

CV-SALTS Executive Committee Meeting

April 5, 2012 9:00 PM to 2:30 PM

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

Teleconference (218) 339-4600 Code: 927571#

Posted 03.27.12

Meeting Objectives:

- Identify Point-of-Use and Point-of-Compliance for Groundwaters
- Identify Point-of-Use and Point-of-Compliance for Surface Waters
- Develop Direction to Technical Subcommittee and Contractors
- Initiate Planning for CV-Salts Presentation at Regional Board Workshop in June, 2012
- **NOTE:** A package of [Supporting Documents](#) for this Meeting are on the CV-SALTS website

AGENDA

- 1) **Welcome and Introductions** - Chair
 - a) Committee Roll call and [Membership Roster](#) -5 min.
 - b) Review/Approve Executive Committee [Meeting Notes for February 16, 2012](#) – 5 min.
- 2) **Identify Expected Outcomes for April 5, 2012 Session** – Tim Moore – 10 min.
- 3) **Identifying "Point-of-Use" and Defining "Point-of-Compliance" for Ground Waters**
- Tim Moore - 60 min
- 4) **Identifying "Point-of-Use" and Defining "Point-of-Compliance" for Surface Waters**
- Tim Moore - 60 min

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

- 5) **Direction to Technical Subcommittees and Contractors**
- Daniel Cozad & Richard Meyerhoff - 45 min
- 6) **Initial Planning for Presentations to Regional Board at Fresno Workshop in June, 2012**
- Daniel Cozad - 45 min
- 6) **Future Items**
 - a) [Review April-May meeting dates](#) & (April 19th, May 24th) and objectives
 - b) Review next Administrative Conference Call date and time (April 6th)

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>

CV-SALTS Executive Committee Meeting

February 16, 9:00 AM to 3:00 PM

Sacramento Regional Sanitation District Offices – Sunset Maple Room

Attendees are listed on the Membership Roster

AGENDA

1) Welcome and Introductions Chair

- Chair Parry Klassen brought the meeting to order, and roll call was completed.
- David Cory moved to approve, and Pamela Creedon seconded, and by general acclamation the January 19, 2012 meeting action notes were approved.

2) Identify Expected Outcomes for February 16, 2012 Session

- Tim Moore reviewed expected outcomes for the session:
 - Define top priorities and the order of completion for Executive Committee.
 - Separate tasks for Executive Committee from subcommittee tasks.
- Tim introduced the concept of “prototypes” (as distinct from “archetypes”) to identify real-world examples that may serve as templates for developing the implementation section of the Salt and Nitrate Management Plan. The term “archetypes” will be used to for real-world case studies where water quality standards must be revised and updated before implementation planning can proceed.
- The Executive Committee should review and revise the CV-Salts list of discussion priorities as necessary (approx. every 3-4 months) to assure the group is making satisfactory progress toward meeting the deadlines imposed by the Recycled Water Policy.

3) Establishing Priority Tasks and 2012 Schedule for the Executive Committee

- The committee reviewed “Proposed Priority Tasks” for 2012 (attached):
 - Debbie Webster requested a clarification of 3d with regard to “area” vs. “water”
 - Tim Moore requested the committee obtain a list of pending regulatory initiatives and permit actions from the Regional Board to focus CV-Salts efforts on the most urgent priorities.
 - Pamela Creedon emphasized that 6b,c & d (contaminated drinking water in disadvantaged communities) is a top priority issue that needs immediate attention.
 - Jennifer Clary suggested the ongoing Alta Irrigation District planning effort might serve as a prototype.
 - Linda Dorn suggested that the BMP’s for food processing and wine, recently referred to the TAC be considered as prototypes.
 - Other possible prototypes with proposed monitoring programs: East San Joaquin tree crop & row crop and Rice Commission ILRP program.
 - Based on priority nominations from the group, Tim Moore suggested 3A, 7 & 8 be assigned to the Technical Advisory Committee, while the Executive Committee works on 1, 2, 3c & 3d.

4) Establishing Priority tasks and 2012 Schedule for the Subcommittees

- This item was discussed under #3.

5) Final Approval of the Strategic Framework, Work Plan and Conceptual Model Documents

- Richard Meyerhoff reviewed the latest revisions to the Strategic Framework document. Three main work areas were identified:

1. Regulatory Planning
2. CV-SNMP Master Plan Development
3. SNMP Implementation

Richard advised the committee that a major challenge would be to keep the dual track of policy decisions and technical work, on a rapid pace for completion without one hindering progress of the other.

- Daniel Cozad also introduced the updated Conceptual Model and Work Plan, requesting approval of the Work Plan. Committee members recommended some minor changes to the Work Plan.
 - Proposed changes to Work Plan to include, but not limited to:
 1. Identify major milestones between now and 2014.
 2. Items 34-87, detail on who will perform work tasks and oversight.
 3. Item 56 of Major Task Schedule, correct date for Regional Board Approval.
- Daniel Cozad will revise and date the three documents. The revised Work Plan will be forwarded to committee members for review, and added to the March 9th Executive Committee Administrative agenda for final approval. Upon final approval the documents will be posted to the CV-SALTS website.
 - Contingent upon these changes, Jeanne Chilcott moved, and Linda Dorn seconded, and by general acclamation the CV-SALTS 5 Year Work Plan was approved.

6) Future Items

- The next Ex. Comm. Policy Session was rescheduled from March 15th to March 26th.
- NOTE: The March 26th meeting was subsequently rescheduled to April 5th.
- Revised schedule of policy discussions will be distributed via in email (attached).
- Homework assignment for next Exec. Comm. meeting will be distributed by March 23rd.

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Proposed Priority Tasks
for the CV-SALTS Executive Committee in 2012

- 1) Define key terms needed to develop appropriate standards to protect AGR
 - a) "Existing use"
 - b) "Probable future use"
 - c) "Most sensitive use"

- 2) Define "point-of-use" and/or "point-of-compliance"
 - a) To assess attainment or impairment of AGR
 - i. In surface waters
 - ii. In ground waters
 - b) To assess attainment or impairment of MUN
 - i. In surface waters
 - ii. In ground waters

- 3) Define key terms needed to implement state antidegradation policy (68-16)
 - a) "Existing quality of water"
 - i. In surface waters
 - ii. In ground waters
 - b) "Better than the quality established in policies"
 - c) "Consistent with maximum benefit to the people of California"
 - d) "Will not unreasonably affect present and anticipated beneficial uses"

- 4) Define conditions and demonstrations required to justify a temporary variance

- 5) Define conditions and demonstrations required to comply by means of "offsets"

- 6) Select Case Studies to serves as Prototypes for Implementation Planning
 - a) Source Control Prototype
 - b) Remediation/Mitigation Prototype
 - c) Offset Prototype
 - d) Trading Prototype

- 7) Define use attainment and impairment thresholds for EC as applied to AGR

- 8) Define use attainment and impairment thresholds for EC as applied to MUN

DRAFT: 2/13/2012

Draft Schedule of Policy Discussions for the CV-Salts Executive Committee in 2012

#	Date	Focus Area	Related Technical Support Tasks
1	4/5/12	Define "Point of Use" and "Point of Compliance." Describe Pros & Cons of alternative regulatory approaches. <i>Strawman Position Paper #1a</i>	<ol style="list-style-type: none"> 1) Identify MUN surface intakes as a GIS map layer 2) Identify MUN wells as a GIS map layer 3) Identify other active wells as a GIS layer (from DWR) 4) Identify POTW outfalls as a GIS layer 5) Create GIS layer to identify prior category B & C segments
2	4/19/12	Define "Existing Water Quality" taking into consideration spatial and temporal variability. Define "assimilative capacity" and what it means to "lower water quality" in order to implement the state antidegradation policy. <i>Strawman Position Paper #1b</i>	<ol style="list-style-type: none"> 1) Survey and describe existing water quality databases 2) Survey and describe existing surface water management zones 3) Survey and describe existing groundwater management. zones 4) Preliminary water quality analysis of pilot locations
3	5/24/12	Identify candidates for Implementation Planning Prototypes among economically-disadvantaged communities with severe nitrate contamination of local drinking water supplies. <i>Strawman Position Paper #2</i>	<ol style="list-style-type: none"> 1) Identify and summarize similar efforts already under way 2) Identify "zones of common interest" for potential offsets 3) Determine readiness-to-proceed & perform needs analysis
4	6/12/12	Regional Board Workshop	
5*	7/19/12	Define what constitutes "Reasonable Protection of Existing and Probable Future MUN uses" with respect to electrical conductivity and some specific individual ions. Determine the whether and when to use secondary MCLs as water quality objectives. <i>Strawman Position Paper #3a</i>	<ol style="list-style-type: none"> 1) Summarize current state of knowledge regarding the effects of elevated EC (salinity or TDS) and hardness concentrations on drinking water supply and other domestic purposes 2) Identify and summarize unique concerns related to specific ions (e.g. sodium, chloride, boron, etc.)
6*	8/23/12	Define what constitutes "Reasonable Protection of Existing and Probable Future AGR uses" with respect to electrical conductivity and some specific individual ions. <i>Strawman Position Paper #3b.</i>	<ol style="list-style-type: none"> 1) Summarize current state of knowledge regarding the effects of elevated EC (TDS) concentrations on crop yields with specific attention to seasonal tolerances 2) Create GIS layers need to support the Ag Zoning Map
7*	9/20/12	Describe appropriate water quality monitoring requirements to determine which surface and groundwaters "are exceeding or are likely to exceed" water quality objectives for EC and nitrates. <i>Strawman Position Paper #4.</i>	<ol style="list-style-type: none"> 1) Survey and summarize existing water quality monitoring and reporting programs 2) Identify exemplars used to implement similar regulatory purposes in other regions/states
8*	10/18/12	<u>Tentative:</u> Define what constitutes "Maximum Benefit to the People of California" as needed to implement the state antidegradation policy (68-16). Establish default demonstration requirements.	TBD
9*	11/8/12	<u>Tentative:</u> Determine when and how Pollution Trading Programs and/or Offset Projects (incl. Mitigation Banks) may be used as an alternative compliance strategy within the SNMP.	Consideration of these tentative policy topics is dependent on achieving satisfactory resolution of the prerequisite issues scheduled for discussion in the preceding months. It may be necessary to continue discussing some of the higher priority issues into the fall of 2012 in order to meet the statutory deadlines imposed by the Recycled Water Policy.
10*	12/13/12	<u>Tentative:</u> Define the conditions and criteria for authorizing the use of Temporary Conditional Variances and/or Long-Term Compliance Schedules where needed to facilitate attainment of water quality standards.	

**Topics 5 & 6 cannot occur until topics 2 & 3 are resolved. Topics 7, 8, 9 & 10 cannot occur until topics 5 and/or 6 are concluded.*



CV-Salts Discussion Outline for April 5, 2012

Objective: To clarify the definition(s) for "*Point-of-Use*" and "*Point-of-Compliance*" with respect to assessing attainment with water quality standards in groundwaters of the state.

Current Regulatory Approach:

- All groundwaters of the state are initially presumed to be suitable for supporting MUN uses unless the Regional Board explicitly exempts an aquifer in accordance with the SWRCB's Sources of Drinking Water Policy (88-63).
- The Basin Plan establishes water quality objectives to protect groundwaters designated (or presumed to be) MUN.
- Waste discharges to groundwater are regulated to require compliance with the applicable water quality objectives at the point where effluent recharge first encounters the groundwater. The availability of assimilative capacity and the effects of mixing are not normally considered when discharge limits are established due to insufficient data and resources.
- Absent detailed monitoring data to demonstrate compliance at the groundwater interface, waste discharge requirements normally require compliance at the surface outfall. If a surface discharge meets the relevant water quality objectives at the outfall, it is presumed that the recharge water will not cause or contribute to a violation of water quality standards in the underlying groundwater.
- The current permitting approach is considered both environmentally conservative and easier to administer while preserving some flexibility to consider site-specific factors where appropriate.
- Default permit requirements may increase the cost of compliance without providing any incremental increase in actual use protection to justify the higher expense. Site-specific standards are extremely costly and rarely approved.
- The estimated cost-of-compliance, including potential legal liabilities, creates a strong incentive to seek judicial review of the water quality standards and discharge requirements further delaying any potential implementation activities.

Working Premises:

- 1) The foremost purpose of the Clean Water Act and California Water Code is protect the beneficial uses of water. Ideally, this could be accomplished by ensuring that water quality in each waterbody is suitable for its intended purposes.
- 2) For this reason, state and federal regulation tends to focus on maintaining water quality rather than on ensuring access to safe water for all citizens.¹ In addition, statutory authority is limited primarily to regulating the chemical composition of discharges by establishing water quality standards and imposing appropriate pollutant limitations to meet those standards.
- 3) The success of this approach depends on three assumptions:
 - (a) Existing pollutant levels in water supply sources are meeting all relevant standards (e.g. acceptable water quality at the designated "point-of-use" is sufficient to ensure acceptable water quality at the actual "point-of-use").
 - (b) That discharge limitations will ensure that pollutant levels in water supply sources continue to meet all relevant standards.
 - (c) State authorities have a cost-effective and efficient means to implement and enforce compliance with the aforementioned water quality standards.
- 4) The traditional regulatory emphasis on protecting water quality at the source (e.g. in the receiving waters) is less likely to be effective (e.g. rapid implementation of actions designed to attain standards) where:
 - (a) Existing pollutant concentrations in water supply sources are not meeting relevant standards as a result of past discharge practices and/or natural conditions.
 - (b) All on-going sources of pollution are not yet known, not yet controllable or not subject to state permitting authority or other legal controls.
 - (c) There is significant scientific or legal uncertainty with respect to ascertaining and assigning responsibility for meeting water quality standards in the supply sources.
 - (d) It is difficult to authorize early implementation of partial solutions for individual dischargers until there is sufficient evidence to demonstrate that the sum of all such efforts will assure attainment of the applicable water quality standard(s).

¹ United Nations Report of the Special Rapporteur on the human right to safe drinking water and sanitation. A/HRC/18/33/Add.4 (Aug. 2, 2011); pg. 4.

- 5) Active remediation projects will cost billions of dollars and require many decades to attain water quality standards in groundwater and cannot ensure safe drinking water supplies to all residents of California in the near term.²
- 6) Enforcement-based implementation strategies are seriously encumbered by the cost and complexity associated with meeting the legal burden-of-proof. In addition, this approach must be implemented on a case-by-case basis and often requires many years to be resolved even when successful.
- 7) State and federal regulators lack legal authority to prescribe the means or methods by which a discharger achieves compliance with permit limitations and, therefore, cannot compel dischargers to meet water quality standards by installing treatment systems or providing alternative water supplies at the actual "point-of-use." State and federal regulators also lack authority to enact many of the "essential" implementation elements (e.g. taxes and fees) recommended in the Harter/Lund Report. However, permitting authorities may approve such an approach, under certain circumstances, when the discharger offers such a strategy as an alternative means of demonstrating compliance.
- 8) Although not directly applicable to groundwater, recent EPA guidance affirms existing flexibility in the Clean Water Act (CWA) to adopt Integrated Planning Solutions (IPS) that "sequence wastewater and stormwater projects in a way that allows the highest priority environmental projects and to come first in order to address the most serious water quality problems sooner."³ EPA's IPS initiative is intended "balance the competing priorities of the CWA" through the use of appropriate compliance schedules and innovative solutions (such as green infrastructure and pollutant trading plans). This approach is expected to be more cost-effective and lower the overall cost of compliance.
- 9) The "most pressing public health and welfare issue" related to water quality is the need to assure safe drinking water supplies to all persons residing in the Central Valley Region.^{4 & 5} Meaningful progress toward addressing this issue will require BOTH of the following:
 - (a) In the near-term, projects that provide direct protection of drinking water quality at the actual point-of-use, while...
 - (b) Long-term remediation projects are implemented to improve water quality in the supply sources (e.g. receiving waters).

² Harter, Thomas and Jay R. Lund. Addressing Nitrate in California's Drinking Water with a Focus on Tulare Lake Basin and Salinas Valley Groundwater. January, 2012

³ U.S. EPA. Achieving Water Quality Through Integrated Municipal Stormwater and Wastewater Plans. Nancy Stoner, Acting Asst. Administrator for the Office of Water (OW) and Cynthia Giles, Asst. Administrator for the Office of Enforcement and Compliance Assurance (OECA). Memorandum to EPA Regional Administrators, OW & OECA Office and Division Directors. Oct. 27, 2011

⁴ Op Cit, Harter & Lund; January, 2012

⁵ Op Cit, U.N. Report; Aug. 2, 2011

Strawman Proposal

- 1) Although it is preferable, as a matter of general principle, to affect beneficial use protection in the receiving waters that serve as sources of water supply, it may not be technically or economically feasible for all waterbodies. In such instances, it is desirable to provide water treatment at any point before the actual beneficial use occurs.
- 2) "Designated use," "existing use," "potential use," "beneficial use," are all terms-of-art that have a specific legal meaning when applied in relation to water quality regulation and almost always refer to the waterbodies serving to support these "uses." That "actual use" refers to the consumptive behavior(s) associated with these legal terms. The formal legal phrases are intended to serve as surrogate constructs designed to facilitate protection of the actual use.
- 3) Given the CWA's original emphasis on regulating point sources, especially municipal and industrial effluents, it was appropriate to treatment prior to discharge rather than in-situ solutions such as in-lake or in-stream mitigation strategies (aka "offsets"). However, this principle may be counter-productive when attempting to manage diffuse non-point sources and legacy contaminants.
- 4) Theoretically, the "point-of-compliance" and the "point-of-use" could be one in the same since the former is intended to protect the latter. However, as implemented, the "point-of-use" has been moved upstream from the location where consumption is occurring to the water supply source. And, the point-of-compliance has moved even further upstream to the discharge location or, alternatively, to the location where the effluent first encounters a receiving water. Making conservative assumptions regarding the absence of dilution/degradation or the potential proximity of water supply intakes simplifies the process of permitting discharges with limited data and analyses.
- 5) Some constructs, such as "first encountered groundwater," while intended to make it easier to determine if a discharge is meeting applicable standards, may be making it more difficult to distinguish true threats to water quality from more theoretical "impairments" by treating all nominal violations of water quality criteria as equivalent risks. However, the burden-of-proof should rest with those proposing to discharge waste to the environment. The availability of assimilative capacity, the potential for mixing or degradation and the proximity to actual consumptive use are critical factors that should also be considered.
- 6) State regulatory authorities are allowed, but not required, to use the most conservative assumptions when defining the "Point-of-Use" and "Points-of-Compliance." Permit writers authorities retain broad discretion to define both the point-of-use and point-of-compliance in any manner they see fit provided that there is adequate evidence to demonstrate that actual existing uses remain fully protected. The SWRCB has affirmed that it is possible to lower water quality without unreasonably affecting beneficial uses. But, doing so is only permissible when it would provide "maximum benefit to the People of California." (*SWRCB Resolution 68-16*)

- 7) The Regional Board's "broad discretion" (referenced above) to define "Points-of-Compliance" and "Points-of-Use" (including both the location and specific metrics of assessment) includes, but is not limited to, ALL of the following:
- A) Existing pollutant concentrations in the receiving waters.
 - B) Availability of assimilative capacity in the receiving waters.
 - C) Spatial variation (3-dimensional) and averaging of water quality in the receiving waters.
 - D) Temporal variation and averaging of water quality in the receiving waters.
 - E) Temporal variation and averaging of pollutant concentrations in discharges.
 - F) Temporal variation in water quality conditions necessary to protect beneficial uses.
 - G) The availability of dilution.
 - H) Chemical transformations that may occur, over time and space, between the point-of-discharge and the point-of use.
 - I) The need for supplemental monitoring to provide site-specific data in-lieu of making more conservative assumptions.
- 8) To encourage more rapid implementation of those "projects" that are expected to provide the greatest improvement where drinking water quality is most severely impaired among economically disadvantaged communities the Regional Board should use its broad discretion to incentivize stakeholders to propose innovative pollutant trading and offset programs as described in EPA's recent Integrated Planning guidance (Oct., 2011). Specifically, the Regional Board must be able to:
- A) Evaluate compliance for a group of discharges collectively (aka "bubble compliance") where the dischargers have established a contractual commitment to operate in a manner that assures conformance to water quality standards.
 - B) Authorize dischargers to achieve compliance by participating in offset/trading programs that encourage pollutant reductions (esp. salt/nitrates) greater than or equal to the loads discharged in a manner that provides more public health benefits than if the discharge were prohibited entirely.
 - C) Authorize offset and trading programs across watershed boundaries where the discharge does not cause a violation to occur in the receiving water, and prohibiting the discharge would not bring an impaired waterbody back into attainment with water quality standards, and the geo-displaced offset would protect an actual use when the designated use is severely impaired.

Theoretical Illustrations

- 1) A discharge to groundwater occurs over a basin that has an average EC level of 2,000 uS/cm. The EC level in the discharge ranges between 1,000 -3,000 and has a volume-weighted average of 1,500 uS/cm. The net effect of the discharge actually improves average groundwater quality but average EC levels in the discharge are well above the thresholds traditionally used by the Regional Board to implement the narrative objective. The discharger is able to demonstrate that the combined flow-weighted EC levels of stormwater runoff and the effluent recharging to groundwater is approximately 900 uS/cm. Can the Regional Board write a permit condition that allows the discharge to continue by placing a "bubble" over the two sources and requiring the discharger to measure both and demonstrate compliance on a 5-year rolling average?

- 2) A discharge to groundwater occurs over a basin that has an average nitrate-nitrogen concentration of 35 mg/L that has been slowly trending upward for many years. The annual average nitrate-nitrogen concentration in the discharge is 40 mg/L and modeling shows that the discharge will increase the average nitrate-nitrogen concentration in the groundwater near the recharge area by 1 mg/L above the existing trend-line over the next 20 years. There is an economically-disadvantaged community downgradient of the discharger that is using the same basin as its primary water supply. Can the Regional Board issue a permit that allows the current discharge to continue provided that:
 - A) The discharger reduces the nitrate-nitrogen concentration in the discharge to <10mg/L, or...
 - B) The discharger reduces the nitrate-nitrogen concentration in the discharge to <13 mg/L and the discharger demonstrates that nitrate-nitrogen concentrations are further reduced by an additional 25% as the effluent percolates through the soil and before it reaches the water table, or...
 - C) The discharger agrees to begin using recycled water for crop/landscape irrigation and offers the disadvantaged community access to imported surface water as an alternate source of municipal supply, or...
 - D) The discharger agrees to subsidize a package treatment process for the disadvantaged community and guarantees to remove an amount of nitrate-nitrogen that is 200% greater than the mass of nitrate-nitrogen allowed in the permitted discharge.
 - E) What, if anything, changes in this scenario should the distressed community be located in the same basin, but UPgradient of the discharger?

- 3) Same scenario as #2 but there are no DAC's downgradient to the discharger? Can the Regional Board authorize an offset based on a subsidized package treatment plant for a DAC whose drinking water is severely impaired by nitrate if the DAC's supply well is not co-located in the same groundwater basin as the permitted discharge?

CV-SALTS Meeting Calendar

2012

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
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26	27	28	29			

3 March

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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4	5	6	7	8	9	10
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4 April

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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29	30					

5 May

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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27	28	29	30	31		

6 June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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7 July

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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8 August

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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9 September

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10 October

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11 November

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12 December

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30	31					

Notes

2nd or 3rd Thursdays

Dark Green Exec Comm Policy

2nd or 3rd Tuesdays

Lt. Green Hatch Exec Comm Admin

First Monday except conflicts

Yellow Salty 5

Light Red conflicts

 Dates Recommended Dark