

## Salinity Management Strategy

The CV-SALTS Salt and Nitrate Management Plan (SNMP) includes recommendations for the adoption of a *Salinity Management Strategy* (Strategy) to guide salt management activities during SNMP implementation.

### Purpose and Need for the Policy

Technical studies show that current salinity management activities may only address about 15% of the annual salt load in the Central Valley Region. Accordingly, long-term solutions, including development of regional de-salters, a regulated brine line, or other projects that would allow containment or removal of salt, are needed to address the other 85%. These long-term management solutions will require significant state and federal funding to implement.

In the meantime, the SNMP finds that the highest water quality priority is the need to address nitrate-impacted drinking water sources. To effectively allocate resources and balance water quality priorities, the SNMP recommends an approach that addresses nitrate as the immediate priority while at the same time make progress on addressing the long-term salt management needs for the Central Valley. This approach resulted in this Strategy to establish a three-phase, long-term salinity management program that considers innovative salt management strategies for both the short- and long-term and moves the Central Valley toward salt balance and restoration of affected areas, where reasonable and feasible.

### Policy Summary

The SNMP recommends adoption of a long-term Strategy that:

- Controls the rate of degradation (“managed degradation”).
- Achieves long-term sustainability (salt balance) where feasible, practicable, and reasonable.
- Protects beneficial uses by meeting applicable water quality objectives and applying appropriate antidegradation concerns.

Due to the long-term nature of salinity management, this Strategy is phased over time. The table summarizes these phases and their purpose. Each phase is anticipated to have a duration of at least 10 years. Key elements of the Strategy include:

#### **Remove Existing Salinity-Related Limitations in the Tulare Lake Bed (TLB) Basin Plan –**

During the current Basin Plan amendment process to facilitate SNMP implementation, the existing salinity-related limitations would be removed from the TLB Basin Plan. These limitations are replaced through implementation of the Strategy.

Phase	Purpose/Activities
I	Complete the Prioritization and Optimization Study to define long-term salt management actions.
II	Obtain necessary funding and complete environmental permitting and engineering/design for salt management projects identified in Phase I.
III	Construct salt management projects, e.g., regulated brine line, salt-sinks, regional/subregional de-salters, etc.

**Complete the Phase I Prioritization and Optimization Study (Study)** – This Study would undertake three primary activities for long-term salt management in the Valley:

- Further define potential regional/subregional salt management projects for long-term salt management, e.g., regulated brine line.
- Identify new projects to help manage salt.
- Identify funding sources and establish governance structures to implement large-scale projects.

The Study is anticipated to cost up to \$10 million and is expected to take at least 10 years to complete. Given this level of effort and considering that the Study is a comprehensive, valley-wide effort, the SNMP recommends that all (or almost all) dischargers of salinity (to surface waters or groundwater) help fund its implementation. Further, the SNMP recommends that entities other than dischargers that would benefit from Central Valley salinity management and control activities participate in funding the Study. For dischargers, their level of participation will be determined based on ambient conditions, proportional contribution of salts, or other factors, as deemed appropriate. It is anticipated that the Central Valley Salinity Coalition (CVSC), which participated in the development of the SNMP, would lead implementation of the Study, including determining the appropriate level of financial participation for dischargers and others. Study implementation would occur in an open stakeholder process through an entity like the CV-SALTS Executive Committee.

**Establish an Interim Salinity Permitting Approach** – During Study implementation, the SNMP recommends that the Basin Plans be amended to include an Interim Salinity Permitting Approach for discharges of salinity. This approach would provide for discharger compliance with salinity water quality objectives during participation in the Phase I Study while the discharger is in compliance with Interim Permit Provisions applicable to their discharge, including for example:

- Implement salinity management practices and/or source control efforts.
- Implement pollution prevention plans, watershed plans, and/or salt reduction plans.
- Monitor for salinity in surface/groundwater as part of existing or regional monitoring programs.
- Maintain current discharge levels of salinity to the extent feasible, reasonable, and practicable, while accounting for conservation, salinity levels in the water supply source, and some appropriate increment of growth.
- Comply with interim permit limits, to the extent that the Central Valley Water Board finds it appropriate and necessary to adopt such limits.
- Participate in efforts related to conducting the Study, and subsequent Strategy Phases II and III as applicable.

The Interim Salinity Permitting Approach is intended to be temporary. The SNMP recommends that this interim approach be established for 15 years to allow for completion of the Phase I Study and approval of any Basin Plan amendments that are determined necessary for implementation of Phase II. Even then, the Interim Salinity Permitting Approach could be extended, or adjusted, to support implementation of Phase II.

**Opting Out Provision** – Dischargers could opt out of participating in the Phase I Study. In general, groundwater discharge permits issued to dischargers that opt out would be based on the following principles:

- When interpreting the narrative objective to protect the Agricultural Supply (AGR) use, the Board would apply a conservative electrical conductivity threshold of 700  $\mu\text{S}/\text{cm}$ , unless an approved site specific objective has been previously adopted.
- No new allocation of assimilative capacity, or expansion of an existing allocation of assimilative capacity would be granted.
- Issuance of time schedules to meet salinity limitations in WDRs/Waivers would be used sparingly and for only minimal time periods.

Surface water dischargers with an NPDES permit wishing to opt out would need to show that their discharge: (1) does not have reasonable potential to exceed the applicable criteria; (2) is able to comply with a water quality-based effluent limit if there is reasonable potential to exceed; or (3) will be able to comply with a water quality-based effluent limitation subject to the terms of a compliance schedule approved by the Central Valley Water Board.

**More information on this policy and other SNMP recommendations may be found at:**

[www.cvsalinity.org](http://www.cvsalinity.org)