Meyerhoff, Richard

From: Chilcott, Jeanne@Waterboards <Jeanne.Chilcott@waterboards.ca.gov>
Sent: Monday, October 03, 2016 11:07 AM
To: Meyerhoff, Richard; Tess Dunham (tdunham@somachlaw.com)
Cc: Creedon, Pamela@Waterboards; Rodgers, Clay@Waterboards; Pulupa, Patrick@Waterboards; Meeks, Glenn@Waterboards; Buford, Pam@Waterboards; Laputz, Adam@Waterboards
Subject: Comments--Sections 1 thru 4 of SNMP (excluding Salt Strategy)
Attachments: R5_SNMP_Section 1_Introduction_091216.docx; R5_SNMP_Section 2_CV Region_091216.docx; R5 _SNMP_Section 3_SN Conditions_091216.docx; R5_SNMP_Section 4_CVSNMP_091216.docx

Attached are comments on Sections 1 thru 4 of the SNMP. These comments include those received by Pamela, Clay and Glenn. I did not yet comment on the Salt Strategy as I thought there would be an updated version. Please let me know if you need comments on that section before the update is released. I plan on sending comments on the policies shortly after lunch.

A couple of general notes:

- The entire document is the SNMP, not just section 4, which becomes confusing as currently worded. I've reworded some items to note that section 4 is focused on the recommended strategy/framework for salt and nitrate management—not that it is the stand alone SNMP.

- There were several white papers that also serve as the technical foundation for the SNMP (i.e. salinity impacts to aquatic life and stock watering). I recommend starting Attachment B with the short paragraph summary of each technical project that we've used for our Board workshops with links to the location of the final documents.

- Monitoring and Surveillance is a required component of the SNMP as well as the anti-deg analysis. I can't tell exactly how these are being incorporated into the document. There should be some discussion in the body of the document—not just leaving as later attachments. In particular, I recommend outlining the SAMP in a new Chapter 5.

- I figured out the confusion with the "trending" conditions for permitting and tried to update the language. The key factor was whether the discharge was in a basin where the upper zone already is documented to have concentrations increasing at an unacceptable rate—not that the discharge itself was causing the shallow zone to increase at an unacceptable rate. This change translates to if we don't know what the trend is in the upper zone and the discharger is asking for assimilative capacity, they need to participate in SAMP or other monitoring to make that determination.

More coming soon.

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