
From: Hartman, Jelena@Waterboards [<mailto:Jelena.Hartman@waterboards.ca.gov>]

Sent: Thursday, May 26, 2016 4:08 PM

To: Wimberger, Emily@ARB; Surovik, Marcelle@ARB

Cc: Mehl, Dave@ARB; Gomberg, Max@Waterboards

Subject: SLCP Strategy: Water Board Comments

Hello, Marcelle and Emily-

The Central Valley Water Board's Dairy Program has asked for edits to the paragraph on page 65 of the Proposed SLCP Strategy; please see attached.

Thanks,

Jelena

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Central Valley Regional Water Quality Control Board

2 May 2016

Kevin Eslinger
California Air Resources Board
1001 I Street
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Proposed Short-Lived Climate Pollutant Reduction Strategy

Central Valley Water Board staff has reviewed the Air Resources Board's *Proposed Short-Lived Climate Pollutant Reduction Strategy*, dated April 2016. The Water Boards support the goal of reducing the generation of short lived climate pollutants and are committed to working with the Air Board as you develop a strategy that maximizes improvement of air quality while also considering both positive or negative cross-media impacts.

Central Valley Water Board staff has a suggested edit to the second sentence in the third paragraph on page 65 of the Proposed Strategy:

Dairies with flush water lagoon systems typically flood irrigate dairy feed crops, such as corn silage and alfalfa, to dilute and disperse nutrients from manure in the lagoon. ~~This practice can lead to soil and groundwater contamination despite being subject to regulation by regional water quality control boards, including the Dairy General Order in the Central Valley.~~ Past practices have led to legacy pollutants contaminating groundwater, which could continue if unabated. To address this, regional water boards issue waste discharge requirements that include development and implementation of nutrient management plans, water quality monitoring, and corrective actions when impairments are found. Solid-scrape manure management may lead to air quality challenges, however, which need to be fully considered. Ultimately, the optimal mix of technologies and manure management practices to reduce methane emissions, protect air and water quality, and support dairy economics will depend on dairy-specific factors and vary across the State.

Thank you for the opportunity to comment on the proposed strategy. The Central Valley Water Board looks forward to working with the Air Resources Board to find solutions to address short-lived climate pollutant emissions from dairies and protect water quality.

If you have any questions, please contact Doug Patteson at (559) 445-5577 or by email at doug.patteson@waterboards.ca.gov.

cc: