

From: Voight, Lysa (SDA) <voightl@sacsewer.com>
Sent: Friday, December 27, 2013 9:54 AM
To: Yee, Betty@Waterboards
Subject: Question related to Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins

Importance: High

Hi Betty.

I'm sending you a question and not an official comment related to the Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins. This is related to the CV Salts efforts.

The staff report text that goes along with the BPA on page 17 under the proposed changes to the Recycled Water Policy Section says;
*"In Resolution No. R5-2010-0024, the Central Valley Water Board noted that the CV-SALTS initiative is consistent with the provisions in the Recycled Water Policy to develop salt and nutrient management plans. When the State Water Board adopted the Recycled Water Policy, the State Water Board found that potential **site-specific recycled water project impacts may need to be considered in subsequent environmental analyses** performed by lead agencies, pursuant to Public Resources Code section 21159.1, and incorporated mitigation measures that reduced impacts to less than significant levels."*

My question is whether the second sentence in this paragraph (with the red text above) relates to the first sentence in the same paragraph or if they are making 2 unique and independent statements. If the red portion of the second sentence applies to CV Salts, it indicates that site specific analysis needs to be done, and I'm assuming that would include evaluating the impacts of salts. That would appear to conflict with a statement in the Information Document prepared for the CV Salts CEQA Scoping Meetings under the section titled Background that says *"Development of a Central Valley SNMP serves the purpose of the Recycled Water Policy by establishing a **comprehensive approach for managing salt and nitrates on a regional or watershed basis and for all sources, rather than through individual recycled water projects.** Given the close relationship between the goals of CV-SALTS and the Recycled Water Policy's requirement to establish a salt and nutrient management plan for the Central Valley region, CV-SALTS stakeholders are working collaboratively to develop a Central Valley-wide SNMP."*

I am under the impression from the CV Salts efforts that the Salt and Nitrate Management Plans will be performed on a regional basis and not for specific projects.

If the two sentences are not related, then you could separate them by placing a hard return after the first sentence as follows:

"In Resolution No. R5-2010-0024, the Central Valley Water Board noted that the CV-SALTS initiative is consistent with the provisions in the Recycled Water Policy to develop salt and nutrient management plans.

When the State Water Board adopted the Recycled Water Policy, the State Water Board found that potential site-specific recycled water project impacts may need to be considered in subsequent environmental analyses performed by lead agencies, pursuant to Public Resources Code section 21159.1, and incorporated mitigation measures that reduced impacts to less than significant levels. "

If the intent is to have individual SNMPs for each recycled water project (as implied by sentence #2 I think), then we should discuss this.

Thanks so much and I hope this is clear.

Happy Holidays!!

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