

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
Preliminary Management Zone Proposal Sections 2 & 3				
1	Michael Niemi, Turlock ID (TID)	2.2.1	2.2.1 Geography...Brush Lake really isn't a water body within the basin. It is an old, cutoff oxbow along the San Joaquin River that only contains water when the river floods. Much of it is now farmed.	Text updated to reflect status of Brush Lake
2	Michael Niemi, TID	2.2.1	Paragraph 2 on page 2-4...Probably better written as: "Water users in the Management Zone use both surface water and groundwater to meet the water demands of the area. M&I water and domestic water within the Management Zone is all supplied by groundwater. The Turlock and Merced Irrigation Districts supply irrigation water, mostly to the western, and a small part of the southeast portions, of the Management Zone. Some growers within the irrigation districts' boundaries have their own private irrigation wells that they use in lieu of, or in addition to, any water supplied by the two irrigation districts. Groundwater is relied on more heavily during drought periods, when surface water supplies are reduced. All agricultural demand outside of the two irrigation districts' boundaries as well as on some dairies and other agricultural facilities is met by groundwater.	Text edited as recommended
3	Michael Niemi, TID	2.2.4	Not sure the Del Este Water Company is still in existence. I believe they were purchased by the City of Modesto.	Text edited to add "[former]" to the listing of Del Este Water Company
4	Jennifer Clary, Clean Water Action (CWA)	2.2.4	The term "Water Management Entities" is not defined in this document. Can you provide that? This section provides a short list of systems that appears to exclude non-community water systems, and that doesn't specifically list small community water systems in the area. It seems as though this section is needed to identify systems that manage water but don't provide drinking water or that act only as wholesale water providers. Perhaps that distinction can be made.	The first sentence in that section defines water management-related entities as "including irrigation districts, water districts, community services areas, and community service districts". The word "entities" is a generic term for any organization that has anything to do with water management. The text has been edited to more clearly define the term.
5	Jennifer Clary, CWA	2.2.5.2	Can you please either clarify or eliminate the sentence "Mutual water companies are frequently classified as SSWS." Size, not governance, determines whether a system is classified as a state small water system. If you've discovered that most of the SSWS in this basin are mutual water companies, you can certainly make that statement here, but it's unclear why you would do so, as the governance structure has no impact on the Early Action Plan. Also, this plan deals with 2 counties. I think more specificity is called for than is provided in this statement "Typically, counties require submission of water quality samples annually (at most) for a smaller set of constituents than monitored by a PWS." Specifically, do Stanislaus and Merced counties require SSWS to test for nitrates; if so, how often is such testing required?	Text re mutual water companies removed. Regarding the specific testing regime in Stanislaus and Merced, the following information is from the counties: <u>Merced</u> - Require. SSWS to test and submit data. - Quarterly bacteria: total coliform, <i>E. coli</i> , fecal coliform - Annually nitrate - Triannually nitrite - Total coliform: if positive test, test again immediately and for fecal coliform/ <i>E. coli</i> , clean/chlorinate, continue to test/clean or address underlying issues until negative, then back to quarterly. - Nitrate/Nitrite: If they get a sample over half the MCL, required to test quarterly for four quarters and then find highest quarter and test at that time from then on at normal rate. - When system is first permitted: test inorganics (Title 22 Table 64431A, and Table 64444A, plus DBCP, EDB, Cr-6) <u>Stanislaus:</u> Follows the Title 22 regulations for State Smalls, the same as Merced County

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
6	Jennifer Clary, CWA	2.2.5.3	Can you explain the attempt to distinguish between domestic wells serving 2-4 homes and wells serving a single household? As far as I know only Monterey County makes this distinction in its regulatory oversight. How does this distinction impact the Early Action Plan? Why aren't Domestic Wells specifically called out in the text?	These counties do not distinguish between LSWS wells and Domestic Wells, as stated in the text. "Most counties regulate LSWS as if they were simply private wells - that is, they are unregulated except for the requirements associated with the drilling permit. Typically, no information is available to identify the difference between a single-household well and one used for a LSWS." The point of this exercise is to see how many people are drinking water from wells in the area, and if those wells are regulated or monitored. Distinguishing between LSWS and Domestic Wells is part of that effort, although that distinction is not made in Stanislaus and Merced Counties.
7	Walt Plachta, Central Valley Water Board (CVWB)	3.4	The methodology proposed for assessing groundwater conditions includes calculating an average nitrate concentration for each well for the years 2000-2018, and averaging those annual averages to identify a single value stated to represent recent conditions. This approach has the potential to significantly underestimate the current nitrate concentration in numerous wells, especially those which have more recently begun to exceed the MCL for nitrate. As a result, there may be numerous residences which are omitted from the described outreach efforts and are left unaware that their well is potentially unsafe to use as a drinking water source or that various methods of accessing safe drinking water have been made available to them.	The purpose of the Preliminary Management Zone Proposal is to provide an "initial assessment" of nitrate conditions that uses readily available data. The focus relies heavily on the previous CV-SALTS ambient nitrate dataset and established methodology for determining ambient conditions (see e.g., CV-SALTS 2016) as well as the Salt and Nitrate Management Plan. CV-SALTS trend data has been added to the Initial Assessment section of the Proposal to identify areas where nitrate concentrations indicate degrading water quality, but this dataset is insufficient to get a good sense of where groundwater is degrading or improving. Although it may seem ideal to limit the nitrate data to only incorporate recent data (e.g. the last 5 years), that reduces the amount of data points needed to do a valid assessment of ambient nitrate across the entire Management Zone area, producing a map with potentially even more data gaps. A comparison of ambient post-2000 average well nitrate concentrations to maximum post-2000 well nitrate concentrations shows that the maximum nitrate is quite similar to the average nitrate. Two additional figures were created and presented to address this comment - a trend map showing the CV-SALTS High Resolution trends analysis (for individual wells with significant trends and post-2000 data); and a maximum post-2000 nitrate map that compares the average-based interpolated ambient post-2000 nitrate to the maximum post-2000 nitrate for individual wells. These are new figures 3-9 and 3-10
8	Walt Plachta, CVWB	3.4	There appear to be a significant number of potential domestic wells in identified "gap" areas where insufficient data exist to do a spatial interpolation of ambient nitrate conditions. Identifying data to fill these gaps should be a high priority for the Management Zone. The Irrigated Lands Regulatory Program's on-farm drinking water supply well monitoring requirement and Groundwater Trend Monitoring Program should produce data for these areas in the near term, and should be incorporated in the assessment when they become available.	Agreed. The ILRP domestic well data would make an excellent addition to the dataset as is noted in Section 7 regarding updates to the groundwater assessment. As these data, or others, become available either during the development of the final Preliminary Management Zone Proposal or during development of the Final Management Zone Proposal they can be incorporated into the analysis.
9	Michael Niemi, TID	General	No comments	Thank you for your review.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

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10	Jennifer Clary, CWA	3.3	I'm a bit confused by Table 3.2 "Basis for determining depth of the Upper Zone" According to the definition in the basin plan amendment, the upper zone is "the portion of groundwater basin, sub-basin or management zone from which most domestic wells draw water..." However, based on Table 3.2, it would appear that domestic well screening is weighted at just 40%. At the same time top perforations of ag wells, Urban PWS, Rural PWS and DDW systems are weighted at 60%. This is problematic for several reasons. First, we want to ensure that the upper zone is properly defined to be inclusive of "most" domestic wells. Second, rural PWS wells are generally comparable in depth to domestic wells – in fact, USGS used small PWS as a proxy for domestic wells in some of its shallow groundwater inspections. Third, this table double counts PWS by including both Urban, Rural and DDW systems. It would be helpful to understand why this weighting method was chosen and why this is considered a better measurement than simply using the lower screening level of domestic wells and rural PWS. Finally, in your narrative describing Figure 3-5 (Depth to bottom of Upper Zone), you talk about the level compared with the depth of the Corcoran Clay level. Can you explicitly identify where the Upper Zone extends to the top of the Corcoran Clay layer?	The delineation and development of the Upper, Lower, and Production Zones was already developed, peer-reviewed, and approved as part of the development of the Salt and Nitrate Management Plan and approval of the Central Valley Water Board Basin Plan amendment. This established methodology for dividing the aquifer into more meaningful units allows for the categorization of nitrate groundwater quality data for better characterization of the subsurface conditions. Please refer to Section 2 of CV-SALTS (2016): "Region 5: Updated Groundwater Quality Analysis and High Resolution Mapping for Central Valley Salt and Nitrate Management Plan, June 2016". (https://www.cvsalinity.org/committees/technical-advisory/conceptual-model-developments/171-updated-groundwater-quality-analysis-for-central-valley.html). This section describes the development and vetting that went into the role of the Corcoran Clay and the various weighting of well perforations and construction information.
11	Jennifer Clary, CWA	Figure 3-8	This figure is useful in showing nitrate exceedance data, but it would be more useful, to the extent same-well data is available, to show trends in nitrate concentrations. This would give us an understanding of where to prioritize additional testing to find out-of-compliance wells. We suggest an additional map with that information.	Readily-available nitrate trends data for wells in the Upper Zone is provided from the High Resolution CV-SALTS geodatabase (CV-SALTS 2016), and is included as a new figure in the document. Link to referenced document is provided in previous response.
Early Action Plan				
1	Walt Plachta, RWQCB	General	The EAP describes a screening process to remove residences that are identified as Members (owned by Members?) of a Coalition. This filtering is based on the assumption that outreach will occur through the ILRP program, but the EAP does not describe how that outreach would occur. If it is referring to the on-farm drinking water supply well sampling and notification requirement, that may not be a dependable mechanism to reach affected residents. The primary concerns would be that a) there may be a number of Members required to sample drinking water supply wells which do not and b) the required Drinking Water Notification Template does not identify alternative water sources that would be made available through the EAP.	Thank you for the comment. This process will need to be developed in collaboration with the Coalition. No revision to address this comment has yet been included in the revised EAP; instead a placeholder note has been added as a reminder of the need to describe this process.
2	Walt Plachta, CVWB	General	Assuming a long-term solution for addressing the drinking water needs of affected residents will take some time to develop/implement, it may be appropriate to repeat the assessment/outreach process on a regular basis. New tenants of properties may be unaware of existing water quality issues or alternative water supplies available to them.	Added two additional follow-up targeted outreach activities to address potential for new tenants or updated information. Modifications made to Section 5.1.2.3.1 (Mailout to Residents within EAP Area) and 6.1 (Implementation Schedule) to address this comment.
3	Michael Niemi, TID	General	No comments	Thank you for your review.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

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4	David Odom, Denair CSD	5.1.1.1	We do not support 24 hour operation at all, there is no reason for this to be necessary. It will be become a nuisance for anyone that lives near the filling station. Cars pulling up at 2am to get water making noise is not something we think is at all necessary.	Thank you for the comment. The reference to 24/7 in Section 5.1.1.1.1 has been revised to state: "Public access to the facility will be made available as many hours/day and week as possible. The goal is to identify locations where the facility can be open 24 hours/7 days per week, but it is recognized that (a) establishing facilities that are always open may not be possible in some areas; and (b) operation of a facility should not create noise impacts to local residents who may live near a facility. Accordingly, as part of the siting selection process and establishment of operational parameters for a facility, the potential impact of facility operation on adjacent properties will be considered during the site development process." We have also added a note that for a "vendor-supplied water facility" the hours of operation will be determined collaboratively with the owner of the facility.
5	David Odom, Denair CSD	5.1.1.1	Machines malfunction, we do not think our staff should be out all hours of the night with people calling about the filling station having a potential problem. Compensation was very lightly covered in the EAP and even stated "if needed"...we believe this is grossly understated and needs attention. Not only will there need to be compensation for the water, but for after hours calls, which we will get as the PWS when something goes wrong i.e. not working, stuck on and wasting water, homeless issues, garbage etc..	These are valid concerns and intended to be addressed through the agreement established with the land/property owner that agrees to host a filling station . To be more clear, in Section 5.1.1.2 the third bullet under "Establish the PAWF" was revised to state: "Establish agreements/contracts as needed to (a) establish operational procedures (e.g., responsibilities for problems that arise during operation such as malfunctions, misuse or vandalism, etc.), (b) ensure appropriate O&M occurs at the facility; (c) and determine how the land/property owner will be compensated for water obtained from the filling station."
6	David Odom, Denair CSD	5.1.1.1	Another concern is misuse or vandalize, if this becomes an issue, there will be an immediate need for some type of private security. PWS should not have to have any concern or responsibility for the potential negative impacts around the water filling station.	Regarding compensation, it is not the intent of the EAP to provide free water. The phrase "if needed" was removed from section 5.3.1 as it will be up to each land/property owner that hosts a filling station to address issues such as appropriate compensation (see above revision to Section 5.1.1.2).
7	David Odom, Denair CSD	5.1.1.1	We strongly feel that using an existing company like Watermill should be contracted with as to remove the PWS from all responsibility and liability. We also do not support free water as it will most likely cause water filling companies to have major revenue loss which would lead to jobs lost in our area.	Site selection will be done collectively as a Management Zone. Filling stations do not have to be located at a PWS. They only need to be connected to a water system that has water that meets drinking water standards. The EAP does not provide free water nor is intended to cause a revenue loss for a water provider. Each filling station will be metered to determine usage and the Management Zone will compensate the entity to which the filling station is connected. See also response to previous comments.
8	David Odom, Denair CSD	5.1.1.1	If a PWS has a water filling station that causes multiple issues within a certain timeframe, we should have an opt out clause somewhere to protect the utility.	Per Section 5.1.1.2, an agreement will be established with each land/property owner where a filling station is established. The issues of concern noted here could be included in such an agreement.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
9	Jennifer Clary, CWA	1.5	Annual review of the items listed here is not adequate; in particular, establishment of the Alternative Water Program will almost certainly require ongoing actions to ensure that it functions as planned. I suggest that annual reporting be used to report to the Board on the number of residents taking part in the system, the scope and number of outreach activities, and an enumeration of implementation challenges and how they were addressed	Reporting (Section 5.4) occurs at 6 months, 1 year and then annually thereafter. In this regard, there is bit of a disconnect between this section (which says annual) and Section 5.4, which includes the 6 month report. Revised Section 1.5 to make sections consistent. Nothing in this document prevents reviews occurring more frequently; instead it requires a review at least during preparation of each status report. Section 1.5 revised to make this more clear.
10	Jennifer Clary, CWA	2.1	We object to using “average ambient nitrate concentrations since 2000” to identify nitrate-impacted areas. Nitrate impacts have generally increased over time, so averaging data over a 20-year period effectively masks trends of increasing nitrate concentration. We recommend a) using only the most recent well result to determine ambient nitrate concentration and b) development of a trend analysis using those wells with multiple test results. The latter will allow the identification of problem areas that may not yet be out of compliance, but where trends indicate a trend towards non-compliance.	The initial assessment of nitrate conditions for this effort uses readily available data. The focus relies heavily on the previous CV-SALTS ambient nitrate dataset and established methodology for determining ambient conditions (see for example CV-SALTS 2016 - see Draft Preliminary Management Zone Proposal for reference). CV-SALTS trend data has been added to the Initial Assessment section of the Preliminary Management Zone Proposal (Section 3.4) to identify areas where nitrate concentrations indicate degrading water quality, but this dataset is insufficient to get a good sense of where groundwater is degrading or improving. Although it may seem ideal to limit the nitrate data to only incorporate recent data (e.g. the last 5 years), that reduces the amount of data points needed to do a valid assessment of ambient nitrate across the entire Management Zone area, producing a map with potentially even more data gaps. A comparison of ambient post-2000 average well nitrate concentrations to maximum post-2000 well nitrate concentrations shows that the maximum nitrate is quite similar to the average nitrate. Two additional figures were created and presented in Section 3 of the Preliminary Management Zone Proposal to address this comment - a trend map showing the CV-SALTS High Resolution trends analysis (for individual wells with significant trends and post-2000 data) (new Figure 3-9); and a maximum post-2000 nitrate map that compares the average-based interpolated ambient post-2000 nitrate to the maximum post-2000 nitrate for individual wells (new Figure 3-10). The maximum post-2000 nitrate map is more useful to address the concern of this comment due to the scarcity of significant trend data in the Management Zone.
11	Jennifer Clary, CWA	2.2.2	As mentioned in our comments on draft Ch. 2, the reference is Mutual Water Systems is not useful and should be deleted. Also, as mentioned in our draft comments, the Early Action Plan does not apply to “most counties”: it applies to Stanislaus and Merced Counties. Please be specific about what these two counties may or may not cover in the way of data for state small water systems.	The generality of the statement is provided for the reader to get a sense of how Stanislaus and Merced Counties fit into the state’s handling of small water systems. More specific information for the Management Zone itself is also provided in the Preliminary Management Zone Proposal (Section 2)
12	Jennifer Clary, CWA	2.2.3	As mentioned in our draft comments on chapter 2, it’s unclear why this terminology is used rather than a direct reference to domestic wells, which are a responsibility of the Early Action Plan. Is it the intent of the plan to exclude domestic wells that serve a single household? If not, the name of this section should be changed to “Domestic Wells”	These counties do not distinguish between LSWS wells and Domestic Wells, as stated in the text. “Most counties regulate LSWS as if they were simply private wells - that is, they are unregulated except for the requirements associated with the drilling permit. Typically, no information is available to identify the difference between a single-household well and one used for a LSWS.” The point of this exercise is to see how many people are drinking water from wells in the area, and if those wells are regulated or monitored. Distinguishing between LSWS and Domestic Wells is part of that effort, although that distinction is not made in Stanislaus and Merced Counties.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

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13	Jennifer Clary, CWA	2.3	Figure 2-2 contains too much information to distill the actual data of what is in compliance and what is not. What would be helpful would be to show only the wells that have been tested and of those, identify those that have exceeded the nitrate standard and their current level of treatment. Figure 2-3 is similarly challenged by having written rather than color-coded information about the current status of out-of-compliance wells. It would be helpful to understand how multiple data points for a single well are handled. For instance, if a well has multiple testing results for nitrate over several years, only the most recent data should be used to develop ambient nitrate concentration. Is that how this is being calculated? If not, can you please clarify? It would also be helpful to include a table using nitrate trend data in order to identify where currently in-compliance wells might be most at risk of falling out of compliance in the near future.	Trends and maximum post-2000 nitrate was included in Section 3 of the Preliminary Management Proposal (see new Figures 3-9 and 3-10, respectively)
14	Jennifer Clary, CWA	2.3	We appreciate the grouping of wells into categories according to nitrate data. It would also be helpful to include a table with nitrate trend data in order to identify where currently in-compliance wells might be most at risk of falling out of compliance in the near future.	Trends and maximum post-2000 nitrate was included in Section 3 of the Preliminary Management Proposal (see new Figures 3-9 and 3-10, respectively)
15	Jennifer Clary, CWA	3.2	Can you clarify that "replacement water" in this context means a permanent alternative source? "Well testing is no longer necessary if a drinking water well is taken out of service or no longer provides drinking water, including where the well is taken out of service because sufficient replacement water is being supplied."	The quoted language from Section 3.2 comes from the Drinking Water Supply Well Monitoring section of the East San Joaquin Order. There is no clear indication that the intent of the wording from this source is intended to mean "permanent" as part of its context. Given that the text in Section 3.2 of the EAP is intended to be a summary of what is required by the Order, it is best to not modify the text as stated in the Order.
16	Jennifer Clary, CWA	5.1.1.1.1	Rather than specifying that "annual maintenance will be documented in the EAP status reports" We recommend that this section refer to "ongoing maintenance."	Text revised.
17	Jennifer Clary, CWA	5.1.2	We think the program should consider contracting with one or more well-known service providers to ensure that experienced, knowledgeable and non-conflicted persons are the contact for residents.	Thank you for the comment. This is something the Management Zone can consider as part of the implementation of the EAP.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
18	Jennifer Clary, CWA	5.1.2	Bottled Water Delivery. Please identify how a level of 50 gallons per month was established as the appropriate delivery volume for a family of 4? This provide about 1.5 liters per person per day, which is well under the recommended minimum of 2 liters per day by the World Health Organization, and even lower than the recommended intake of 3.7 liters per day for men and 2.7 liters per day for women recommended by the National Academies of Sciences, Engineering and Medicine. While we appreciate the promised follow-up, we think the program should start out by providing a minimum of 2 liters/person/day.	Thank you for the comment. We agree the 50 gallons/month/household of four should be revised. Given the information and range of recommendations provided in this comment and comment numbers 25, 34 and 35 (see below), the selection of a minimum delivery volume should be discussed more broadly by the Management Zone before selecting an appropriate number for inclusion in the EAP. For now, the EAP has been revised in two places: (a) Section 5.1.2.1 now states: "The initial volume of water delivered on a monthly basis to a household will be _____ [Placeholder to allow additional discussion by Management Zone] . This initial volume may be modified at an individual residence as discussed in Section 5.1.2.3.4." (b) With regards to Bottled Water Delivery, Section 5.1.2.3.4 now states: "Approximately three months after implementation of an AWP at a residence, the Management Zone will contact the residence to verify one of the following: (a) the amount of bottled water being provided on a monthly basis is sufficient; if the current volume is too much or too little, the Management Zone will work with the resident on determining an appropriate volume to deliver..."
19	Jennifer Clary, CWA	5.1.2	Point-of-use treatment system. If maintenance of the POU is withdrawn due to a permanent resolution of water supply, the filter should be removed or the customer required to sign a waiver – in an appropriate language – stating that they understand the maintenance requirements of the system.	Added text to 5.1.2.3.3.
20	Jennifer Clary, CWA	5.2.3	For this program to be successful, multiple types of community contact must be included. Social contacts such as clubs, schools and churches provide an excellent opportunity to inform residents of the interim water supply options. Additionally, social service providers such as the county departments of public health, senior services, and social service providers such as El Concilio could easily include this option with the services already provided. Clean Water Action collaborated with Community Water Center and the Union of Concerned Scientists on a stakeholder engagement report for SGMA that includes basic advice on outreach and engagement as well as case studies from around the state – including one from Turlock – you can find the report here. It provides some helpful information about reaching out to community members. We strongly urge the MZ committee to contract with a qualified 3rd party to conduct this engagement.	Thank you for the information/report. The intent of the Community Outreach section is to implement multiple types of community contacts, e.g., see Sections 5.2.3, 5.2.4, and 5.2.5.
21	Jennifer Clary, CWA	5.2.4	Once again, we urge that you a) engage qualified 3rd parties to conduct this engagement and b) that you not hold stand-alone meetings but contact people where they are already gathering, such as church, community events or shopping.	The Management Zone will evaluate the best approach to implement community outreach activities when the EAP is being implemented.
22	Lisa Hunt, American Rivers (AR)	2	If I am interpreting correctly, nitrate-impacted areas are defined as locations where average recent nitrate concentrations measured from 2000-2018 in the Upper Zone exceed the MCL. Averaging over an 18 year period could misrepresent areas where recent concentrations are higher than the MCL, but previous concentrations are lower. Defining impacted areas based solely on average concentrations over an 18 year period is not appropriate. Recent trends should be considered as well. Although it is important to take into consideration all available data, what we should be most concerned with are current conditions, which may be vastly different than 18 years ago.	To ensure that the ambient interpolated nitrate areas are appropriate, the Preliminary Management Zone Proposal provides readily available trend data and maximum post-2000 nitrate data, which agree well with the nitrate-impacted areas.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
23	Lisa Hunt, AR	2.4	What is the basis for the assumption that any domestic wells within the boundaries of a PWS would not be used for drinking? Some kind of evaluation should be done before making this assumption.	For the purpose of looking at alternative water supplies, if a house is within the service area of a Public Water System, it seems reasonable to utilize the Public Water System's water.
24	Lisa Hunt, AR	5	It appears that even in highly impacted areas, residents may have to travel up to about 6 miles to reach a kiosk location, which is a major inconvenience. More kiosks should be provided, especially in highly impacted areas.	The document states that the presentation of filling stations (number and area served) is "for planning purposes only". Having an estimated number and general location to target for siting is needed to support development of a cost and schedule for implementation. In other sections of the document it is stated that the need for additional filling stations will be evaluated (e.g., Sections 1.5 and 5.3.1). In addition, the Table 6-1 schedule considers the potential the need for more than the eight filling stations as initially planned.
25	Lisa Hunt, AR	5	For bottled water delivery, 50 gallons of water per month for a family of four is not sufficient to cover drinking and cooking needs.	See response to Comment No. 18
26	Lisa Hunt, AR	5	Residents should not be considered ineligible for the Alternative Water Program if a single grab sample has a nitrate concentration below the MCL, because a single sample is not representative of average exposure over time. If a single sample is to be used to determine eligibility, the threshold should be below the MCL (5 mg/L might be reasonable).	The 10 mg/L water quality objective is also the federal MCL for nitrate. Exposure is considered when establishing appropriate pollutant thresholds. The approach is consistent with the State Water Board's East San Joaquin Water Quality Order (see Section 3.2). This Order requires well testing annually; there is no requirement for averaging multiple samples. Exceedance of the 10 mg/L objective is the threshold for action. If the three annual samples show 8 mg/L or less then the testing frequency can be reduced.
27	Lisa Hunt, AR	5	Why are English and Spanish the only languages included for outreach? What kind of evaluation was done to select these languages?	Text was revised as needed to indicate that the Management Zone will evaluate language needs as part of Community outreach, e.g., see Section 5.2 opening paragraph.
28	Lisa Hunt, AR	5	Community outreach meetings should be offered during evenings and/or weekends when residents are more likely to be available.	Following text was added to Section 5.2.4: "Meetings will be scheduled on days or at times that best meet the needs of the community."
29	Aysha Massell, AR	2	Understanding current conditions as well as trends is an important analysis. Hopefully this will be analyzed more in depth in the PMZP; however, I recommend that the EAP take another look at current conditions (i.e. within the last 5 years of data) to see if more areas are negatively impacted by nitrates than currently mapped.	Trends and maximum post-2000 nitrate was included in Section 3 of the PMZP.
30	Aysha Massell, AR	5.1.1	Nowhere does the EAP state a maximum radius of the circles, it just illustrates for planning purposes a radius of 5 miles. The EAP does not require this maximum nor state it as an aspirational goal. Given that ease of access is absolutely needed in this EAP, and proximity is part of the ease of access, I recommend you state the maximum diameter as a clear requirement or at least a goal.	As noted in the document the size and illustration of the circles is for planning purposes only. The size area of a planning area for locating a water filling station should remain somewhat flexible given challenges expected in locating sites in some areas.
31	Aysha Massell, AR	5.1.1	My comment during the first round regarding the 10 mile diameter number (comment 32 in your table) was addressed in the response to the comments by stating that it was developed as part of an exercise and that a state water board settlement agreement included a 10-15 mile diameter. However, no explanation is given in the EAP text. I recommend you explain how you arrive at this number, and reference the settlement agreement and/or planning process that got you to a 10 mile diameter.	The 10-15 mile diameter is conceptual as shown in Exhibit B of the Settlement Agreement. It has no special meaning so we have not cited it here. We are using it for planning purposes as is stated in the document. In the end it will be up to the Management Zone to decide if that is an appropriate size or not. This decision may be driven by local factors.

Comment/Response Summary: July 2019 Draft Turlock Management Zone Documents

No.	Commenter	Section	Comment	Response
32	Aysha Massell, AR	Figure 5-1	The text references a 10 mile diameter for the targeted planning areas, but the diameters in Figure 5-1 are larger, about 12-13 miles. Even though the figure is conceptual at this stage, it should accurately reflect the numbers referenced in the text.	Reviewer is correct. The intended radius and map scale do not correspond. This will be corrected in the final deliverable under the Pilot Study.
33	Aysha Massell, AR	5.1.1.1	The 24/7 aspirational hours of operation is good. In addition there should be minimum hours stated in this plan (i.e. at minimum 6 am - 10 pm)	Agree with the comment in principal, but want to be careful about too many prescriptive statements that may limit selection of locations, especially in rural areas where it cannot be guaranteed, at least at this time, that a 6 am to 10 pm minimum can always be complied with. Currently the document states that (a) "public access to the facility will be made available as many hours/day and week as possible", and (b) the goal is 24/7. These statements combined direct the Management Zone to maximize availability.
34	Aysha Massell, AR	5.1.2.1	50 gallons/household/month is unacceptably far below water requirements. Did you mean per week? Even that is scraping the lower limits of the World Health Organization's minimum requirements for water needs during emergency situations. According to the WHO (see link here), just for survival and cooking an individual needs at least 5.5 - 9 liters per day (or 1.5-2.4 gallons per day)* depending on climate and other factors (and we know people in the Central Valley are subject to high temperatures during summer, and therefore will likely require the upper end of this scale). For a family of four over 30 days, this equals 180-288 gallons per month. And this is just for an emergency (flood, earthquake, fire, etc.), not a long term situation. * Note that I excluded sanitation from the calculation, which establishes basic needs as follows: 7.5-15 lpd or 2-4 gpd for the individual and 240-480 gallons per month for a family of four.	See response to Comment No. 18
35	Aysha Massell, AR	5.1.2.1	I strongly recommend that developers of the EAP spend some time researching how much safe water a person/family needs for drinking and cooking over the long term (not emergencies) in order to live in dignity and health. This process should include talking to people who are currently impacted to understand how much they in fact need and use. This will give a realistic picture of how much the program will actually cost. I see you did in fact budget 50 gallons per month per family in the costs table - this dollar amount will be much higher because of the EAP's significant underestimation of water needs. Much better to get out in front of this and plan for realistic costs.	See response to Comment No. 18
36	Aysha Massell, AR	5.1.2.3.1	A person who applies and fails to meet the mg/L standard one year should be able to apply in subsequent years. This would address nitrate plumes that are expected to affect more communities in the future. In the draft EAP, residents who tested for 8 mg/L can have repeated annual testing, but what about others? I can imagine a situation where someone's wells test for 5 mg/L this year, and 10 mg/L in ten years. The EAP should establish an "open enrollment" process regardless of current levels, in anticipation of changing conditions in the future.	The opportunity for annual testing is consistent with the State Water Board's East San Joaquin Order, i.e., it also relies on annual testing. That Order also states that where a well does not exceed 8 mg/L for at least three years, the frequency of testing may be reduced.