

**SUMMARY OF CENTRAL VALLEY SALT & NITRATE MANAGEMENT PLAN
SUPPLEMENTAL ENVIRONMENTAL DOCUMENT
IMPACT DETERMINATIONS**

Resource Categories other than Water Quality	
No Impact	Less-than-Significant Impact
<ul style="list-style-type: none"> • Aesthetics • Agriculture and Forestry Resources • Air Quality • Biological Resources • Cultural Resources • Geology, Soils, and Seismicity • Hazards and Hazardous Materials • Hydrology • Land Use and Planning • Mineral Resources • Noise • Public Services • Recreation • Transportation/Traffic • Utilities and Service Systems 	<ul style="list-style-type: none"> • Greenhouse Gas Emissions (p. 83 of SED) – <u>Less than significant</u> to formation of nitrous oxide gas from nitrate in soil. • Population and Housing (p. 106 of SED) – <u>Less than significant</u> to displacement of people due to impairment of groundwater nitrate, because of requirement for alternative, safe, reliable drinking water supply.

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SNMP Policy / Strategy / Guidance	Description of Element	Impact Determination	Basis
WATER QUALITY			
Default Groundwater Management Areas (p. 88 of SED)	Amend Basin Plans to make definitions of groundwater basins/subbasins consistent with 2003 DWR Bulletin 118	No impact	Not an action that involves changes in WQOs or beneficial uses; rather provides a framework for groundwater quality management.
	<i>Option: None</i>	N/A	N/A
Groundwater Management Zone Policy (p. 89 of SED)	Establishes criteria for the formation of management zones (MZs) that would be subject to Central Valley Water Board approval. May be a regulated entity for compliance with WDRs.	No impact	The formation of a management zone, itself, would not result in water quality degradation, as this action is the establishment of a management structure to address degradation through the other SNMP strategies and policies. The potential for substantial water quality degradation associated with implementing the other SNMP strategies through a management zone (e.g., Nitrate Permitting Strategy, Exceptions Policy) is addressed in assessments of those policies/strategies.
	<i>Options: Include not allowing MZs to be used for compliance with WDRs, time to restoration of 50 yrs, determine assimilative capacity at first encountered groundwater</i>	<i>Same</i>	<i>Same as above. The specific impacts to water quality would occur through implementation of other policies (e.g., Nitrate Permitting Strategy).</i>

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Nitrate Permitting Strategy (p. 89 of SED)	Regulates degradation of nitrate in groundwater according to nitrate concentrations in discharge and underlying groundwater.	Potentially significant ; less than significant at full implementation	Permitting discharges that fall into Category 5 (already degraded in groundwater and above objective in discharge) could contribute to substantial degradation of groundwater quality for nitrate in basins/subbasins where nitrate levels are already above the applicable objective, thereby making adverse nitrate conditions worse, which would adversely affect the beneficial uses of groundwater. With implementation of short-term, intermediate, and long-term compliance projects, would see improvement in groundwater basins.
	<i>Option: Provides alternative structure, information requirements and timelines.</i>	<i>Same</i>	<i>As with the proposed strategy, there still could be substantial degradation in regard to nitrate for a period of time (years to decades) until projects are ultimately implemented that achieve nitrate loading balance and improved (reduced) nitrate concentrations, relative to existing conditions.</i>
Salinity Management Strategy (p. 91 of SED)	Regulates degradation of salts in surface water and groundwater.	Less than significant – surface water Potentially significant – groundwater	<u>Surface water</u> : Not much degradation expected given that salts would be controlled at existing levels, flows, and receiving water conditions, and not a parameter that is being treated for now. <u>Groundwater</u> : In groundwater basins or portions of basins where levels of salinity constituents are near or above applicable objectives and the discharge levels are above groundwater levels, there is the potential for water quality degradation to occur that results in groundwater concentrations being increased above applicable objectives, or results in groundwater quality that is already exceeding objectives being further degraded.
	<i>Option: None</i>	<i>N/A</i>	<i>N/A</i>

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Exceptions Policy (p. 92 of SED)	Grants exceptions to meeting groundwater objectives for salt and nitrate in WDRs	<i>Potentially significant;</i> less than significant at full implementation of other regulatory tools	Because the exception allows discharges and groundwater to exceed water quality objectives for salt and nitrate, there would be the potential to adversely affect MUN and/or AGR beneficial uses in some areas of the Central Valley. Exceptions would be part of “toolbox” with other policies to temporarily allow degradation with the ultimate long-term plan to improve groundwater quality (or develop SSO, if appropriate).
	<i>Option: Add in boron</i> <i>Other Options: Address conditions under which an exception would be granted, incorporation of performance measures, and restricting use of exceptions to a permit-by-permit basis.</i>	<i>Same</i> <i>Same</i>	<i>Same</i> <i>While these other options incorporate additional conditions and restriction on the use of exceptions, there would still be the potential for substantial adverse water quality degradation for the term of the exception. Thus, the same impact determinations also would apply with the options.</i>
AGR Policy (p. 94 of SED)	Establishes four classes of groundwater basins based on existing EC/TDS to interpret Chemical Constituents objective; allows for development of site-specific objectives	Less than significant	To address situations where localized EC/TDS may differ from the AGR class assigned to the basin, the Central Valley Water Board would manage the EC/TDS in the groundwater through application of the state Antidegradation Policy and Central Valley SNMP, or potentially through site-specific objectives. Thus, while there could be degradation of EC/TDS through the assignment and management of EC/TDS through the proposed AGR classes, that degradation would be managed and limited such that it would not adversely affect the AGR beneficial uses that rely on groundwater in the Central Valley Region.
	<i>Option: None</i>	<i>N/A</i>	<i>N/A</i>

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Salinity Variance Policy (p. 94 of SED)	Grants variance to meeting surface water objectives for salinity discharges	Less than significant	Permittees applying for a variance would be required to demonstrate how their discharge situation is similar or comparable to the case studies evaluated for the current Salinity Variance Program, which consisted of three municipal wastewater treatment facilities that discharge to surface waters (City of Tracy, City of Stockton, and City of Manteca). Modeling conducted for original Variance Program showed little to no impact to EC.
	<i>Option: None.</i>	<i>N/A</i>	<i>N/A</i>
Offsets Policy (p. 95 of SED)	Allows use of offsets toward compliance with WDRs	Potentially significant	There is the potential for long-term degradation of water quality, relative to existing conditions, on a localized basis within groundwater basins, subbasins, and management zones, on a long-term average basis, that could adversely affect the direct use of the degraded water for MUN or AGR uses within the local area.
	<i>Option: Allow use of offsets across MZs, basins/subbasins.</i>	<i>Same</i>	<i>Same</i>
	<i>Option: Allow use of offsets only in area where impact is occurring that would result in water quality objectives being attained</i>	<i>No impact</i>	<i>This situation is more restrictive in its implementation than the proposed policy. Because attainment of water quality objectives is a condition of this option, which would require an improvement over the existing conditions.</i>
Drought and Water Conservation Policy (p. 96 of SED)	Modifications to how compliance with salinity objectives is assessed to facilitate recycled water use and compliance with WDRs, particularly during drought periods	Less than significant	Degradation to salinity would be temporary and, thus, not expected to result in substantial adverse effects to beneficial uses.
	<i>Option: Include boron</i>	<i>Same</i>	<i>Same</i>

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<p>Secondary MCL Guidance (p. 98 of SED)</p>	<p>Modifies how SMCL constituents are regulated in WDRs for surface water and groundwater discharges</p>	<p>Less than significant</p>	<p>SMCLs for EC/TDS/chloride/sulfate: clarifies use of recommended, upper, and short-term objectives. No change from existing anticipated because salts are being regulated now.</p> <p><i>The following applies to compliance with secondary MCLs for Aluminum, Color, Copper, Iron, Manganese, Silver, Turbidity, Zinc</i></p> <p>Measuring compliance using filtered sample: no substantial change in environment anticipated because quality of discharges now a function of controls (i.e., BMPs, wastewater processes) in place that would remain in place in the future.</p> <p>Consideration of Natural Background: Make clear that where the natural background is greater than secondary MCLs, including the “Upper” levels, that the water body shall not exceed the natural background concentration due to controllable anthropogenic sources. By definition, controllable anthropogenic sources could not cause water quality degradation.</p> <p>Consideration of Dilution/Attenuation: For surface water, mixing zones must be as small as practicable and not adversely affect aquatic life and drinking water uses, so this would not result in appreciable change in regulation of surface water discharges. For groundwater discharges, water quality would continue to be regulated to protect MUN, so would not adversely affect beneficial uses.</p> <p>Compliance assessment time period as an annual average: Consistent with current implementation in many WDRs. Not expected to result in appreciable change to wastewater, storm water, or agricultural discharge quality.</p>

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	<p><i>Option re. Consideration of Dilution/Attenuation:</i> a) compliance determined at point of discharge b) compliance determined at edge of mixing zone</p>	<p><i>Same</i></p>	<p><i>Would result in lesser degradation, because more stringent than proposed guidance. Nevertheless, the options to the guidance would not lessen or eliminate a significant water quality impact caused by implementing the guidance because no significant impact to water quality would occur from implementing the Secondary MCL Guidance.</i></p>
<p>Alternative Compliance Project Guidelines (p. 102 of SED)</p>	<p>The Alternative Compliance Project Guidelines establish the components of an Alternative Compliance Project.</p>	<p>No impact</p>	<p>These guidelines do not establish new water quality standards or implementation of water quality standards. To the extent that an Alternative Compliance Project would involve construction of new facilities, that project would undergo separate environmental review to identify project-specific environmental impacts and to incorporate any necessary measures to avoid, reduce, or mitigate for any identified significant environmental impacts.</p>
<p>Maximum Benefit Guidance (p. 102 of SED)</p>	<p>The Maximum Benefit Guidance provides a list of water quality degradation and socioeconomic factors for the Central Valley Water Board to consider when making a determination whether WDRs are “consistent with the maximum benefit to the people of the State” portion of the state Antidegradation Policy.</p>	<p>No impact</p>	<p>Within the existing regulatory framework, the Central Valley Water Board considers water quality degradation and socioeconomic factors when making findings in WDRs regarding consistency with the state Antidegradation Policy. The proposed guidance simply provides further definition to what those factors can be.</p>
	<p><i>Option: None</i></p>	<p><i>N/A</i></p>	<p><i>N/A</i></p>

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MANDATORY FINDINGS OF SIGNIFICANCE (p. 112)		
Fish and Wildlife Populations	Cumulative Impacts	Adverse Effects to Human Beings
<ul style="list-style-type: none"> - No Impact 	<p>Surface Water</p> <ul style="list-style-type: none"> - <u>Salinity Parameters</u>: would not have considerable contribution to any significant adverse cumulative condition - <u>Nitrate</u>: would not have considerable contribution - <u>Additional Secondary MCL Parameters</u>: would not have considerable contribution <p>Groundwater</p> <ul style="list-style-type: none"> - <u>Salinity Parameters and Nitrate</u>: beneficial impact on basin/subbasin level. Would contribute considerably to adverse condition on local level. <i>Potentially significant and unavoidable.</i> - <u>Additional Secondary MCL Parameters</u>: would not have considerable contribution 	<ul style="list-style-type: none"> - Less than significant