



June 20, 2013

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CENTRAL VALLEY SALINITY ALTERNATIVES FOR LONG-TERM SUSTAINABILITY (CV-SALTS) TECHNICAL ADVISORY COMMITTEE RECOMMENDATIONS REGARDING THE CITY OF LIVE OAK'S SITE-SPECIFIC SALINITY STUDY WORKPLAN (ORDER No. R5-2011-0034)

On May 17, 2013, the CV-SALTS Technical Advisory Committee (TAC) reviewed and discussed the Site-Specific Salinity Study Work Plan and Time Schedule submitted under Order No. R5-2011-0034, as it related to ongoing CV-SALTS evaluations to determine appropriate salinity water quality objectives to protect agricultural supply water. A summary of key discussion points and recommendations are provided below with more detail noted in Attachment 1.

- Selection of Study Area: Use of the Vicinity Basis method appears appropriate provided cropping patterns are compared with the Local Basis study area as proposed.
- Selection of Most Sensitive Crop: More detailed information on the cropping pattern for the 900-acre Vicinity Area should be provided
- Effective precipitation: Clarify basis for estimating "normal" effective precipitation
- Leaching Requirement: The factor used is extremely conservative and provides a significant margin of safety

Additional discussion revolved around the focus of the Workplan on the use of an annual average of the water quality data to evaluate compliance with a water quality objective or effluent limitation to protect irrigated agriculture. Given the seasonal nature of crop irrigation, shorter averaging periods may be appropriate. Currently, evaluating protection of the AGR use is typically based on monthly data or 30-day rolling average concentration data. While a final policy recommendation regarding this issue would need to be developed by the CV-SALTS Executive Committee, TAC discussions included monthly, 30-day rolling and seasonal averaging as potential options.

In summary, the Committee recommends that the City of Live Oak provide additional information as noted above before a determination that an EC of 1,100 umhos/cm is fully protective of the AGR beneficial use in the area potentially impacted by the City's effluent.

Sincerely,

Parry Klassen
Chair, CV-SALTS Executive Committee

Nigel T. Quinn
Co-Chair, CV-SALTS TAC

Cc: Ken Landau, Central Valley Regional Water Quality Control Board
Jeanne Chilcott, Central Valley Regional Water Quality Control Board