

## STAKEHOLDER PROPOSED EDITS TO EXECUTIVE SUMMARY--FEBRUARY 2018

### Salinity Control Program

- Add language to Phase I P&O Study
  - “Identify funding programs, including federal and state funds, and opportunities for future phase implementation”
  - “Identify recommendations for Phase II for Salinity Control Program.
- Remove existing for “Existing pollution prevention, watershed, and/or salt reduction plans” under the Alternative Salinity Permitting Approach in Table S-1.
- Add bullet to Basin Plan Recommendations in Table S-2: “Consider extension of salinity variance and exception policy”
- Change adequately participate in P&O Study to fully participate.
- Under Permitted Discharge to a Water Body Subject to De-designation of a Beneficial Use, add “The P&O Study shall evaluate all areas de-designated based on salinity for suitability as salt management areas.”
- **Remove “in-kind” financial support in P&O Study.**
- Specification to consequences for permittees joining the P&O Study late.
- Chapter 4 Implementation under the heading “Irrigated Agriculture”
- Include ability for MSR/Industrial discharges to use historic representative data
- Specify that full participation in P&O Study satisfies Variance
- **Limit use of Site Specific Objectives to “more conservative”**

### TLB Salinity Implementation

- **Remove references to 175 mg/L chloride and exception/variance policy.**
- **Remove references to maximum salinity limits for oil field wastewater in unlined sumps and White Wolf site specific**

### Nitrate Control Program

- Change contaminated by nitrate to exceed the nitrate water quality objectives in Table N-5 A and B and language throughout the section.
- Additional clarification provided on how assimilative capacity will be allocated to Management Zones - specifically, allocations will only be granted to underlying basins or subbasins. If a Management Zone spans multiple basins/subbasins, separate requests and determinations must be made for each basin/subbasin within the Management Zone where the assimilative capacity is intended to be used.
- Move ACP guidelines to staff report

### Conditional Prohibition

- Add full participation in P&O Study.
- **Remove annual progress for reports to Regional Water Board during P&O Study participation. Just reports.**
- Provide flexibility to update other General Orders rather than utilize Conditional Prohibition

### Surveillance and Monitoring Program Requirements

- Replace “defensible” with representative for ambient water quality determinations and trend analyses for TDS/EC and Nitrate.
- Change the time requirement for Work Plan to be submitted from one year to two years.
- Specification that Work Plan includes QAPP. Also add language for EO ability to allow additional time if justified.
- **Remove requirements of program assessment report on nitrate in the lower zones for each required groundwater basin/sub-basin.**
- Remove one of the management questions required to be answered in a summary report required by the P&O Study: “To what extent has the Nitrate Control Program facilitated the provision of safe drinking water supplies to both municipal and domestic users?”
- **Remove the requirements of describing the use of monthly and annual average concentrations for salinity and other secondary MCLs when reporting ambient conditions.**
- Under Surface Water Requirements added additional language to clarify:
  - No new data collection is required
  - **Assessment of ambient conditions and trends of salinity shall be determined only from data readily available through CEDEN and USGS**
  - Call out salinity-related constituents (Table B), but provide flexibility to include other SMCLs as determined through Work Plan development process
- **Remove Central Valley Dairy Representative Monitoring Program as a source of supplemental data**

### Variance Policy

- Under III. Variance Program for Salinity Water Quality Standard, add “No proven means exist at present that will allow ongoing human activity in the Basin and maintain ground water salinity at current levels throughout the Basin.”

### Exception Policy

- Remove Limited-Term from the title: “Limited-Term Exceptions from Basin Plan Provisions and Water Quality Objectives...”
- **Add nitrate plus nitrite as part of what nitrate includes.**

--See Next Page--

**SMCL (note: some of these recommendations are to go back to “no action” alternative)**

- *For both surface and groundwater: keep original BP language referring to Tables 64449-A and B, lead language, treatment requirements, and protection of beneficial uses.*
- ***For surface water, move compliance with constituent in Table 64449-A and B with annual average of results to Chapter 3 WQOs Section.***
- ***For groundwater, move compliance language to Chapter 3 WQOs but use long-term averaging periods instead of annual average. Change compliance Add compliance language to WQO for groundwater: Compliance with any chemical constituent in Tables 64449-A and 64449-B shall be determined by the application of appropriate long-term averaging periods, and in conjunction with the Conservation and Drought Policy.***
- ***Remove prospective language.***
- ***Remove “tests other than for “total”. Use filtered.***
- ***Use filtered samples instead of unfiltered for Foaming Agents (MBAs) and Odor.***
- ***Changes to the consideration of site-specific factors when developing WDR.***
- ***For both surface and groundwater: remove reference to Title 22 Section 64449 language on upper and short term level***
- Move “considerations” language to staff report

**Definitions**

- Remove non traditional in Alternative Compliance Program (ACP) definition.
- Changes made to Area of Influence Contribution definition: The portion(s) of Basin or Sub-basin where a discharge or discharges will co-mingle with the receiving water and where the presence of such discharge(s) could be reasonably be detected and differentiated from background conditions or other sources.
- ***Replace baseline with existing in Assimilative Capacity definition.***
- Remove SNMP attachment reference from Average Groundwater Concentration definition.
- ***Add baseline water quality should be representative of water body, accounting for temporal and spatial variability to Baseline Water Quality definition.***
- Remove Basin Plan definition.
- ***Remove Current Groundwater Quality definition.***
- ***Include costs commensurate with benefits to water quality and beneficial use protection as a factor to Reasonable, Feasible, and Practicable and Unreasonable, Infeasible, or Impracticable definition.***
- ***Remove Groundwater definition.***
- ***Add Maximum Benefit to the People of the State definition.***
- ***Remove Public Nuisance definition.***
- Add fixed dissolved solids to the Salinity definition.
- Remove SNMP attachment reference in Sub-Basin definition.
- ***Add calculation using perforation depths of other supply wells to Upper Groundwater Zone definition. Remove references to Section 2.***
- Remove reference to resolution number in Variance to Water Quality Standard definition.