

CV-SALTS Basin Plan Needs and Issues

Aggregation **DRAFT Version 2**

Items are listed in Dot vote order # in [Blue](#). Additional work is needed to completely combine and correlate these issues and needs, however here they are grouped into Areas of Emphasis. The numbering of 1-5 is not indicative of the priority among the the major areas of emphasis.

1. Volume/Concentration Flow - Maximum Benefit/Anti Degradation

This area of emphasis is marked by the need to clearly reflect the different constituent Salts represent and to balance water supply/volume and concentration differences with assessing and balancing standards. Within the protection of beneficial uses is the need to address quantity of water or lack thereof. This area of emphasis also includes the need to assess the Anti-degradation policy as it is applied in the Central Valley and define the proofs needed to support a maximum benefit case.

- N-3 Recognize that Delta objectives impact quality & quantity of water delivered to SJ basin and beyond, and that water quality & quantity are interlinked, [6](#)
- I-3 There is a failure to consider constraints on the system under drought conditions in Basin Plans [4](#)
- N-1 State/ Reg. Boards should dedicate resources to develop a real-time management program with stakeholders addressing flow & quality issues, [1](#)
- Basin Plan must deal with recycled water issues
- Define maximum benefit for the Central Valley in compliance with the State Anti-degradation Policy.

2. Program for Implementation - Variance, Offsets, Time Schedule, Credits, Management

Area of emphasis two is the largest by number of areas and issues. It is identified as being broader than the Implementation Plan in the basin plan and will identify all actions needed to implement the salt management “regulatory and non-regulatory” to include adaptive management. This plan of implementation should include programs which are voluntary, program or industry membership governed or compulsory by regulation. Potentially: credits, offsets, variances and time schedule and other management alternatives. This area of emphasis also includes the need to identify long term salt and nitrate balance or management programs and may be supported by the Anti-degradation policy findings in Area 1.

- N-6 Develop Short & long term strategies addressing salt including adaptive management, [24](#)
- N-2, I-7 I-12 and N-4 Develop Basin Plan/Policy and process for reviewing, considering and approving best available scientific and information (attenuation, local soil conditions, criteria changes, etc.) when determining guidelines related to [14](#)
 - whether and to what degree discharges will affect or contribute to long term salt balance including:
 - groundwater quality
 - applicability of mixing zones for groundwater (and develop guidelines for application) [1](#)
 - guidelines for site-specific studies

or when new information should supersede previous or less definitive/applicable information on guidelines or criteria. 6 Additionally the Program of Implementation should include feedback loops to ensure accurate interpretation of narrative objectives for permits. This item links to Area 4.

- Table 2 A # 64 Develop an offset policy for credit, trading and an accounting and monitoring process to reduce costs and increase compliance 12
- N-9 and I-17 Develop the Basin Plan Implementation Plan with timelines and triggers understanding that certain receiving waters will require many years to meet salinity and nutrient WQOs. This will reduce chances the Board will have to adopt unrealistic compliance dates,3, #25, T2A
- Additionally, if processes or programs are making adequate progress toward meeting objectives, contrary immediate actions should not be evoked. This may vary by receiving water, basin or regions. 6
- N-24 and I-5 Address salt collection, aggregation and final disposal options for salt eg (a valley-wide drain or several smaller drains) are viable and the role of the SJR in elimination of salts while protecting beneficial uses. 6 Some participants commented that this should be ranked higher. Within the Plan of implementation provide process and guidelines for determining "best economically achievable treatment practices" and the process for changes to the guidelines. 1
- Table 1-A #20 Address the interdependence and tradeoffs among salt minimization and environmental or water supply impacts and vice versa, 4
- I-11 A long-term Salt Balance goal should be defined with an outline of steps needed to achieve the goal. This could include interim steps and a framework for implementation. Additionally the Basin plan should address the length of time a beneficial use should last?? 2
- N-20 For S-SJR Basin Plan, evaluate the (current) TL Basin Plan approach (500 EC over source water EC) for setting effluent limits (eg evaluate potential to permit a specified salinity increase for consumptive use up to a specified limit), 1, Develop consumptive use guidelines and process for revision, in conformance with salt balance definition usable in all BP Regions. ties to 4
- N-17 Basin Plans must have a goal of MUN Beneficial Use, with a timeline, workplan, and funding identified, 1, touches on legacy contamination and program, mitigation, attainment for actions until met
- #33 Include Irrigated Lands program as part of implementation, 1
- N-21 Clarify what defines "good quality ground waters" on statement on page IV-11 of Tulare Lake Basin Plan - "Discharges to areas that may recharge good quality ground watersö ..",

3. Beneficial Use

This emphasis area is focused on developing and improving the definitions and characterization of Beneficial Uses and science needed to accomplish it.

- N-18 Consider appropriate designation of existing, potential, limited MUN and Ag use, beneficial uses 10
- I-1, I-6 and N-22 Address the problems with beneficial uses established for surface and ground water in Basin Plans via Sources of Drinking Water Policy, and objectives set by the tributary rule. 9 Review and revise beneficial uses to ensure they are as reasonable and appropriate as legally allowable. 1, How to implement exceptions in source of drinking water rule S-SJR Basin Plan does not specifically identify groundwater basins and their applicable beneficial uses, resulting in the need to protect unreasonable beneficial uses
- N-15 Reach and groundwater subbasin refinements for selected water bodies are needed, 5, ties to 2
- N-19 Scientifically justified recommendations for designating beneficial uses of ag drains are needed and evaluation of the Tributary and Sources of Drinking Water Rules

4. Objectives

The Objective Emphasis area is closely linked to the Beneficial Use area and naturally follows it. Included in this area is setting objectives while accounting for issues including background, averaging periods and better defining the objectives measurement and monitoring. Additionally, includes improving guidelines for interpretation and implementation of objectives in difficult circumstances including water conflicts, drought and difficult water quality areas.

- N-23 Develop salinity objectives for AGR protection for specific sub-regions based on sub-region specific conditions, 12
- N-10 A process and framework is needed for determining "naturally occurring background concentrations", 12,
- N-8 A process and framework is needed for determining "Reasonable protection" and what factors are to be considered as the basis for determining appropriate objectives and management tools. 9
- N-13 and I-4 Modify water quality objectives to include appropriate averaging periods as part of water quality objectives, 7
- N-14 For the TL Basin Plan, the maximum average annual increase range of 1 to 6 uS/cm should be evaluated to see if it is practicable, 3
- Table 1A #19 TDS/EC definition should address the organic components, 3
- I-14 Inconsistency between groundwater exception found in Basin Plans (TDS>3,000mg/l, EC>5,000 mS/cm) and secondary MCL standards, 3,
- N-5 Boards should establish a process to determine State's protected beneficial use priorities and changes or variances under drought or other conditions where they cannot be effectively simultaneously met. 3, Links to water recycling and ties to Implementation 2, 3, 4
- I-2 Develop provisions in the Basin Plans for determining compliance with groundwater objectives, to reduce likelihood for effluent quality standards to be set to receiving water standards. 3, ties to 2
- I-10 and N-11 Basin Plans should include guidelines for interpreting and applying narrative objectives and reviewing appropriate use of three potential MCL's for source water protection), 1
- Lack of guidelines for use of MCLs for MUN designation, 1
- N-7 Assess flow records & patterns and use information to develop a variance under low flow conditions,
- I-9 Difficulty in translating narrative objectives to enforceable numeric water quality objectives. Ties to 2
- N-12 Evaluate and select valid model(s) and develop appropriate criteria for site-specific salinity objectives to protect AGR. This area needs restatement, interpretation and generalization to be implemented. Ties to issues 4 & 8ties to 2, ties to sub-area objectives.
- I-15 and I-8 Page IV-11 of Tulare Lake Basin Plan - "Discharges to areas that may recharge good quality ground waters" language is not clear. What defines "good quality ground waters?"

5. Applies to all or Miscellaneous

Overall concepts are shown in this emphasis area. These will likely be incorporated into the overarching discussions and introductions.

- I-13 Definition of groundwater (e.g., first encountered groundwater) is too broad - MUN being assigned to waters unsuitable for drinking and prohibited by DPH, 10
- I-16 Determine a framework and process where constituent control programs developed individually rather than holistically, 3
- N-16 Groundwater quality & contamination by salt and nitrate must remain a priority and the health and economic impacts of nitrates must be recognized, 3, How to approach this? Ties to all areas.