

SURVEILLANCE AND MONITORING PROGRAM REQUIREMENTS FOR SALT AND NITRATE CONTROL PROGRAM

Basin Plan Elements	No Action Alternative	SNMP Recommendations	Alternative Recommendations	Notes
Program Goals	No language provided	<ol style="list-style-type: none"> 1. Utilize statistically-representative approach for evaluating Ambient Water Quality (AWQ) determinations and water quality trends across Central Valley. 2. Establish a cost-effective program that relies on existing monitoring programs and data collection efforts to maximum extent possible. 	<p><u>Alternative:</u></p> <ol style="list-style-type: none"> 1. Periodically assess effectiveness of Salinity and Nitrate Control Program, support efforts to re-evaluate requirements of the program. 2. Develop statistically-defensible ambient water quality determinations and trend analyses for TDS/EC and Nitrate. 3. Maximize use of existing monitoring programs to provide needed data and avoid duplication of efforts. <p><u>Alternative Revise #2:</u> Replace “defensible” with <u>representative</u> for AWQ determinations and trend analyses for TDS/EC and Nitrate.</p>	
Questions	No language provided	No language provided	<p><u>Alternative:</u> Information gathered will be consolidated and evaluated by lead entity of P&O Study in summary report answering the following:</p> <ul style="list-style-type: none"> • Ambient conditions and trends of salinity in surface waters • Ambient conditions and trends of salinity and nitrate in groundwater zones: shallow, upper, lower, and production. • The extent the Nitrate Control Program has facilitated provision of safe drinking water supply to both municipal and domestic users. <p><u>Alternative:</u> Remove the last management question: The extent the Nitrate Control Program has facilitated provision of safe drinking water supply to both municipal and domestic users.</p>	

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Area of Assessment	No language provided	No language provided	<p><u>Alternative:</u></p> <p><u>Surface Water</u> Assess ambient conditions and trends of salinity in surface waters throughout the Central Valley</p> <p><u>Groundwater</u> Evaluate ambient water quality and trends in groundwater basins in floor of Central Valley, including all sub-basins within DWR defined basins: Redding Area (#5-6), Sacramento Valley (#5-21) and San Joaquin Valley (#5-22). Remaining groundwater basins will be incorporated after the first phase.</p>	
Frequency of Assessment		For groundwater assessment: Recommend recomputation of ambient TDS and nitrate every 5 years, using a moving 10 year average of well concentration data.	<p><u>Alternative:</u> Assessment of ambient water quality and trends shall be completed for both surface and groundwater at least once every five years.</p>	
Time Requirement of Plan Submissions	No language provided	No language provided	<p><u>Alternative:</u> Within one year of the effective date of Salinity and Nitrate Control Program, lead entity will submit Work Plan and QAPP for approval.</p> <p><u>Alternative:</u> Change time requirement from one year to <u>two</u> years.</p> <p><u>Specification to Alternative:</u> Add specification that EO has the ability to allow additional time for plan submissions if justified.</p>	

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Plan Submissions	No language provided	<p>Should establish a common:</p> <ul style="list-style-type: none"> • Sampling Analysis Plan (SAP) <ul style="list-style-type: none"> ▪ Background, data quality objectives, sampling rationale, request for analyses, field methods/procedures, sample containers, preservatives, packaging, investigation-derived waste, sample documentation, COC, shipment. • Quality Assurance Project Plan (QAPP) <ul style="list-style-type: none"> ▪ Data quality objectives, criteria for data, documentation/records, certification and training, sample handling and COC, QC, instrument/equipment testing, inspection, maintenance, assessment and oversight, data validation/usability, data reporting protocols. • Health and Safety Plan (HASP) <ul style="list-style-type: none"> ▪ Known hazards, evaluation of risks, key personnel/alternates, response operations, protection of public health, personnel protection levels, control site access, decontamination for personnel and equipment, site emergency, heat stress prevention, slip trip and fall hazards, safe driving. 	<p><u>Alternative:</u></p> <p>Must submit the following:</p> <p><u>Surface Water Requirements</u> Work Plan to describe how lead entity will utilize data (ambient conditions—monthly and annual average concentrations for salinity and other secondary MCLs; trends for salinity and other secondary MCLs) collected by existing monitoring and assessment programs to evaluate major water bodies (Sac R, Feather R, SJR, Delta and major tributaries).</p> <p><u>Groundwater Requirements</u> Work Plan To include monitoring program goals, entities responsible for collection and reporting, identification of monitoring wells, governance and funding mechanisms and agreements, procedures for review and revision of Groundwater Monitoring Program.</p> <p>QAPP To include characteristics of each well, sample collection requirements, data reporting and management requirements.</p> <p><u>Specification to Alternative:</u> Add specification that Work Plan includes QAPP.</p>	

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			<p><u>Alternative:</u> Remove monthly and annual average concentrations along with secondary MCLs references under Surface Water Requirements.</p> <p><u>Clarification to Alternative:</u> Add language to clarify the following under Surface Water Requirements:</p> <ul style="list-style-type: none"> • No new data collection is required • Assessment of ambient conditions and trends of salinity shall be determined only from data collected by already established Central Valley monitoring programs and readily available in CEDEN or through USGS <hr/> <ul style="list-style-type: none"> • Call out salinity-related constituents (Table 64449-B), but provide flexibility to include other SMCLs as determined through Work Plan development process 	
Program Assessment Report	No language provided	No language provided	<p><u>Alternative:</u></p> <p><u>Surface Water</u> Provide ambient and trend information for major water bodies</p> <p><u>Groundwater</u> Provide current ambient water quality conditions and water quality trends for TDS/EC and Nitrate as Nitrogen in Upper, Lower, and Production Zones for each required groundwater basin/sub-basin.</p> <hr/> <p><u>Alternative:</u></p> <p><u>Groundwater</u> Remove requirement of providing conditions and trends in the Lower Zone.</p>	

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Utilization of Existing Monitoring Programs	No language provided	<p>Only provided for Groundwater: Existing monitoring programs that can provide data needed for the program will be identified and evaluated for incorporation into the program including: ILRP Groundwater Trend Monitoring, GAMA shallow domestic well monitoring program, Central Valley Dairy Representative Monitoring Program, Title 22 sampling program, WDR sampling programs, and other identified programs.</p>	<p><u>Alternative:</u></p> <p><u>Groundwater Requirements</u> ILRP Groundwater Trend Monitoring provide foundation for development of the monitoring program. Supplemental data include GAMA shallow domestic well monitoring program, Central Valley Dairy Representative Monitoring Program, Oil and Gas Regional Groundwater Monitoring Program, Title 22 sampling program, WDRs/Conditional Waivers monitoring programs and monitoring program established as part of approval of management zone under nitrate control program.</p> <p><u>Alternative:</u> Remove Central Valley Dairy Representative Monitoring Program as a source of supplemental data.</p>	