

**DRAFT SALINITY MANAGEMENT
STRATEGY**
CV-SALTS EXECUTIVE POLICY MEETING
AUGUST 1, 2016

OUTLINE OF DISCUSSION

1. Proposed Salinity Management Strategy Phases
2. Interim Permitting Approach Options
3. Potential Basin Plan Amendments needed to implement Salinity Management Strategy

THREE PHASES

- Phase I – Priority and Optimization Study
- Phase II – Environmental Permitting & Obtaining Capital Project Funding
- Phase III – Build Capital Projects

PHASE I – 10 YEARS

- Priority and Optimization Study (Regionwide)
 - Identify actual projects
 - Evaluate impact of all policies and actions
 - Create governance
 - Conceptual Design
 - Identify estimated costs and potential funding
- Implement Interim Permitting Approach

PHASE II – 10 YEARS

- Conduct environmental permitting
- Engineering and design
- Obtain capital funding
- Continue interim permitting approach

PHASE III – 10 YEARS

- Construct capital projects (if funding is available)
- Re-evaluate interim permitting approach

INTERIM PERMITTING APPROACH SUBJECT TO SUNSET PROVISION

Two options for discussion

- Option 1 – “In lieu of” approach
- Option 2 – alternative compliance approach
 - Production Zone assimilative capacity
 - Exceptions Policy

OPTION 1 – “IN LIEU” APPROACH

- Resolution(s) amends all salinity provisions in permits
 - In lieu of meeting receiving water limits and/or effluent limitations, must participate in efforts to conduct/fund Prioritization and Optimization Study
 - Must continue to implement reasonable/feasible salinity control measures
 - Must maintain current salinity levels to the extent feasible and practicable, with some allowed increase for conservation and incremental growth

PROCESS FOR IMPLEMENTING OPTION 1

- Resolution(s) developed by Central Valley Water Board, with stakeholders
 - One resolution – valleywide
 - Several resolutions – geographically-based (e.g., valley floor v. non-valley floor, via sub-basin, or management zone- based)
 - Discharge sector – POTWs, Agricultural, Industry
- Must be ready for consideration by Central Valley Water Board within 1 year of effective date of Basin Plan Amendment
- Must be reviewed after 10 years

OPTING OUT OF IN LIEU PROGRAM

- Dischargers would have discretion to opt out (i.e., not participate in Prioritization and Optimization Study efforts)
- Would be permitted under traditional permitting approach
 - Compliance determined at first encountered groundwater

OPTION 2 – ALTERNATIVE COMPLIANCE APPROACH

- Permit by permit
- Regulatory compliance via use of assimilative capacity (i.e., production zone) or granting of an exception
- To allow use of alternative compliance, must participate in efforts to fund Prioritization and Optimization Study
- Coordinated with AGR and Secondary MCL Policies

OPTING OUT OF ALTERNATIVE COMPLIANCE PROGRAM

- Traditional permitting approach
- Compliance determined at First Encountered Groundwater

OPTION 2.A

- Permit by permit
- Look at actual impact of discharge (e.g., impact to AGR classification)
- Require participation in Prioritization & Optimization Plan based on trigger criteria (e.g., will use x% of assimilative capacity)

PARTICIPATION IN PRIORITIZATION AND OPTIMIZATION STUDY EFFORTS

- Level of participation to vary based on impact of salinity discharges and local water quality conditions
- Collective efforts subject to meeting specified milestones
- Others besides dischargers need to be encouraged to participate

NEEDED BASIN PLAN AMENDMENTS

- Incorporate Salinity Management Strategy
 - Including interim permitting approach
- Tulare Lake Basin Plan
 - Remove managed degradation objectives
 - Remove salinity effluent limitations for POTWs and Industrial Dischargers
- Depending on interim permitting option, revise Exceptions Policy
- Include recommendations for actions by other agencies

OTHER CONSIDERATIONS

- Is it legal?
- Is it logical?
- Is it implementable?
- How does it impact other proposed policies?
