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?