL FUTURE COSTS FOR THE P&O STUDY. THE EXISTING COSTS ARE BASED ON THE SCOPE IN THE SSALTS STUDY, AND NO NEW STUDY HAS BEEN DONE. COSTS COULD INCREASE BASED ON THE SCOPE THAT THE GROUP DETERMINES. THE SAMP COSTS ARE BASED ON THE SAMP REPORT WHICH WAS MODIFIED IN THE BASIN PLAN DEVELOPMENT, BUT NO NEW SCOPE IS FINAL FOR IMPLEMENTATION. A SMALL GROUP OF INDUSTRY MEMBERS IS WORKING IN CVSC TO IDENTIFY AN APPROACH THAT WOULD SUPPORT AND PROPORTION THESE COSTS SEPARATELY. THE BASIN PLAN DOES NOT SET THE PROPORTION OR COST. **I WILL TAKE THIS AS A COMMENT TO THE CVSC FEE GROUP.**

5. The RWB should be allowed to re-evaluate the program costs and apportionment for the program(s) components based on findings from the studies, for newly identified responsible parties, reduction or increases in loading from permittees, or other appropriate factors.

I THINK THIS FLEXIBILITY IS WITHIN THE DISCRETION OF THE EXECUTIVE OFFICER BUT CERTAINLY YOU ARE CORRECT CVSC OR WHOEVER PERFORMS THE P&O AND SAMP SHOULD BE ABLE TO JUSTIFY AND ADJUST THE FEES I AM NOT SURE WE NEED A CHANGE TO THE STAFF REPORT FOR IT. **WE CAN TALK MORE ABOUT THIS AS NEEDED I DO NOT THINK THIS IS CARRIED FORWARD AS A WRITTEN COMMENT TO THE BOARD.**

From: Debbie Webster <eeofficer@cvcwa.org>

Sent: Tuesday, April 10, 2018 1:50 PM

To: dcozad@cvsalinity.org

Subject: Identification of Issues for CV-SALTS Staff Report/BPA

Hi Daniel, we were able to discuss some of the report which lead to some of these items, but are still working our way through it for now. Here are some areas we identified:

1. Implementing SMCLs – as written, the process is limited to metals, color and turbidity and use of filters as a translator for metals from a total to a dissolved fraction. We are working on some minor edits and source v. finished water for SW drinking water treatment plants to compare with other SMCLs or possibly other constituents as disinfection, and other treatment aspects can play a part. We hope to have the materials by Friday. **I AGREE IF YOU HAVE MATERIALS THIS SHOULD BE DISCUSSED ON FRIDAY.**
2. Conditional Prohibition – we are considering suggesting some language that makes it clear about what happens with permit conditions as we move forward. **THIS SHOULD BE DISCUSSED ON FRIDAY**
3. Phase 1 P&O to Phase 2 process
 - a. We are going to recommend that the Basin Plan note that the RWB will not only “take” what is learned by the P&O study, but that they include language in the Basin Plan that this would be done through a collaborative effort (i.e. a CV-SALTS 2).
 - b. Wordsmith the language so that the current Phase 1 numeric values are not the default consideration and that more might be considered. FROM PAST DISCUSSION, I THINK CLARIFICATION CAN BE MADE; **THIS LIKELY DOES NOT NEED CONVERSATION WITH THE GROUP BUT AN INFORMAL COMMENT.**
4. On ES-11, recommend the following change: For MUN supply, TDS concentrations at or below 500 mg/L are recommended with an upper range of 1,000 mg/L and a short term range of 1500 mg/L to protect human welfare and provide for consumer acceptance (Title 22 of the California Code of Regulations). **THIS MAY NEED DISCUSSION ON FRIDAY, WHILE A FACTUAL STATEMENT THERE MAY BE OTHER IMPLICATIONS AND MAY BE BETTER COVERED IN DROUGHT AND CONSERVATION POLICY.**
5. Variances/excpetions:
 - a. In the variance section (see pg 23 for example or page 99) remove the and when it is not reasonable or feasible to prohibit the discharge language
 - b. Acknowledge that variances are also the appropriate tool when changing a water quality standard. **THIS SHOULD LIKELY BE DISCUSSED ON FRIDAY**

6. We agreed to add Fixed Dissolved Solids and Nitrate + Nitrite or other form as a way to express salinity and nitrate, but did not see those changes. Why? **THIS SHOULD BE DISCUSSED ON FRIDAY**
7. Pg. 34, make sure it is clear that the EO can extend interim milestones as well as the final compliance dates. **THIS LIKELY DOES NOT NEED CONVERSATION WITH THE GROUP BUT AN INFORMAL COMMENT**
8. For the NPDES permitting for the P&O portion, we have some questions and may be suggesting clarifications, especially for a particular class of POTWs. **THIS SHOULD BE DISCUSSED WHEN YOU HAVE CHANGES TOGETHER IF NOT BY FRIDAY.**
9. P&O – no mention is made of in-kind service. Needs to be added **WE HAVE HAD A LONGER DISCUSSION ON THIS ISSUE AND CAN ADDRESS IT FRIDAY IF YOU WISH. MY ADVICE IS THAT YOU DO NOT WANT TO GUARANTEE THAT IN-KIND CONTRIBUTIONS ARE ALLOWED, THEY CAN BE CREDITED IF APPROPRIATE AND VALUABLE. I HAVE BEEN INVOLVED IN SEVERAL PROGRAMS WHERE AN AGENCY'S "IN-KIND" PARTICIPATION WAS TO SEND ALL ITS REPORTS AND MONITORING DATA OR ATTEND A FEW MEETINGS AND CLAIM THEY HAVE PROVIDED IN-KIND SUPPORT. I BELIEVE FOR THE P&O THE CVSC OR LEAD CAN CREDIT IN-KIND AS APPROPRIATE WITHOUT IT IN THE LANGUAGE IF IT MUST BE THERE I RECOMMEND CLARIFYING IT AS REQUESTED AND APPROVED. IT IS VERY HARD TO VALUE PRIOR WORK FOR IN-KIND VALUE.**
10. Nitrate – include the language on ACPs “except in limited and unique circumstances” as agreed. **THIS SHOULD BE DISCUSSED ON FRIDAY TO ASSURE CONSENSUS AND UNDERSTANDING**
11. SAMP – data from management zones – not mentioned here but elsewhere, should it be? **THIS SHOULD BE DISCUSSED ON FRIDAY, I AM NOT SURE, BUT GOOD QUESTION**
12. Other Agency recommendations:
 - a. Fails to recognize the addition of salts or the removal of assimilative capacity in there
 - b. Does not talk to the agencies with jurisdiction over septic's and private wells. **THIS SHOULD BE DISCUSSED ON FRIDAY**
13. Definitions, although some changes were made, it wasn't with what I think we consistently agreed to. **SPECIFICS SHOULD BE DISCUSSED ON FRIDAY**
14. Do 1 and 2d on page 102 contradict?
15. There are several areas where use of a tool (such as offsets) is predicated on improving water quality. Should improving user protection also be included as an option? **THIS SHOULD BE DISCUSSED ON FRIDAY**
16. Footnote 28 needs fixing **ADDRESS AS INFORMAL COMMENT**
17. Offsets note 3 – change pollutant to constituent or class of constituents. **ADDRESS AS INFORMAL COMMENT**

From: Vicki Kretsinger <vkretsinger@lsce.com>

Date: 04/08/2018 13:38 (GMT-08:00)

To: 'David Cory' <farmeratlaw@comcast.net>, Nicole Bell <nbell@krwca.org>

Cc: Nick Watterson <nwatterson@lsce.com>

Subject: Problematic Language in the RB BPA Staff Report re the SAMP

Hi Dave and Nicole:

I was looking at the Regional Board Staff Report for SAMP-related info with the anticipation that there would be very little (i.e., simplified and flexible as discussed during the Executive Committee meeting

just a month or two ago). However, I came across many pages in the Draft Staff Report for the BPA, including the highlighted language below. The text below is exactly what we provided very lengthy comments and criticisms about previously and what should not be in the SNMP or BPA or the Draft Staff Report as anything other than an example and certainly not as guidelines or a template or the SAMP algorithm. The language below may only be in the Draft Staff Report and not in the BPA, but goodness knows how RB staff may refer to this later for more information on how to evaluate other programs like the CVGMC.

It may be that RB staff had many authors helping out with this document and this contribution came from an uninformed staff person drawing upon the original SAMP document. However, it is strongly recommended that a small part of the text get reframed as has been discussed by the Executive Committee and the rest of the text largely eliminated from the Draft Staff Report.

DISCUSS IF NEEDED ON FRIDAY

Thanks,

Vicki

Within two years of the effective date of the Salinity and Nitrate Control Program, the entity leading the effort will submit to the Regional Water Board for approval, a Work Plan and Quality Assurance Project Plan that is compliant with all requirements set forth in this section. Work under the plan will be initiated within 30 days of Regional Water Board approval. Permittees that discharge salt or nitrate in the Central Valley Region shall participate in the preparation of the Program Assessment Report by contributing funding for the preparation of the report and ensuring required information is available to the lead entity. Permittees that discharge salt or nitrate must either gather needed information required by the Work Plan for their area of contribution and provide the information to the lead entity in a format acceptable to the lead entity or permittees must demonstrate their support for the lead entity to gather needed information by submitting documentation of such support from the lead entity. The requirements for participation shall be established by the lead entity and will consider factors such as participation in other existing groundwater quality monitoring programs that will contribute data to the Salt and Nitrate Monitoring Program, resources required to develop and implement the Monitoring Program, including preparation of the Periodic Assessment Reports, and other

factors.

It is anticipated that the groundwater portion of the monitoring program will build off of the most recent version of the CV-SALTS database (Luhdorff & Scalmanini and Larry Walker Associates, 2014) and that the design will build off of the template provided as part of the SAMP (CDM Smith, 2016c) which includes guidelines for defining a monitoring network; appropriate power analyses for determining a sample size; grid cell size selection; and algorithm for monitoring well density.

Based on the SAMP algorithm, two monitoring well networks were established – one for the shallow zone and one for the deep zone. Of the 8,712 wells in the CV-SALTS database for the deep zone, 2,315 were selected by the SAMP algorithm, or approximately 27 percent of the available wells.

Likewise, for the shallow zone, 1,461 of 7,285 wells (20 percent) were selected by the SAMP algorithm. This translates to a well density of about one SAMP well per 9.7 square miles in the deep zone and one well per 15 square miles for the shallow zone. These initial networks should serve as the basis for future adjustments



Addressing Central Valley Drinking Water Quality New Groundwater Quality Regulations

The Problem – Unsafe Drinking Water

Many communities in the Central Valley rely on groundwater as their primary source of drinking water. In some localized areas, contaminants, including salts, nitrates, pesticides, heavy metals, and organisms that can cause disease, have seeped into the groundwater.

In these localized areas, nitrates are a major cause of unsafe drinking water. Nitrates seep slowly into the groundwater from fertilizers or after being discharged as wastewater from animal feedlots, industrial facilities, municipal wastewater plants, or leaky septic systems.

Drinking water with high levels of nitrate can create a health risk, especially to infants and pregnant women. Because nitrate levels have been increasing in groundwater over the last few decades, some drinking water supplies are unhealthy and do not meet State drinking water standards.

Salt is another contaminant that has, over time, gotten into the groundwater from agricultural, municipal, and industrial practices. Also, some areas of the Central Valley have naturally occurring high salt levels. High salt levels in water and soils can reduce crop production.

New Approaches for Safe Drinking Water

Changes in regulations are needed to address the complex nitrate and salt problem. Current regulations do not address the need for safe drinking water in communities where groundwater is contaminated with nitrates and salts.

A group of dischargers, representing growers, dairies, industries, and local communities, regulators from government agencies, environmental organizations, and the Central Valley Regional Water Quality Control Board



(Regional Board) formed the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS). The goals of the CV-SALTS program are to:

1. Identify short- and long-term solutions to **ensure safe drinking water** in communities where groundwater is high in nitrates and salts.
2. Reduce impacts from nitrates and salts to the groundwater.
3. Where reasonable and feasible, restore groundwater quality.

To meet these goals, using scientific studies, CV-SALTS developed the 2017 Salt and Nitrate Management Plan (SNMP). The SNMP proposes new, more locally flexible regulations for nitrates and salts.

Once the new regulations are adopted in 2018, they will be implemented first in **high-priority areas** that include: Kaweah, Turlock, Chowchilla, Tule, Modesto, and Kings groundwater sub-basins and basins.

How can I learn more about CV-SALTS?

You are encouraged to participate and get involved now. For more information, visit www.cvsalinity.org.



Addressing Central Valley Drinking Water Quality

New Groundwater Quality Regulations

The Challenge: Unsafe Drinking Water Supplies in Parts of the Central Valley

Some areas of the Central Valley do not yet have safe drinking water supplies. Not having safe drinking water, whether from private wells or from a public water system, is an urgent problem, particularly in rural, low-income, disadvantaged communities.

Pollutants in the Groundwater

Wastewater carrying contaminants can be released into a river, a lake, or the soil where it seeps or moves slowly into the groundwater below the ground. At high enough concentrations, the contaminants can make groundwater supplies unusable for drinking water and, in some cases, for agricultural use.

Wastewater is water discharged from your home (sewer or septic tank), agriculture (farms and dairies), industries (such as food processing), or cities (public sewer system), and from surface or stormwater runoff. It can contain contaminants including salts, nitrates, pesticides, heavy metals, and organisms that can cause disease.

Nitrates that get into the groundwater are a major cause of the unsafe drinking water. For example, when fertilizer containing nitrates is applied to crops, not all nutrients in the fertilizer are absorbed by the plants. The excess nutrients then seep into groundwater supplies as nitrates.

Salt is another pollutant that has gotten into the groundwater. Over the years, agricultural, municipal, and industrial practices have all contributed salt to groundwater. Also, some areas of the Central Valley have naturally occurring high salt levels. High salt levels in water and soils can reduce crop production.



Who is Responsible for Regulating Water Quality?

Agricultural, municipal, and industrial facilities and households are all responsible for managing possible contaminants in their wastewater. The U.S. Environmental Protection Agency (EPA) and the Central Valley Regional Water Quality Control Board (Regional Board) are responsible for regulating water quality, and specifically for regulating nitrates and salts from agricultural, municipal, and industrial facilities.

Drinking water in the Central Valley is provided in several ways—large city systems, water districts, small community water systems, and private household wells. In areas where groundwater has high nitrate levels, the cost of treatment systems and maintenance can be high, particularly for small systems and private wells. In many small, disadvantaged communities, residents struggle to pay high water bills or the high cost of water treatment requires residents to purchase bottled or tanked water.

Current regulations for nitrates and salts do not address the need for safe drinking water. More effort is needed to provide safe drinking water in communities affected by nitrates and salts, while preventing and cleaning up contaminants.



Addressing Central Valley Drinking Water Quality New Groundwater Quality Regulations

CV-SALTS Addresses Salts and Nitrates in Groundwater

In the Central Valley, the State of California and dischargers are working together to find solutions for unsafe drinking water. One solution is the CV-SALTS program. The CV-SALTS program is a group of state and federal regulatory agencies, growers, dairies, industries, municipalities, and environmental interests that have been working together to find better ways to regulate nitrates and salts in the Central Valley.

In January 2017, CV-SALTS released the *Salt and Nitrate Management Plan* (SNMP). It includes changes to the regulations for nitrates and salts. The new regulations address the need for safe drinking water, while at the same time, balancing environmental and economic sustainability by offering more flexible local options for controlling nitrate discharges and cleaning up groundwater.

In late 2018, the Regional Board will implement the new regulatory options in areas with high concentrations of nitrates in the ground water. These high-priority areas are in the Kaweah, Turlock, Chowchilla, Tule, Modesto, and Kings sub-basins and basins.

Programs Supporting Safe Drinking Water for Disadvantaged Communities

The State Water Resources Control Board (State Water Board) has programs that support access to safe drinking water supplies and help offset the cost of buying water. Depending on the program, the State Water Board offers technical and financial assistance (loans and/or grants) for smaller community water systems and residents located in disadvantaged communities.

- In 2016, funds (from the State's Cleanup and Abatement Fund Account) were allocated for the **Interim Emergency Drinking Water program** to address drought-related drinking water emergencies and provide interim emergency drinking water to disadvantaged communities with a contaminated water supply.
- The State Water Board Division of Financial Assistance **Office of Sustainable Water Solutions** offers funding and technical assistance to disadvantaged communities through three funds: The Drinking Water State Revolving Fund, Clean Water State Revolving Fund, and Proposition 1 bond funds.

Learn More About CV-SALTS, Help Shape Your Future

- You are encouraged to participate and get involved now. To learn more, visit CV-SALTS at www.cvsalinity.org. CV-SALTS is just one avenue working to ensure safe drinking water supplies for everyone in the Central Valley.
- To learn more about funding and technical assistance for small community water systems and disadvantaged communities, visit: https://www.waterboards.ca.gov/water_issues/programs/grants_loans/sustainable_water_solutions/#funding.

CV-SALTS Meeting Calendar

2018

1 January

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

2 February

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

3 March

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

4 April

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

5 May

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

6 June

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

7 July

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

8 August

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

9 September

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

10 October

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

11 November

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

12 December

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

Notes/Key

Light Red conflicts

Third Thursdays Where possible

Executive Committee Meetings

Policy or Admin Calls 1:00 or 1:30pm

Yellow Salty 5

Regional Board Workshops/Hearings

TAC Meeting

PEOC Committee