

Meyerhoff, Richard

From: Elissa Callman <ECallman@cityofsacramento.org>
Sent: Friday, July 22, 2016 5:37 PM
To: dorzalli@cvsalinity.org; Meyerhoff, Richard
Cc: 'Elaine Archibald' (elaine.archibald@comcast.net); Chilcott, Jeanne@Waterboards (Jeanne.Chilcott@waterboards.ca.gov); Sherill Huun; Pravani Vandeyar; Dave A. Phillips; 'danm@cityofwestsacramento.org'; Kania, Christopher; 'juanah@cityofwestsacramento.org'; williamsf@saccounty.net; Gwaltney, Dan; 'grantsa@saccounty.net'; Pasterski, Tom (pasterskit@SacCounty.NET); Hall, Keith; Bonny Starr (bstarr@usamedia.tv)
Subject: RE: CV-SALTS: Policy Documents - Request for Comment
Attachments: SMCL V2.2_060316 SRSWPP comments - 7-22-16 final.docx; RE_ For Review_ First Draft CV-SALTS Policy for Secondary Maximum Contaminant Levels 2-5-16.pdf

Dear Mr. Meyerhoff and Ms. Orzalli:

The purpose of this letter is to provide stakeholder input from the Sacramento River Source Water Protection Program (SRSWPP) on the public draft version of the SMCL Policy. The SRSWPP seeks to maintain the high quality of the Sacramento River drinking water supply for the current and future generations. The stakeholder input provided in this letter also relates to protection of the high quality of the American River water supply. It is our responsibility as water utilities to ensure that our water is both healthful and free of any unpleasant taste, odor, or other aesthetic effects. Protecting the quality of the raw water supply is key to ensuring that treated water quality not only meets the primary and secondary drinking water standards, as required by the Division of Drinking Water (DDW), but moreover is the best quality that we can reasonably provide to protect public health.

We are concerned that some aspects of the proposed SMCL policy may result in unintended consequences to the quality of the Sacramento River and American River surface water supplies that we use for our municipal drinking water supply. We have participated in CV Salts SNMP via providing input on the CEQA scoping during the public input period, as well as participating in the stakeholder work group on the SMCL policy.

Source water protection is the first step in a "multi-barrier" approach to providing safe drinking water. This approach is acknowledged and supported in the Board's Central Valley Drinking Water Policy for Surface Waters of the Delta and its Upstream Tributaries (Drinking Water Policy). It is further stated that, "While source water protection is the first barrier, it is not intended to provide pristine water that does not require treatment but rather, to prevent source degradation from requiring additional treatment and placing more reliance on the treatment process. High quality source waters minimize public health risk if there is a breakdown in the treatment process." Drinking water treatment is constituent-specific and does have the potential for breakthrough. Even in cases where treatment is an option, treatment can be substantially more costly than source water protection. We rely on management programs, including the very important programs of the Board, as an essential part of the source water protection for the high quality of the Sacramento and American River watersheds. The Sacramento River watershed, including the American River watershed, is nearly 25,000 square miles and includes many types of activities and dischargers, most of which are regulated by permits from the Board. The Board, supported by other regulatory agencies, regulated communities, and educational organizations, has made substantial strides in implementing programs that are protective of the many beneficial uses of our State Waters, including drinking water.

Our key areas of concern are as follows:

- The draft policy has inconsistency with the intents and requirements of other policies and regulations, including the Health and Safety Code, Division 104 Environmental Health, Part 12 Drinking Water, Chapter 4 California

Safe Drinking Water Act, Article 1, Section 116275 that includes the definition and importance of SMCLs and the General State Policy on Right to Safe, Clean, Affordable, and Accessible Water.

- The proposed approach for use of filtered samples for water quality monitoring for compliance with the Basin Plan would result in significant disconnect between drinking water regulation and treatment and Regional Board policies and programs for protection of current and future MUN use.
- Degradation of source waters may result in increased public health risk as well as risk of impacts to the drinking water's aesthetics, water body categorizations.
- Revisions to point of compliance are proposed that would remove the current protections afforded to entire reaches of designated MUN water bodies.
- Further evaluations are needed to identify issues associated with non-salinity related secondary MCLs and ensure that water quality will not be degraded due to the proposed changes.
- Will there be the opportunity for drinking water experts and stakeholder review of guidelines to be developed and used by Regional Board staff to apply the SMCLs to WDRs?

Please see our attached specific mark-up comments to the draft policy, as requested. These include some comments previously provided that we continue to believe are important for further consideration. Also attached is additional supporting information, provided via email on February 5, which we request to be included as supporting information to today's comments. We recommend further evaluation of the issues related to non-salinity secondary MCLs, including modeling potential impacts, as well as consultation with the Division of Drinking Water to help ensure that source water protection and drinking water treatment considerations are appropriately incorporated into the policy.

We appreciate the opportunity to provide constructive input towards planning solutions for this complex issue. Please do not hesitate to contact me at 916-808-1424 if you would like to discuss the above. Please confirm receipt of this email.

Sincerely,
Elissa Callman
Senior Engineer
City of Sacramento Department of Utilities

From: dorzalli@cvsalinity.org [mailto:dorzalli@cvsalinity.org]
Sent: Friday, July 08, 2016 3:20 PM
To: dorzalli@cvsalinity.org
Subject: CV-SALTS: Policy Documents - Request for Comment

EXECUTIVE COMMITTEE PARTICIPANTS:

The attached Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) Policy documents were recently made available to the public and discussed at the June 22, 2016 Central Valley Water Board CV-SALTS Workshop. To facilitate the finalization of these specific Policy documents and in preparation of the Central Valley Salt and Nitrate Management Plan (SNMP), the CV-SALTS Executive Committee requests specific written comments on these specific Policy documents be submitted no later than **close of business on July 22, 2016**; written comments should include alternative language for consideration by CV-SALTS. Please provide suggested edits or comments in Track Changes on the attached WORD versions of these documents.

Please note that the Policy documents provided here do not include the Nitrate Permitting Strategy, the Management Zone Policy, AGR Policy, and the anticipated Salinity Permitting Strategy that is currently in development. For these specific documents, we will be asking for similar written comments and alternatives to those documents on July 14, 2016, and they will have a due date of July 29, 2016. When these documents are sent, they will include the versions of the Nitrate Permitting Strategy, Management Zone Policy and AGR Policy made public for the June 22, 2016 Workshop along with summary documents that capture comments received on these documents at the June 15-16, 2016 Executive Committee Policy Meeting and at the Regional Board's June Workshop. WORD versions of the existing documents are

currently available, and will be provided on request (see contact information below). Commenters do not need to wait until July 14, 2016 to start working on revisions/alternatives to these existing documents. As indicated, the Salinity Permitting Strategy is in development and will be made available by July 14, 2016. The Salinity Permitting Strategy is also scheduled to be discussed at the August 1, 2016 Executive Policy Committee meeting.

The attached schedule provides further information with respect to the timeline and process for completing work on the Policy documents. Please note that the tight timeline is necessary to meet the schedule for the preparation of the CEQA, Economics, and Antidegradation Analyses to support the Central Valley SNMP.

Please submit your comments to both the CV-SALTS Technical Project Manager Richard Meyerhoff (meyerhoffrd@cdmsmith.com) and CV-SALTS Administrator Daphne Orzalli (dorzalli@cvsalinity.org).

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