

CIPA is pleased to provide CVSC with our comments on SWRCB-required revisions to the enabling BPA. Overall, the revisions set metrics and specific enhanced compliance terms, as within the water boards' authority and as anticipated.

Three concerns, two overarching that seek to frame final discussions:

- How is a balanced loading achieved? Is it a flexible approach, approved by locality and plan?
- Have the variance and exception policies been fully eliminated? If so, what is the impact?

And one specific:

- For the nitrate management zones, CVSC participants must now take into account DAC water district O&M expenses and must conduct residential sampling programs. (pages 37-38) While laudable, these undertakings could require significant permanent expenses and result in specific remediations that could require determinations of responsible parties. Additionally, O&M expense and residential sampling appear to be beyond the scope and intent of CVSALTS. Thus, we seek to clarify:
 - Is CVSALTS the proper place for water district drinking water O&M consideration and funding? Shouldn't this fall under the overall SWRCB SADW program, with designated and defined CVSC participation? Is CVSC direct O&M funding contemplated? If so, with what parameters?
 - Residential sampling is potentially extensive, fraught with liability problems and a highly detailed process. This is the responsibility of the water district or well owner. Again, CVSALTS addresses compliance through permit conditions. Becoming a permanent partner for water supply and quality on a well-by-well basis was not contemplated.

CIPA respectfully reminds CVSC that our members are significantly committed to resolving salinity and nitrate issues for SJV drinking water contamination. CIPA seeks a full CVSC exploration of drinking water supply sustainability. The management by state- and region-wide mechanisms must first be developed before engaging with limited entities, such as CVSC.

Please feel free to contact Willie Rivera or me with questions.

Thank you,

Bob

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