

## Meyerhoff, Richard

---

**From:** Debbie Webster <eofficer@cvcwa.org>  
**Sent:** Wednesday, August 03, 2016 7:51 PM  
**To:** Meyerhoff, Richard; 'Tess Dunham (tdunham@somachlaw.com)'  
**Cc:** Daphne Orzalli (dorzalli@cvsalinity.org)  
**Subject:** Salinity\_AGR Policy\_Vers A2\_Abridged\_061416\_dyw com  
**Attachments:** Salinity\_AGR Policy\_Vers A2\_Abridged\_061416\_dyw com.docx

Hi Richard,

This should be the last of the documents that I have in this round. Some key thoughts on this document heading into tomorrow:

- For POTWs and others, measuring salinity as EC is key, and so the objective should be stated as such. TDS contains sugars (dissolved organic matter such as urea) that is not completely removed at a POTW, but are not salts. I know others have this issue too. Additionally, for us, I believe TDS is a much more intensive test and costs more to evaluate.
- Salt ions were not really mentioned in this policy, but have been compliance issues for some of our members. Can some text be added?
- The IAZ areas which are now described as Basins and Sub basins are still just too big as they relate to management and using the classifications at that level is not marrying well with the Salinity Management Strategy. Until recently, the plan was to deal with salinity as smaller plans (“A plan within a plan”). I think the management strategy gets us back towards that idea and can and should incorporate this as well as address surface water. Early in my comments I mentioned surface water – it is really clear that in the default trigger section, this is only applicable to groundwater, so we will need to be clear how we are handling surface water and present it in such a way that some of the justifications for alternative methods of compliance are supported for surface water too.
- Site specific objectives should always be on the table. The Woodland order as well as work we have done in CV-SALTS provides guidance on what parameters to base the evaluation on.

Thanks, Debbie