

BENEFICIAL USE DESIGNATIONS

Current Regulatory Approach	Alternatives Being Considered
1) MUN A) Presumed per 88-63 B) Exceptions per 88-63	1) Apply 88-63 exceptions criteria 2) Subdivide/partition aquifers 3) Sub-categorize MUN use
2) AGR A) Assumed for all groundwaters B) Site-specific exceptions C) No statewide policy guidance D) Crops may not rely on groundwater	1) Develop exceptions criteria 2) Subdivide/partition aquifers 3) Sub-categorize AGR use
3) Most Sensitive Use (usually assumed to be MUN)	1) Need not be species-specific for AGR as it is for WARM or COLD.
4) Existing vs. Potential Use	1) Recognize limitations of existing quality on probable future use(s).

WATER QUALITY OBJECTIVES

Current Regulatory Approach	Alternatives Being Considered
1) Nitrate Objective for MUN = 10 mg/L (nitrate as nitrogen)	No change proposed.
2) TDS Objective for MUN = 500 mg/L	1) Delete Secondary MCLs as numeric water quality objectives from Basin Plan and replace with narrative objective and implementation procedure.
3) The Basin Plan does not identify specific numeric salinity objectives for groundwaters designated AGR.	2) Revise existing numeric objectives to recognize the full range of salinity tolerances described in the Secondary MCLs.
4) Meeting TDS objective for MUN is presumed to protect AGR (based on recommendations provided in the UN: Ayers and Westcott report).	3) Develop narrative implementation procedure to demonstrate AGR uses are reasonably protected for salinity.
4) Natural Background Concentration	1) Recognize some existing AGR uses (crops) are dependent on imported surface water not groundwater.

WASTE DISCHARGE REQUIREMENTS

Current Regulatory Approach	Alternatives Being Considered
1) Attainment assessment evaluated at First Encountered Groundwater	1) Comprehensive Groundwater Management Zones 2) Evaluation at Point-of-Actual-Use
2) Assimilative Capacity	1) Volume-weighted average water quality in a given groundwater management zone 2) "Maximum Benefit" demonstration requirements
3) Receiving Water Limitations	1) Define Best Practicable Treatment or Control (BPTC) requirements.
4) Point-of-Compliance	1) Alternative Compliance Demonstration through Direct Use Protection Strategies.
5) Time-to-Comply	1) Recognize long-term influence of pre-existing vadoze zone loading (e.g. "Managed Degradation"). 3) Evaluate utility of Variances

SOME KEY SURFACE WATER ISSUES

Current Regulatory Approach	Alternatives Being Considered
1) Beneficial Uses	1) Apply 88-63 exceptions criteria 2) Recognize DHS prohibitions on MUN use 3) Refine application of tributary rule for unusual hydrologic situations 4) Seasonal use sub-categories
2) Water Quality Standards	1) Reconsider application of Secondary MCLs as numeric water quality objectives. 2) Re-evaluate role of mixing zones in managing assimilative capacity and protecting downstream uses.
3) Waste Discharge Requirements and Effluent Limitations	1) Alternate compliance demonstrations through Direct Use Protection strategies. 2) Alternate averaging periods. 3) Evaluate application of "bubble/ umbrella compliance" options.