

CHOWCHILLA MANAGEMENT ZONE EARLY ACTION PLAN

Attachment E

PREPARED FOR

MADERA COUNTY FARM BUREAU



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LIST OF ACRONYMS

Acronym	Definition
AB	Public Water Supply Well Status Abandoned
AR Difference	Difference Between Nitrogen Applied and Nitrogen Removed
AR Ratio	Ratio of Nitrogen Applied to Nitrogen Removed
AU	Public Water Supply Well Status Active Untreated
Basin Plans	Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin
BPA	Basin Plan Amendment
C	Public Water System Type Community
CDP	Census Designated Place

Acronym	Definition
Central Valley Water Board	Central Valley Regional Water Quality Control Board
CETHP	California Environmental Health Tracking Program
CIWQS	California Integrated Water Quality System
Coalition	East San Joaquin Water Quality Coalition
CVDRMP	Central Valley Dairy Representative Monitoring Program
CVHM2	Central Valley Hydrologic Model 2.0
CV-SALTS	Central Valley Salinity Alternatives for Long-term Sustainability
CVSC	Central Valley Salinity Coalition
CSD	Community Services District
CWD	Community Water District
CWS	Community Water System
DAC	Disadvantaged Community
DDW	Division of Drinking Water
DS	Public Water Supply Well Status Destroyed
DUC	Disadvantaged Unincorporated Community
DWR	California Department of Water Resources
EAP	Early Action Plan
ESJWQC	East San Joaquin Water Quality Coalition
FMZP	Final Management Zone Proposal
GAMA	Groundwater Ambient Monitoring and Assessment
GAR	Groundwater Quality Assessment Report
GIS	Geographic Information Systems
GQMP	Groundwater Quality Management Plan
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCM	Hydrologic Conceptual Model
ILRP	Irrigated Lands Regulatory Program
INMP	Irrigation and Nitrogen Management Plan
INMPSR	Irrigation and Nitrogen Management Plan Summary Report
IRWM	Integrated Regional Water Management
IX	Ion Exchange
LSWS	Local Small Water System
MCL	Maximum Contaminant Level
mg/L	milligrams per liter
mg/L as N	milligrams per liter as nitrogen
MHI	Median Household Income
MPEP	Management Practice Evaluation Program
MZIP	Management Zone Implementation Plan
N	Nitrogen
NMP	Nutrient Management Plan

Acronym	Definition
NO ₃ -N	Nitrate as Nitrogen
NO ₃ N	Nitrate as Nitrogen
NRCS	California Natural Resource Conservation Service
NTC	Notice to Comply
NTNC	Public Water System Type Non-Transient Non-Community
NWIS	National Water Information System
OAL	Office of Administrative Law
PMZP	Preliminary Management Zone Proposal
POU	Point of Use
PWS	Public Water System
RO	Reverse Osmosis
SDAC	Severely Disadvantaged Communities
SDWIS	Safe Drinking Water Information System
SGMA	Sustainable Groundwater Management Act
SNMP	Salt and Nitrate Management Plan
sq. mi	square mile
SSWS	State Small Water System
State Water Board	State Water Resources Control Board
TDS	Total Dissolved Solids
USGS	United States Geological Survey
WDR	Waste Discharge Requirements
WMP	Waste Management Plan
WWTF	Wastewater Treatment Facility
WWTP	Wastewater Treatment Plant

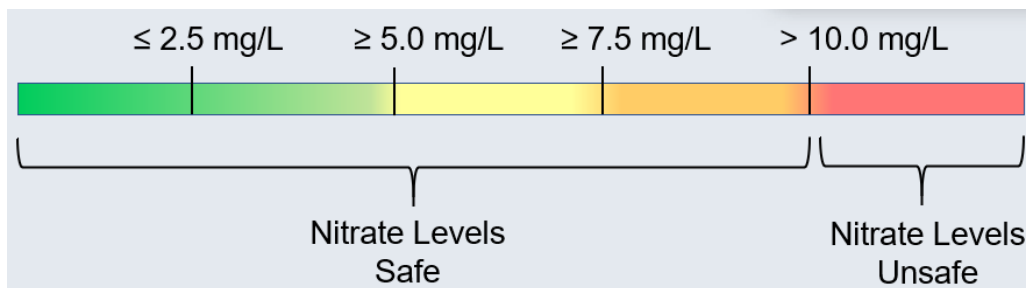
Executive Summary

ES 1. Background

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) has begun implementing a new Nitrate Control Program in the Central Valley that is designed to achieve three nitrate management goals:

- *Goal 1* – Ensure a safe drinking water supply;
- *Goal 2* – Reduce nitrate loading so that ongoing discharges neither threaten to degrade high quality waters absent appropriate findings by the Central Valley Board nor cause or contribute to exceedances of nitrate water quality objectives; and
- *Goal 3* – Implement long-term, managed restoration of impaired water bodies.

The Chowchilla Management Zone is being established to achieve these three goals. As required by the Nitrate Control Program, the Management Zone prepared this Early Action Plan (EAP), which identifies the initial actions that will be carried out to address drinking water being used by residences in the basin with unsafe nitrate levels (Figure ES-1). The key element of this EAP, which was developed in collaboration with the community, is the Interim Replacement Water Program. This Program provides immediate alternative sources of drinking water for residences that depend on groundwater that contains unsafe levels of nitrate used for drinking and cooking (water with more than 10 milligrams per liter nitrate as nitrogen (mg/L-N) .



Scale Showing Nitrate Safe and Unsafe Levels

ES 2. Identification of Nitrate-Impacted Areas

As described in more detail within the Preliminary Management Zone Proposal, nitrate groundwater data were requested, downloaded, and compiled using various publicly available sources and complemented by data requested from Madera, Merced, and Fresno County

departments. These nitrate groundwater data compilations were categorized into depth zones, following previously-developed CV-SALTS best management practices. Wells constructed in the Upper Zone of the groundwater system and with nitrate data since the year 2000 were used to determine recent average ambient nitrate conditions.

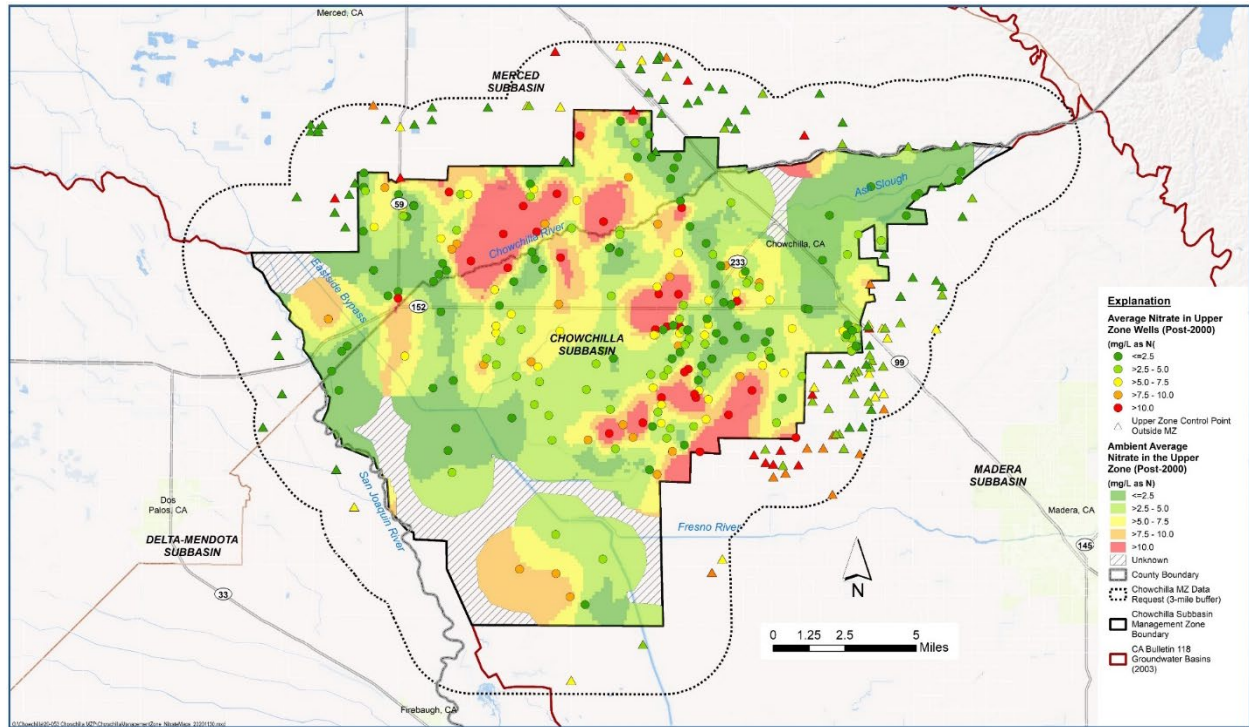
The Upper Zone average nitrate concentrations were used to produce a map showing the spatial interpolation of ambient nitrate conditions within the Management Zone. Using this map, it is possible to locate several nitrate-impacted areas that occur within the Management Zone. These areas are defined by average recent nitrate concentrations in the Upper Zone that exceed the drinking water Maximum Contaminant Level (MCL) of 10 milligrams per liter nitrate as nitrogen. As illustrated in Figure ES 1, there are several pockets of nitrate-impacted areas, mostly in the central portions of the Management Zone.

In addition to the map that shows several areas potentially impacted by nitrate in groundwater in the Upper Zone, the groundwater nitrate data compilation also contains all available public water system supply well nitrate sample results. From the available records downloaded from the State Division of Drinking Water¹, it appears that seven (7) public supply wells located within the Management Zone have exceeded the nitrate MCL in their past. None of the four (4) public water systems that these wells belong to have wells that are currently exceeding the drinking water standard for nitrate and are all in compliance with Title 22 Drinking Water Standards (as of January 2021). The public water systems that had experienced nitrate problems have all taken steps to solve their problems by deepening, replacing, abandoning, or destroying problem wells.

Continuing with this effort to identify nitrate-impacted areas, the spatial interpolation map of ambient nitrate conditions in the Upper Zone was overlain by known public water system boundaries and approximate domestic well locations. An estimate of approximately 64 domestic wells located outside of known public water system boundaries are located within mapped areas with estimated Upper Zone ambient nitrate above the safe drinking water standard (of 10 milligrams per liter nitrate as nitrogen). Using census block data from the 2010 U.S. Census, the estimated population of residents living outside known public water system boundaries and within mapped areas with potentially unsafe drinking water (estimated Upper Zone ambient nitrate above the MCL) is just over 400.

¹ Public Supply Well nitrate data was acquired from the Division of Drinking Water (https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDTlibrary.html) accessed December 2020.

Figure ES-1. Ambient Post-2000 Nitrate Concentrations in the Upper Zone of Groundwater in the Chowchilla Management Zone



ES 3. Identification of Potentially Affected Areas

A key component of the EAP is identification of residents or other entities in the Chowchilla Management Zone that may be obtaining their drinking water from a well impacted by nitrate levels that exceed 10 mg/L-N. The Management Zone will target some of its outreach efforts specifically to those identified as being most likely impacted by elevated nitrate. This targeted outreach will occur at the same time the Management Zone is implementing general community outreach activities to the entire Management Zone. The process to identify residents or other entities in potentially affected areas will begin immediately upon EAP implementation using the steps described.

ES 4. Community Outreach Program

The Management Zone conducted a series of community outreach meetings to obtain input on the development of this EAP. During February 2021 the Management Zone provided the public

with an opportunity to review the proposed Interim Replacement Water Program. This EAP reflects the input received from the public. General community outreach will continue during EAP implementation through a variety of mechanisms including regular community meetings, sharing information through the Management Zone's website or through entities that are locally collaborating with the Management Zone's efforts to provide safe drinking water. In addition to this ongoing broad community outreach, this EAP includes a program to outreach directly to residences in areas most likely to have domestic wells contaminated by nitrate.

ES 5. Interim Replacement Water Program

The Interim Replacement Water Program provides an immediate solution for those currently experiencing unsafe levels of nitrate in their drinking water source. However, these solutions are only temporary and will eventually be replaced by long-term, permanent solutions.

There are two key options to obtain safe water at no cost to a resident of the Management Zone: (a) home bottled water delivery; or (b) installation of a Point-of-Use (POU) treatment system in your home. A residence may receive these alternative water options if the resident can answer yes to the following three statements:

1. My home is in the Chowchilla Management Zone;
2. I am willing to sign an agreement with the Management Zone's service provider; and
3. My well has unsafe nitrate levels (> 10 mg/L-N) (see Figure ES-1) as determined by a water quality analysis conducted by a certified laboratory

If you do not know if your well water has unsafe nitrate levels, contact the Management Zone (INSERT URL) and they will send a representative to your home to test your well at no cost to you. Results from the nitrate test, which will be provided to you will be used to determine the next steps. Most importantly, if your nitrate levels are unsafe the Management Zone will work with you immediately to obtain a safe source of drinking water. If nitrate levels are high (> 8 mg/L-N) but safe the Management Zone will offer the opportunity to have your well tested again at no cost to you in the future.

Finally, the Management Zone may also install one or more local water fill stations in the Management Zone based on the needs of the community. If this option becomes available, outreach will be conducted in the community to advise residents of the availability of this alternative water source. All established fill stations will use a certified source of safe and free drinking water and will be available to the entire community at no cost.

ES 6. Early Action Plan Implementation

The Management Zone will begin implementation of the EAP by May 7, 2021. A community outreach meeting will be held in May to kick-off the implementation of the program and inform

residents regarding how to participate in the Interim Replacement Water Program. The Management Zone will also continue in its outreach to the community regarding the need and/or approach for developing water fill stations.

1. BACKGROUND

1.1. Regulatory Requirements

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) established a Nitrate Control Program for the Central Valley Region of California that became effective January 17, 2020. One of the key goals of this Program is to ensure that a safe drinking water supply is available to residents affected by high levels of nitrate in the groundwater that is the source of their drinking water.

To implement the Nitrate Control Program the Central Valley Water Board sent out Notices to Comply to permitted dischargers (e.g., growers, dairies, poultry farms, wastewater treatment and composting facilities) in the Chowchilla Subbasin on May 29, 2020. To comply with requirements of this Program, permitted dischargers have opted to work collectively through the establishment of a nitrate Management Zone.

The Management Zone is required to develop an Early Action Plan (EAP), which is defined in the Nitrate Control Program as: “a plan that identifies specific activities, and a schedule for implementing those activities, that will be undertaken to ensure immediate access to safe drinking water for those who are dependent on groundwater from wells that exceed the primary maximum contaminant level (MCL) for nitrate” (Central Valley Water Board, 2018; page 83). The MCL is 10 milligrams/liter nitrate as nitrogen (mg/L-N). The provisions in the EAP to provide access to safe drinking water to those impacted by nitrate contamination in groundwater are temporary. These provisions will be replaced when permanent solutions are implemented through an approved Management Zone Implementation Plan (MZIP).

The Nitrate Control Program requires that the EAP include the following elements (Central Valley Water Board, 2020):

- A process to identify affected residents and the outreach utilized to ensure that impacted groundwater users are informed of and given the opportunity to participate in the development of proposed solutions;
- A process for coordinating with others that are not dischargers to address drinking water issues, which must include consideration of coordinating with impacted communities, domestic well users and their representatives, the State Water Resources Control Board’s (State Water Board) Division of Drinking Water (DDW), Local Planning Departments, Local County Health Officials, Sustainable Groundwater Management Agencies (SGMA) and others as appropriate;
- Specific actions and a schedule of implementation that is as short as practicable to address the immediate drinking water needs of those initially identified within the management zone, or area of contribution for a Path A discharger, that are drinking

groundwater that exceeds nitrate standards and that do not otherwise have interim replacement water that meets drinking water standards; and

- A funding mechanism for implementing the EAP, which may include seeking funding from Management Zone participants, and/or local, state and federal funds that are available for such purposes.

This EAP was submitted to the Central Valley Water Board as an attachment to the Chowchilla Management Zone's Preliminary Management Zone Proposal (PMZP), March 8, 2021. The implementation of this EAP will begin within 60 days of submittal, or by May 7, 2021, unless the Central Valley Water Board notifies the Chowchilla Management Zone that this EAP is incomplete. If deemed incomplete, the Management Zone will work with the Central Valley Water Board in a timely manner to address their concerns.

1.2. Community Participation

This EAP was developed in collaboration with community residents and other stakeholders in the Chowchilla Subbasin in accordance with the Chowchilla Subbasin Nitrate Control Program Communication and Engagement Plan (CEP) (see **Appendix A-1** to review the CEP). Community engagement activities were conducted in a manner consistent with guidance prepared by the State Water Resources Control Board (State Water Board, 2020) (see **Appendix A-2**). The subsections below provide a general overview of the elements of the CEP and the outreach activities completed during development of this EAP.

1.2.1. Nitrate Control Program Communication and Engagement Plan

The Chowchilla Management Zone developed the CEP to provide a communications strategy to engage stakeholders, including community residents, in the development of the PMZP and EAP. CEP implementation focused on accomplishing the following goals:

- Educate stakeholders about: (a) Nitrate Control Program and its requirements; (b) the permitted dischargers operating in the Management Zone; (c) potential changes to current nitrogen management under the Nitrate Control Program; and (d) how stakeholders will be represented in the PMZP and EAP development process;
- Communicate important Nitrate Control Program deadlines and dates;
- Coordinate outreach and engagement activities among permitted dischargers to ensure efficiencies and to support stakeholders in PMZP and EAP development;
- Articulate strategies and channels for gaining ongoing stakeholder input and feedback to inform PMZP and EAP design and development; and
- Encourage stakeholder engagement by communicating dedicated Nitrate Control Program outreach strategies and channels, including meeting and workshop dates and

content, as opportunities for stakeholders to provide input in the PMZP and EAP decision-making and planning processes.

1.2.2. Community Outreach Activities

Diverse approaches were used to notify stakeholders and community residents regarding development of the EAP. To facilitate outreach efforts, the Chowchilla Management Zone partnered with Self-Help Enterprises (SHE) to not only directly support outreach activities but also provide guidance on approaches to reach community residents and provide input on this EAP. SHE provided support in the following areas:

- Developing the Management Zone outreach and engagement plan;
- Preparing English/Spanish outreach and meeting materials (e.g., flyers, posters, calendar listings, social media messages, radio outreach);
- Conducting community outreach, including, e.g., canvassing the local community (to the extent possible given COVID restrictions);
- Provide Spanish translation and interpretation services;
- Participating in community outreach meetings; and
- Review and comment on this EAP.

Key Management Zone outreach activities completed during the development of this EAP are described below (see **Appendix B** for additional documentation as well as in the main Preliminary Management Zone Proposal within Sections 1.4 and 4.2).

1.2.2.1. Community Outreach Meetings

Due to state directives during the COVID pandemic all community outreach meetings were held online using a ZOOM Webinar platform with Spanish translation provided. This approach is consistent with state-provided guidance (State Water Board, 2020). Three community outreach meetings were held during EAP development:

- *October 16, 2020* – The meeting presentation focused on: (a) What is the Nitrate Control Program? (b) Who needs to be involved; and (c) Where is drinking water affected and what are the solutions? The EAP was introduced to the community as the mechanism to implement early actions or short-term solutions to address nitrate contamination concerns.
- *December 11, 2020* – This meeting presented information on: (a) nitrate water quality conditions in the Management Zone area and identified areas where domestic wells are most likely impacted by nitrate; (b) early actions being considered for inclusion in an interim replacement water program; and (c) information about how the public can contribute to the EAP development process.

- *January 29, 2021* – This meeting presented: (a) updated information on nitrate water quality conditions in the Management Zone area and areas where domestic wells are most likely impacted by nitrate; (b) the draft Interim Replacement Water Program planned for implementation through the EAP, including bottled water delivery, Point-of-Use (POU) treatment system installation and water fill stations; and (c) how the public may comment on the draft EAP available for public review and continue to participate in the program during EAP development implementation.

Appendix B-1 provides the presentations delivered at each of these meetings and summarizes meeting participation by stakeholders.

1.2.2.2. Public Meeting Notices and Neighborhood Canvassing

To inform the community of Management Zone efforts to develop the EAP, the following activities were conducted:

- Chowchilla Management Zone engaged with Self-Help Enterprises (SHE) via the contract with the Central Valley Salinity Coalition for outreach services with other Priority 1 areas. In addition, the Chowchilla Management Zone contracted directly with SHE for specific outreach for the Chowchilla Management Zone.
- SHE prepared public meeting notices (“flyers”) in English and Spanish for distribution to the community via email or physical posting (see **Appendix B-2**). These flyers directed residents to contact SHE for more information.
- Chowchilla Management Zone sent out meeting flyers to its mailing list via email (see list of interested parties in CEP, **Appendix A-1**).
- SHE canvassed areas of the Chowchilla Management Zone in advance of community outreach meetings to the extent possible given COVID restrictions. These efforts included:
 - *October 16 Meeting* – On October 9, SHE targeted school district offices (Dairyland School District, Dixieland School District, and Chowchilla Elementary School District) and public areas (Chowchilla City Hall, Chowchilla Post Office, supermarkets, and gas stations) to provide information regarding the upcoming October 16 meeting. School Districts stated that the information would be shared via school newsletter to parents and the flyer would be sent out via the email list serve. Flyers were placed outside of supermarkets, gas stations, where the public would be able to view and take pictures of meeting information.
 - *December 11 Meeting* – Prior to this meeting SHE posted the flyer prepared specifically for this meeting (see **Appendix B-2**).
 - *January 29 Meeting* - Placeholder

1.2.2.3. Community Surveys

The Management Zone sent out an electronic survey with polling questions during the December 11 community public meeting in both English and Spanish. **Appendix B-3** provides the survey questions sent out and a summary of responses received.

1.2.2.4. Management Zone Website

Madera County hosts the Chowchilla Management Zone's website: <https://www.maderacountywater.com/cv-salts/>. The website includes a Storymap (<https://storymaps.arcgis.com/stories/b7a902ac42b743548d461dddf9c97e75>) that provides an easily understood summary of nitrate water quality concerns in the Management Zone and ongoing efforts to develop this EAP.

1.2.2.5. Outreach to Non-discharger Stakeholders

The CEP includes a list of interested parties representing a diverse group of stakeholders in the Management Zone area (see **Appendix A-1**). Many of these interested parties are non-dischargers, but they have interest in ensuring the local community has access to safe drinking water. These interested parties were notified of all outreach activities.

1.2.2.6. Public Review Opportunities

The Chowchilla Management Zone provided stakeholders, including local community residents, the opportunity to review a public draft of this EAP. Stakeholders were notified that the public draft was available for review and comment on January 29, 2021; comments to the Management Zone were due by February 22, 2021. To notify residents of the opportunity to review this document, the following notification activities were conducted:

- Introduction of the documents (document contents, where to find them, and how to provide comments/review) presented during January 29, 2021 Public Outreach Meeting
- Notification of documents available on Madera County website, Madera County Farm Bureau website, City of Chowchilla website, and Self-Help Enterprises website.
- Link to Public Draft documents sent to interested parties list.

Appendix B-4 summarizes the comments received on the public draft EAP and the Management Zone's responses.

1.3. Early Action Plan Implementation

This EAP will begin implementation by May 7, 2021 unless the Chowchilla Management Zone receives notice from the Central Valley Water Board to delay implementation. Community outreach will occur on a regular basis during EAP implementation with the first meeting planned for May 2021. The first tasks to be implemented include identification of:

- Date, time and location for a community outreach meeting to kickoff implementation of the EAP.
- Potentially affected residents, i.e., those in areas of the Management Zone where nitrate concentrations most likely exceed 10 mg/L-N. Once these residents are identified the Management Zone will begin outreach to advise residents of their interim replacement water options, including the opportunity to receive bottled water deliveries or installation of a Point-of-Use (POU) treatment system (“POU System”).
- With community input, begin identification of potential locations for installation of water fill stations that could be made available to all residents.
- Respond to requests to participate in the Interim Replacement Water Program and need for nitrate testing in wells.

The following sections provide detailed information about the above tasks as well as other activities that will be implemented through this EAP.

2. IDENTIFICATION OF NITRATE-IMPACTED AREAS

2.1. Groundwater Nitrate Assessment

To support the development of the Chowchilla Preliminary Management Zone Proposal, nitrate groundwater data were requested, downloaded, and compiled using various publicly available sources, including the State Water Board’s DDW, GeoTracker Groundwater Ambient Monitoring and Assessment (GAMA) data, the Irrigated Lands Regulatory Program monitoring data, and the previously developed Central Valley Salinity Alternatives for Long-term Sustainability (CV-SALTS) salt and nitrate database. These data were complemented by data requested from Madera, Merced, and Fresno County departments. Groundwater data were categorized into depth zones, following previously-developed CV-SALTS best management practices; and, wells completed in the Upper Zone² of the groundwater aquifer were used to determine recent average ambient nitrate concentrations for data since the year 2000.

The Upper Zone average nitrate concentrations for wells in the Management Zone were used to produce a geospatial analysis of ambient conditions across the Management Zone. **Figure 2-1** shows the Chowchilla Management Zone with the estimated ambient nitrate conditions in the Upper Zone, representing average groundwater quality conditions since 2000. For this Management Zone, groundwater quality data for wells completed in the Upper Zone covered almost the entire area, with some gap areas located in the eastern, northwestern, and southern parts of the Chowchilla Subbasin.

Using the available nitrate dataset, there are several nitrate-impacted areas that occur within the Management Zone; these are defined by average recent nitrate concentrations in the Upper Zone exceeding the drinking water Maximum Contaminant Level (MCL) of 10 mg/L nitrate as N. **Figure 2-1** depicts these nitrate-impacted areas (see Section 3 of the Preliminary Management Zone Proposal for information regarding the development of **Figure 2-1**). The largest nitrate-impacted areas exist in the north-central and central portions of the Management Zone.

2.2. Potentially Impacted Public Water Supply Wells

2.2.1. Public Water Supply Wells in the Management Zone

Public Water Systems (PWS) are defined as systems that provide drinking water to: (1) 15 or more service connections; or (2) regularly serves at least 25 individuals daily for at least 60 days per

² Upper Zone as defined by the Central Valley Water Board is, “the portion of the groundwater basins, subbasin or Management Zone from which most domestic wells draw water.”

year. Non-Community systems include any facility that provides drinking water, such as churches, rest stops, stores, schools, businesses, etc. (**Table 2-1**).

Table 2-1. Classification of Drinking Water Systems by Constituency, Connections, and Duration of Service per Year (adapted from Boyle et al. 2012)									
Duration of Service	Connections:		< 5	5 +	< 15	15 +	< 200	200 +	
	Persons Served:		< 25			25 +			
N/A	Small Water System (SWS) ¹	Classification Defined By	Connections						
< 60 days/year	Local Small Water System		Connections & (persons, duration)						
< 60 days/year	State Small Water System			Connections & (persons, duration)					
>= 60 days/year	Community Public Water System (PWS) ²					Connections or (persons, duration)			

¹ Classification as a SWS does not preclude classification as any of the other types. SWS may be regulated by DDW or by Local Primary Agency county.

² A PWS is a system for the provision of water for human consumption that has 15 or more service connections OR regularly serves at least 25 individuals at least 60 days per year.

Community PWS, which are regulated by the State’s Division of Drinking Water (DDW), are required to submit water samples of their raw and delivered water for a broad suite of regulated constituents on various schedules that depend on the constituent and the source water context. All PWS data on water quality, source locations, service areas, and historical data are publicly available on the State Water Board website³.

State Small Water Systems (SSWS) are defined as systems serving at least five but not more than 14 residential households. Mutual Water Companies are frequently classified as a SSWS. Typically, SSWS are regulated by county environmental health departments; regulatory oversight of these systems varies by county. Typically, counties require submission of water quality samples annually (at most) for a smaller set of constituents than monitored by a PWS.

³ <https://data.ca.gov/dataset/drinking-water-public-water-system-information>

SSWS data are public; however, most counties in the state do not have these data compiled in any easily accessible format. Many counties require a fee for data retrieval for these systems. Typically, the data available include sporadic water quality data for a few constituents, and the original permit for the system. The permit typically includes information on the construction of the water source (well) and the street where service is provided.

Local Small Water Systems (LSWS) include residential systems serving two to four households. 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.

Elevated nitrate concentrations have been found in a few PWS wells in the Chowchilla Management Zone. The State Water Board’s Drinking Water Source and Water Systems identification documentation was accessed via the internet⁴ to complement data from the DDW to understand how many systems have active versus inactive wells that have nitrate (as N) exceeding the MCL. This documentation provides a status code for each well, as well as a population served and number of connections for each water system.

Wells with any measurement of raw untreated water having nitrate exceeding the MCL were extracted from the database to determine if the wells are considered to be actively providing water to the water system or have been abandoned, destroyed, or inactive. Based on DDW data (from data accessed in December 2020), seven public supply wells in the Management Zone have exceeded the MCL for nitrate. Of those, four wells are considered “Active” (Active Raw, meaning the groundwater is sampled directly from the well; or Active Untreated, meaning the groundwater is sampled at a point between the well and a treatment system); the remainder are either abandoned wells (one well) or destroyed wells (two wells). Nitrate exceedances recorded for PWS that have historically experienced elevated nitrate conditions in one or more of the systems’ wells showed that there are no unique water systems with active wells that currently exceed the drinking water standard for nitrate. The estimated potentially affected population with active wells that have experienced nitrate levels above 10 mg/L as N (the MCL) is 24 people. The four water systems with wells that have exceeded the MCL have either abandoned, destroyed, or deepened wells that had a nitrate problem. Recent samples (since about 2009 for each system) indicate nitrate levels below the MCL. Active wells that have experienced nitrate concentrations exceeding the MCL are located outside and southwest of the City of Chowchilla, and in the northwestern portion of the Management Zone (**Figure 2-2**).

California Department of Water Resources (DWR) provides approximate well locations for all Well Completion Reports (WCR) they have on record. These records include location information for domestic wells drilled across the state. **Figure 2-2** shows the locations provided

⁴ <https://sdwis.waterboards.ca.gov/PDWW/> accessed January 2021.

by DWR for the domestic drinking water wells in their WCR database, as well as the service area boundaries of PWSs available in the area. Publicly available PWS service area boundaries are compiled by the California Environmental Health Tracking Program (CEHTP).

Table 2-2 lists the seven public supply wells from the DDW database that have concentrations that have exceeded the nitrate MCL for their entire period of record. This table provides:

- (a) Summary of the nitrate data available for the individual well, including:
 - a. Date range of measurements;
 - b. Number of measurements;
 - c. Range of nitrate measurements; and
 - d. Date of the most recent nitrate exceedance.
- (b) Well system characteristics, including:
 - a. Well status (active, inactive, etc.);
 - b. Water system to which the well provides water;
 - c. Water system type (community, non-community non-transient, etc.);
 - d. Number of connections; and
 - e. Population served by that water system.

Table 2-3 provides the list of four unique public water supply systems that have had at least one well where nitrate concentrations have exceeded the MCL. This table provides:

- a) Water system number (as identified by DDW);
- b) Water system name;
- c) Water system type;
- d) Number of connections (which ranges from 45 to 137);
- e) Number of wells in each well status category that have exceeded the nitrate MCL;
- f) Population served by the PWS; and
- g) If the PWS has an active impacted well, the population of potentially affected people served by the PWS (based on an estimated total of 24 people).

2.2.2. Delivered Water Treatment Status of Public Water System Wells

Although there are some active wells that have been tested for nitrate with results indicating nitrate concentrations have exceeded the MCL of 10 mg/L nitrate as N, many PWSs have treatment facilities to remove nitrate or other contaminants prior to the water being delivered to consumers. Using the best information readily available, it is possible to find DDW sources of water for PWS that are categorized as “treated”. This includes the following potential DDW-defined well status categories:

- AT – Active Treated: An active source which is sampled after any treatment.
- CT – Combined Treated: Combined sources which are treated.

- DT – Distribution System Sample Point, Treated: Sample point within the distribution system after treatment.
- IT – Inactive Treated: A source which is not in service for periods of one year or greater and which provides treated water to a system.
- ST – Standby Treated: A source which is used less than 15 calendar days per year, with periods not to exceed five consecutive days and which provides raw water which is sampled after treatment.

Even when a water system has a documented treated source according to DDW, this does not ensure that the water system treats its water for nitrate (a treated source may mean chlorination prior to being distributed, or possible treatment for other contaminants such as organic chemicals). PWS typically treat elevated nitrate by using blending, reverse osmosis (RO; membrane technology), ion exchange (IX), or biological or chemical nitrate removal via denitrification (less common). Out of the 23 Public Water Systems located within any portion of the Management Zone, seven of them have treatment capabilities as indicated by having a treated source in the DDW records. One of those seven water systems indicate treatment via Reverse Osmosis (RO) in the water source information (Cold Spring Granite Co Raymond; the service boundary crosses the Management Zone boundary but the public supply well is outside the Management Zone); three have treatment with chlorine and/or stage 2 disinfection byproducts (one of which, Le Grand CSD, has a small portion of its southern service boundary that crosses the Management Zone but the public supply wells are outside the Management Zone); and three have unknown treatment methods. Treatment capabilities for the five water systems that have wells inside the Management Zone are noted on **Figure 2-2** with purple and white circles surrounding active public supply wells connected to a public water system that has treatment capabilities according to DDW.

Table 2-4 summarizes the water system treatment information that is available from DDW for the four public water systems that have exceeded the nitrate MCL in the past. A summary of the steps taken by these public water systems to solve the nitrate problem in their wells is included in this table. According to the DDW nitrate records, all four of the public water systems that had a nitrate problem seem to have solved it by abandoning, destroying, or deepening wells that had elevated nitrate. Recent samples from the past 11 years indicate that these solutions have worked to keep the nitrate levels below the MCL.

Table 2-2. Nitrate-Impacted Public Supply Well Summary

Well ID	Other Well Name	Date Range	Number of Measurements	Minimum NO3N	Maximum NO3N	Most Recent NO2N exceeding the Nitrate MCL of 10 mg/L as N	Well Status	DDW Water System Name	PWS Type	Population Served	Number of Connections
2000511-001	Source Well 1-deepen 2009	2/22/2006 - 1/29/2020	73	2.3	13.21	5/4/2009	AU	MD 85 VALETA	C	45	20
2400053-001	ABNDND WELL (WAS #1) - BY 250 GAL TANK	7/21/1992 - 7/21/1992	1	10.03	10.03	7/21/1992	AB	EL NIDO MOBILE HOME PARK	C	137	50
2400053-002	WELL 02 - DESTROYED MNGRS SIDE PARK	7/21/1992 - 8/17/2006	45	0.47	13.78	8/17/2006	DS	EL NIDO MOBILE HOME PARK	C	137	50
2400053-003	WELL 03 - NEW WELL	3/28/2002 - 11/29/2011	7	<0.23	10.53	3/29/2004	DS	EL NIDO MOBILE HOME PARK	C	137	50
2000823-001	Source Well 1	12/4/2002 - 10/8/2015	8	2.71	21.91	3/5/2008	AU	PIONEER MARKET	NTNC	100	2
2000609-001	Source Market Well	3/12/2003 - 1/5/2010	20	0.99	12.69	3/4/2009	AU	RED TOP MARKET	NTNC	100	2
2000609-002	Cotton Gin Well	11/3/2006 - 1/9/2014	16	<0.23	10.98	4/4/2007	AU	RED TOP MARKET	NTNC	100	2

Table 2-3. Summary of Public Water Supply Systems that have had Nitrate-Impacted Wells.

DDW Number	System Name	PWS Type	Number of Connections	Number of Wells in Public Water Supply Systems > 10mg/L as N by Well Status						Population Served	Estimated Potentially Affected Population with Active Wells >10mg/L as N
				Active Wells	Pending	Abandoned Wells	Destroyed Wells	Inactive Wells	Number of Active Wells Exceeding 10 mg/L as N		
2000511	MD 85 VALETA	C	20	1	0	0	0	0	1	45	45
2000609	RED TOP MARKET	NTNC	2	2	0	0	0	0	2	100	100
2000823	PIONEER MARKET	NTNC	2	1	0	0	0	0	1	100	100
2400053	EL NIDO MOBILE HOME PARK	C	50	0	0	1	2	0	0	137	0

Table 2-4. Treatment of Water Systems with Nitrate-Impacted Wells.

DDW Number	System Name	PWS Type	Population Served	Number of Connections	Has a Treated Water Sourced Filed with DDW?	Nitrate Comments	PWS Currently In Compliance?
2000511	MD 85 VALETA	C	45	20	No	Max Nitrate 13.2 mg/L as N on 2/9/2009; Exceedances in nitrate occurred in 2006-2009; Well was deepened in 2009; Most recent nitrate sample was 5 mg/L as N on 1/29/2020	Yes
2000609	RED TOP MARKET	NTNC	100	2	No	Max Nitrate 12.7 mg/L as N on 7/13/2006; Exceedances in nitrate occurred in two wells from 2006-2009; Most recent nitrate sample was 1.7 mg/L as N on 1/10/2020	Yes
2000823	PIONEER MARKET	NTNC	100	2	No	Max Nitrate 21.9 mg/L as N on 2/12/2008; Exceedances on record between 2007 and 2008; Well was destroyed/replaced; Most recent nitrate sample was 2.4 mg/L as N on 1/7/2019	Yes
2400053	EL NIDO MOBILE HOME PARK	C	137	50	No	Max Nitrate 13.8 mg/L as N on 5/2/2002; Exceedances in Nitrate occurred between 1992 and 2006 from wells that are now abandoned or destroyed; Most recent nitrate sample was <0.4 mg/L as N on 11/5/2019	Yes

2.3. Potentially Impacted Domestic Wells and Local Small Water Systems

Figure 2-3 illustrates the locations of potentially impacted domestic wells and areas of elevated nitrate (7.5 mg/L to 10 mg/L as N, and > 10 mg/L as N). These areas were used along with DWR's domestic well locations based on Well Completion Reports⁵. It was assumed that any domestic wells located within the boundaries of a PWS would not be used for drinking and were removed from the estimation of the number of potentially impacted domestic wells. There are approximately 14 domestic wells within the PWS residential service areas. It is unknown whether any of these wells are still being used even though they are potentially in a PWS area.

To estimate the number of wells potentially impacted by elevated nitrate, domestic wells were placed into six groups:

- Group 1 - Groundwater in the Upper Zone with nitrate as N at or below 2.5 mg/L;
- Group 2 - Groundwater in the Upper Zone with nitrate as N above 2.5 mg/L and at or below 5.0 mg/L;
- Group 3 - Groundwater in the Upper Zone with nitrate as N above 5.0 mg/L and at or below 7.5 mg/L;
- Group 4 - Groundwater in the Upper Zone with nitrate as N above 7.5 mg/L and at or below the MCL of 10 mg/L;
- Group 5 - Nitrate as N exceeding the MCL of 10 mg/L in the Upper Zone; and
- Group 6 - Unknown category because the domestic well(s) are located where insufficient nitrate data exist in the Upper Zone to perform the spatial interpolation of ambient nitrate conditions.

The total number of wells outside PWS boundaries was compared to the number of wells in each elevated nitrate category to provide an estimate of the percent of domestic wells potentially impacted by elevated nitrate in the groundwater. **Table 2-4** summarizes the results of this analysis.

To estimate the population potentially impacted by residents relying on domestic wells that may have elevated nitrate, 2010 census block data were mapped and joined with the ambient Upper Zone nitrate concentrations occurring outside of PWS boundaries. The population was summed for census blocks outside PWS boundaries and within the Management Zone for those areas with nitrate concentrations in the Upper Zone (using the six categories of nitrate concentration described above). **Table 2-4** summarizes the results of this analysis.

⁵ Several domestic well locations provided by DWR's Well Completion Report database may not be exact locations, but rather plot in the center of a 1-square mile township/range-section area. Therefore, several domestic wells may plot at the same location, and their locations are accurate up to one mile.

Table 2-4. Summary of Domestic Wells and Population with Estimated Upper Zone Nitrate Area Categories Located Outside PWS Boundaries.			
Estimated Upper Zone Ambient Nitrate (2000-2020)	DWR Domestic Wells Located Outside PWS Boundaries		2010 Census Block Analysis
	Domestic Well Count Outside of PWS Boundaries	% of Total Domestic Wells Outside PWS	Population Outside PWS Boundaries
Group 1: <=2.5 mg/L as N	197	28.5%	946
Group 2: >2.5 – 5.0 mg/L as N	232	33.6%	1,759
Group 3: >5.0 – 7.5 mg/L as N	124	17.9%	991
Group 4: >7.5 – 10.0 mg/L as N	66	9.6%	385
Group 5: >10.0 mg/L as N	64	9.3%	401
Group 6: Unknown*	8	1.2%	36
Total (Outside PWS Boundaries)	691	100%	4,518

**Domestic wells or Census Blocks are located in a “Gap Area” where insufficient Upper Zone nitrate data exist to do a spatial interpolation of ambient nitrate conditions.*

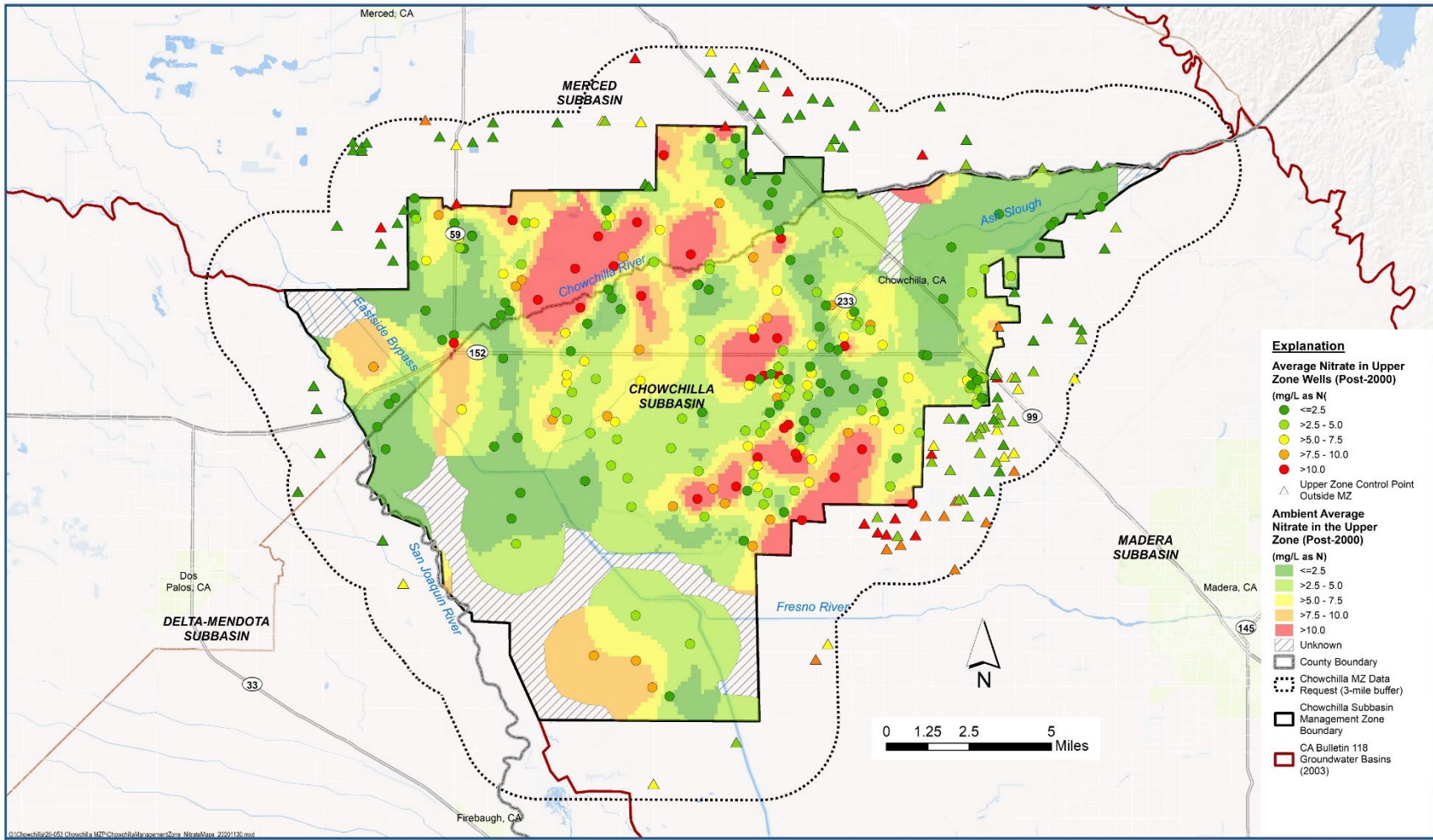


Figure 2-1. Chowchilla Management Zone: Ambient Post-2000 Nitrate Concentrations in the Upper Zone of Groundwater

Chowchilla Management Zone
Admin Draft Early Action Plan

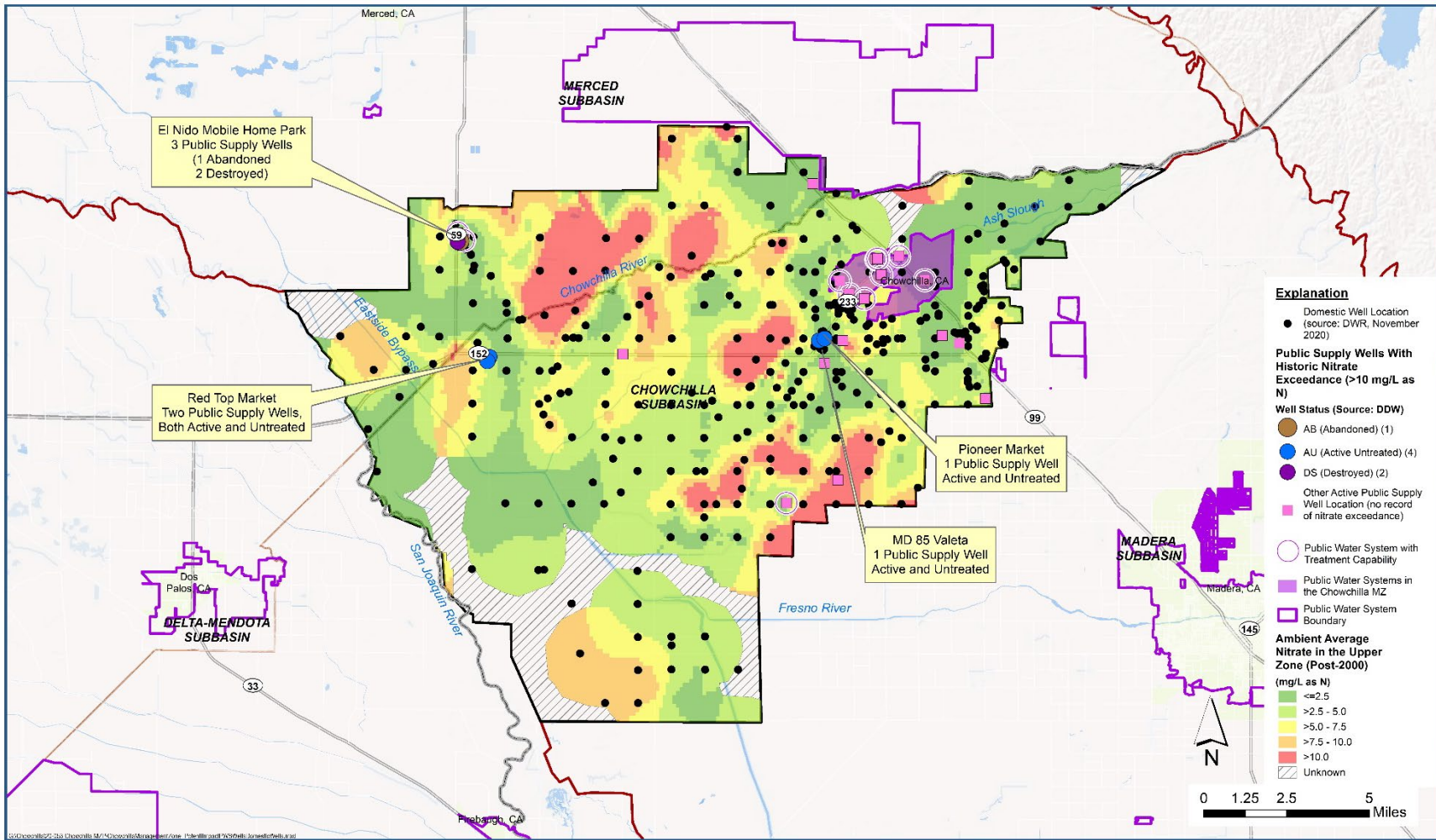


Figure 2-2. Chowchilla Management Zone: Potentially Impacted Public Water Supply Wells and All Domestic Wells

Chowchilla Management Zone
Admin Draft Early Action Plan

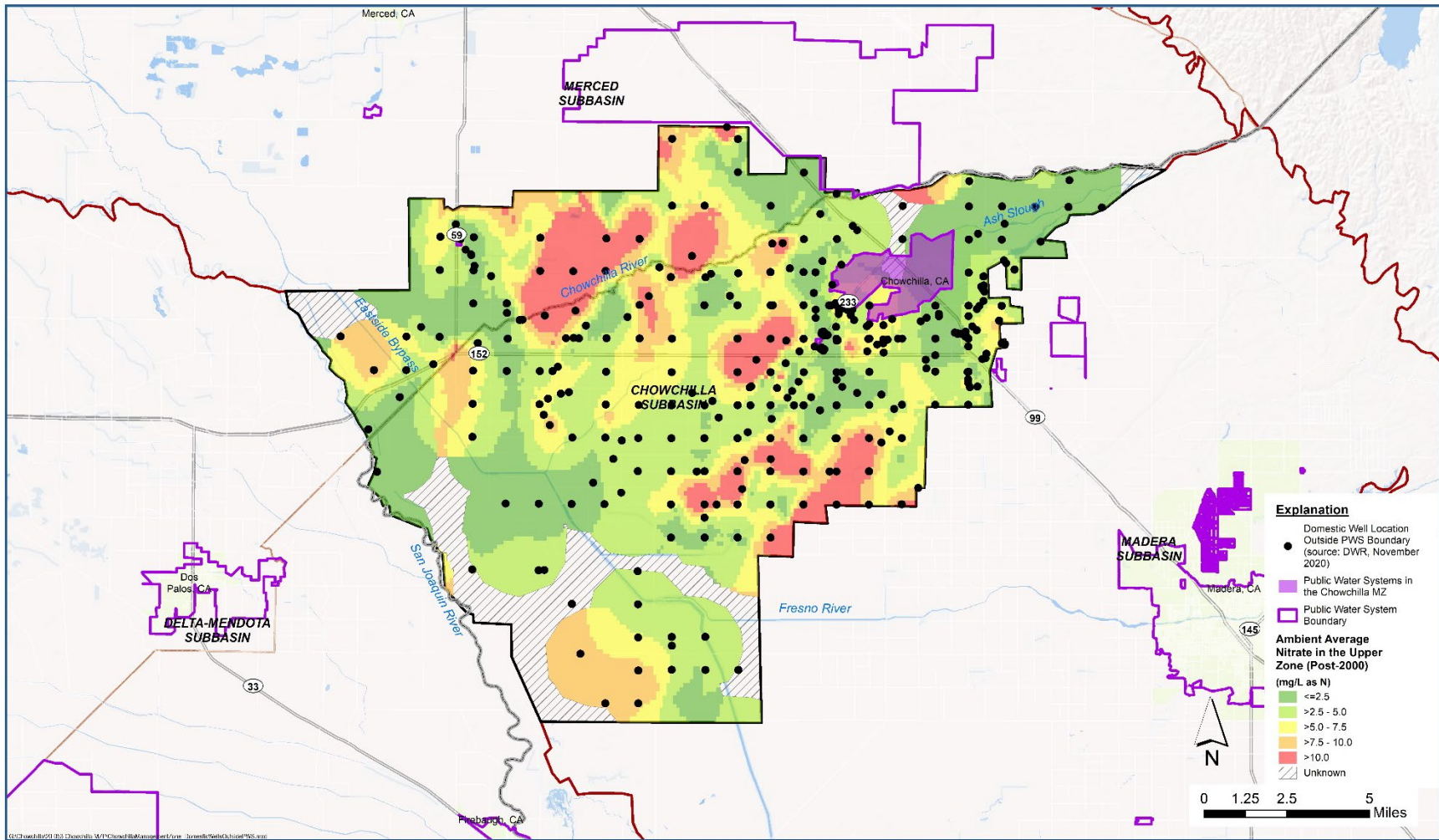


Figure 2-3. Chowchilla Management Zone: Domestic Wells Located Outside Public Water System Areas

3. IDENTIFICATION OF POTENTIALLY AFFECTED AREAS

A key component of the EAP is identification of areas where residents or other entities in the Chowchilla Management Zone may be obtaining their drinking water from a well impacted by nitrate levels that exceed 10 mg/L-N. The Management Zone will target some of its outreach efforts specifically to those identified as being most likely impacted by elevated nitrate. This targeted outreach will occur at the same time the Management Zone is implementing general community outreach activities to the entire Management Zone. The process to identify residents or other entities in potentially affected areas will begin immediately upon EAP implementation using the steps described in the following subsections.

3.1. Process to Identify Affected Residents

Figure 2-1 identifies the portion of the Chowchilla Management Zone where nitrate conditions in the Upper Zone of the groundwater likely exceed 10 mg/L-N (see red-colored areas). Except for those areas which are served by a nitrate compliant Public Water System (PWS) (e.g., around the City of Chowchilla), the residences in these red-colored areas are most likely to be served by a domestic well that has potentially unsafe nitrate levels.

The Management Zone will implement the following stepwise process to identify residences that may have a domestic well or may be connected to a PWS that is not compliant with the nitrate drinking water standard. The information developed to identify domestic wells and small water systems (see Sections 2.2. and 2.3 above) in nitrate-impacted areas provide a starting point for the work described below. The outcome of this process will be information needed to target EAP outreach to those residents most likely served by a drinking water source that has high nitrate levels.

Step 1: Data Development - Identify PWS Boundaries and Obtain County Parcel Data

Public databases that provide PWS boundary information are often not accurate. Therefore, in Step 1, the Management Zone will reach out to all PWS identified in the Chowchilla Subbasin (see Section 2) to request a list of Assessor Parcel Numbers (APN) and service addresses for their respective customers (no personal customer information will be requested). The outcome will be an accurate depiction of PWS service boundaries and identification of parcels served by a nitrate compliant PWS. If a PWS is unwilling to share the requested data or is unable to provide the data in a timely manner, the Management Zone will rely on what is available from public databases.

To identify the parcels within the Management Zone, county assessor parcel GIS data will be requested. The GIS-based parcel data will be overlaid with the PWS data obtained above and

groundwater nitrate water quality characterization data. The outcome will be a base map that identifies areas where nitrate is most likely > 10 mg/L-N and not served by a PWS.

Step 2: Remove Parcels Served by Nitrate Compliant PWS

Each PWS will be evaluated to determine if it is compliant with the nitrate water quality standard (Note: An initial evaluation was completed during development of the PMZP; the findings from this effort will be updated as needed). Parcels located within nitrate compliant PWS boundaries will be removed from further evaluation. If it is unclear whether the PWS is in compliance with the nitrate requirements, the associated parcels will be retained. After Step 2 all remaining parcels should meet the following criteria:

- Located within the Management Zone;
- Not served by a nitrate compliant PWS or status of compliance of the associated PWS is unknown; and
- Located in an area where the Upper Zone of the Chowchilla Subbasin potentially has elevated nitrate levels > 10 mg/L-N.

Step 3: Establish List of Potentially Affected Residences

GIS-based parcel information (APN or address) will be exported into an Excel spreadsheet. The resulting spreadsheet will be provided to a third-party vendor to generate a mailing list. The outcome will be a preliminary mailing list to be used for targeted resident outreach activities, as described below.

Step 4: Identify Targeted Residences Subject to Existing Well Testing Program

The East San Joaquin Water Quality Coalition members began monitoring drinking water wells on their enrolled parcels for nitrogen in January 2019. The purpose of this monitoring is to identify drinking water wells that have nitrate concentrations exceeding 10 mg/L-N and notify well users of the potential for human health risks if the water is used for drinking or cooking.

Under Step 4, the preliminary mailing list created under Step 3 will be evaluated to determine if any residences included on the target list have already had their well tested under the existing well sampling program. For residences identified under this step: (a) if the well test result exceeded 10 mg/L-N, the Management Zone will include them on the targeted outreach mailing list to inform them of the EAP and interim replacement water options available to them (if replacement water is still needed); or (b) if the test result is \leq 10 mg/L, then they will not be targeted for direct outreach under the EAP. However, their well will continue to be re-tested as required under the ILRP (see also Section 5.3).

3.2. Process for Non-Compliant Public Water Systems

The EAP is also intended to address situations where a PWS is non-compliant with the nitrate drinking water standard. Corona Environmental Consulting, LLC (2021) recently completed a review of PWSs within the Chowchilla Management Zone. The study found that there are currently no PWSs in the proposed Management Zone with unresolved nitrate compliance concerns. This is consistent with the research performed for this Early Action Plan (January 2021). The Management Zone will periodically re-evaluate these findings to verify that PWSs in the area remain compliant with regards to nitrate. If a PWS is found to be non-compliant, the Management Zone will collaborate with representatives of the PWS to identify potential solutions (temporary or permanent) for implementation.

4. COMMUNITY OUTREACH PROGRAM

Section 1.2 above summarized the community outreach activities completed to support the development of this EAP. Community outreach will continue during EAP implementation to obtain community input during program implementation. The outcome of this effort may result in modifications to this EAP in the future. SHE provided support to the Management Zone during EAP development and will continue to assist with outreach by supporting the community outreach activities described below.

4.1. Information Sharing

The Chowchilla Management Zone shares information with stakeholders, including community residents, with interests in the implementation of this EAP through several mechanisms, as described in the following subsections.

4.1.1. Management Zone Website

The Chowchilla Management Zone maintains a website on the Madera County website: <https://www.maderacountywater.com/cv-salts/>. This website serves two key purposes. It provides a: (a) mechanism for residents to notify the Management Zone that they would like to receive notifications of upcoming outreach events and mailouts of program information; and (b) place to post the following information:

- Planned community outreach-related activities and how to participate.
- Schedule for implementation of EAP's interim replacement water program.
- Interim replacement water program information, including, e.g., (1) how to receive bottled water deliveries at your home; (2) how to have a POU System installed in your home; or (3) locations of and procedures to use operational water fill stations (if available in the Management Zone);

- Informational materials such as fact sheets, community flyers or other materials that can be used individually or shared with others.
- Frequently Asked Questions (FAQs) regarding relevant Nitrate Control Program activities, e.g., EAP implementation and Management Zone development.

4.1.2. Materials Development & Distribution

The Chowchilla Management Zone will prepare informational materials on an as needed basis to support implementation of this EAP (e.g., FAQs or “how to” instructions for topics such as how to have your well tested, how to request bottled water delivery or installation of a POU System, or how to operate a water fill station (if available in the Management Zone). These materials will be posted on the website and, as needed, provided to stakeholders within the Management Zone to facilitate information sharing. Any posted documents will include both English and Spanish translations. Other language translations will be developed if the need is identified.

4.2. Community Outreach Activities

The Chowchilla Management Zone will conduct periodic community outreach meetings to support EAP implementation (see **Section 6.1** for implementation schedule). Upcoming meeting schedules will be shared with the community during outreach activities and through website postings.

4.2.1. General Community Outreach Meetings

General community outreach meetings were held during development of this EAP. Opportunities to participate in these meetings will continue during EAP implementation. Unless restrictions still exist due to government directives related to the COVID pandemic, meetings will be held in-person. **Table 4-1** summarizes the activities that will be implemented by the Management Zone to conduct each meeting (information will be provided in both English and Spanish to the maximum extent practicable). The content of each meeting may vary, but the primary purpose of these meetings is to inform the community of the following:

- Overall status of implementation of the EAP;
- Opportunity for residents with a domestic well with nitrate at a concentration greater than 10 mg/L-N to participate in or access services from the interim replacement water programs;
- Obtain input from the community on how implementation of the EAP can be improved;
- Have discussions regarding potential long-term drinking water solutions as those planning efforts increase;

- Status of next steps in the Nitrate Control Program, e.g., development of Final Management Zone Proposal and Management Zone Implementation Plan; and
- Schedule for subsequent meetings and upcoming milestones.

The Management Zone will notify the public of EAP-related community outreach events (in English and Spanish to the maximum extent practicable) using one or more of the following methods:

- Email to residents that have registered with the Chowchilla Management Zone to receive information.
- Postings on the Chowchilla Management Zone website and the websites of organizations that have partnered with the Management Zone to share information.
- Social media networks, e.g., Facebook or Nextdoor.
- Direct mail to Management Zone residents, using cost effective methods.
- Public announcements, e.g., through newspaper notices in local and regional media or radio advertisements in the local area.
- Requests to other entities to facilitate outreach efforts, e.g., civic organizations, school and community service districts or houses of worship.
- Others, as determined by the Management Zone.

Table 4-1. Process to Conduct Community Outreach Meeting

Task	Primary Activities
1. Address meeting logistics (if meeting is virtual, 1a will not be necessary)	<ul style="list-style-type: none"> a. Secure public venue for in-person meeting b. Prepare and send out “save the date” meeting notice at least 10 days in advance of the meeting date (English and Spanish); post same information on the website c. Send out follow-up meeting notice in English and Spanish within 3-4 days of the meeting date d. Send out meeting notice flyers to other supporting stakeholders to email their internal email list, post on bulletin boards or post on their websites e. Secure necessary translation services for meeting
2. Prepare meeting materials	<ul style="list-style-type: none"> a. Prepare, as needed, meeting agenda, handouts, PowerPoint presentation materials specific to the purpose of the meeting b. Bring copies of any Management Zone informational materials for distribution at the meeting (if in-person)
3. Post follow-up information as needed after outreach meeting	<ul style="list-style-type: none"> a. Post meeting presentation materials and handouts to Management Zone website (Note: If meeting was virtual, also post a recording of the meeting on the website)

4. Follow-up directly with meeting participants after meeting, as needed	<ul style="list-style-type: none"> a. Follow-up on action items from the meeting b. Respond to post-meeting emails/inquiries
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4.2.2. Targeted Resident Outreach

Section 2 identifies areas within the Chowchilla Management Zone where nitrate concentrations in the Upper Zone of the underlying groundwater are most likely to exceed 10 mg/L-N (e.g., see **Figure 2-1**). The Management Zone will conduct additional outreach to target residents in these areas that are not served by a PWS that is compliant with state and federal nitrate drinking water regulations. **Section 3.1** describes the process for identifying these residents for the purpose of developing a targeted mailing list for direct residential outreach.

The Management Zone will send the following information to each household on the targeted residential outreach mailing list (information will be provided in both English and Spanish):

- Cover letter that explains the EAP and how its implementation may apply to their residence.
- Educational materials regarding nitrate in drinking water as a potential health concern.
- Provide information about options available to obtain interim replacement water and, if needed, have their domestic well tested for nitrate.
- Information about opportunities to participate in EAP implementation and development of long-term drinking water solutions.
- Contact information for a representative of the Management Zone and website where the resident can obtain more information.

The Management Zone will conduct additional outreach to targeted residents that have not responded in some manner to the initial mailout of information. Additional outreach to non-respondents may include a second mailout of information (unless previous mailed information was returned as undeliverable) or a visit to the residence to leave behind information. The Management Zone will also look for opportunities to share information at locations where people gather in the local area, e.g., local community centers, schools, houses of worship, or farm labor centers.

4.3. Coordination with Non-Dischargers

The Chowchilla Management Zone will coordinate with entities that are not dischargers subject to the requirements of the Nitrate Control Program but have a potential role in ensuring residents have access to safe drinking water. This collaboration can help the Management Zone:

- Identify potentially affected residents to target for outreach;

- Implement the interim replacement water program;
- Support outreach activities to all residents within the Management Zone;
- Prepare outreach materials tailored to the constituencies associated with non-dischargers;
- Inform other interested parties of EAP-related activities ongoing in the area, e.g., Madera County Board of Supervisors, Madera County Public Health Department, other appropriate County departments, trade groups, local community organizations, etc.;;
- Keep the Central Valley Water Board and DDW informed (outside of regular EAP status reports) of any issues or concerns that may be developing through program implementation;
- Apply for grants that support not just implementation of the Nitrate Control Program but other area programs to ensure the community has safe drinking water; and
- Develop long-term solutions for providing safe drinking water to residents in the Management Zone.

The CEP (**Appendix A-1**) has a list of interested parties that includes non-dischargers that the Management Zone has been already coordinating with during EAP development. As needed, others will be added to this list over time. During EAP implementation all entities on the interested parties list will continue to receive notices of EAP-related activities and will be invited to all community outreach meetings.

5. INTERIM REPLACEMENT WATER PROGRAM

This section describes the specific early actions the Chowchilla Management Zone will implement to provide interim replacement water for residents who are dependent on groundwater from wells that supply water that has a nitrate concentration of > 10 mg/L-N. These actions are considered temporary but will remain available until permanent sources of safe drinking water become available within the Management Zone.

5.1. Interim Replacement Water Program Options

The Chowchilla Management Zone will implement a replacement water program that is at the same time both broad and narrow in focus. This approach has two parts:

- Replacement water options that are designed to meet individual household needs. These options include (a) bottled water delivery and (b) POU System installation.
- Water fill stations that can provide an additional source of safe drinking water at no cost to as many Management Zone residents as possible.

The sections below describe each of these program options. Subsequent sections describe how the programs will be implemented including how a resident may request replacement water. Section 6 provides the schedule for implementation of these options.

5.1.1. Bottled Water Delivery Program

The Management Zone will offer a bottled water delivery program to meet household-specific water needs. Section 5.2 below describes how a residence can participate in this program. In general, program participants will receive regular deliveries of bottled water from the Management Zone's bottled water vendor at no cost to the residents. The resident will establish any necessary agreements and schedules with the Management Zone's vendor(s) to implement service at their residence. It is anticipated the vendor providing the bottled water service will: (a) provide a 5-gallon water dispenser (leased or purchased); (b) deliver 5-gallon water bottles on a regular schedule; and (c) pick-up the empty bottles. The initial volume of water delivered to any household is 60 gallons/month. This initial volume may be increased or decreased based on the needs of each household.

As noted above, each resident is responsible for establishing any necessary agreements with the vendor and complying with the terms and conditions of any signed agreements. However, the Management Zone will assist residents as needed with any questions or issues that arise during the establishment of the agreement with the Management Zone's vendor.

5.1.2. Point of Use (POU) Treatment System Program

The Management Zone will also offer a program to install and operate a POU System in a residence at no cost to the resident to meet household-specific needs for water that meets nitrate drinking water standards. In general, a residence participating in this program would have a POU System installed at an appropriate location in the residence to provide the household with water for drinking and cooking (e.g., under the kitchen sink). **Section 5.2** below describes how a residence can participate in this program.

Every request for POU System installation will require careful evaluation to be sure the appropriate treatment system can be installed in the household. In some cases, due to site-specific circumstances a POU System may not be a viable interim replacement water option for the residence. Reasons why installation of a POU System may not be a viable option include, but may not be limited to:

- Inadequate incoming pressure to the treatment system;
- High nitrate levels that limit the effectiveness of the POU System to treat the water a safe level; and
- Presence of other contaminants besides nitrate that limit the effectiveness of the POU System and/or are not treatable through a POU System.

To support the POU System Program, the Management Zone will coordinate with DDW and the vendor(s) as needed to assist with POU System technical issues. If the technical problems are unresolvable, the residence may alternatively participate in the bottled water delivery program.

Where a POU System is a feasible interim replacement water option, the Management Zone's POU System vendor(s) will work with the resident to install the treatment system. If the resident is not the owner of the residence, the process to install and maintain the POU System will require written approval of the property owner.

Once approved, resident will establish any necessary agreements (and schedule) with the Management Zone's vendor(s) to install and maintain a POU System at the residence. It is anticipated that services will include: (a) installation of the treatment device; (b) initial and follow-up water testing to ensure the device is removing nitrate down to safe levels as expected; and (c) periodic maintenance of the POU System (as required by the manufacturer). The cost of these services will be borne by the Management Zone as long as the EAP is effective or until an alternative option is provided to ensure the residence has drinking water safe from nitrates. If the resident does not allow required maintenance and monitoring of the POU System to take place (as per the vendor agreement), then the Management Zone has the discretion to modify the approved interim replacement water option from a POU System to bottled water delivery.

As noted above, each resident is responsible for establishing any necessary agreements with the vendor and complying with the terms and conditions of any signed agreements. However, the Management Zone will assist residents as needed with any questions or issues that arise during the establishment of an agreement with the Management Zone's vendor.

5.1.3. Water Fill Station Program

5.1.3.1. Description

A water fill station is an independent water-dispensing facility connected directly to a PWS that meets safe drinking water standards and is constructed and operated as required by state and federal regulations (i.e., as required to meet implementation of the California Safe Drinking Water Act as defined in the California Health & Safety Code and Titles 17 and 22 of the California Code of Regulations).

Based on community input, the Chowchilla Management Zone may establish up to two fill stations. Potential locations for these fill stations will be developed in coordination with the community. Ideally, fill stations would be located in areas not served by a nitrate compliant PWS and where the nitrate concentration in the underlying groundwater is most likely greater than 10 mg/L-N.

The purpose of the water fill stations is to provide an additional trusted source of safe water for the community. These stations may be used by anyone to fill water bottles up to five gallons in size as often as necessary at no cost to the user. While these stations are being developed to address nitrate concerns, their presence in the community can provide other local benefits, including for example:

- Safe drinking water source for the homeless;
- Source of water for farm labor contractors to fill up containers to provide safe water for field workers;
- Alternative water source for residents who are:
 - Reliant on wells that may dry up during significant periods of drought;
 - Already reliant on bottled water, but experienced delivery cutbacks for whatever reason (e.g., as has occurred during parts of the COVID pandemic); and
 - Who, because of privacy concerns, do not respond to the Management Zone's offers to provide bottled water delivery or POU System services.

Figure 5-1 illustrates the two general areas the Management Zone will especially seek input from the public regarding potential location for fill stations. These areas coincide with where water quality analyses indicate that nitrate concentrations likely are > 10 mg/L -N (see **Section 2**) and are not served by a nitrate compliant PWS. Each targeted area is represented as a circle with a radius of four miles. The figure illustrates how two filling stations could adequately cover the areas of greatest concern in the Management Zone. While **Figure 5-1** indicates where the Management Zone will focus its efforts to identify a specific location for installation of a fill station, the actual locations selected will depend on community input, need for the stations and identifying sites that best meet the siting and use criteria described below.

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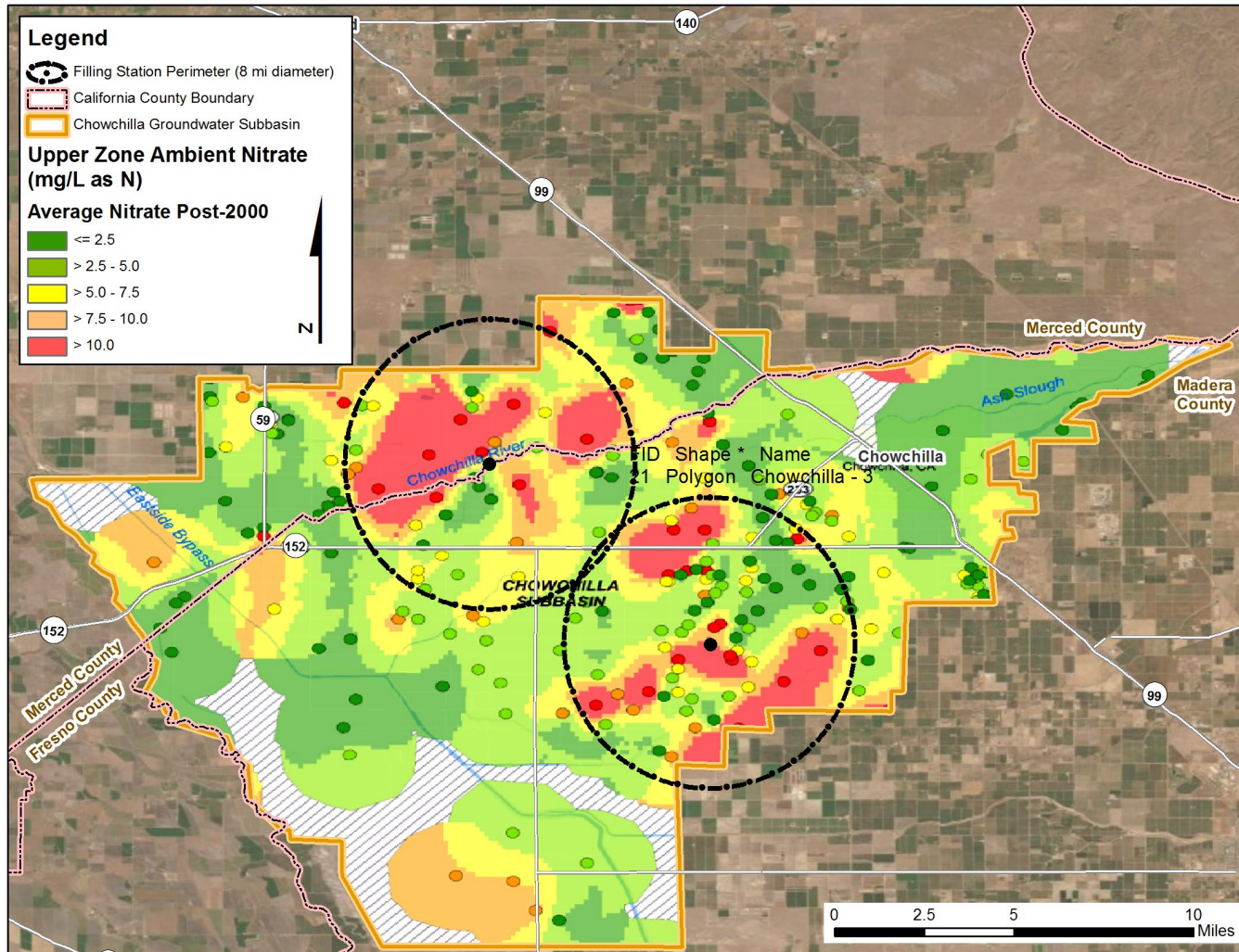


Figure 5-1. General Areas to be Targeted for Development of Water Fill Stations in the Chowchilla Management Zone

5.1.3.2. Siting and Use Criteria for Identifying a Water Fill Station Location

It is anticipated that any fill stations developed by the Chowchilla Management Zone will be new installations. However, as part of the process to identify appropriate locations to potentially install a new fill station, the Management Zone will consider partnering with an entity that already has an operational fill station. Where such a partnership can be established, the Management Zone will work with the current owner to make any modifications to the facility necessary to support the fill station requirements under this program and compensate the owner for water used. For new or existing fill stations, the Management Zone will seek locations that meet as many of the following criteria as possible:

- Community has indicated its support for the installation of the fill station.
- Management Zone is able to obtain permission to install and operate a filling station on land or property owned by a third party.
- Fill station receives its water from an existing PWS that (a) complies with all regulatory requirements to provide safe drinking water; and (b) has sufficient capacity to dispense water at a reasonable rate to fill up multiple containers (up to five gallons) within a short period of time. The minimum targeted rate is 1.5-2 gallons/minute, consistent with California regulations for faucets in new residential construction.
- The location is within an area where the public already goes to meet other family needs, e.g., at a governmental facility, shopping center, school, or house of worship.
- Establishment of the fill station is not expected to create any safety issues for users, e.g., location is in a well-lit and well-trafficked area.
- Vehicle access/parking is available close to the fill station (to minimize distance a water bottle must be carried) and sufficient in area to not cause any unnecessary congestion.
- To the extent practicable, the location meets the goal to have a water fill station open 24 hours/7 days per week.
- Operation of the fill station does not create noise impacts to neighboring properties, especially during nighttime hours.

5.1.3.3. Implementation Approach

Table 5-1 summarizes the key steps/activities that the Management Zone will implement to install and operate a water fill station. Residents that use the fill station will need to provide their own fill containers.

Table 5-1. Process to Develop Water Fill Stations	
Task	Primary Activities
1. Establish locations for installation of fill stations and/or identify existing fill stations that may also be used for this program	<ul style="list-style-type: none"> a. Complete research to identify viable locations b. Conduct site visits; coordinate with land/property/fill station owners c. Make final selection of site location
2. Establish any necessary agreements, e.g., land/property owner of selected site for new installation; partnership agreements with owner of existing station	<ul style="list-style-type: none"> a. Establish any necessary agreements to secure use of the site for a fill station b. Establish water usage agreements with water provider, as needed
3. Complete site design and obtain necessary approvals and funding to install new fill station	<ul style="list-style-type: none"> a. Prepare the station design (including operational signage) and construction-related documents b. Obtain any required approvals/permits to implement the project (as required by local or state regulations)
4. Establish operational plans, as needed	<ul style="list-style-type: none"> a. Prepare sampling analysis plan for testing b. Prepare operation and maintenance (O&M), including cleaning procedures as needed to operate the station
5. Construct the filling station	<ul style="list-style-type: none"> a. Complete construction of the facility (including installation of signage) and obtain any necessary approvals to open the facility to the public
6. Conduct outreach to the local community to inform the public of the availability of the fill station	<ul style="list-style-type: none"> a. Conduct outreach as described in Section 4 b. Notice the community when the fill station is open c. Notify the Central Valley Water Board when the fill station is open
7. Manage site, conducting necessary maintenance and gathering usage data	<ul style="list-style-type: none"> a. Gather data on usage b. Respond promptly to repair needs to minimize time when water not available c. Conduct routine maintenance

5.2. Participation in Bottled Water or POU System Programs

Table 5-2 summarizes the steps or activities to be carried out by the Chowchilla Management Zone to implement the bottled water and POU System programs. Residents may request participation in either of these interim replacement water options by submitting a Program Participation Request (see **Appendix D**) to the Management Zone. The Management Zone will confirm that the resident submitting the request meets the following three eligibility criteria:

1. Residence requesting services is within the Chowchilla Management Zone and does not receive drinking water from a PWS where state- and/or county-mandated testing indicates the PWS complies with the nitrate water quality objective.

2. If the Management Zone contracts with a vendor(s) to provide the requested bottled water or POU System services and the vendor(s) requires the resident sign an agreement to receive these services, the resident must be willing to sign and meet the terms and conditions of the agreement.
3. Current drinking water source at the residence has a nitrate concentration that is above the safe drinking water level of 10 mg/L-N (see Section 5.3).

Residents participating in the bottled water or POU System replacement water programs will receive periodic check-ins from the Management Zone after services are initiated. These check-ins, e.g., via email or telephone, are provided to verify the Management Zone's approved vendor(s) are providing services as contracted. In addition, check-ins provide the opportunity for the Management Zone to: (a) answer questions from residents; (b) verify sufficient bottled water is being delivered to the residence; and (c) evaluate if the POU System is receiving proper maintenance.

5.3. Residential Well Testing Program

The Chowchilla Management Zone is establishing a residential nitrate well testing program to support implementation of this EAP. Any resident in the Management Zone may request to have their well sampled for nitrate. A well test is also necessary to verify eligibility to receive bottled water delivery or installation of a POU System, as described in the previous section. To request a well test, the resident may (a) send in a completed Program Participation Request Form (see **Appendix D**) which is available for download from the Management Zone website; (b) fill out a request online at the Management Zone website; or (c) contact the Management Zone directly for assistance. The following sections describe the well-testing program planned for implementation in the Management Zone.

5.3.1. Initial Well Test

If the nitrate concentration of the well water is unknown, the Management Zone will coordinate with the residence to have the water tested as soon as possible at no cost to the resident. If the resident is not the owner of the property, permission from the landowner is necessary to have the well tested. The resident may also provide the results from a previous well test if the water sample was collected within the last five years using standard methods for well sampling, and the nitrate concentration was analyzed using an approved Environmental Protection Agency (EPA) method by a laboratory certified under the California Environmental Laboratory Accreditation Program (ELAP).

Well sampling carried out by the Management Zone will be conducted using standard well sampling procedures consistent with sample methods used to implement other well testing programs in the area, e.g., as described in Central Valley Water Board's ILRP Drinking Water

Well Program FAQ guidance (Central Valley Water Board 2020). All samples will be analyzed for nitrate using EPA-approved methods at an ELAP certified laboratory.

Table 5-2. Process to Request Participation in Replacement Water Programs	
Task	Primary Activities
1. Establish agreements with vendor(s) to provide services to residents	<ul style="list-style-type: none"> a. Select vendor(s) to provide the following services: (a) bottled-water delivery; (b) POU System; and (c) well testing b. Establish procedures to (a) connect vendor(s) with residents (including understanding regarding agreements residents will need to establish with the vendor); and (b) process payments for services rendered
2. Conduct targeted residential outreach in Management Zone (see Section 4.2.2)	<ul style="list-style-type: none"> a. Using the mailing list developed under Section 3, send direct mailout to target areas (areas most likely to have nitrate concentrations in groundwater > 10 mg/L-N) informing them of the availability of all replacement water programs active in the Management Zone and how to participate in any program b. Use other mechanisms described in Section 4 to notify the community at large of the availability of replacement water programs and how to participate in any program
3. Verify residents requesting bottled-water delivery or POU System installation meet eligibility Criteria 1 and 2 (see Section 5.2)	<ul style="list-style-type: none"> a. Verify the resident is located within the Management Zone b. Verify the resident is willing to establish any required agreements with the Management Zone’s vendor(s) providing the requested services
4. Unless acceptable nitrate data are already available (see Section 5.3.1), conduct well testing to verify eligibility with Criterion 3	<ul style="list-style-type: none"> a. Obtain well water sample in coordination with the resident and property owner (as needed) to test the drinking water source to the residence; notify resident of well test results b. If well test result indicates the nitrate concentration is > 10 mg/L-N, connect resident or property owner with the appropriate vendor (bottled water delivery or POU System) to initiate replacement water services c. If well test result indicates the nitrate concentration is ≤ 10 mg/L-N the resident or property owner will be notified that (a) the bottled water delivery or POU System options are not available to them through the Management Zone at this time; and (b) a follow-up well test may be offered if appropriate (see Section 5.3.2)

Table 5-2. Process to Request Participation in Replacement Water Programs	
Task	Primary Activities
5. Conduct follow-up with residents receiving bottled water deliveries	<p>a. Check-in with residents receiving services to verify: (a) monthly delivery volume is sufficient for household; modify as needed; and (b) service is being provided by vendor(s) as contracted. Check-ins will occur as follows:</p> <ul style="list-style-type: none"> i. Within one month of initiation of service ii. Approximately six months after initiation of service iii. Annually
6. Conduct follow-up with residents with POU System	<p>a. Check-in with residents receiving services to: (a) verify POU System is operating; (b) answer any questions regarding POU System O&M; and (c) verify resident is having system maintained as required by agreement with the vendor(s). Check-ins will occur as follows:</p> <ul style="list-style-type: none"> i. Within one month of initiation of service ii. Approximately six months after initiation of service iii. Annually
7. Conduct follow-up outreach to residents or property owners with a nitrate test result that was ≤ 10 mg/L but ≥ 8.0 mg/L	<p>a. Provide opportunity for residents or property owners to have well re-tested per procedures provided in Section 5.3.2.</p>

Residents and property owners will be notified of the results from the well test following receipt of the results from the laboratory:

- If the results indicate nitrate levels exceed 10 mg/L-N, the resident and/or property owner will be contacted directly via telephone or email within five business days of the Management Zone receiving the test result. The Management Zone will coordinate with the resident/property owner to initiate bottled-water or POU System service at the residence as quickly as possible. The telephone/email communication will be followed up with a mailed written summary of the well test findings to the resident and the property owner, as applicable, the mailed summary will include a copy of the laboratory report, documentation that the well water was only tested for nitrate and recommend that the resident consider having the well tested for other potential contaminants if seeking installation of a POU System (also see **Section 5.4**; if known, the Management Zone will provide information regarding other well testing programs that may be available in the area) and any recommended next steps. If any additional water testing is required by the vendor to

support installation of a POU System, this testing will be coordinated with the vendor providing this service.

- If the results indicate nitrate levels are ≤ 10 mg/L-N, the resident and property owner will receive a written summary of the results, including a copy of the laboratory report. The written summary will indicate that: (a) the residence will not be able to participate in the Management Zone's bottled water or POU System replacement water programs; (b) the well water was only tested for nitrate and recommend that the resident have the well tested for other potential contaminants (also see **Section 5.4**) (if known, the Management Zone will provide information regarding other well testing programs that may be available in the area); and (c) advise the resident of opportunity to have their well tested again, if applicable (see **Section 5.3.2**).

5.3.2. Follow-up Well Test

For any resident or property owner that has an initial nitrate well test result showing nitrate levels ≤ 10.0 mg/L but ≥ 8 mg/L, and the resident or property owner is not already having their well tested on a regular basis as required through the Central Valley Water Board's ILRP well testing program, the Management Zone will offer follow-up well testing. Within one year of the initial well test the Management Zone will contact the resident or property owner to offer the opportunity to retest the well at no cost. If the resident or property owner does not want their well re-tested, no additional follow-up will occur. If the resident or property owner agrees to have the well re-tested and the result remains between 8 and 10 mg/L, then the Management Zone will continue to reach out to the resident or property owner on an annual basis to provide the opportunity to have the well tested at no cost to until the nitrate concentration is < 8.0 mg/L.

5.4. Coordination with Other Related Safe Drinking Water Programs

The purpose of this EAP is to fulfill the safe drinking water requirements of the Nitrate Control Program as they pertain to nitrate levels in groundwater. It does not address other potential water quality concerns that may impact drinking water within the Management Zone area, e.g., arsenic, uranium or 1,2,3 Trichloropropane (TCP). However, other programs (e.g., Safe and Affordable Funding for Equity and Resilience [SAFER] under the Safe and Affordable Drinking Water Fund) may be able to support efforts to test for these other constituents of concern through other funds.

Through its ongoing community outreach program and coordination with SHE (either directly or through contract mechanisms established by other entities such as the Central Valley Salinity Coalition), the Management Zone will identify opportunities to collaboratively address these other contaminants of concern where appropriate. The intent of this collaboration is to

implement as cost effective a program as possible that minimizes the potential for a residence to have its well tested multiple times, each time for different constituents. To this end, the Management Zone will coordinate with DDW, community-based organizations and other interested entities to identify opportunities to implement a complementary well testing program.

6. EARLY ACTION PLAN IMPLEMENTATION

6.1. Schedule/Milestones

Figure 6-1 illustrates the general schedule and key milestones for implementation of the EAP. **Table 6-1** provides a more detailed schedule of activities associated with each of the key components of this plan: General and Targeted Community Outreach, Interim Replacement Water Program and Monitoring and Reporting. The schedule assumes a startup date no later than May 7, 2021, or 60 days after submittal of the PMZP.

6.2. Early Action Plan Funding Mechanism

The Madera County Farm Bureau, a California nonprofit mutual benefit corporation, established a Memorandum of Agreement (MOA) with permitted dischargers in the Chowchilla Subbasin to form the Chowchilla Management Zone (see Attachment A of the Preliminary Management Zone Proposal). This MOA (“Management Zone Agreement for Permittees in the Chowchilla Groundwater Basins/Subbasins as identified in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins”) serves as the preliminary basis for governance in this Management Zone, including securing the funding to implement this EAP.

The MOA establishes the Madera County Farm Bureau as the temporary fiduciary agent for the Chowchilla Management Zone until participants establish a new organization or identify an existing organization to administer the Nitrate Control Program requirements as required for a Management Zone. Per the MOA, Management Zone costs, including the implementation of the EAP, will be shared with other participants based on an equitable cost allocation mechanism to be developed by the participants.

The MOA is being implemented by a Steering Committee comprised of representatives of the permitted dischargers (see the Preliminary Management Zone Proposal for the current Steering Committee membership). A primary focus of the Steering Committee has been to develop the Management Zone’s cost sharing and governance structures necessary to develop and implement the PMZP. In January 2021, the Steering Committee developed and approved a cost allocation formula to implement the PMZP program including this EAP. Based on this formula, the Madera County Farm Bureau through its authority established under the MOA has collected

fees from the Management Zone participants and is prepared to begin implementation of this EAP.

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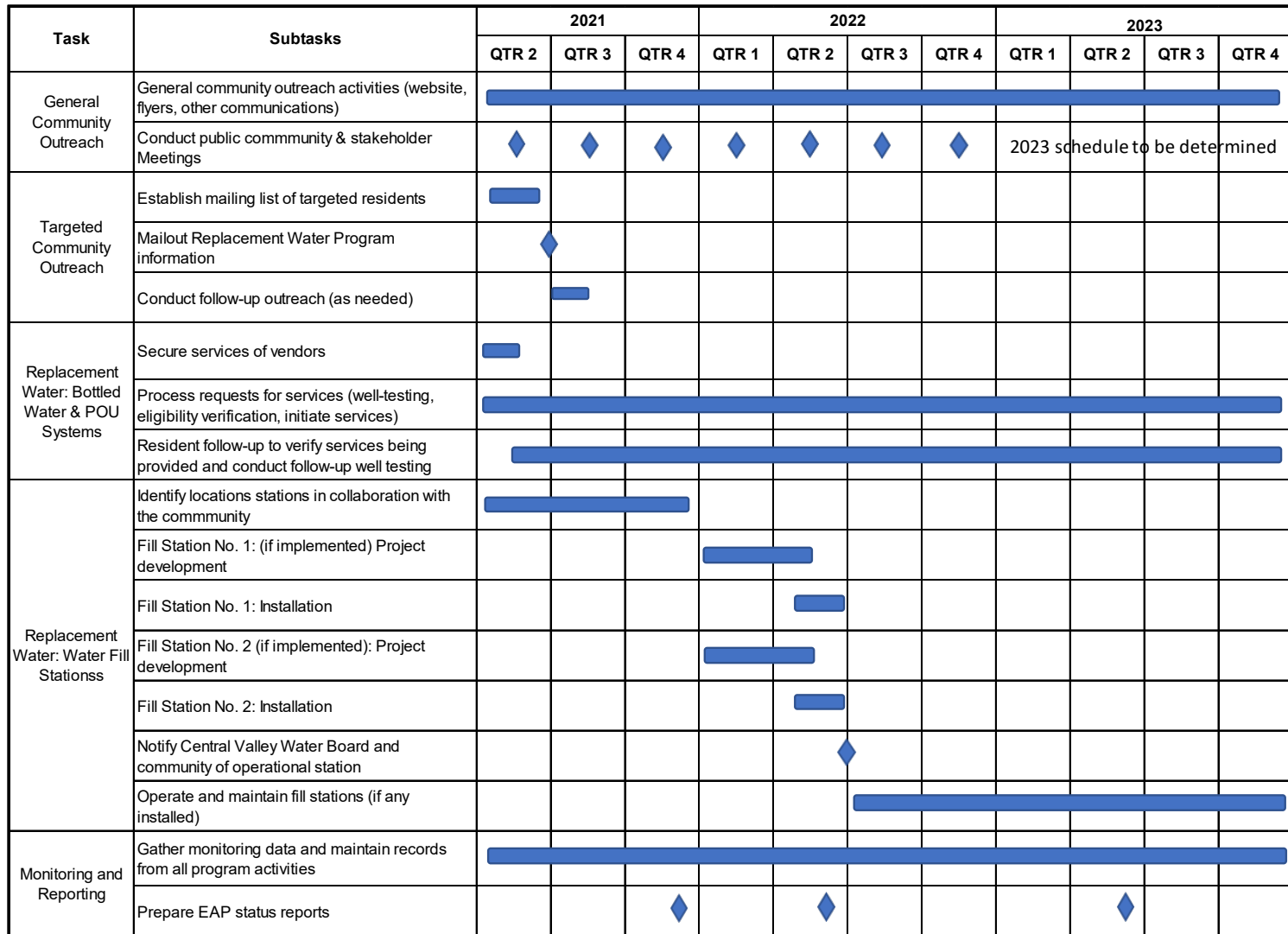


Figure 6-1. General EAP Implementation Schedule

Table 6-1. Chowchilla Management Zone EAP Implementation Schedule (see also Figure 5-2)

Task	Subtasks	Schedule (Assumes EAP Start Date: May 7, 2021)
General Community Outreach	Maintain Chowchilla Management Zone website	Ongoing
	Maintain existing and develop additional mechanisms to provide notice to the public of EAP implementation activities	Ongoing
	As needed, prepare materials to support community outreach activities (e.g., flyers for upcoming meetings, FAQs, etc.)	Ongoing
	Send out public notice of upcoming community meetings	<ul style="list-style-type: none"> • “Save the Date” public meeting notice – send within 10 business days prior to scheduled meeting • Final meeting notice – send within 3 business days of meeting date (include Zoom link if meeting will be virtual)
	<ul style="list-style-type: none"> • Conduct public community meetings to provide: <ul style="list-style-type: none"> – EAP status update; – Information on replacement water program options; – Implementation schedule; – Well-testing opportunity; and – Other topics as needed. 	<ul style="list-style-type: none"> • Initial EAP implementation kickoff meeting – May 2021 • Additional meetings – minimum of once every three months after May 2021 kickoff meeting (August, November 2021; February, May, August, November 2022) • 2023 schedule to be determined before end of 2022 <p>Note: Meetings will be virtual until the State of California lifts restrictions on public in-person meetings. Once restrictions are lifted, the Management Zone will hold in-person meetings initially, but may balance in-person vs. virtual meetings over the long-term.</p>

Table 6-1. Chowchilla Management Zone EAP Implementation Schedule (see also Figure 5-2)

Task	Subtasks		Schedule (Assumes EAP Start Date: May 7, 2021)
Targeted Community Outreach	Establish mailing list for targeted residents (residents with domestic well in areas most likely impacted by nitrate at concentrations > 10 mg/L-N – see red area in Figure 2.1)		Complete by June 15, 2021
	Mailout Replacement Water Program information to residents on mailing list of targeted residents		Complete initial mailing by July 1, 2021
	Conduct follow-up outreach to residents that did not respond to initial contact or had mailed information returned as undeliverable		As needed, but complete by August 15, 2021
Replacement Water: Bottled Water or POU System Programs	Establish third-party agreements with vendors to supply bottled water or install a POU treatment system		Prior to initial mailout of outreach packet to targeted residences (see above)
	Acknowledge receipt of service request from resident and initiate eligibility evaluation		Within 3 business days of receipt of request to receive services
	If well test required to verify eligibility of residents requesting services, schedule and conduct well test		Schedule well testing as quickly as possible in coordination with resident (and property owner if the resident is not the owner)
	Advise residents of initial nitrate well test results	Result is > 10 mg/L-N	Within as soon as possible within 5 business days of receipt of test results, contact resident or property owner via telephone or email to initiate bottled water or POU System services; follow-up with written information within 10 business days
		Result is ≤ 10 mg/L-N	Within 5 business days of receipt of test results, send written notice to the resident or property owner of ineligibility to participate in bottled water or POU System programs (see Section 5.3.1 regarding other information to be communicated)

Table 6-1. Chowchilla Management Zone EAP Implementation Schedule (see also Figure 5-2)

Task	Subtasks		Schedule (Assumes EAP Start Date: May 7, 2021)
	Follow-up well testing if initial well test is ≥ 8.0 mg/L but ≤ 10 mg/L-N	Initial well test is ≥ 8.0 mg/L but ≤ 10 mg/L-N	<p>Within one year offer resident or property owner the opportunity to retest the well at no cost. If the resident or property owner:</p> <ul style="list-style-type: none"> Does not want their well re-tested, no additional follow-up is required. Agrees to have the well re-tested and the result remains between 8.0 and 10 mg/L, then the Management Zone will continue to reach out to the resident or property owner on an annual basis to provide the opportunity to have the well tested at no cost until the nitrate concentration is < 8.0 mg/L.
	Follow-up with residents participating in bottled water/POU program to verify: (a) services are being received as contracted; and (b) bottled water recipients have sufficient water being delivered		Conduct first check-in with each resident within 30 days after confirming eligibility to receive bottled water/POU System services; conduct second check-in within 90 days after first check-in
Replacement Water: Fill Stations	Identify locations for up to two water fill stations in coordination with the community		If water fill stations supported by the community, identify locations by end of 2021.
	Establish final agreements with land/property owner/fill station owner to operate/maintain filling station (as needed)		As needed
	Water Fill Station No. 1 (if implemented)	Complete design/specifications and obtain necessary permits or approvals to install facility	Within 120 days of confirmation of site location and establishment of agreement with land/property owner
		Complete installation	Within 60 days of obtaining necessary permits/approvals
	Water Fill Station No. 2 (if implemented)	Complete design/specifications and obtain necessary permits or approvals to install facility	Within 90 days after Water Fill Station No. 1 is operational
		Complete installation	Within 60 days of obtaining necessary permits/approvals

Table 6-1. Chowchilla Management Zone EAP Implementation Schedule (see also Figure 5-2)

Task	Subtasks	Schedule (Assumes EAP Start Date: May 7, 2021)
	Notify Central Valley Board and community	Within 14 days of a water fill station becoming operational
	Operate and Maintain Water Fill Stations	Ongoing as fill stations become operational
Monitoring and Reporting	Collect monitoring data/maintain records	Ongoing
	Submit progress reports to the Central Valley Water Board	<ul style="list-style-type: none"> • Within 30 days after the first six months of EAP implementation or by December 7, 2021 • Within 30 days after the first year of EAP implementation is completed or by June 7, 2022 • By June 7 of each year beginning in 2023 (as long as EAP continues to be implemented)

6.3. EAP Program Evaluation

The Chowchilla Management Zone will conduct monitoring to evaluate the effectiveness of its EAP program. This information will be used to prepare EAP status reports and adaptively manage the EAP over time while long-term drinking water solutions are in development.

6.3.1. Monitoring Activities

The Management Zone will implement the following record-keeping and data collection efforts:

- *Bottled-water Delivery Program* - The Management Zone will maintain records that include the following information:
 - Requests for participation in this program;
 - Wells tested as a result of requests for participation and the well test results;
 - Communications with each resident regarding well test results and eligibility to participate in bottled water program; and
 - Communications with residents and status of participation in program (e.g., follow-up check-ins to verify water needs are being met and contracted services are being provided).
- *POU System Program* - The Management Zone will maintain records that include the following information:
 - Requests for participation in this program;
 - Wells tested as a result of requests for participation and the well test results;
 - Communications with each resident and property owner regarding well test results and eligibility to participate in POU System program;
 - Status of participation of residents that had a POU System installed (e.g., verify vendor is able to provide maintenance and conduct monitoring as required for each system); and
 - Communications with residents and status of participation in program (e.g., follow-up check-ins to verify contracted services are being provided).
- *Water Fill Station* – For any water fill station that is operational, the Management Zone will collect usage data, including volume of water dispensed and days and times fill stations are most often used. These data will provide: (a) insight on patterns of usage at each facility; and (b) if needed, a basis for compensating the owner of the facility providing water to the fill station. Fill station usage data will also allow the Management Zone to evaluate whether additional fill station capacity is needed in the Management Zone. If periods of high usage are identified at any station, additional site monitoring may be temporarily conducted to determine the degree to which lines may be forming causing significant delays in obtaining water or congestion at the site.

The Management Zone will also conduct the following additional record-keeping activities to support its effort to evaluate EAP implementation:

- Residences that have been targeted for outreach to participate in the replacement water program but have not responded or have indicated no interest in participating in the program.
- Documentation of any residents that were approved for bottled-water delivery or POU System installation but did not activate the services with the Management Zone’s vendor(s).
- Documentation of how situations were resolved where the resident requested a POU System but due to technical issues had to rely on bottled water delivery instead.
- Contacts with residents to provide an opportunity for a re-test of their domestic well and the outcome of those efforts.

6.3.2. Reporting and Adaptive Management

The Management Zone will submit EAP progress reports to the Central Valley Water Board per the schedule in **Table 5-3**. Each report will address the following:

- Status of implementation of each EAP element in **Table 5-3**. Where a program element has not been completed per the schedule, the progress report will document the reason for the delay and provide a revised schedule to complete the activity.
- Summary of public outreach efforts that have occurred since last reporting period.
- Summary of findings from ongoing monitoring activities.
- Program expenditures during the current reporting period and anticipated costs to implement the EAP during the next reporting period.
- Requests to modify the EAP. The basis for a request to modify the EAP will be based on knowledge gained during implementation and may include, but not be limited to, one of the following drivers:
 - Evaluation of available program monitoring data;
 - Outcomes from ongoing community outreach activities;
 - Input from Management Zone participants, including permitted dischargers and non-dischargers within the Management Zone area; and
 - Identification of other replacement water program options to supplement the overall EAP program or replace an existing program option.

The Management Zone will submit any recommended revisions to the EAP to the Executive Officer of the Central Valley Water Board. Unless the Executive Officer objects to the proposed revisions to this EAP, the Management Zone will begin implementation of the revised EAP within 60 days of submittal. If the Central Valley Water Board objects to the proposed revisions, the Management Zone will work with the Central Valley Water Board to address their concerns

to the extent possible. If the proposed revisions are not approved, then the EAP will continue to be implemented as written.

7. REFERENCES

(To be Expanded)

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8. APPENDICES

Appendix A Community Engagement

A-1 Chowchilla Subbasin Nitrate Control Program Communication and Engagement Plan (CEP)

A-2 State Water Board Community Engagement Checklist

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B-1 Community Meeting Summaries (presentations and summary of participants)

B-2 Public Meeting Notices (Flyers)

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B-4 Public Draft EAP comment/response summary

Appendix C Community Profile Data

Appendix D Chowchilla Management Zone Participation Request

Appendix A-1 Chowchilla Subbasin Nitrate Control Program Communication and Engagement Plan (CEP)

[in progress]

Appendix A-2 State Water Board Community Engagement Checklist

State Water Board (2020) provides a table that summarizes the guidance found in its community engagement document. **Table A-2** below demonstrates how the Chowchilla Management Zone’s community outreach program aligns with the guidance.

Table A-2. Alignment Between Chowchilla Management Zone Community Outreach Actions and State Water Board Guidance (Table adapted from State Water Board (2020), page 17)		
Community Engagement Element	Potential Actions to Implement Element	Implementation During EAP Development
Communicate Effectively	Communicate with affected communities remotely during the COVID-19 crisis	Community outreach events held using Zoom Webinar virtual platform on October 16 and December 11, 2020 and January 29, 2021
	Translate materials into Spanish and other language(s) identified	<ul style="list-style-type: none"> Spanish translation provided during all virtual community outreach events Meeting notices prepared in both English and Spanish Used CV-SALTS Spanish translations of Nitrate Control Program materials to provide basic information to the community
	Provide a point of contact who speaks residents’ primary language	SHE, which provided Spanish translation services, was the point of contact on community flyers posted in local community
	Ensure planned one-on-one communications have personnel fluent in the primary language	Not required to date
	Offer live interpretation at community meetings	SHE provided Spanish translation services during virtual community outreach events

**Table A-2. Alignment Between Chowchilla Management Zone Community Outreach Actions and State Water Board Guidance
(Table adapted from State Water Board (2020), page 17)**

Community Engagement Element	Potential Actions to Implement Element	Implementation During EAP Development
	Provide written materials in plain language	Relied on CV-SALTS Nitrate Control Program brochures as the primary source of nitrate-related information; these materials have been written in plain language
Communicate Effectively (ctd)	Speak in plain language	To the extent practical, presentations during webinars relied on use of plain language to explain technical issues, e.g., what is a groundwater well, how can it be impacted by nitrate, how can elevated nitrate impact your health and how the EAP is designed to provide interim solutions.
	Consult community groups if your materials are understandable to the community	SHE provided community outreach services throughout and prepared flyers to communicate with the local residents.
	Ask participants if materials are understandable	
	Present information without bias	EAP program materials presented as concepts or options with no priority given to one temporary solution over another. First time a proposed program was presented to the community was the January 29, 2021 meeting. The opportunity was provided to allow for public comment on the proposed program
	Know and communicate your constraints	Management Zone has responded to questions regarding program requirements.
	Be transparent with decision-making processes	
Protect Personal Information	Mitigate concerns about information collection	

**Table A-2. Alignment Between Chowchilla Management Zone Community Outreach Actions and State Water Board Guidance
(Table adapted from State Water Board (2020), page 17)**

Community Engagement Element	Potential Actions to Implement Element	Implementation During EAP Development
	Minimize collection of personal information	Only requested names of people participating in community outreach events (to associate with a telephone number)
Acknowledge Diverse Interests	Be inclusive of all groups within a community	Community outreach conducted without bias; no one was excluded from a meeting
	Provide “balanced access” to groups you are engaging with	
Evaluate and Revise	Evaluate your community engagement strategy	<ul style="list-style-type: none"> Community engagement strategy was presented to the CV-SALTS Executive Committee Comments on early drafts provided by Steering Committee and a number of stakeholders
	Make modifications	Throughout EAP development the CEP was a “living document.” It was modified as needed during the process based on knowledge gained and lessons learned. It will continue to be updated as needed going forward.
Learning About the Community	Develop a Community Profile	
	Develop a Contact List	Management Zone maintained an “interested party” list that was added to as more members of the community expressed interest in the program. This list will continue to grow over time
Educating the Community	Develop educational materials	Management Zone relied primarily on CV-SALTS developed educational materials which provide background on nitrate health concerns and nitrate management requirements

**Table A-2. Alignment Between Chowchilla Management Zone Community Outreach Actions and State Water Board Guidance
(Table adapted from State Water Board (2020), page 17)**

Community Engagement Element	Potential Actions to Implement Element	Implementation During EAP Development
	Establish contact(s)	
	Establish locations where information is publicly accessible	Management Zone information is housed on Madera County website, SHE posted flyers at selected locations
	Distribute materials using multiple communication platforms	Information shared via webinars, website. SHE posted information and provided it to school districts to share with families
Educating the Community	Hold community meetings to educate the community	Meetings held on October 16 and December 11, 2020 and January 29, 2021. Meetings will continue during EAP implementation. Meeting presentation information posted on Management Zone website
Collaborating with the Community	Create a process for collaborative decision-making	<ul style="list-style-type: none"> • Provided opportunity for Q&A during Zoom webinars • Provided contact information for the public to reach out to the Management Zone directly • Provided opportunity for community to comment on draft EAP (PMZP includes response to comments) • Survey questions linked to presentations to obtain direct input from community members
Maintaining Involvement	Provide updates	Updates of program status were provided during each community meeting during EAP development. Proposed EAP includes regular community updates through various mechanisms, e.g., community meetings and website postings.

**Table A-2. Alignment Between Chowchilla Management Zone Community Outreach Actions and State Water Board Guidance
(Table adapted from State Water Board (2020), page 17)**

Community Engagement Element	Potential Actions to Implement Element	Implementation During EAP Development
	Maintain contact and process for responding to community inquiries	

Appendix B Community Outreach to Support EAP Development

[in progress]

- B-1 Community Meeting Summaries (presentations and summary of participants)
- B-2 Public Meeting Notices (Flyers)
- B-3 Community Surveys
- B-4 Public Draft EAP comment/response summary

Appendix C Community Profile Data

U.S. Census Bureau information about Population, Age and Sex, Race and Hispanic Origin, Population Characteristics, Housing, Families & Living arrangements, Computer and Internet Use, Education, Health, Economy, Transportation, Income & Poverty, Businesses, and Geography (<https://www.census.gov/quickfacts/maderacountycalifornia> , accessed January 2021).

QuickFacts

Madera County, California

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Table

All Topics	Madera County, California
Population estimates, July 1, 2019, (V2019)	157,327
PEOPLE	
Population	
Population estimates, July 1, 2019, (V2019)	157,327
Population estimates base, April 1, 2010, (V2019)	150,834
Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)	4.3%
Population, Census, April 1, 2010	150,865
Age and Sex	
Persons under 5 years, percent	▲ 7.3%
Persons under 18 years, percent	▲ 27.4%
Persons 65 years and over, percent	▲ 14.3%
Female persons, percent	▲ 51.8%
Race and Hispanic Origin	
White alone, percent	▲ 85.9%
Black or African American alone, percent (a)	▲ 4.2%
American Indian and Alaska Native alone, percent (a)	▲ 4.4%
Asian alone, percent (a)	▲ 2.6%
Native Hawaiian and Other Pacific Islander alone, percent (a)	▲ 0.3%
Two or More Races, percent	▲ 2.6%
Hispanic or Latino, percent (b)	▲ 58.8%
White alone, not Hispanic or Latino, percent	▲ 33.2%
Population Characteristics	
Veterans, 2015-2019	6,317
Foreign born persons, percent, 2015-2019	20.2%
Housing	
Housing units, July 1, 2019, (V2019)	51,438
Owner-occupied housing unit rate, 2015-2019	64.1%
Median value of owner-occupied housing units, 2015-2019	\$251,200
Median selected monthly owner costs -with a mortgage, 2015-2019	\$1,551
Median selected monthly owner costs -without a mortgage, 2015-2019	\$478
Median gross rent, 2015-2019	\$1,014
Building permits, 2019	644
Families & Living Arrangements	
Households, 2015-2019	44,881
Persons per household, 2015-2019	3.28
Living in same house 1 year ago, percent of persons age 1 year+, 2015-2019	87.9%
Language other than English spoken at home, percent of persons age 5 years+, 2015-2019	45.3%
Computer and Internet Use	
Households with a computer, percent, 2015-2019	89.8%
Households with a broadband Internet subscription, percent, 2015-2019	79.9%
Education	
High school graduate or higher, percent of persons age 25 years+, 2015-2019	71.9%
Bachelor's degree or higher, percent of persons age 25 years+, 2015-2019	14.6%
Health	
With a disability, under age 65 years, percent, 2015-2019	8.7%
Persons without health insurance, under age 65 years, percent	▲ 10.7%
Economy	
In civilian labor force, total, percent of population age 16 years+, 2015-2019	54.3%
In civilian labor force, female, percent of population age 16 years+, 2015-2019	47.9%
Total accommodation and food services sales, 2012 (\$1,000) (c)	150,065
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	760,956
Total manufacturers shipments, 2012 (\$1,000) (c)	1,441,125

Total merchant wholesaler sales, 2012 (\$1,000) (c)	508,930
Total retail sales, 2012 (\$1,000) (c)	1,012,856
Total retail sales per capita, 2012 (c)	\$6,654

Transportation

Mean travel time to work (minutes), workers age 16 years+, 2015-2019	28.3
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Income & Poverty

Median household income (in 2019 dollars), 2015-2019	\$57,585
Per capita income in past 12 months (in 2019 dollars), 2015-2019	\$22,853
Persons in poverty, percent	▲ 17.6%

BUSINESSES

Businesses

Total employer establishments, 2018	1,984
Total employment, 2018	27,141
Total annual payroll, 2018 (\$1,000)	1,216,841
Total employment, percent change, 2017-2018	1.4%
Total nonemployer establishments, 2018	7,504
All firms, 2012	8,094
Men-owned firms, 2012	3,888
Women-owned firms, 2012	3,202
Minority-owned firms, 2012	3,203
Nonminority-owned firms, 2012	4,524
Veteran-owned firms, 2012	618
Nonveteran-owned firms, 2012	7,044


GEOGRAPHY


Geography

Population per square mile, 2010	70.6
Land area in square miles, 2010	2,137.07
FIPS Code	06039

About datasets used in this table

Value Notes

 Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info  icon to the row in TABLE view to learn about sampling error.

The vintage year (e.g., V2019) refers to the final year of the series (2010 thru 2019). *Different vintage years of estimates are not comparable.*

Fact Notes

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

Value Flags

- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper inf open ended distribution.
- D Suppressed to avoid disclosure of confidential information
- F Fewer than 25 firms
- FN Footnote on this item in place of data
- N Data for this geographic area cannot be displayed because the number of sample cases is too small.
- NA Not available
- S Suppressed; does not meet publication standards
- X Not applicable
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and F Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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Appendix D Chowchilla Management Zone Participation Request Form

Chowchilla Management Zone Participation Request Form

The Chowchilla Management Zone is implementing an **Interim Replacement Water Program** to ensure that residents who are dependent on water for drinking and cooking that exceeds the nitrate drinking water standard of 10 milligrams/liter as Nitrogen (10 mg/L-N) have access to safe water.

Residents may receive safe drinking water at no cost through one of the following options (see INSERT URL for more information):

- Delivery of bottled water to their residence
- Installation of a Point of Use (POU) Treatment System (“POU System”) in their home

If neither of these options are suitable, the resident may be able to obtain at no cost safe drinking water from a public water fill station in your area. Click here to see if there are any water fill stations currently operating in this Management Zone (INSERT URL):

To request participation in the bottled water or POU System program, you must meet the following criteria:

- Your residence is within the Chowchilla Management Zone and does not receive drinking water from a state or county regulated Public Water System that already provides water that meets the nitrate drinking water standard.
- Demonstration that your domestic well has unsafe nitrate levels (nitrate > 10 mg/L-N). The Management Zone will test your well for free if the nitrate level in your well is unknown.
- Be willing to sign an agreement with the Management Zones approved vendor(s) to receive bottled water or have a POU treatment system installed in your home.

To apply, please complete all of the information in the attached form to request service at your residence (form may also be filled out online at: INSERT URL). Note: If you are unsure if you meet the criteria, please submit the form and the Management Zone will help you determine if you are eligible.

Request to Participate in the Chowchilla Management Zone Interim Replacement Water Program

Please complete the entire form and submit to the Chowchilla Management Zone. Submittal of an incomplete form may delay evaluation of this application.

Applicant Information (Main contact for phone calls and correspondence about this request form)			
Applicant Name:			
Is the applicant above the property owner? (circle one)	Yes No	Address:	
Phone:		City:	
Secondary Phone:		State, Zip Code:	
Email:			
Property Owner Contact Information (this must be provided if the applicant is not the owner of the residence requesting participation in this program)			
Property Owner(s) Name(s):			
Address:			
City:		State, Zip:	
Phone:		Email:	
Nitrate Water Quality			
Has your well been tested for nitrate within the last 5 years? (circle one)	Yes	No	Don't Know
<i>Note:</i> <ul style="list-style-type: none"> If yes, please attach the laboratory report with the test result for Management Zone review If no, or don't know, our representative will contact you to schedule a free well test 			
Authorizing Signature(s)			
Applicant:		Date:	
Property Owner: (if applicable)		Date:	

Submit the completed form and attachments (if you have a laboratory report) to the Chowchilla Management Zone in one of the following ways:

- Mail to: [INSERT Address]
- Electronically scan and email to: [INSERT Email Address]
- Go to [INSERT URL] and complete the request to participate online

NOTE: The Management Zone will keep your information private. It will not be shared with any local, state, or federal agency, including those involved with law enforcement or immigration enforcement.