

Meyerhoff, Richard

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Sent: Monday, October 03, 2016 3:59 PM
To: Meyerhoff, Richard; Tess Dunham (tdunham@somachlaw.com)
Cc: Creedon, Pamela@Waterboards; Rodgers, Clay@Waterboards; Laputz, Adam@Waterboards; Pulupa, Patrick@Waterboards; Buford, Pam@Waterboards; Meeks, Glenn@Waterboards
Subject: Comments on SNMP Policies: A1, A2, A4, A7, A8 and A10
Attachments: R5_A-1_Groundwater Management Zone Policy_091216.docx; R5_A-2_Nitrate Permitting Strategy_091216.docx; R5_A-4_Exceptions Policy_091216.docx; R5_A-8_Drought & Water Conservation_091216.docx; R5_A-10_ACP Guidelines_0901216.docx

Attached are edits to the above policies. I did not comment on A3 (Salinity Strategy) or A5 (AGR in Groundwater) as I wanted to see the revised salinity strategy document. A6 (Variance) and A7 (Offsets) already incorporated our comments, A9 (SMCLs) was waiting for the final CEQA and Anti-deg analyses, and A11 was fine as written.

A couple of highlights:

- Groundwater management zones:
 - Concerned with what seems like a potential exclusion of using MZ's for salt, so tried to soften the language
 - Included additional language highlighting the need to collaborate with the users who are to receive the benefits of short/long-term safe drinking water activities
 - User protection extends to all down-gradient users impacted by the discharge even if they are "outside" of the MZ boundary
- Nitrate permitting strategy—similar comments to Section 4 of SNMP
- Exceptions
 - Tried to clarify language so that it is clear that the Water Boards have the "authority" to grant exceptions even without this policy. The policy provides transparent guidance on what needs to be provided for an exception to be granted.
- Drought and Conservation still reading as solely Drought focus.
- Alternate compliance projects
 - Need to clarify that the shallow or upper zone is being used to determine impacts for nitrates
 - ACP must include a description of best efforts that will be implemented as the ACP moves forward
 - Clarify that affected users will help define how their drinking water issues will be resolved

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