CV-SALTS Executive Committee Meeting
Thursday, October 18, 2018 – 9:00 AM to 12:00 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/688830973

Posted 10-9-18 – Revised 10-17-18

1) Welcome and Introductions – Chair – (15 mins)
   a) Committee Roll Call and Membership Roster
   b) Review and Approve September 20, 2018 Meeting Notes

2) Basin Plan Amendments – State Board Consideration Schedule – Patrick Pulupa, Anne Littlejohn (20 mins)
   – Update on schedule, if any
   – State Board/EPA feedback and questions on BPA
   – Stakeholder comments or feedback

3) Grant Funded Contractor RFQ/RFP– Daniel Cozad (30 mins.)
   – Procurement recommendations from Selection Committee
   – Selection of Management Zones for Scope of work development
     • Management Zone Development Support
     • Letters of Interest Summary
     • Management Zone Letters of Interest

4) PEOC Update – Nicole Bell (15 mins.)
   – Fall Workshops: December 12th in Modesto and December 13th in Tulare
   – Overview of CV-SALTS Prioritization and Optimization Study
   – Link to video clips:
     https://www.dropbox.com/sh/e82p41ap3pdn71w/AADpeHr_icl6l99m4uQogroha?dl=0

5) P&O Study Participation Fee Update – Daniel Cozad– (20 mins.)
   – Preliminary Fee Summary by Industry/Permit Type
   – Approaches for P&O Implementation

6) SAMP Workplan and Development Update – Richard Meyerhoff (30 mins)

One or more Central Valley Regional Water Quality Board members may attend.
7) **Program Implementation Planning** – Jim Marshall (30 mins.)
   – NPDES Implementation

8) **MOU Renewal** – Daniel Cozad (10 mins.)
   – Approve Extension Letter

9) **Review Meeting Schedule/Location** – (10 mins)
   – Review and Approve [2019 CV-SALTS Proposed Meeting Calendar](http://www.cvsalinity.org)
   – Policy Meeting: **November 15, 2018, 9:00 – 3:00** @ Regional San
   – Administrative Meeting: **December 14, 2018, 1:30 – 3:00** Teleconference

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*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](http://www.cvsalinity.org)*

*One or more Central Valley Regional Water Quality Board members may attend.*
## CV-SALTS Committee Rosters

### Executive Committee Membership

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<th>Voters</th>
<th>Category/Stakeholder Group</th>
<th>Name</th>
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### CV Salinity Coalition

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### Comm. Chairs/Co-chairs

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ADDITIONAL PARTICIPANTS:
CV-SALTS Executive Committee Meeting - Summary Action Notes  
For September 20, 2018 – 9:00 AM to 11:30 AM  
Attendees are listed on the Membership Roster

DISCUSSION ITEMS

1) Welcome and Introductions  
   a) Executive Committee Vice Chair, Debbie Webster, brought the meeting to order, and roll call was completed.  
   b) David Cory moved, and Sam Safi seconded, and by general acclamation the August 16, 2018, Meeting Action Notes were approved.  
   c) The committee agreed to schedule Executive Committee election for Chair and Vice Chair for the October 18th meeting.

2) Basin Plan Amendments – State Board Consideration Schedule  
    Patrick Pulupa provided an update on the CV-SALTS Amendment. Regional Board staff is working on Response to Comments internally for State Board review. Adam Laputz has set up a series of weekly meetings with State Board staff to answer any questions for their technical and legal staff as they work to come up to speed on the amendment.  
    Anne Littlejohn provided an update on the MUN Basin Plan Amendment. Regional Board staff is working with State Board staff to develop recommendations. There is currently no update for the timeline on the MUN amendment.  
    Tess Dunham, Tim Johnson and Debbie Webster also met with State Board staff to answer any outstanding questions they may have on the CV-SALTS effort. The State Board staff had questions on technical elements, such as high-resolution mapping and the method for prioritization of basins. Staff also expressed interest in setting up a series of meetings with both CVSC members, and technical consultants.

3) Grant Funded Contractor RFQ/RFP  
    Daniel Cozad presented the Approach and Plan for Selection of Management Zone Support. The committee discussed the approach to selection, and requirements for letters of interest. The committee recommended the following:  
     − State specifically that the Letter of Interest is not intended to require board/organizational formal approval.  
     − The project should apply to both Priority 1 and Priority 2 basins.  
    The Request for Letters of Interest will be distributed either Friday, September 21, or Monday, September 24, 2018.

4) PEOC Update  
    Nicole Bell provided an update on Outreach activities. The committee provided the following feedback:  
     − Save the Date announcement  
       ▪ Add Stormwater to the list of “Who Should Attend”  
       ▪ Correct the name listed for ILRP  
       ▪ Replace California Farm Bureau with County Farm Bureaus  
       ▪ Replace CASA with CVWCA
- Revise “Food Processing Industry Leaders” to Food Processing and Other Industry Leaders
  - Preliminary Program for Workshops
- Replace references to the SNMP to Basin Plan Amendment

- Daniel Cozad presented the new “Overview of CV-SALTS Prioritization and Optimization Study.” Committee members were asked to forward any comments or edits to Daniel. The document will be revised and return to the Executive Committee for approval at the October meeting.
- Debbie Webster volunteered to speak at the CLFP Agricultural Production Committee Meeting on November 2nd in Merced.
- The committee briefly discussed the PEOC proposal to produce a short 2-minute video. There were no objections from the committee. The video and production budget will be discussed at the CVSC meeting.

5) Request for Letter of Endorsement
- Daniel Cozad presented the letter of support from CVSALTS for an NSF proposal, led by Professor Sebnem H. Düzgün, entitled “INFEWS/T1: FEW (Food/ Energy/Water) Interdependencies in California and Colorado under Natural and Anthropogenic Stressors Using Big Data Analytics and Systems Dynamic Analysis”.
  - There were no objections from the committee.

6) P&O Study Participation Fee Update
- There was no current update on the P&O participation fee proposal. The subcommittee is still working on a fee structure and should have a proposal to review at the October meeting.

7) Program Implementation Planning
- An update on the NPDES implementation is anticipated for October.

8) Review Next Meetings - Schedule/Location
- Policy Meeting: October 18, 2018 from 9:00 – 3:00 @ Sac Regional
- Policy Meeting: November 15, 2018 from 9:00 – 3:00 @ Sac Regional
RFQ/RFP Management Zone, P&O Study, and Implementation Outreach
Executive Committee Procurement Recommendations
Calendared for approval 10/18/2018

Background
On August 16, 2018 the Executive Committee authorized release of a Request for Qualifications (RFQ) and Proposals (RFP) to support the Management Zone planning, provide planning for the prioritization and Optimization Study (P&O) and providing outreach to potential management zones and P&O participants. The RFP/RFQ was released August 30, 2018 and six responsive Statements of Qualifications (SOQ) or Proposals were received. Larry Walker and Associates Team (LWA), Luhdorff and Scalmanini Consulting Engineers, and GEI submitted SOQs for supporting management zones development. Carollo Engineers and GEI submitted proposals for the development of the P&O Study Workplan. Only Catalyst Communications submitted a proposal for outreach to support implementation.

A Selection Committee was assembled to review and rank the qualifications and proposal. The committee included:

1. Charlotte Gallock, So San Joaquin Valley Water Quality Coalition
2. David Cory, San Joaquin Valley Drainage Authority (Drainage Authority)
3. Debbie Webster, Central Valley Clean Water Association
4. Daniel Cozad, Central Valley Salinity Coalition
5. J P Cativiela, Dairy Cares
6. Sam Safi, Sacramento Regional Sanitation District

The committee reviewed the SOQs and proposals based on a review and scoring format. Many members provided scores that were used as one guide of ranking the firms/teams. Scores were tabulated and reviewed by the team along with observations and comments from the proposals. A conference call was held on 10/4/18 for the Selection Committee to review their scoring and discuss their selections recommendations. There was consistent consensus of the reviewers both in scoring and final ranking. Representative from the Kings River Water Quality Coalition also reviewed the proposals and concurred with the group’s recommendations. Based on the committee’s recommendation, the Executive Committee on October 18, 2018 accepted Larry Walker and Associates, GEI and Luhdorff and Scalmanini as qualified firms. These companies will be further evaluated to provide support to CV-SALTS pilot Management Zones. Further, based on GEI’s qualifications, experience and proposal the selection committee recommends the CV- SALTS Executive Committee award the P&O Study Workplan to GEI, not to exceed $75,000 based on their experience and project understanding. Finally, only one proposal was received from Catalyst Communications for implementation outreach and the selection committee recommends the Executive Committee award the CV-SALTS implementation outreach task to Catalyst Communications and negotiate a final cost within the grant cost limit of $70,000. Further the Selection Committee recommends the Executive Committee acknowledge the Kings River Water Quality Coalition is the Administrator of the grant, with support from the Central Valley Salinity Coalition, and as such KRWQC is eligible for up to $39,588 in grant funding.

To determine which firms would be asked to provide proposals on Management Zone support, the committee would consider the needs of the selected Management Zones and skills of the consultants or CVSC support contractors and select the best contractor for the efforts. If the committee is unsure, the committee will request selected SOQ holder provide pricing for the specific Management Zone Support and select from among the qualified firms.
The Selection Committee recommends the Executive Committee request:

1. CVSC Executive Director and the Kings River Water Quality Authority work with the qualified consultants as appropriate to scope and price efforts needed for Management Zone Support at a cost not to exceed $315,000.

2. Kings River Water Quality Authority award and contract with GEI for P&O Study Workplan scope at the not-to-exceed cost of $75,000.

3. Kings River Water Quality Authority award and contract with Catalyst Communications an amount not to exceed $70,000 for Implementation Outreach as directed by the PEOC and CVSC Executive Director.

4. Authorize the remaining costs for administration and Program Management be reimbursed to the Kings River Water Quality Authority and as subcontracted to the Central Valley Salinity Coalition.

The Executive Committee reviewed and approved the preceding recommendation on October 18, 2018.
CV-SALTS Management Zone Development Support

Letters of Interest Summary

Process

The Executive Committee approved Letters of Interest for Support Services in Developing Management Zones to Meet CV-SALTS Nitrate Control Program Requirements on September 20, 2018. On September 21, 2018, the request was emailed to all CV-SALTS participants and distributed by the Central Valley Waterboard via the CV-SALTS LYRIS email list. Letters of interest were due October 5, 2018.

On October 5, 2018, four timely qualified responses were received from East San Joaquin Water Quality Coalition (WQC), County of Madera, Kings River WQC, and Kaweah Basin Water Quality Association (WQA).

The letters are summarized in Table 1 by their five evaluation criteria consolidated into three major areas:

A. Responsiveness to this request, Completeness, and clarity of submission, Organizational capacity, understanding, and experience
B. CV-SALTS Prioritized Area
C. Likelihood of successful scope of work and Management Zone development

Further item 1 above was characterized by adherence to the requirements:
1) Demonstrate experience or organizational capacity to begin development of Management Zone
2) Agency/Organization is a legal entity within or directly supporting water users, dischargers or permittees in the proposed Management Zone
3) Indicate capability to determine the scope of work for the needs of the area to take steps toward being a Management Zone for the area indicated
4) Indicate the organization/legal structure of group or organization, any cooperating groups, and any matching funds supporting the effort
5) Indicate principle technical or managing contact who will work with CV-SALTS

A small group of volunteers made up of CV-SALTS Executive Committee Members, and Regional Board Staff reviewed the letters and provided feedback. Executive Committee Members ranked the most beneficial areas for CV-SALTS to develop pilot Management Zones.

The small group found all areas were to be commended to planning and beginning to develop concepts to support a future Management Zone. Because all letters were responsive, and each area could potentially have been a good management Zone the small group identified additional objectives:

a. Increased the likelihood of adequate work with limited funding by selecting two areas
b. Represent the diverse geography of the Priority 1 areas
c. Prioritize commitment and areas most likely to complete Management Zone submittals
d. Leverage prior funded CV-SALTS efforts for continuity

Based on the criteria and objectives the selection small group unanimously agreed to recommend developing work scopes with:

1. East San Joaquin Water Quality Coalition – Turlock Subbasin
2. Kings River Water Quality Coalition for the Kings/Alta Irrigation Subbasin
Scope Development

The Potential Management Zones (PMZ)s will work with the Management Zone Support Contractors through CVSC to develop the scope and cost for support needed for their area. The scope of work and cost will be summarized for approval at the November CV-SALTS Executive Committee meeting for approval.
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<th>Sponsor</th>
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<th>Kings River WQC</th>
<th>Kaweah Basin WQA</th>
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<td>Turlock Subbasin</td>
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<td>Kings and Tulare Lake Subbasins</td>
<td>Kaweah Watershed Primary/secondary</td>
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<td>South Modesto and Turlock</td>
<td>between Merced and Madera</td>
<td>Alta Irrigation District</td>
<td>Visalia and Tulare</td>
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<td>Responsiveness, Completeness and Clarity</td>
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<td>1) Demonstrate experience or organizational capacity to begin development of Management Zone</td>
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<td>Yes Board approved letter, Consultant staffed WQA</td>
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<td>2) Agency/Organization is a legal entity within or directly supporting water users, dischargers or permittees in the proposed Management Zone</td>
<td>501 (c) (5) and GSA</td>
<td>Madera County for Madera County GSA</td>
<td>JPA</td>
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<td>3) Indicate capability to determine the scope of work for the needs of the area to take steps toward being a Management Zone for the area indicated</td>
<td>Outline Prepared for deliverables requesting support to complete Draft and final Management Zone</td>
<td>Outline of tasks needed for support</td>
<td>Staff experience and capacity limited scope, but significant past work</td>
<td>Identified watershed and DAs known, Contamination experience with replacement DW. Scope Requested is Preparation of the Draft and Final MZ documentation and strategy</td>
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<td>4) Indicate organization/legal structure of group or organization, any cooperating groups, and any matching funds supporting the effort</td>
<td>503 (C) (5) Member Benefit Non-profit plus coordination with the Turlock Subbasin GSA.</td>
<td>County of Madera Water and Natural Resources Department for the potential MZ</td>
<td>27 member Board or Water and Ag with advisory committee for policy and staffing from Kings River Conservation District</td>
<td>502 (c) (5) with coordination with GSA and etc. Ag based with others</td>
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<td>5) Indicate principle technical or managing contact who will work with CV-SALTS</td>
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<td>Yes</td>
<td>Yes and identified existing data and potentially matching funds</td>
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<td>Likelihood of successful scope of work and MZ development</td>
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<table>
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<tr>
<th>Sponsor</th>
<th>East San Joaquin WQC</th>
<th>County of Madera</th>
<th>Kings River WQC</th>
<th>Kaweah Basin WQA</th>
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<tr>
<td>Area</td>
<td>Turlock Subbasin</td>
<td>Chowchilla Subbasin</td>
<td>Kings and Tulare Lake Subbasins</td>
<td>Kaweah Watershed Primary/secondary</td>
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<td></td>
<td>South Modesto and Turlock</td>
<td>between Merced and Madera</td>
<td>Alta Irrigation District</td>
<td>Visalia and Tulare</td>
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<td>Responsiveness, Completeness and Clarity</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>1) Demonstrate experience or organizational capacity to begin development of Management Zone</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes Board approved letter, Consultant staffed WQA</td>
</tr>
<tr>
<td>2) Agency/Organization is a legal entity within or directly supporting water users, dischargers or permittees in the proposed Management Zone</td>
<td>501 (c) (5) and GSA</td>
<td>Madera County for Madera County GSA</td>
<td>JPA</td>
<td>502 (c) (5)</td>
</tr>
<tr>
<td>3) Indicate capability to determine the scope of work for the needs of the area to take steps toward being a Management Zone for the area indicated</td>
<td>Outline Prepared for deliverables requesting support to complete Draft and final Management Zone</td>
<td>Outline of tasks needed for support</td>
<td>Staff experience and capacity limited scope, but significant past work</td>
<td>Identified watershed and DAs known, Contamination experience with replacement DW. Scope Requested is Preparation of the Draft and Final MZ documentation and strategy</td>
</tr>
<tr>
<td>4) Indicate organization/legal structure of group or organization, any cooperating groups, and any matching funds supporting the effort</td>
<td>503 (C) (5) Member Benefit Non-profit plus coordination with the Turlock Subbasin GSA.</td>
<td>County of Madera Water and Natural Resources Department for the potential MZ</td>
<td>27 member Board or Water and Ag with advisory committee for policy and staffing from Kings River Conservation District</td>
<td>502 (c) (5) with coordination with GSA and etc. Ag based with others</td>
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<tr>
<td>5) Indicate principle technical or managing contact who will work with CV-SALTS</td>
<td>Yes and Identified in-kind staff time</td>
<td>Yes and potential in-kind staff time</td>
<td>Yes</td>
<td>Yes and identified existing data and potentially matching funds</td>
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<td>CV-SALTS Prioritized Area</td>
<td>Priority 1</td>
<td>Not Stated but Priority 1</td>
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<td>Likelihood of successful scope of work and MZ development</td>
<td>Very High</td>
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</tr>
</tbody>
</table>
October 5, 2018

Mr. Daniel Cozad  
Central Valley Salinity Coalition  
360 Lakeside Ave  
Redlands, CA  92373

Dear Mr. Cozad,

The East San Joaquin Water Quality Coalition (ESJWQC or Coalition) is submitting a letter of interest for funding to develop a Management Zone. Resolution R5-2018-034, Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin to Incorporate a Central Valley-wide Salt and Nitrate Control Program, adopted on May 31, 2018 requires development of Management Zones to implement the Salt and Nitrate Management Plan (SNMP) for the Central Valley.

The proposed Management Zone is for the Turlock groundwater subbasin, a Priority I subbasin. Priority I subbasins are the first areas for which a Management Zone Proposal and Implementation Plan will be developed. The ESJWQC was part of the stakeholder entity that developed the Basin Plan Amendments and the Management Zone concept. The Coalition has already identified a core group of relevant participants and engaged in discussions about the need for a Management Zone. Coalition representatives also engaged the Turlock Subbasin Groundwater Sustainability Agency (GSA) and its members to explain the nexus between CV-SALTS and Sustainable Groundwater Management Act elements. The ESJWQC has received a good preliminary response from other stakeholders to forming a Management Zone although all entities must receive approval from their respective Boards of Directors prior to moving forward.

The ESJWQC Groundwater Assessment Report (GAR) completed by the Coalition in 2014 provides the initial assessment of groundwater conditions in the subbasin. Updating the report will occur perhaps as early as 2019. In addition, the ESJWQC developed a list of management practices known to be protective of groundwater and is actively working with its members to facilitate implementation. Consequently, the likelihood of success in developing a Preliminary and a Final Management Zone Proposal is very high.

Below, the ESJWQC provides additional information to demonstrate its qualifications to manage the process of engaging consultants to develop a Management Zone.

**Experience and Organizational Capacity to Begin Development of a Management Zone**

The ESJWQC formed in 2003 to manage Irrigated Lands Regulatory Program (ILRP) compliance activities for almost 4000 members and 800,000 acres of irrigated agriculture in the region. Since its inception, I have been Executive Director of the Coalition. I’m also involved in managing the Coalition on a day-to-day basis, overseeing both part-time and contract employees who serve in capacities ranging from Member Relations to Chief Financial Officer. As Executive Director, I also manage consultants...
who address the technical elements of the compliance tasks, and have significant experience managing the necessary administrative support necessary for the Management Zone project.

The ESJWQC has considerable experience with developing/participating in large collaborative efforts focused on water quality issues. The Coalition joined the Central Valley Salinity Coalition in 2010 and I along with other stakeholders worked to develop approaches for managing salt and nitrate. The ESJWQC and other ILRP agricultural coalitions are developing common reporting tools and metrics to evaluate grower’s fertilizer management performance. I am also involved in developing the Central Valley Groundwater Monitoring Collaborative, a joint effort of several of the ILRP coalitions to develop a valley-wide groundwater quality trend monitoring network. Expandable to other dischargers, the network satisfies the need for groundwater quality trend monitoring as required by the ILRP, and has good potential to serve as the basis for the CV-SALTS Surveillance and Monitoring Program.

**Deliverables**

The stakeholder group developing the Preliminary Management Zone Proposal for the Turlock Subbasin will provide several deliverables as part of the Preliminary Management Zone Proposal. These include:

- **Proposed preliminary boundaries** – currently, the proposed Management Zone is the Turlock Subbasin although the stakeholders will work together and with the adjacent subbasin groups to develop the appropriate boundaries once the Management Zone stakeholder group organizes and meets.
- **Identification of initial participants/dischargers** – the ESJWQC is working with several dischargers/water users in the management zone and is in the process of engaging these stakeholders in forming the management zone and developing the proposal.
- **Identification of other dischargers and stakeholders** – additional stakeholders will be identified, contacted, and encouraged to join the stakeholder process. A full list of participants and their status will be provided in the Preliminary Management Zone Proposal.
- **Initial assessment of groundwater conditions** – two complementary sources of current groundwater conditions exist, the ESJWQC GAR and the Central Valley SNMP. In addition, the ESJWQC is initiating a groundwater quality trend monitoring program that will generate some additional groundwater quality data. These sources will contribute to the development of the initial assessment of groundwater quality in the Turlock Subbasin.
- **Identification/summary of current treatment and control efforts, or management practices** – the ESJWQC identified management practices known to be more protective of groundwater quality. Those practices are provided in the Northern ILRP Coalition’s Management Practices Evaluation Report, a required deliverable to the Regional Water Board. As stakeholders in other industries formally join the Management Zone stakeholder group, they will contribute their inventory of practices to the summary.
- **Initial identification of public water supplies or domestic wells within the Management Zone area** – all PWS wells in the subbasin are identified in the ESJWQC GAR. Some of these wells located in the upper zone are used in the ESJWQC groundwater trend monitoring program. These wells are not sampled by the Coalition in its trend monitoring program but do provide important data on nitrate concentration. The Management Zone stakeholder group will develop a method of locating individual domestic supply wells and owners in the subbasin, and then contact the individuals responsible for those wells. An Early Action Plan will address the drinking water needs of individual domestic or PWS wells.
that are impacted by nitrate. The stakeholder group will also develop a process for including these individuals in the development of the Early Action Plan. A full list of PWS and private domestic supply wells will be provided in the Early Action Plan.

**Identification of areas within or adjacent to the management zone that overlap with other management areas/activities** – the Turlock Subbasin shares a border with the Merced Subbasin, another Priority I groundwater subbasin. Although the boundary is the Merced River, there may be activities undertaken in the Turlock Subbasin that impact the Merced Subbasin. I am also attending meetings with the Merced Subbasin GSA and will be able to interface with that group as necessary.

**Constituents of concern (COC) other than nitrate** – the ESJWQC identified additional constituents of concern in the Coalition region in its GAR. The Management Zone stakeholder group will identify any additional COCs from other dischargers in its preliminary proposal.

**Proposed timeline for** (a) identifying additional participants, (b) further refining boundary areas, (c) developing a proposed governance and funding structure for administration of the Management Zone, (d) additional evaluation of groundwater conditions across the management zone boundary area if necessary, and (e) preparing and submitting a Final Management Zone Proposal and a Management Zone Implementation Plan. – All elements (a – e above) will be addressed and timelines provided in the Preliminary Management Zone Proposal.

**ESJWQC Legal Status as an Entity Supporting Water Users, Dischargers and Permittees**

The ESJWQC is a 501 c5 member-supported non-profit entity that assists growers comply with the ILRP. The ESJWQC formed in 2003 and has represented its members continuously since that time. Agricultural operations are both water users and dischargers regulated by General Order R5-2012-0116-R4.

The ESJWQC, working with other agricultural coalitions in the Valley, is developing groundwater protection formulas, values, and targets for the ESJWQC region. The Coalition developed a Groundwater Quality Management Plan that identifies actions necessary to bring groundwater quality in the region into compliance with nitrate objectives. The Coalition collects information on quantities of nitrogen applied and removed by members during fertilization and harvest activities as required by the General Order.

**The ESJWQC’s Capability to Create a Management Zone for the Turlock Subbasin**

Due to past participation in CV SALTS and engagement with the Turlock Subbasin GSA, I believe that I clearly understand the elements needed to develop a Management Zone. I’ve already identified the key groups that must be included in the nitrate Management Zone. For agriculture, we have a clear understanding for explaining to participants the options for management of nitrate. As the entity representing the dischargers assigned the majority of the responsibility for contaminated groundwater, the ESJWQC will initiated and will continue to engage in discussions with the stakeholders in the Turlock GSA.
Mr. Daniel Cozad  
360 Lakeside Avenue  
Redlands, CA 92373  

Re: Kings River Watershed Coalition Authority Letter of Interest for Support Services in Developing Management Zones  

Dear Mr. Cozad,  

The Kings River Watershed Coalition Authority (“Coalition”) requests your consideration to provide Support Services in the development of Management Zones to meet Salt and Nitrate Management Plan requirements in the Kings and Tulare Lake Subbasins. Specifically, the Coalition proposes to develop at least one Management Zone located within one of the identified subbasins, which are priority 1 and priority 2 subbasins respectively. Below is a summary of our experience, knowledge and background as it pertains to your evaluation criteria.

1. Experience or Organizational Capacity to Begin Development of a Management Zone  
Coalition staff are active participants in broad-based water resource management planning efforts (e.g., Integrated Resource Water Management (IRWM), Sustainable Groundwater Management Act, etc.), and in region-wide water quality issues (e.g., Irrigated Lands Regulatory Program (ILRP), CV-SALTS, etc.). Our involvement means that we are familiar with the various issues of concern, and that we collaboratively with many stakeholders, including other irrigated agricultural coalitions, environmental justice interests, communities, and the Central Valley Salinity Coalition. Furthermore, Coalition staff have extensive experience and have developed extensive knowledge associated with the CV-SALTS initiative, Salt and Nitrate Management Plan (“SNMP”), and associated Basin Plan Amendments and implementation requirements. Along with numerous related endeavors, the Coalition teamed with the Central Valley Salinity Coalition, CV-SALTS Executive Committee and select consultants to develop a Management Zone archetype for illustrative purposes within the SNMP and associated Basin Plan Amendments. The Alta Irrigation District’s service area, located within the Kings Subbasin, served as a Management Zone archetype to examine, test, analyze, and suggest potential solutions for application of proposed policies, data analysis methods, and salt and nitrate management approaches being considered in the SNMP. The efforts and products associated with the data, data analysis, processes, and procedures produced from this archetype are readily available to be utilized to develop a Management Zone and associated pilot projects in the Kings Subbasins. The aforementioned and following experience, knowledge and expertise make our Coalition uniquely situated for proposed early action Management Zone efforts.

2. Agency is a Legal Entity Directly Supporting Water Users, Dischargers or Permittees in the Proposed Management Zone
The Coalition is a Joint Powers Authority established on January 1, 2009 covering the Kings River service area, spanning the Kings and Tulare Lake Subbasins. The Coalition represents over 4,000 members including irrigation districts, mutual water companies and individual growers encompassing approximately 760,000 irrigated acres in Fresno, Kings, Tulare and Kern counties. The Basin Plan Amendments have prioritized the Kings Subbasin under Priority 1 and the Tulare Lake Subbasin under Priority 2.

3. Organizational Capability to Determine the Scope of Work for the Needs of the Area towards being a Management Zone
The Coalition was specifically created to address broad-based water quality issues with sufficient staff while strategically supplementing resources with consultants to address issues, solve problems, implement solutions, create and institute practices, gather, analyze, and monitor and report data. Thus, Coalition staff have the knowledge, experience, and expertise to not only determine the scope of work required but to also accomplish the goal of Management Zone early implementation. Our proven track record with similar endeavors, including the aforementioned archetype, shows our ability to work with multiple stakeholders, and to conduct such work in an efficient and cost effective manner. In short, the Coalition would work with multiple stakeholders to develop an appropriate scope of work for development of a Management Zone that meets the requirements of the pending Basin Plan Amendments.

4. Organizational Structure
The Coalition is governed by a 27 member Board of Directors comprised of landowners from each of the irrigation districts and mutual water companies. Board officers include Board President Mark McKean, Vice-President Larry Cruff, Secretary/Treasurer Paul Peschel, P.E., Assistant Secretary Christine Simon, and Assistant Treasurer Randy Shilling. The Coalition also established an Advisory Committee with delegated powers to perform certain functions for purposes of program development, policy formation and program implementation. The Coalition is staffed via the Kings River Conservation District through an agreement.

The Coalition does not anticipate contributing matching funds at this time. However, if selected to receive support services, the Coalition, subject to Board Approval, would contribute in-kind services through use of its staff and consultants that would assist in the development of a management zone pilot project. Furthermore, the Coalition would continue its pursuit of other State and Federal grant opportunities through various grant programs including but not limited to Proposition 1 and 68 and Federal grant opportunities. For example, several Coalition members are also members or interested parties to the Kings Basin Water Authority (aka Upper Kings Basin IRWM Authority), and Coalition staff correspondingly support grant pursuit opportunities for the Kings Basin IRWM Authority. In light of the Coalition’s broad-based network with other related water authorities and Groundwater Sustainability Agencies, the Coalition’s existing organizational structure is well-suited to assist in developing a Management Zone structure.

5. Technical / Administrative Contact
I will serve as the technical and administrative contact for the Coalition.

Charlotte Gallock, KRWCA Coordinator
c/o Kings River Conservation District
The Coalition will work closely with the CV-SALTS Executive Committee, interested stakeholders and approved consultant to create a scope of work for the development of Management Zones. Thank you for the opportunity to provide you with this Letter of Interest. If you require additional information or have any questions, please do not hesitate to contact me.

Sincerely,

Charlotte Gallock, P.E.
Coordinator

L18-0000
File: KRW 300.04
October 5, 2018

Daniel Cozad
360 Lakeside Ave
Redlands, CA 92373
Dcozad@cvsalinity.org
(909) 793-8498

RE: Request for Letters of Interest for Support Services in Developing Management Zones to Meet CV-SALTS Nitrate Control Program Requirements

Dear Mr. Cozad:

Please consider this a letter of interest from the County of Madera, which intends to develop a Management Zone in the Chowchilla Subbasin.

We have responded to the requirements for the letter below:

1) Demonstrate experience or organizational capacity to begin development of Management Zone

Madera County (County) encompasses most of the Chowchilla Subbasin and has staff capable of coordinating efforts relating to development of Management Zones. The County is a Groundwater Sustainability Agency (GSA) in the Chowchilla Subbasin and is currently working with other GSAs in the Subbasin on development of a single Groundwater Sustainability Plan (GSP) for the Subbasin, to be completed by January 31, 2020. The County serves as the contracting entity on State grant funding to support development of the GSP and other Sustainable Groundwater Management activities totaling $2.5 million. Additionally, the County has played a key role in developing an Integrated Regional Water Management Plan (IRWMP), completed in 2014 for the entire County, and is also currently coordinating work to update the IRWMP.

2) Agency/Organization is a legal entity directly supporting water users, dischargers or permittees in the proposed Management Zone, or

a) Would become one if a Management Zone is implemented, or b) Is sponsored by such an entity

The County encompasses most of the Chowchilla Subbasin and directly supports water users, dischargers, and permittees within the Madera County portion of the Subbasin in a variety of ways. During development of the GSP for the Subbasin, the Madera County GSA is serving as a representative
for water users within the GSA area and has been working in coordination with other GSAs and stakeholder groups to further support water users across the entire Subbasin.

3) Indicate the potential work or deliverables or the group or organizations capability to determine the scope of work for the needs of the area to take steps toward being a Management Zone for the area indicated

The County has been coordinating with other GSAs in the Chowchilla Subbasin on developing a single GSP. The technical team conducting GSP work includes Davids Engineering and Luhdorff & Scalmannini, Consulting Engineers (LSCE). Both firms are highly experienced with expertise relating to agricultural management practices and water resources analysis and management. LSCE also has extensive experience with groundwater treatment techniques such as will be an important consideration in development and implementation of Management Zones.

As part of the Subbasin GSP technical team, LSCE has a long history of involvement with CV-SALTS, extending from 2009 to today. LSCE is highly familiar with the provisions of the Central Valley Salt and Nutrient Management Plan, and helped write portions of the draft document, including an early Appendix detailing the Methodology for Delineating Management Zones in August 2016 for Phase II, and performing the Alta Irrigation District’s Management Zone Archetype modeling and analyses. LSCE also developed the high-resolution ambient groundwater quality representations of salt and nitrate concentrations in groundwater throughout Region 5 for CV-SALTS, which provided important information for salt and nitrate management policy throughout the Central Valley. Since 2008 LSCE has also been heavily involved in work on behalf of waste dischargers in the area, including dairy and irrigated agriculture. In addition to providing technical knowledge of salt and nitrate conditions in the Central Valley, LSCE also understands how Salt and Nitrate Management Plans (SNMPs) and the forthcoming Basin Plan Amendment (BPA) are fundamentally tied to the Sustainable Groundwater Management Act (SGMA).

Below are some examples of considerations that could be evaluated during development of Management Zones. Many of the datasets relating to these considerations would be available from work already being conducted by the GSP technical team as part of the GSP preparation.

<table>
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<tr>
<th>Category</th>
<th>Considerations</th>
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<tr>
<td>Salt/Nitrate Management Goals and Objectives</td>
<td>Establish short and long-term goals in the context of:</td>
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<tr>
<td></td>
<td>• Current conditions in the Management Zone.</td>
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<td></td>
<td>• Monitoring needs.</td>
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<td></td>
<td>• Planned land use and water resources development and management.</td>
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<td></td>
<td>• Sustainable management of groundwater quality and beneficial use protection.</td>
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<td>Stakeholder Outreach/Governance</td>
<td>• Establish the stakeholder group early in the process.</td>
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<td></td>
<td>• Ensure the appropriate stakeholders are part of the planning process.</td>
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<td>Category</td>
<td>Considerations</td>
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</table>
| Management Zone Boundary Delineation         | - Identify the key drivers for the horizontal and vertical boundaries.  
- Consider factors such as current groundwater quality, trends, and future water resources management strategies.  
- Develop a preliminary physical conceptualization of the area.  
- Identify hydrogeologic factors associated with the structure of previous existing modeling platforms and whether such models are applicable for Management Zone purposes. |
| Basin/Subbasin Characterization of Groundwater Quality | - Assess the distribution of groundwater quality data in the context of the physical conceptual model.  
- Stakeholders should obtain construction data for drinking water wells and other monitored wells as early as possible.  
- Identify and address data gaps.                                                                                                                   |
| Tools for Assessing Surface Loading of Salt and Nitrate to Groundwater | - Use the best available data for applied water quality (e.g. quality of surface water deliveries from various sources; proportion of groundwater pumping from upper and lower groundwater zones; etc.).  
- Use the best available data for actual fertilizer and amendments applied.  
- Refine nitrogen loading parameters for dairy solids.  
- Assess regional variations in nitrogen losses.  
- Refine crop models.  
- Give smaller loading sources (urban land uses, septic systems, etc.) more detailed development.  
- Calculation of salt and nitrate amounts reaching groundwater will rely on:  
  - Plant-soil water process model and long-term climate series with 40 land cover classes for percolation and nitrate; post-processing for salinity;  
  - Fertilization assumptions from UC work and Extension publications; salinity from CV-SALTS and AID work; Dairy from DairyCares datasets;  
  - Standard irrigation efficiencies associated with surface and high-efficiency systems;  
  - Municipal loading from permit limits and facilities information;  
  - Percolation from root-zone assumed to arrive immediately at groundwater (no legacy loading). |
| Groundwater Flow and Quality Modeling        | - Modeling tools for MZ analyses and management actions can be simpler or more complex, depending on the needs of the specific MZ.  
- Evaluate existing groundwater model platforms for application to salt and nitrate planning and management.  
- Refine existing model to account for local distribution of nitrogen, salt, recharge, pumping, etc. |
| Impact of Management Scenarios on Groundwater Quality | - Use modeling tool to evaluate management scenarios and effects of management practices on groundwater quality.  
- Identify meaningful management alternatives.  
- Ensure adequate data for use of modeling tools to reduce uncertainty.  
- Focus on management options that deal directly with beneficial use protection, given the difficulty in changing ambient groundwater quality in the short term. |
4) Indicate organization/legal structure of group or organization, any cooperating groups, and inkind work or matching funds, if known

The County would be the lead contracting entity and would work to assemble or identify a group of stakeholder representatives to participate in the Management Zone development process. Stakeholder representatives may include cooperating GSAs in the Chowchilla Subbasin, representatives participating in the IRWM efforts, or other representatives. In-kind work relating to the development of the GSP will provide considerable technical support in the development of Management Zones through characterization of historical and future conditions in the Subbasin, including groundwater quality.

5) Indicate a technical or administrative contact who will work with CV-SALTS, if known

Stephanie Anagnoson
Director of Water and Natural Resources
Madera County
200 W. Fourth Street
Madera, CA 93637
(559) 675-7703
Stephanie.anagnoson@maderaCounty.com

Please let me know what additional information you need,

Stephanie Anagnoson
October 5, 2018

Daniel Cozad
360 Lakeside Avenue
Redlands, CA 92372

RE: Letter of Interest for Support Services in Developing Management Zones to Meet CV-SALTS Nitrate Control Program Requirements

Dear Mr. Cozad,

The Kaweah Basin Water Quality Association (KBWQA) appreciates the opportunity to respond to the Central Valley Salinity Coalition’s request for letters of interest for groups who intend to develop a Management Zone as part of the CV-SALTS Basin Plan Amendments (BPA). The KBWQA was formed in 2013 as a non-profit mutual benefit Corporation and has been approved by the Executive Officer of the Central Valley Regional Water Quality Control Board to assist owners of irrigated agricultural lands in meeting the requirements of the Regional Board’s Irrigated Lands Regulatory Program.

On October 4, 2018, the KBWQA board formally approved submittal of this letter of interest for development of a Management Zone(s).

The Kaweah groundwater sub-basin is identified in the BPA as a Priority I basin. Given the accelerated time line for management zone development in Priority I areas the KBWQA recognizes the benefit of working collaboratively with the salinity coalition to develop a management plan approach and framework.

Attached is a description of the KBWQA’s organizational structure, geography, previous relevant experience and initial project description and approach. We look forward to additional discussion to further define matching efforts as well as scope of the support requested.

Best Regards,

Donald Ikemiya
Executive Director

www.kaweahbasin.org
**Organizational Structure**

The Kaweah Basin Water Quality Association (KBWQA or Coalition) was formed in 2013 as a non-profit mutual benefit Corporation. The Kaweah Coalition was established to assist owners of irrigated agricultural lands in meeting the requirements of the Central Valley Regional Water Quality Control Board’s (RWQCB) Irrigated Lands Regulatory Program (ILRP) as required by the Waste Discharge Requirements General Order for Growers in the Tulare Lake Basin that are Members of a Third-Party Group, Order No. R5-2013-0120 (General Order). The Executive Officer of the RWQCB has approved the KBWQA to serve as a third-party group to conduct monitoring, reporting and outreach on behalf of approximately 1,300 enrolled grower members within the Coalition’s boundaries, representing approximately 160,000 enrolled acres of irrigated lands within the Kaweah groundwater sub-basin.

Provost & Pritchard Consulting Group (Provost & Pritchard) is responsible for providing administrative, engineering, and consulting support services for ongoing aspects of the ILRP for the KBWQA. The KBWQA is governed by a nine (9) member board of growers and water community representatives. On behalf of the association’s grower members, Provost & Pritchard provides advocacy, technical consulting services and grower education and outreach associated with the implementation of the General Order of Waste Discharge Requirements. Project tasks have included negotiations with RWQCB staff, analysis of draft regulations, and collaboration with other Central Valley Coalitions. In addition, Provost & Pritchard is responsible for the general day-to-day operation of the Coalition, financial accounting, grower outreach event coordination and correspondence, website design and maintenance, data management, and ongoing communication with growers within the Kaweah Basin area. KBWQA is operated from the Provost & Pritchard’s Visalia Office. The KBWQA board officers are the legal signatories for payables.

If selected by the Salinity Coalition for support services the KBWQA intends to offer a portion of matching support for management zone development by utilizing resources available through Provost & Pritchard, including civil and agricultural engineers, hydrogeologists, geologists, GIS analysts, environmental specialists, planners, land surveyors, and field representatives. Additionally, Provost & Pritchard Consulting Group has been successful in obtaining over $270 million in grants and loans for projects funded by grant monies, including: Integrated Regional Water Management Plans; groundwater recharge, construction and studies; infrastructure rehabilitation construction and feasibility studies; rural development; State Revolving Funds; local groundwater assistance; Water for America System Optimization Reviews; and various others. This experience in working with grant funded projects and seeing them to completion will support the KBWQA in this support services opportunity.

**Geographic Area**

The KBWQA boundary encompasses the Kaweah River watershed in the Sierra Nevada Mountains to the valley floor within the Tulare Lake Basin in northern Tulare County. It is divided into a primary and secondary area (Figure 1). The KBWQA Primary Area is comprised primarily of the valley floor, where a majority of the irrigated commercial agricultural activity occurs. The foothill and mountain regions are considered the Supplemental Area due to significantly reduced irrigated commercial agricultural activity. The KBWQA’s service area encompasses approximately 958,000 acres in total. There are approximately 356,000 total acres in the Primary Area on the valley floor and 602,000 total acres in the Supplemental foothill and mountain areas.
The KBWQA primary area is located predominately within the Kaweah groundwater sub-basin, which is within the Tulare Lake Basin on the east side of the south-central portion of the San Joaquin Valley \(\text{(Figure 2)}\). The Kaweah groundwater sub-basin is bordered by the Kings Groundwater sub-basin on the north and west, the Tule Groundwater sub-basin on the south, and the crystalline bedrock of the Sierra Nevada foothills on the east. The sub-basin’s watershed is the approximate extent of the Supplemental KBWQA area. Major rivers and streams in the sub-basin include the Kaweah and St. Johns Rivers.

Irrigated agriculture and dairies are the dominate land uses within the KBWQA’s Primary Area. Citrus, alfalfa, hay and forage, nuts, stone fruit, and vegetables account for 85 percent of the crops grown within the KBWQA. Citrus is the dominant crop type in the eastern portion of the KBWQA. The central portions of the KBWQA predominantly host deciduous fruit and nut crops while in the western half of the KBWQA, dairy facilities are the predominate land use.

**RELEVANT EXPERIENCE**

**Technical Reports**

The primary objective of the KBWQA’s monitoring efforts are to maintain compliance with requirements of the ILRP General Order. The MRP requires the KBWQA to characterize water quality within the coalition region in order to track any trends and identify any irrigated agricultural practices which may potentially contribute to improving or degrading water quality. To meet requirements of the General Order the KBWQA has developed multiple technical reports which are relevant to an understanding of groundwater quality conditions and agricultural management practices which may impact groundwater quality. These foundational documents will further management zone development as described below.

**Groundwater Assessment Report**

The KBWQA completed a Groundwater Quality Assessment Report \(\text{(GAR)}\) which was submitted to the RWQCB on February 7, 2015. The GAR identified and prioritized High vulnerability Areas \(\text{(HVA)}\) by inputting a combination of parameters in an additive and overlay framework. HVAs as identified in the GAR are illustrated in \text{Figure 3}. The GAR framework employed geographic information systems \(\text{(GIS)}\) to assign point values to areas based on parameter sub-categories. These factors are defined as:

- Detections of MCL exceedances in nitrates or pesticides indicating a condition of groundwater pollution.
- Longer-term detections of groundwater quality indicating a condition of active degradation defined as statistically significant up-trending nitrate detections.
- Groundwater impacted areas upgradient of a disadvantaged community \(\text{(DAC)}\) or a small water system that is reliant on groundwater.

The highest priority designation was identified as cropped or potentially cropped areas with nitrate or pesticide groundwater quality impacts (both exceedances and up-trending nitrate detections) that are located upgradient of a DAC or small water system that is reliant on groundwater. Much of the assessment completed through development of the GAR supports management zone requirements by characterizing groundwater quality conditions using readily available data and is recognized by the Basin Plan Amendments as a qualifying option to provide an initial assessment of groundwater conditions.
Groundwater Trend Monitoring Report

The KBWQA submitted a Groundwater Trend Monitoring Workplan (GTMW) to the RWQCB on February 3, 2017. The purpose of the GTMW is to establish a Groundwater Trend Monitoring Program (GTMP) as specified in Section IV of the General Order; Monitoring and Reporting Program. The objectives of the GTMP are to determine current groundwater quality conditions relevant to irrigated agriculture, and to develop long-term groundwater quality information that can be used to evaluate the regional effects of irrigated agriculture and its practices.

Efforts to collect groundwater water quality data are currently underway, utilizing both a coalition specific Quality Assurance Project Plan (QAPP) and a Quality Assurance Programmatic Plan (QAPrP) as part collaboration with the Central Valley Groundwater Monitoring Collaborative. It is expected that this groundwater quality data will be used to support the objectives of the Surveillance and Monitoring Plan (SAMP) as described by the Basin Plan Amendments.

Management Practices Implementation Program

The KBWQA, as part of the Southern San Joaquin Valley Management Practices Evaluation Program (MPEP), has worked diligently and collaboratively with other coalitions to develop a workplan that meets the objectives of the General Order in advance of the required due dates. The Southern San Joaquin Valley MPEP Committee submitted a completed workplan to the RWQCB on November 21, 2016. The completed workplan describes monitoring, research, and modeling deliverables to provide the feedback necessary to assess and verify progress in protecting groundwater quality with respect to agricultural practices. Work completed by the MPEP will assist in meeting the objectives of a management zone as described in the Basin Plan Amendments by providing accurate information to growers to manage irrigation and nitrogen application at a field level.

Grower Reported Data Report Summaries

The General Order designates requirements for members of a third-party group, including submission of required reports and notices. Member required reports include Farm Evaluations and Nitrogen Management Plan (NMP) Summary Reports. This grower reported data is summarized by the KBWQA and submitted to the Regional Board in Annual Monitoring Reports. In 2017 the KBWQA achieved 100% compliance for all growers for all required Farm Evaluations and NMP Summary Reports. Grower reported data collected by the KBWQA is expected to be an integral component in achieving compliance with requirements to manage nitrate discharges within a management zone.

Education and Outreach

The KBWQA provides education and outreach meetings to assist growers in complying with requirements of the General Order. Community outreach and engagement are expected to be a critical part of management zone development as part of the stakeholder involvement requirements described in the Basin Plan Amendments. Relevant experience in outreach, education, coordination and communication are described below.

The KBWQA hosts multiple grower meetings each year. These outreach events include information on the preparation and submittal of Farm Evaluations, Nitrogen Management Plan worksheets and Nitrogen Management Plan Summary Reports, and self-certification training opportunities for the completion of NMPs, SECPs, and management practices considered to be protective of water quality.
The KBWQA routinely communicates information to growers through direct mailings, email blasts, and notifications on the KBWQA website. A total of 1,499 memberships were represented collectively at the numerous outreach workshops and trainings hosted by the KBWQA during the 2016-2017 water year. Meeting attendance ranges from more than 400 growers at Annual Membership meetings to 50 growers at targeted technical meetings.

Resources for grower education and outreach meetings are routinely posted online at http://www.kaweahbasin.org and http://members.kaweahbasin.org. These resources include meeting notifications, links to pre-registration forms (if required for a specific meeting or training), PDF copies of Power Point presentations, and video links (for those education workshops which were filmed). Report templates and instructions, and PDFs of reports filed with the RWQCB, are also accessible online.

Replacement Drinking Water

As part of confidential settlement negotiations with the State Water Quality Control Board’s Office of Enforcement, the KBWQA has developed an approach to provide clean, safe replacement drinking water to residents within the coalition boundary whose drinking water is affected by elevated levels of nitrate. Negotiations are ongoing and the KBWQA is continuing to make significant progress in developing replacement water solutions. Once an agreement is finalized the KBWQA will provide additional details to the Central Valley Salinity Coalition regarding replacement water solutions. It is anticipated that an agreement will be finalized by the end of 2018.

Project Approach

Coordination

Initial Management Zone development will require determining area and extent of the Management Zone through a stakeholder process as well as work to identify participants and dischargers of nitrates through coordination with Regional Board staff, email blasts, mailers and Groundwater Sustainability Agencies (GSAs).

The KBWQA anticipates working with the selected consultant to facilitate coordination and meetings with other local stakeholders to determine Management Zone boundaries. In preliminary discussion, local leaders and other entities have indicated a preference to work to define sub divisions of the whole Kaweah Sub-Basin. These sub divisions would be small enough to be effectively be managed to meet requirements described in the Basin Plan Amendments and retain enough discharges to provide adequate funding. We anticipate delineating Management Zone boundaries which would ensure all portions of the sub basin have Management Zone coverage.

Prepare Preliminary Management Zone Proposal

The KBWQA anticipates that support services will assist in establishing an organizational structure for various dischargers to collectively work to organize a Management Zone Proposal. Further assistance will be necessary to establish a fee structure and collection mechanism to support work conducted by the Management Zone group. Grant funding assistance may be needed to apply for applicable state and federal funding opportunities.
Provost & Pritchard has extensive working relationships with irrigation districts, ag commodity groups, the local dairy industry, food and industrial processors, small and large municipalities, and disadvantaged communities. These relationships with local stakeholders will help to formulate a mutually beneficial Management Zone.

**Prepare Final Management Zone Approach**

Support services will be needed to determine a Management Zone approach and strategy, as well as drafting documentation of the Management Zone group’s proposal and approach to be submitted to the Regional Board for review and approval.

**Outreach**

As described in the Basin Plan Amendments, Management Zone development must include public outreach and stakeholder involvement to identify residents whose water supply is impacted by elevated levels of nitrate. This outreach is intended to provide opportunities for interested persons to participate in the development of proposed drinking water solutions.

The KBWQA’s experience with public outreach and education will facilitate and benefit development of a Management Zone.

**Technical/Administrative Contact**

On behalf of the KBWQA, Sarah Rutherford will be the primary contact person working with the CV-SALTS Executive Committee and consultant.

**Sarah Rutherford**
Email: srutherford@ppeng.com
Phone: (559) 302-1620
PO Box 2840
Visalia, CA 93279
Figure 2. High Vulnerability Area
Modesto Program, December 12, 2018

9:30 am  Doors open, registration begins

10:00 a.m.  Welcome by David Cory, Chair, Central Valley Salinity Coalition

10:10 a.m.  CV-SALTS and New Nitrate Regulations Coming in 2019
to 10:45 a.m.

Presenters:

Timothy Moore, Risk Science, Denver, Colorado. Tim is an expert in the water quality and nitrate challenge in California’s Central Valley and was a major developer of CV-SALT’s Salt and Nitrate Management Plan and Basin Plan Amendment.

Tess Dunham, Somach, Simmons & Dunn, a leading water quality lawyer and played a critical role in the development of CV-SALT’s Salt and Nitrate Management Plan and Basin Plan Amendment.

These experts will explain, in simple terms:

- What is CV-SALTS and how does it relate to the new nitrate regulations?
- What is the Basin Plan amendment for salt and nitrate?
- What are Management Zones?
- What you need to know about Management Zones?
- What are the requirements for Setting up Management Zones?

10:45 a.m.  
to 11:00 a.m.  Question and Answers and Quick Break

11:00 a.m.  
to 11:30 a.m.  It’s Time to Start Thinking about Management Zones

Panel Discussion, moderated by David Cory, Central Valley Salinity Coalition

Panelists (Preliminary)

1. Parry Klassen, East San Joaquin Water Quality Coalition
2. County of Madera representative
3. GSA representative
4. To be determined

11:30 to Noon – Questions and Answers with Panelist and Tess and Tim
Tulare Program, December 13, 2018

9:30 am    Doors open, registration begins

10:00 a.m. Welcome by Daniel Cozad, Executive Director, Central Valley Salinity Coalition

10:10 a.m. CV-SALTS and New Nitrate Regulations Coming in 2019

Presenters:
Timothy Moore, Risk Science, Denver, Colorado. Tim is an expert in the water quality and nitrate challenge in California’s Central Valley and was a major developer of CV-SALT’s Salt and Nitrate Management Plan and Basin Plan Amendment

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- What are the requirements for Setting up Management Zones?

10:45 a.m.
to 11:00 a.m. Question and Answers/Quick Break

11:00 a.m.
to 11:30 a.m. It’s Time to Start Thinking about Management Zones in Your Area

Panel Discussion moderated by Daniel Cozad, CV-SALTS
Panelists (Preliminary)
1. Eric Osterling, Greater Kaweah GSA
2. Steve Worthley, Tulare County Supervisor and IRWMP Director
3. Grant awardee for management zone pilot (possibly Charlotte Gallock)
4. TBD

11:30 to Noon – Questions and Answers with Panelist and Tess and Tim
The Salinity Challenge in the Central Valley

High levels of salt exist in waters throughout the Central Valley. Increasing levels of salts can reduce crop production, impair water quality, and reduce water supply and ecological functions. Salt concentrations in the groundwater are naturally high in some areas and increasing in many others. The high levels come from: (1) the geology (2) the arid climate, and (3) intensive water use. All water use, including agricultural, industrial, and municipal increases salinity. Even using water more effectively or recycling water increases salinity. Increased salinity occurs because salt is either added or concentrated through the processes employed to use water or treat wastewater. In the San Joaquin Valley alone, six million tons of salt accumulate every year. The recent drought increased the use of groundwater, which can have higher concentrations of salt.

To learn more: Salt and Salinity Management, a Resource Management Strategy of the California Water Plan, DWR, June 2016

CV-SALTS Salinity Management Strategy

The Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) was formed more than a decade ago as a collaborative stakeholder group tasked with developing a sustainable salt and nitrate management program for the Central Valley. Working directly with the Central Valley Regional Water Quality Control Board (Regional Board), the CV-SALTS initiative released a technical plan – Salt and Nitrate Management Plan (SNMP) – in January 2017. The SNMP recommended modifications to regulations for nitrates and the establishment of a Salt Control Program with short- and long-term strategies for salinity management. On May 31, 2018, the Regional Board approved amendments to the Central Valley’s Water Quality Control Plans (i.e., Basin Plans) based on the SNMP, which included a Salt Control Program.

The goals of the Salt Control Program are to: (1) Control the rate of degradation through a “managed degradation” program; (2) Implement salinity management activities to achieve long-term sustainability and prevent continued impacts to salt sensitive areas; (3) Protect beneficial uses by maintaining water quality that meets applicable water quality objectives and pursuing long-term managed restoration where reasonable, feasible and practicable; and (4) Protect beneficial uses by applying appropriate antidegradation requirements for high quality water. The Salt Control Program recommends implementing a phased process to develop a long-term salinity management plan, while at the same time establishing an Interim Permitting Approach for salinity discharges.

Salt Control Program for the Central Valley

Short-Term Salinity Management

During the development of the long-term plan for salt management, an Interim Permitting Approach will be used. This approach may include actions such as: (1) continued implementation of existing pollution prevention, watershed, and salt reduction plans; (2) continued maintenance of current salinity discharge levels; (3) enforced compliance with Interim Permit Limits; (4) implementation of new salinity management practices and source control activities; (5) monitoring of salinity discharge activities, where required; and (6) requiring either participation in the Prioritization and Optimization Study (P&O Study) or compliance with stringent water quality limitations.

Long-Term Salinity Management Planning

A Strategic Salt Accumulation Land and Transportation Study (SSALTS) was undertaken previously to identify and evaluate salt management strategies. Using the SSALTS findings as a foundation, the Prioritization and
Optimization Study (P&O Study) will expand prior studies, conduct a wide-ranging analysis of existing conditions, policies, and engineering alternatives to identify salt management projects and actions to achieve salt sustainability in the Central Valley.

Once the State Water Resources Control Board and Office of Administrative Law (and US EPA for surface waters under federal jurisdiction) approve the Salt Control Program, anticipated to occur in 2019, and Notices to Comply are issued by the Regional Board, all permitted dischargers must comply by selecting one of two compliance pathways: Conservative Pathway 1, or Alternative Pathway 2.

Dischargers selecting the Conservative Pathway 1 must demonstrate that they meet stringent permitting requirements established in the Salt Control Program. Dischargers selecting Alternative Pathway 2 must participate in the regionwide P&O Study with fellow permittees. P&O study participants under Pathway 2 will be allowed to defer more stringent and costly permitting requirements associated with Pathway 1 until such requirements are reevaluated after completion of the P&O Study. Participating in Pathway 2 will likely be less costly than the conservative approach in Pathway 1. Further, the P&O study is more likely to achieve the regional goals of long-term sustainability rather than individual efforts through Pathway 1.

The first step to providing a coherent and workable long-term management strategy for salinity is undertaking and completing the P&O Study. The P&O Study will likely begin in 2019 or 2020, take about 10 years to complete, and cost from $10 to $15 million. If a discharger chooses Pathway 2, compliance includes (but is not limited to) paying a minor annual fee to support the P&O Study. The Central Valley Salinity Coalition (CVSC) will administer the P&O Study as the lead entity with oversight from the Regional Board and CV-SALTS stakeholders.

Long-Term Salinity Management Phasing
The value to everyone in the Central Valley and beyond will be a long-term, integrated Salt Control Program that stabilizes and cost-effectively restores water supplies while keeping agriculture, businesses and communities operating in the interim. The long-term salinity management strategy will be undertaken in three phases:

**Phase 1:**
- **Conduct expanded evaluations of existing conditions** by hydrologic region, sources of salinity, and the impact of state and federal policies that affect the management of salt in both surface and groundwaters.
- **Identify the types of and locations for physical projects.** Physical projects could include regulated brine line(s), salt sinks, regional and/or subregional de-salters, recharge areas, deep well injection, and others. Conceptual designs for preferred physical projects will be developed.
- **Identify non-physical projects** and begin implementation. These may include changes in water supply, use, and management, as well as changes in salt management policies, practices, or regulations.
- **Identify governance structure(s) and seek state and federal funding** for preferred physical projects.
- **Determine if Basin Plan amendments are necessary** to support the implementation of Phases 2 and 3.

**Phase 2:** The engineering design and environmental permitting required to implement the preferred physical projects identified in Phase 1 will be completed. Non-physical projects will continue to be implemented as needed.

**Phase 3:** Construction of physical projects will be completed during this final phase of the Salt Control Program.

For More Information: Visit [www.salinity.com](http://www.salinity.com); read the [SNMP](http://www.salinity.com); read the [Regional Board staff report](http://www.salinity.com) for the Basin Plan amendments approved on May 31, 2018.
### Preliminary P&O Fee Summary by Industry/Permit Type

<table>
<thead>
<tr>
<th>Type/Indust.</th>
<th>POTW/Stormwater</th>
<th>Irrigated Ag Coalitions</th>
<th>Dairy</th>
<th>Food Proc</th>
<th>Wine</th>
<th>Oil/Gas</th>
<th>Others **</th>
<th>Total ***</th>
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<td>Total Cost</td>
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* Most permit types contribute on sliding scale for size, salinity and other factors
** All Other Permit Types approximately $200 + Estimated Collection Costs
*** Total includes P&O Study plus collection and overhead not SAMP or CVSC
APPROACHES FOR P&O IMPLEMENTATION

IMPLEMENTING THE CV-SALTS SALT AND NITRATE MANAGEMENT PLAN FOR THE P&O STUDY

SALINITY AND NITRATE PERMITTING FRAMEWORK TO IMPLEMENT P&O STUDY

- Salinity Permitting Strategy allows funding for the Prioritization and Optimization Study (P&O) via CVSC
- The BPA allows funding of the Surveillance and Monitoring Program (SAMP)
- P&O Scoping/Workplan being done in advance with CAA Grant
- Initial budget from SSALTS for P&O
- Developing approach/framework to apportion and collect a fees
CONCEPTUAL BUDGET FOR P&O

- All Permits/WDRs regulate Salinity
- Some may choose Path A
- Central Valley NPDES permit – ~286
- Central Valley WDRs - ~1348
- Budget estimate
  - Average Year $1,500,000
  - Initial Year expected to be lower
- Actual Costs determined during Scoping and Work planning
- SAMP Costs are not included and would be on different basis

Preliminary Annual P&O Budget

<table>
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<tr>
<th>Year</th>
<th>Low</th>
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Average Cost per Year $1,500,001

PERMITTING AND FEE APPROACH TO IMPLEMENT P&O STUDY

- CVSC members worked to develop a methodology based on industries represented
- Preliminary approach/framework to apportion fee by permittee size (Acres/MGD/Cases/Barrels/etc.) where appropriate and understood

Preliminary P&O Fee Summary by Industry/Permit Type

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** All Other Permit Types approximately $200 + Estimated Collection Costs
*** Total includes P&O Study plus collection and overhead not SAMP or CVSC
PERMITTING AND FEE APPROACH TO IMPLEMENT P&O STUDY

• Outreach
  • PEOC developed a two page handout describing the P&O Study
  • Looking for feedback on the fee approach
  • Continuously reviewing the approval timeline to determine initiation

• Workplan Development
  • Award of Contract
  • November Meeting - Initial Scoping

• SAMP
  • Still working on approach – Surface Water and Groundwater programs and costs
KEY SURVEILLANCE & MONITORING PROGRAM REQUIREMENTS

• Submit Workplan within two years of effective date of Salt & Nitrate Control Program
  – Workplan to address all surface water and groundwater monitoring requirements
  – Includes Quality Assurance Project Plan
• Implement Workplan within 30 days of Executive Officer approval
• Workplan to address two questions
  – What are the ambient conditions and trends of salinity in surface waters throughout the Central Valley?
  – What are the ambient conditions and trends of salinity and nitrate in the following groundwater zones for groundwater basins within the Central Valley Region: upper; lower; and production

SURFACE WATER PROGRAM REQUIREMENTS

Monitoring program for surface waters will rely on data collected by existing Central Valley monitoring and assessment programs already established in the region as well as any additional information collected under the Salt and Nitrate Control Program.

• Select sites relying on existing monitoring programs as much as possible
  – ...in major water bodies including but not limited to the Sacramento River, Feather River, San Joaquin River and Delta as well as their major tributaries
  – Approach to compile data from existing surface water quality databases and other sources for use in the assessment
• Select parameters - Approach to assess ambient water quality conditions and trends for selected SMCLs, including but not necessarily limited to salinity-related SMCLs. Identification of the specific SMCLs to be assessed by the SAMP and frequency of analysis will be included in the work plan.
Table A

<table>
<thead>
<tr>
<th>Constituents</th>
<th>Maximum Contaminant Levels/Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aluminum</td>
<td>0.2 mg/L</td>
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<tr>
<td>Color</td>
<td>15 Units</td>
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<tr>
<td>Copper</td>
<td>1.0 mg/L</td>
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<tr>
<td>Foaming Agents (MBAS)</td>
<td>0.5 mg/L</td>
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<tr>
<td>Iron</td>
<td>0.3 mg/L</td>
</tr>
<tr>
<td>Manganese</td>
<td>0.05 mg/L</td>
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<tr>
<td>Methyl-tert-butyl ether(MTBE)</td>
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<tr>
<td>Silver</td>
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<tr>
<td>Thiobencarb</td>
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<tr>
<td>Turbidity</td>
<td>5 Units</td>
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<tr>
<td>Zinc</td>
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Table B

<table>
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<tr>
<th>Constituents, Units</th>
<th>Recommended</th>
<th>Upper</th>
<th>Short Term</th>
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<tr>
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<tr>
<td>Sulfate, mg/L</td>
<td>250</td>
<td>500</td>
<td>600</td>
</tr>
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</table>

ANTIDEGRADATION ANALYSIS

SITE SELECTION

- Data sources
  - USGS Water Quality Portal
  - California Environmental Data Exchange Network (CEDEN)
- Focused on data collected since 1990
- Basis for site selection
  - For EC, stations with > 50 results
  - For Nitrate, stations with > 20 results
  - For Al, Fe, Mn, stations with > 10 results
  - The date range for the measurements at a station had to be > 2 years
SACRAMENTO RIVER REGION

- Antidegradation Analysis Sites
  - Sacramento River (5 sites)
  - Feather River (1 site)
  - Yuba River (1 site)
  - American River (1 site)
  - Colusa Basin Drain (1 site)

SAN JOAQUIN RIVER REGION

- Antidegradation Analysis Sites
  - San Joaquin River (4 sites)
  - Stanislaus River (1 site)
  - Tuolumne River (1 site)
  - Merced River (1 site)
  - Other (3 sites)
    - Orestimba Creek
    - Mud Slough
    - Salt Slough
TULARE BASIN

- Antidegradation Analysis Sites
  - Kings River
  - Gould Canal
  - Kaweah River
  - Main Drain Canal

GROUNDWATER PROGRAM REQUIREMENTS

- Program goals;
- Entities responsible for the collection/reporting data from wells in the Program;
- Identification of wells to be included in the program and how the selected wells will provide a representative assessment of ambient water quality and trends by basin/sub-basin;
- Governance and funding mechanisms and agreements necessary to ensure the Program obtains the required data;
- Procedures for review and revision of the Groundwater Monitoring Program;
- QAPP: (a) Characteristics of each well in the program (e.g., well types/logs/construction data, where available); (b) Sample collection requirements, e.g., parameters, sampling frequency and collection methods; (c) Data reporting and management requirements
- Approach to assess ambient water quality conditions trends for TDS/EC and Nitrate as Nitrogen in the Upper, Lower and Production Zones for each groundwater basin/sub-basin; and
- Approach to evaluate the progress of the Salt and Nitrate Control Program based on trends in water quality.
GROUNDWATER PROGRAM

- Central Valley Groundwater Monitoring Collaborative (CVGMC)
  - Phase 1: ILRP Technical Workplan – submitted May 2018
    - Identifies consistent approach(es) for monitoring and reporting among the agricultural coalitions to meet requirements of the General Orders
  - Phase 2: Coordination Among Existing Groundwater Monitoring Programs
    - E.g., dairy operations, food processors, POTWs, and oil and gas operations
  - Phase 3: Future Groundwater Monitoring Program Coordination
    - SGMA and SNMP Implementation

CVGMC KEY COMPONENTS

- Governance Agreement
- Monitoring Network Design Approach
  - Principal Wells – Sampled by Coalition
  - Complementary Wells – Sampled by others
- Programmatic Quality Assurance Program Plan
- Data Management System (under discussion)
CVGMC KEY COMPONENTS

- Data Analysis & Reporting
  - Common reporting template
  - Annual Monitoring Report by region
    - Principal well results only
  - 5-Year Assessment Reports - Results of regional analyses of groundwater quality conditions and trends across entire Central Valley (or the portions of the Central Valley participating in the CVGMC)
    - Principal and complementary Wells

CVGMC SUMMARY

- CVGMC provides a good template for the groundwater portion of the SAMP
- Completion of CVGMC Phase 2 and 3 can serve as a mechanism to expand the CVGMC program to satisfy SAMP requirements
SUMMARY

• Groundwater Program
  – Central Valley Groundwater Monitoring Collaborative (CVGMC) has established a template that can be built on to address SAMP needs
  – Phases 2 & 3 of the CVGMC provide opportunity to develop elements that address SAMP

• Surface Water Program
  – Minimum sites for inclusion in the program need to be selected
  – Evaluation of whether existing monitoring sites provide sufficient coverage still to be determined; if not, determine how to supplement from other sources
  – Basis for selection of SMCLs for inclusion in the program needs development
Central Valley Salinity Coalition
Board of Directors

October 18, 2018

Mr. Patrick Pulupa
Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Dear Mr. Pulupa:

The Central Valley Salinity Coalition Board of Directors reviewed the original Memorandum of Agreement effective from March 2010 through December 31, 2014, and the extension of the effective date through December 2018. Based on the progress made to date and the essential work needed in the coming four years we request the Regional Water Board extend the MOA for another four years to December 31, 2022. We appreciate your staff taking the lead on the form of the extension. If needed we will make a similar request to the State Water Board.

Please contact me if you have any questions.

Sincerely,

Daniel B. Cozad
Executive Director
Central Valley Salinity Coalition