

VALLEY WATER MANAGEMENT COMPANY

7500 MEANY AVE.
BAKERSFIELD, CALIFORNIA 93308

July 22, 2016

VIA EMAIL TO:

Richard Meyerhoff, CV-SALTS Technical Project Manager (meyerhoffrd@cdmsmith.com)

Daphne Orzalli, CV-SALTS Administrator (dorzalli@cvsalinity.org)

Dear Mr. Meyerhoff and Ms. Orzalli:

Valley Water Management Company ("Valley Water") supports the adoption of Basin Plan amendments incorporating drought, offsets, and exceptions policies, and also supports modification of the implementation plan for secondary Maximum Contaminant Levels ("SMCLs"). Notwithstanding this support, Valley Water submits proposed modifications to these policies in the attached Word documents to make the policies more clear and helpful to the regulated community.

One of the most important comments is to not limit the drought, exceptions, and offsets policies unnecessarily to just constituents of salinity. There are other constituents, such as boron for example, that are equally problematic for many dischargers that also need regulatory relief. Without such relief, dischargers may suffer the same costly and unnecessary issues as those faced by salinity yet without a pathway to compliance.

We hope that CV-SALTS will consider and incorporate our proposed changes into the final documents.

Very truly yours,



Russell Emerson
Manager

cc: Gary Carlton, Kennedy/Jenks
Melissa Thorme, Downey Brand LLP
Daniel Cozad
Tim Moore