

## Meyerhoff, Richard

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**From:** Chilcott, Jeanne@Waterboards <Jeanne.Chilcott@waterboards.ca.gov>  
**Sent:** Friday, July 29, 2016 4:06 PM  
**To:** Meyerhoff, Richard; Tess Dunham (tdunham@somachlaw.com); Daphne Orzalli (dorzalli@cvsalinity.org)  
**Cc:** Meeks, Glenn@Waterboards; Buford, Pam@Waterboards; Pulupa, Patrick@Waterboards; Rodgers, Clay@Waterboards; Creedon, Pamela@Waterboards  
**Subject:** Comments on Nitrate Strategy  
**Attachments:** jec6-13-2016 Draft Nitrate Permitting Policy.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

It looks bad over, but the main concerns are that we seem to push up (and sometimes over) 75% of the objective before doing much more than monitoring trends. I've tried to include additional language for a degradation trigger and additional requirements when the ambient GW concentration is already over 50% of the objective and the degradation rate exceeds the trigger. (Note that the degradation trigger proposed would equate to a 2 mg/L increase over a 20-year period—which seems high now that I think of it). To try to incorporate this concept, I mucked around in Figure 1 and also with the language in the various individual discharge classes.

Other comments:

- We need to include timelines for activities. I inserted the timelines from the management zone policy, but don't know the thoughts for individual permits.
- One activity not noted in the document is the outreach that should be occurring during the Basin Plan Amendment Process (right after submittal of the SNMP)
- Question: Where will the priority basins be identified (so that outreach can be focused)?

Thanks. I don't have comments right now on the AGR or Management Zone policies. I already provided the rough draft on Alternate Compliance Project Guidelines and assume these will all be part of the small group discussion next week.

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