

CV-SALTS Executive Committee Meeting - Summary Action Notes

For July 16, 2015 – 9:00 AM to 3:00 PM

Attendees are listed on the Membership Roster

AGENDA

1) Welcome and Introductions

- a) CVSC Chair David Cory brought the meeting to order, and roll call was completed.
- b) Richard Meyerhoff presented the [SNMP 2015 Development Schedule Revised 070815](#). Some topics have been juggled to accommodate the CEQA schedule. Richard emphasized the importance of the October meeting where both nitrate (NIMS) and salt (SSALTS) implementation programs will be discussed.

2) Exception Policy for Groundwater: Eligibility, Justification, Application

- During the morning and afternoon session Tim asked the committee to consider the following questions regarding an exceptions policy:

1) Should the SNMP recommend extending the Regional Board's authority to grant exceptions beyond June 20, 2019? If so, what is the rationale to justify that recommendation?

2) Should the SNMP recommend expanding or contracting the list of chemical constituents eligible for an exception? And, more specifically, should nitrate-nitrogen be eligible for an exception?

3) Assuming that CV-SALTS intends to recommend some sort of continuing authority to grant exceptions, what eligibility requirements should apply?

4) Assuming that a discharger (or group of dischargers) is eligible for an exception, what demonstrations must be made to the Regional Board to justify approval? And, what evidence is required to support those claims?

5) What should be the maximum term of an exception? What, if any, intermediate review requirements should apply during that term? Can a new exception be granted following expiration of a prior exception? If so, how would the requirements for reauthorization differ from the requirements imposed for the initial approval?

6) What special monitoring and reporting requirements should apply in order to see that the exception is implemented as intended?

7) What other interim performance obligations and mitigation requirements should be imposed as a condition for granting an exception?

8) What, if any, requirements related to implementing long-term sustainability programs (like those envisioned by SSALTS) should be linked to the long-term exceptions policy?

9) Does CV-SALTS want to recommend that a long-term streamlined Exceptions Program be developed for one or more of the chemical constituents eligible for such exceptions as part of the proposed Basin Plan amendment package scheduled for submission to the Regional Board in the spring of 2017? The streamline Exceptions Program would request that the Regional Board apply its extended/expanded authority by granting some specific exceptions.

- The committee also discussed the Eligibility Requirements for a Conditional Exception from WDRs and Key Demonstrations to be made with the Application for a Conditional Exception.
- Some of the recommendations, or concerns, from the committee members were:
 - Laurel Firestone was concerned that the discussion on assimilative capacity did not appear in the SNMP Development Schedule and that conversation needs to be held before moving forward.

- In response to Laurel’s concern about a clear pathway to long-term restoration of impaired waterbodies, Daniel Cozad asked that she prepare a list with key elements to be included in the work plan for that project, and send to Tim within 2 weeks, prior to the first meeting of the NIMS Project Committee.
- Pamela Creedon requested that specific language be included that ties the streamlined process to active engagement in the CV-SALTS process, including a long-term commitment to the long-term SSALTS or NIMS projects.
- Some minor edits suggested for the document:
 - Section IV,
 - 2) Insert “or otherwise unreasonable.”
 - 5) Insert ‘re-attainment.’
 - Section V add “, and if it is NOT granted.”

3) Framework for SWRCB’s New Policy to Protect Groundwater Quality

- Annalisa Kihara provided an overview of this ongoing effort. A scoping document was drafted and released. Follow-up meetings with stakeholders were held 6/23, 6/29 and 7/10. Executive Management and the Board members still need to be briefed on feedback received from stakeholders. The schedule going forward will be determined pending outcome of high level policy decisions.

4) Set next meeting date

- The next Admin Meeting will be August 7th. August Policy is scheduled for August 13th.