

# **CV-SALTS DISCUSSION POINTS FOR OCTOBER 12, 2017**

**Program for Control and Permitting of Nitrate Discharges to Groundwater in the Sacramento-San Joaquin River Basins and in the Tulare Lake Basin**

- 1) How will Regional Board staff be able to determine if there is assimilative capacity in the shallow zone? What level of data and information will be necessary for this determination?**
- 2) How will Regional Board staff and permittees show if impacts will occur over a 20-year planning horizon?**
- 3) How do we determine the “zone of influence”?**
- 4) How much time should elapse between Early Action Plan submittal and implementation?**
- 5) Is it a given that WDRs/Waivers would be revised with approval of a Management Zone Implementation Plan?**
- 6) Do we all agree that a Management Zone Implementation Plan is the equivalent of an alternative compliance project?**
- 7) Should Guidelines for ACPs be in the Basin Plan, or a standalone guidance document that has little legal affect?**
- 8) What is the appropriate mechanism to insure timely implementation of EAP and completion of milestones leading to a Management Zone Implementation Plan?**