

CONCISE MESSAGING FOR SPECIFIC AUDIENCES

The overall key messages for the SNMP rollout are included here for reference. Following these message points are shorter bullets of point that can be used for specific audiences.

1. **There is a problem with historic and ongoing salt and nitrate accumulations** that are impacting water quality and the economic sustainability of the Central Valley.
 - The Central Valley has a growing salt problem that could negatively impact the water quality and ultimately the economic engine of region.
 - The Central Valley is facing nitrate levels are impacting the drinking water
 - More salt enters the Central Valley than leaves. Salts, from a variety of sources, have been accumulating in the water and soil for decades now.
 - Approximately 1.5 million acres of land are salinity impaired and 250,000 acres have already been taken out of production.
2. The problem is **both urgent and long-term**. New regulatory approaches are needed to address the challenges and sustain the economy and environmental of the Central Valley.
 - Water supply wells in dozens of communities do not meet State safe drinking water standards.
 - Salts and nitrates have accumulated in soils and groundwater from legal and accepted agriculture, municipal, and industrial activities over many decades.
 - Immediate actions are needed to protect and provide safe drinking water.
 - Improved agricultural, industrial, and municipal management practices are needed to reduce the discharges of salt and nitrate.
 - Long-term management of surface and groundwater is needed to restore all beneficial water uses in the Valley.
3. **CV-SALTS formed ten years ago to address these issues with regulators and stakeholders**. Since then, CV-SALTS has identified key changes needed.
 - CV-SALTS stakeholders are working with Regional and State regulators to identify actions, results, regulatory policies, and a timeline to address the problems in the *Salt and Nitrate Management Plan*.
 - CV-SALTS has held hundreds of stakeholder meetings and is supported by a non-profit coalition representing a broad range of Central Valley interests.
4. **The identified solutions are now available for review** in the *Salt and Nitrate Management Plan* (SNMP).
 - The *Salt and Nitrate Management Plan* is built on the following management goals:
 1. Ensure a safe drinking water supply
 2. Achieve balanced salt and nitrate loadings
 3. Implement a managed aquifer restoration program
 - The proposed regulations and policy modifications would provide local flexibility with timelines, outcomes, and State oversight.

- By better managing salt and nitrate accumulations public health risks will be reduced, overall water quality will improve, and ultimately groundwater quality will be protected and restored.
 - If salt accumulations are not managed differently, the resulting direct economic costs to the Central Valley could exceed \$1.5-billion per year by 2030.
5. The SNMP contains proposed policy changes that will **add flexibility and achieve faster results**.
- There are eight proposed policy changes outlined in the SNMP that would enhance the regulatory framework to allow flexibility and more efficient use of resources for safe drinking water and a robust agricultural economy.
 - The three-pronged approach combines provision of safe drinking water to affected communities, reasonable, achievable source control measures for farmers and other dischargers, and regional and cooperative efforts to treat water sources to reduce salt and nitrate.
 - In the near-term, dischargers will bear part of the cost of treating and serving water to nitrate and salt impacted communities to address the most critical needs. As more comprehensive, long-term source control measures take effect, it is assumed that the costs will be reduced and more broadly distributed. This approach will achieve faster results compared to a strategy relying solely on source control measures.
 - The Plan prioritized ensuring safe water in areas affected by nitrates and allows flexibility in the local implementation of the plan to maximize cost effective implementation.
 - The plan also provides for planning time to develop detailed salt infrastructure plans over the next 10 years to begin building the infrastructure needed to manage salts.
6. Across the Central Valley, **farmers, businesses, and communities will need to make changes** to meet the objectives of the SNMP and the goals for the Central Valley.
- Everyone contributes to the problem, so everyone must take part in the solution.
 - The proposed policies will focus resources and requirements on the most urgent problems, while allowing local flexibility to design workable solutions.
 - Long-term, consistent action, regulation, and funding are needed to maintain public health, the economy, and the environment in the Central Valley.

Generic Agricultural Oriented Audience

(most of these points came from Cristel Tufenkjian KRCD and from Stephanie Tillman, Land IQ)

- Without an effective way to address salt accumulation, farming and rural communities will be threatened, costs of managing saline irrigation water and salinized land will continue to increase, and fresh water supplies will become even more scarce.
- Without a salt management strategy that agriculture and government regulators develop together like CV-SALTS, regulators will continue to develop salinity control measures that could make compliance more difficult, especially for irrigators.
- Facing this impasse, stakeholders in the Central Valley including regulators, business and industry, cities and counties, municipal agencies, environmental organizations, irrigated and non-irrigated agriculture, food processors, etc. have been meeting for the last 10 years under a non-profit program called CV-SALTS to develop workable solutions.
- The result of this joint effort is a comprehensive plan laid out in the SNMP.
- Farmers throughout the Central Valley will need to come together with regulators and business, etc. to rebalance salts so that farming can continue to be viable.
- A strategy agreed upon by these diverse interests will increase the potential for success and sustainability for the Central Valley's farms, industries, and communities.
- The innovative strategy, policies, and actions to balance the accumulation of salt in the Central Valley, based on 10 years of scientific studies, will be circulating for public review and comment via the release of the SNMP.
- These strategies will be finalized into new regulations in 2018 that will introduce greater flexibility to manage salts in different areas of the Central Valley.
- Agriculture's voice is critical in helping to shape salinity regulations that will be considered by the Central Valley Water Board in 2017, adopted in 2018, and that will impact the way Central Valley growers farm for years to come.

Message Points for the Dairy Industry

(Largely from what was provide by JP Cativiela Dairy CARES and Tim Moore)

- Dairy owners and operators have every right to be concerned, pessimistic and asking themselves whether the California wants to sustain the dairy industry, given legislative action on the minimum wage, SGMA, and methane reduction, coupled with recent enforcement action by the SWRCB. Federal RCRA lawsuits in Yakima and (threatened) in Corcoran also are a wakeup call.
- California isn't like other states, as we have the perfect storm—groundwater problems with salt and nitrate accumulations and economically disadvantaged communities.
- **CV-SALTS is a non-profit partnership** made up of state water quality regulators and growers, farmers, processors, and others, all working together to find long-term solutions and plans that will provide safe drinking water for Central Valley residents, businesses, and

farmers, without putting farmers, growers, food processors and most of the valley's economy out of business!

- The **groundwater quality problem** we are facing is largely because of the buildup of salts and nitrates in the groundwater over the past century. With limited or no outlet to the ocean, more salt is being imported into the San Joaquin Valley than is being exported resulting in approximately 2 million tons of salt accumulating annually.
- This trend, causing salt and nitrate build-up and polluting the groundwater, is exactly what the CV SALTS partners have been working on – to find ways to **slow and eventually reverse** these accumulations.
- The **CV SALTS partnership is proposing solutions** that include treating drinking water to remove nitrates and salts, creating new sources of safe drinking water, exporting salts to the ocean, and adopting improved management practices for farms and other contributing sources of salt to minimize future impacts and achieve long-term sustainability, which in turn keeps the Central Valley in business.
- The proposed solutions require a **major change in the current regulatory** approach.
- Existing regulations are focused on **ever-tightening control measures** that are very difficult or even impossible to achieve for many whose operations discharge salts and nitrates.
- There are eight proposed policy changes in the SNMP that will change the regulatory framework to allow a **dual-pronged approach**, leading to a more efficient use of resources that will ultimately result in safe drinking water and a robust agricultural economy.
- **The dual-pronged approach** combines **reasonable, achievable source control measures** for farmers and other dischargers with regional and cooperative efforts to **treat water sources** to reduce salt and nitrate.
- Using a dual-pronged approach will initially mean that dischargers will bear part of the cost of treating and serving water to nitrate and salt impacted communities. However, it is assumed that the costs will ultimately be more fairly distributed. And, this approach will achieve faster results compared to a strategy relying solely on source control measures.
- We want to tell it to you like it is and **identify your real-world options**, so you can make appropriate business decisions. Get involved in the SNMP, read it, and let CV-SALTS know what you think.
- If you wait, and don't get involved, and enforcement actions to take place, it could cloud the title to your land and attach liability to the land if cleanup and abatement orders are issued.
- What are your options? Quit farming and sell your land. Move to another state. Line all lagoons. Hunker down and wait for them to come get you, or find a way to get water to some of these people now and avoid enforcement action.
- Regulatory change is needed to make the last option available – right now, even if the State Board wanted to help you, they could not do so until the policy changes (in the SNMP and Basin Plan) proposed by CV SALTS are adopted.

Message Points for the Petroleum Industry

(Revised very slightly from what was provide by Christine Zimmerman, Zimmerman Consulting)

- Oil and gas production in the Central Valley has become increasingly challenging as the regulatory policy governing produced water management undergoes a thorough scrutiny and process check relative to Federal and State law.
- The effects of discharging produced water to the ground surface or to deep underground zones are likely subject to increasing regulation.
- Certainty of process and compliance costs, as well as the establishment of alternate compliance policies are essential to create an environment of economic wellbeing and protection of beneficial uses (and reuses) of the Central Valley's water balance.
- Over the course of the last decade, CV-SALTS has functioned as a coalition among industries, regulatory agencies, and non-government organizations dedicated to establishing industry specific general order discharge compliance and alternate compliance draft policies outlined in the *Salt and Nitrate Management Plan (SNMP)*.
- The draft policies in the SNMP, if approved, will become the template for industry specific regulation. Other industries included in the process consist of agriculture, dairy, public water treatment.
- The future pathway for petroleum industry regulatory policy has been established by these other industries and regulatory agency collaboration.
- Currently, there are only two petroleum industry CV-SALTS coalition members. To have a meaningful stake in the policy process, that number must increase.
- It is far better that we wade into this process and help shape what the regulations will look like than to inherit regulations that are potentially economically crippling or that miss key issues. Once policy becomes regulation, the effort to improve it becomes significantly more difficult to engage.
- The CV-SALTS process is essential to our industry's future.
- Please contact Christine Zimmerman at (661) 205-2885 to discuss additional petroleum industry engagement.

Message Points for the Food Processing Industry

- As food manufacturing operating in CA, we are all focused on meeting the industry's state and federal regulatory requirements for public health and safety.
- In CA, the leading food manufacturing groups generally include: Animal Food Manufacturing, Grain and Oilseed Milling, Sugar and Confectionery Product Manufacturing, Fruit and Vegetable Preserving and Specialty Food Manufacturing, Dairy Product Manufacturing, Animal Slaughtering and Processing, Seafood Product Preparation and Packaging, Bakeries and Tortilla Manufacturing, Beverage Product Manufacturing.
- About 15% of California's food processing takes place in the Central Valley. (www.coecc.net/documents/foodmfg_custom_ca_10.pdf)

- Our businesses create waste water due to the cleaning and sanitation requirements we must fulfill, and in times of drought, we have all had to learn ways to conserve. The California League of Food Processors released its Water Use Efficiency Report in February 2015 to assist us all in this endeavor. <http://clfp.com/water-use-efficiency-study/>
- For those of us operating in the Central Valley, there is an important threat on the horizon that we must now face --- the pollution to our surface and groundwater from salt and nitrate accumulations that have been building up over decades.
- Yes, we are regulated now regarding salt and nitrates, but the regulations are outdated, general inflexible and require retooling.
- **CV-SALTS is a non-profit partnership** made up of state water quality regulators and growers, farmers, food processors, etc., all working together to find long-term solutions and plans that will provide safe drinking water for Central Valley residents, without putting us and most of the valley's economy out of business!
- The salt and nitrate build-up in the groundwater is exactly what the CV SALTS partners have been working on – to find ways to **slow and eventually reverse** these polluting accumulations.
- The **CV SALTS partnership is proposing solutions** that include treating drinking water to remove nitrates and salts, creating new sources of safe drinking water, exporting salts to the ocean, and adopting improved management practices for farms and other contributing sources of salt to minimize future impacts and achieve long-term sustainability, which in turn keeps the Central Valley in business.
- The proposed solutions require a **major change in the current regulatory** approach.
- As an industry, we need to be at the table. We need to review and provide input to the SNMP and remain involved as new, more flexible regulations are brought into play.

Other Talking Points to be Developed

- Wastewater Treatment Managers
- Cities, Counties and Other Special Districts
- Others?