

**Variance Policy Recommendations
Key Comments Received
November 9, 2017**

Recommendation	Comment or Concern	Notes
Extend Salinity Variance 15- yrs from Effective Date	Do not extend the variance timeline. Original sunset was to require dischargers to determine how to meet requirements in the San Joaquin and Sacramento Rivers	
Extend Application to cover all beneficial uses, not just AGR	No comments	
Require participation in P&O Study	No comments	
Salinity Variances to be reviewed and revised based on P&O Study Results	No comments	
Allow Variances to be granted to single or multiple dischargers	No comments	Multiple discharger application would need to note characteristics of individual permittees for review/approval by USEPA

**Exceptions Policy
Key Comments Received
November 9, 2017**

SNMP Recommendation Incorporated	Comment or Concern	Notes
Delete June 2019 Sunset Provision	No comment	
Board Discretion to Adopt for more than 10-years	No comment	Set term not to exceed 50-years with discretion for Board to renew. Both require public notice and hearing as does a rescission.
Status report every 5-years	No comment	
Include requirements for Nitrate (and potentially TIN and TKN)	No comment	
Include ability to apply for Boron exception if appropriate documentation provided	No comment	
Add needed assurance of provision of safe drinking water in GW areas impacted by nitrate	No comment	Requires consistency with nitrate permitting strategy and commitment by dischargers to provide the resources needed to complete the proposed activities
Add new provisions consistent with SNMP Management Goals	Should these provisions be duplicated within the Exceptions Policy or remain within the Salt and Nitrate Management Strategies	Currently text points to provisions within the Salt and Nitrate Management Strategies
Clarify that exceptions are to provide time needed to meet water quality standards or revise an inappropriate standard	No comment	
Applicants may be individual or collective dischargers	No comment	
Not to be considered unless adequate safe, reliable, affordable drinking water available in area adversely affected by non-compliant discharges (need detailed workplan and commitment)	No comment	Lists general requirements and points to EAP and alternate compliance projects consistent with Nitrate Permitting Strategy
Periodically reassess BMPs and available treatment technologies	No comment	Reviews required every 10-yrs
If a standard is being re-evaluated a detailed work plan with milestones and resource commitment must be provided	No comment	
Where standards not being re-evaluated, document facilitation of larger long-term strategies to attain standards.	No comment	Requires documentation of participation in long-term Salt/Nitrate Management Strategy
n/a	Automatic exception for recycled water projects	Inconsistent with Recycled Water Policy
n/a	Is there a way to make exceptions automatic or do you need to separately apply	