

## Meyerhoff, Richard

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**From:** Debbie Webster <eofficer@cvcwa.org>  
**Sent:** Wednesday, August 03, 2016 11:02 AM  
**To:** Meyerhoff, Richard; 'Tess Dunham (tdunham@somachlaw.com)'  
**Cc:** Daphne Orzalli (dorzalli@cvsalinity.org)  
**Subject:** 6-13-2016 Draft Nitrate Permitting Policy dyw comments  
**Attachments:** 6-13-2016 Draft Nitrate Permitting Policy dyw comments.docx

Here are comments and edits on the nitrate permitting strategy. Richard, please forward to others if you see a need.

I appreciate that I saw many of our earlier comments incorporated. Most comments are editorial in nature. Some of these more substantial include:

- Need to apply to surface water or at least allow surface water/NPDES to participate where nitrate and MUN are of concern.
- Clarification for process for POTWs as some of our renewal of permits may not completely align or some text may need to be added due to permit requirements (e.g. can you give a compliance schedule in an NPDES permit for nitrate?, etc.)
- A reminder that antideg is that the WDR (not the discharge) results in BPTC.

The areas where I see my edits maybe requiring more discussion with the small group are:

- Allowing more than 10 years for intermediate as well as long term solutions. Permanent solutions, if it is securing a new water supply, will likely be longer and the investment significant.
- Any and all exceptions may not warrant participation in the long term solution.
- Possibly where you could do something but participating in a ACP provides greater benefit. I think we got consensus that it made sense, and I saw some indications of this, but not in some areas of the document that if not changed could contradict.

Thanks, let me know if you have questions.

Debbie