

## **CV-SALTS Policy SNMP Policy Changes to be Implemented through the Basin Plan Amendment on Salinity and Nitrate**

For the past 10-year the Central Valley Salinity Alternatives for Long Term Sustainability (CV-SALTS) has been working with stakeholders, the Central Valley Regional Water Quality Control Board (Regional Water Board), California State Water Resources Control Board to develop a Salt and Nitrate Management Plan (SNMP). This plan took concerted effort from hundreds of participants representing regulators, dischargers, agriculture, industry groups, State and federal government and environmental justice organizations. Over hundreds of meetings the group has collected data, performed analyses and documented the changes needed to regulations to sustainably manage salt and nitrate in the Central Valley. With the plan submitted to the Regional Water Board, a short summary of the goals and proposed policy changes has been prepared to inform those who have not had the opportunity to participate in the SNMP development process.

### **Priority Goals**

- 1) Ensure a safe drinking water supply for users of nitrate-impacted groundwater as a first priority
- 2) Achieve balanced salt and nitrate loadings to reduce impacts to groundwater
- 3) Implement managed aquifer restoration program to restore beneficial uses where feasible

### **Major Policy Changes**

1. Nitrate Permitting Strategy – To address the first priority goal to protect users of groundwater impacted by nitrates, this policy provides a proactive, locally led process to cost effectively and sustainably manage nitrate where the drinking water supply is impaired.. Linked closely with the Management Zone Policy, this strategy provides methods to permit discharges that manage water differently to provide user protection for users while working to reduce nitrate in discharges and ultimately restore beneficial uses, where feasible.
2. Management Zone Policy – This policy, which is linked to the Nitrate Permitting Strategy, enables local/regional management of nitrate and drinking water issues. This policy allows areas within groundwater basins/subbasins to be managed holistically and coherently with water supply, discharger and other water users to mitigate nitrate impacts in the most cost effective manner fitting with local plans and leadership. Understanding that management activities to achieve the priority goals of balance and restoration will be costly and require very long concerted efforts, the policy sets criteria for management zone formation and the process for implementation through waste discharge requirements. The policy relies on nitrate conditions in the groundwater upper zone for making regulatory decisions rather than first encountered groundwater. The policy allows integration with basins working to implement the Sustainable Groundwater Management Act.
3. Salinity Management Strategy – This policy provides the basis for the long term management of salinity-related compounds and the planning of regional and valley wide infrastructure (e.g., regional brine management or sub-regional salt management projects) to manage salt in as cost effective manner as possible. The strategy focuses efforts on planning for infrastructure solutions in the early years and coordinated construction and operation of salt management facilities in the future. Permitted dischargers would be required to participate equitably in the study.

4. Agricultural Beneficial Use Policy – While not implemented at this time, the policy addresses the use of improved approaches to protecting the economic harm related to the impacts from salinity and other constituents on agricultural water use. The policy identifies four classes of groundwater basins based on existing EC/TDS levels and requires management to keep them in their current range. The policy also allows site specific objectives where needed.
5. Salinity Variance Policy – Recommends that the existing salinity variance program, which sunsets June 30, 2019, be extended 15 years to support implementation of the Salinity Management Strategy. An extension would allow the Regional Water Board to authorize variances from compliance with water quality objectives for salinity-related constituents in surface water discharges while planning studies are completed as part of the Salinity Management Strategy to support implementation of a long-term salt management program in the Central Valley.
6. Exception Policy – Currently, an exception to compliance with a water quality objective in groundwater may be authorized for salinity-related constituents, but only until June 30, 2019. The policy recommends the existing exceptions program be expanded to include nitrate and be revised to allow for authorization of exceptions after June 2019.
7. Offset Policy – Implementation of this policy would authorize the use of offset projects in situations where mitigation of a salt or nitrate concern offsite from where a discharge occurs provides a greater environmental and/or user benefit than if mitigation were restricted to the area only covered by the permit.
8. Drought and Water Conservation Policy – This policy changes the manner in which compliance with salinity-related water quality objectives are implemented to facilitate the use of recycled water and compliance with waste discharge requirements during drought periods. The recommendations within this policy are intended to facilitate optimum water management.
9. Guidance Documents – The SNMP includes recommendations to provide guidance to permit writers on the manner in which the policies were intended to be implemented and to facilitate consistency of implementation of existing regulations. Guidance documents in the following areas are included:
  - a. Clarification of current practices for implementation of Secondary MCLs in permits
  - b. Development of Alternative Compliance Projects to support a request for an exception or allocation of assimilative capacity for nitrate providing expectations to allow compliance by other than traditional methods
  - c. Maximum benefit guidelines consistent with the State Antidegradation Policy.

These proposed changes, which are detailed in the SNMP submitted to the Regional Water Board, are intended to be implemented through adoption of a Basin Plan amendment. Supporting documents that establish the technical basis for proposals and evaluate economics and environmental compliance are available at [www.cvsalinity.org](http://www.cvsalinity.org). The timeline for completion of the Basin Plan amendment development process continues through early to mid 2018. Stakeholder management and development was funded by the Central Valley Salinity Coalition and the State Water Resources Control Board's Cleanup and Abatement Account funding.