



# CV-SALTS: So What?

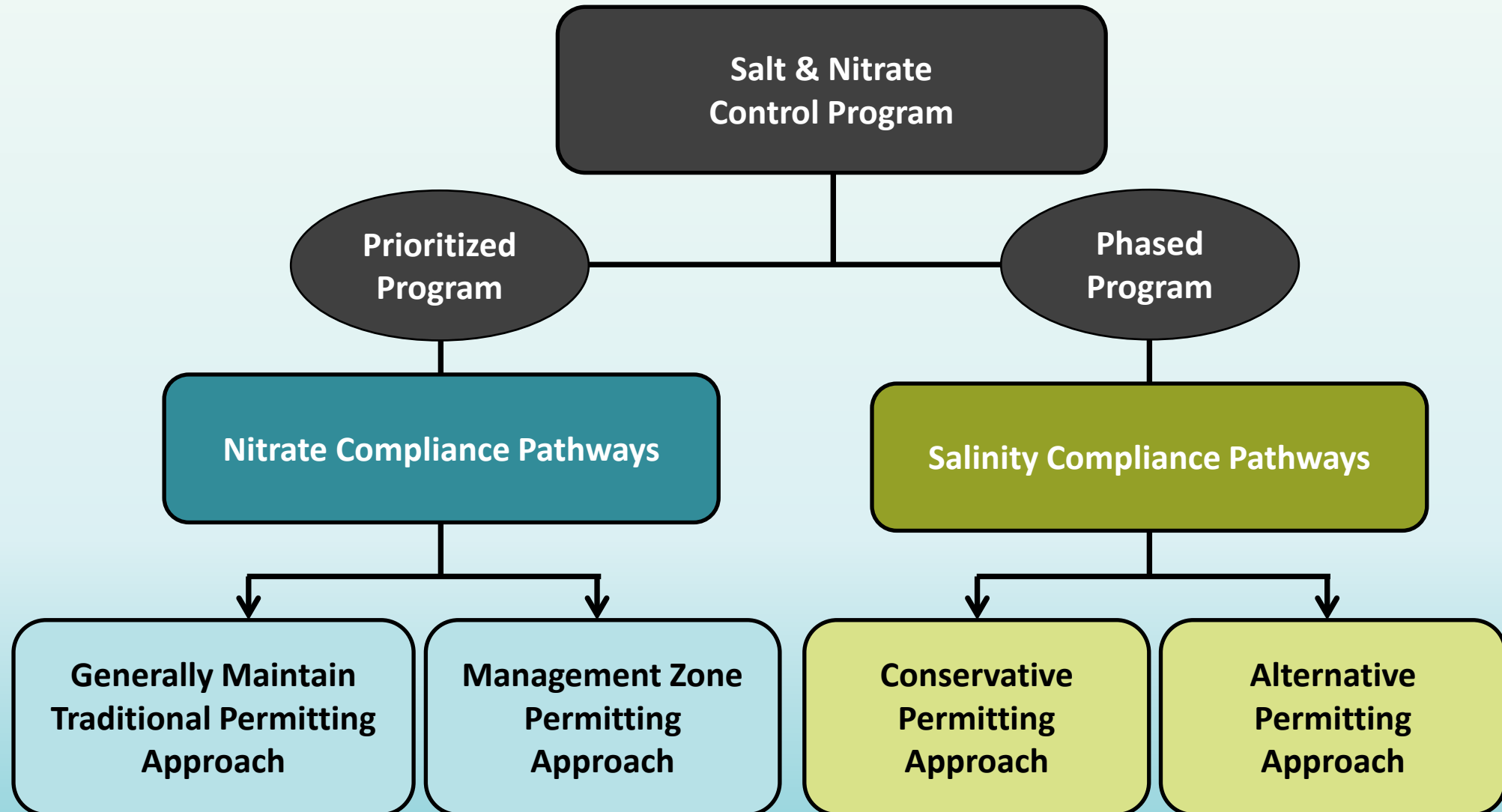
Water Association of Kern County  
Kern County Farm Bureau

*Bakersfield Museum of Art  
October 29, 2019*

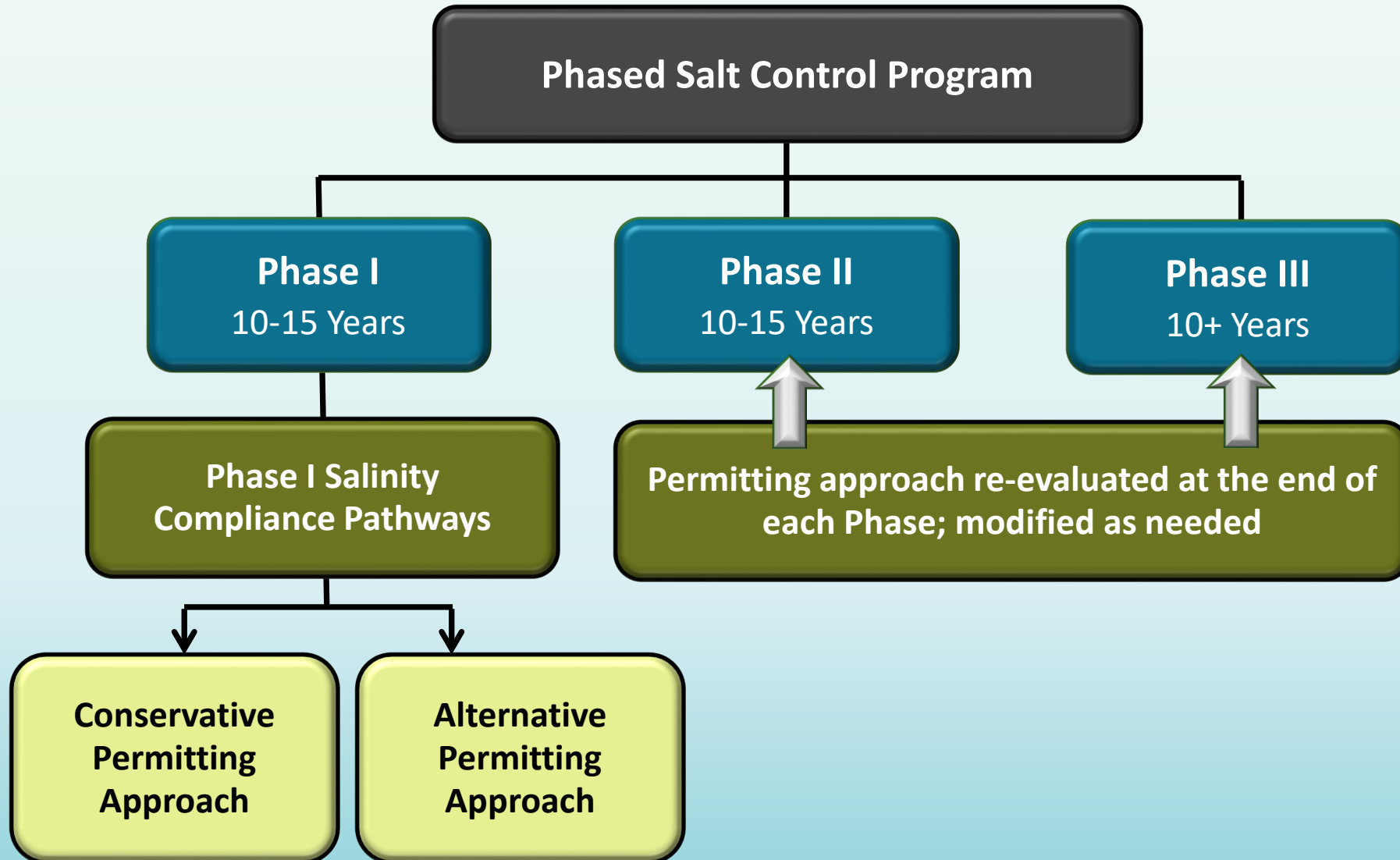
Clay Rodgers, Central Valley Water Board  
Tess Dunham, Somach Simmons & Dunn  
Richard Meyerhoff, GEI Consultants



# SALT & NITRATE CONTROL PROGRAM - OVERVIEW



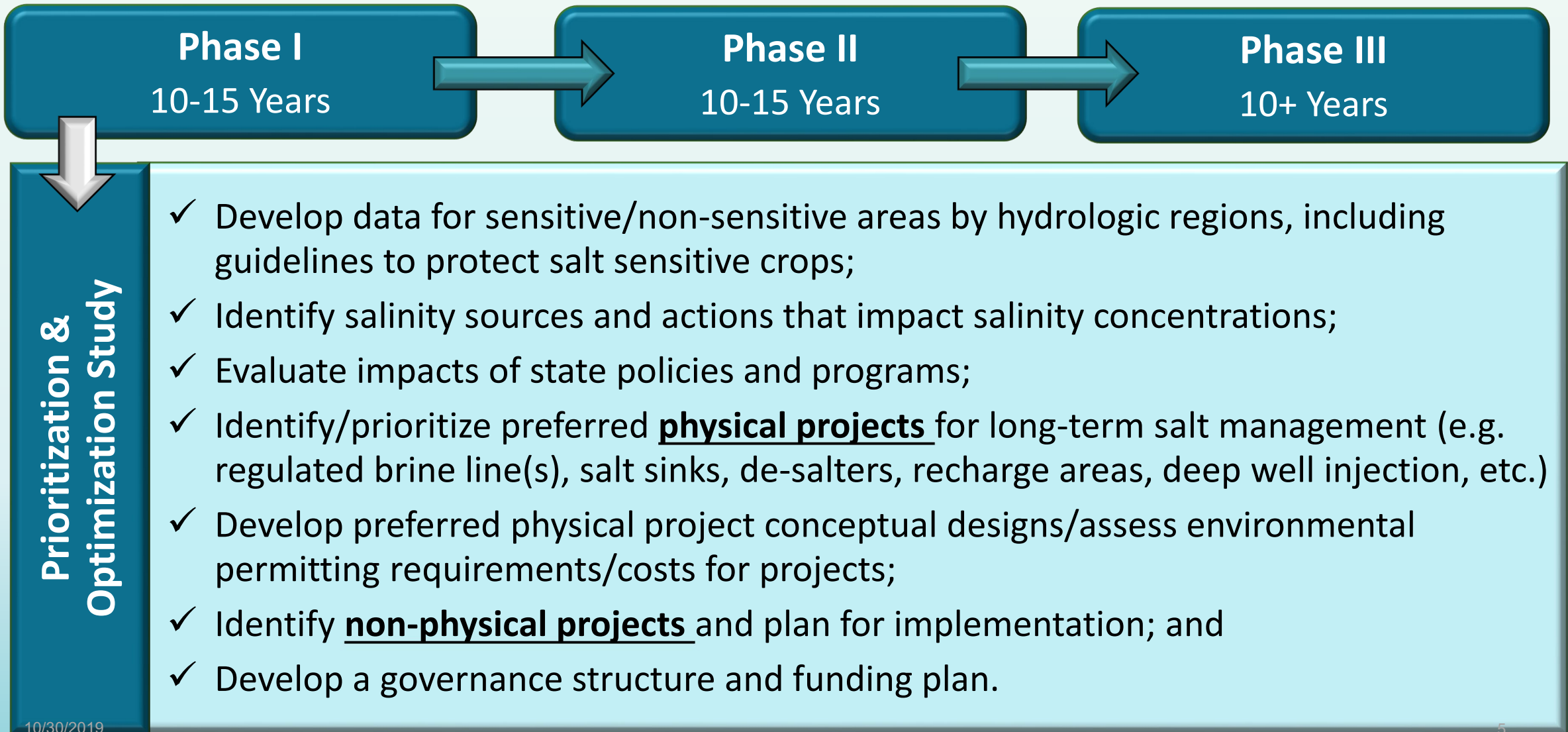
# PHASED SALT CONTROL PROGRAM



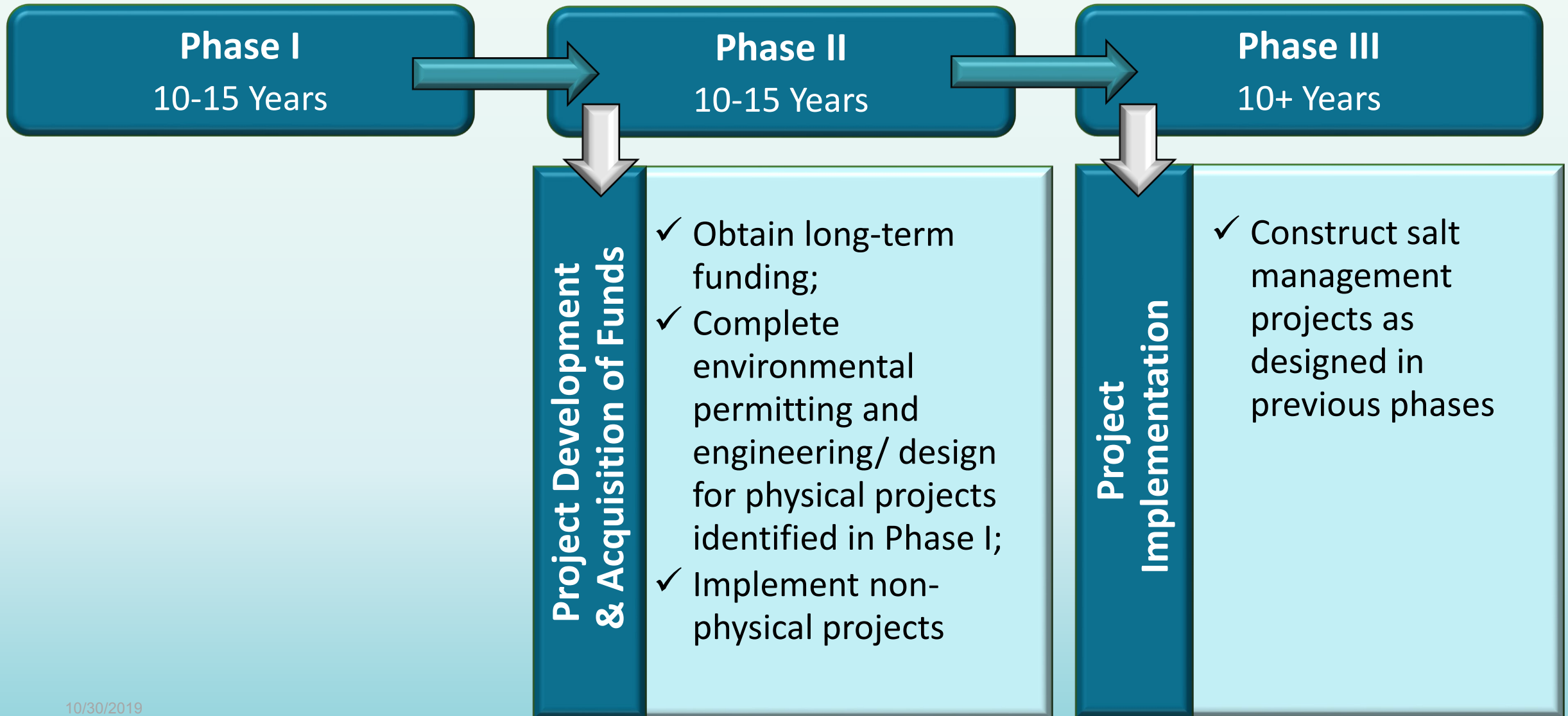
# SALT CONTROL PROGRAM – PHASE I



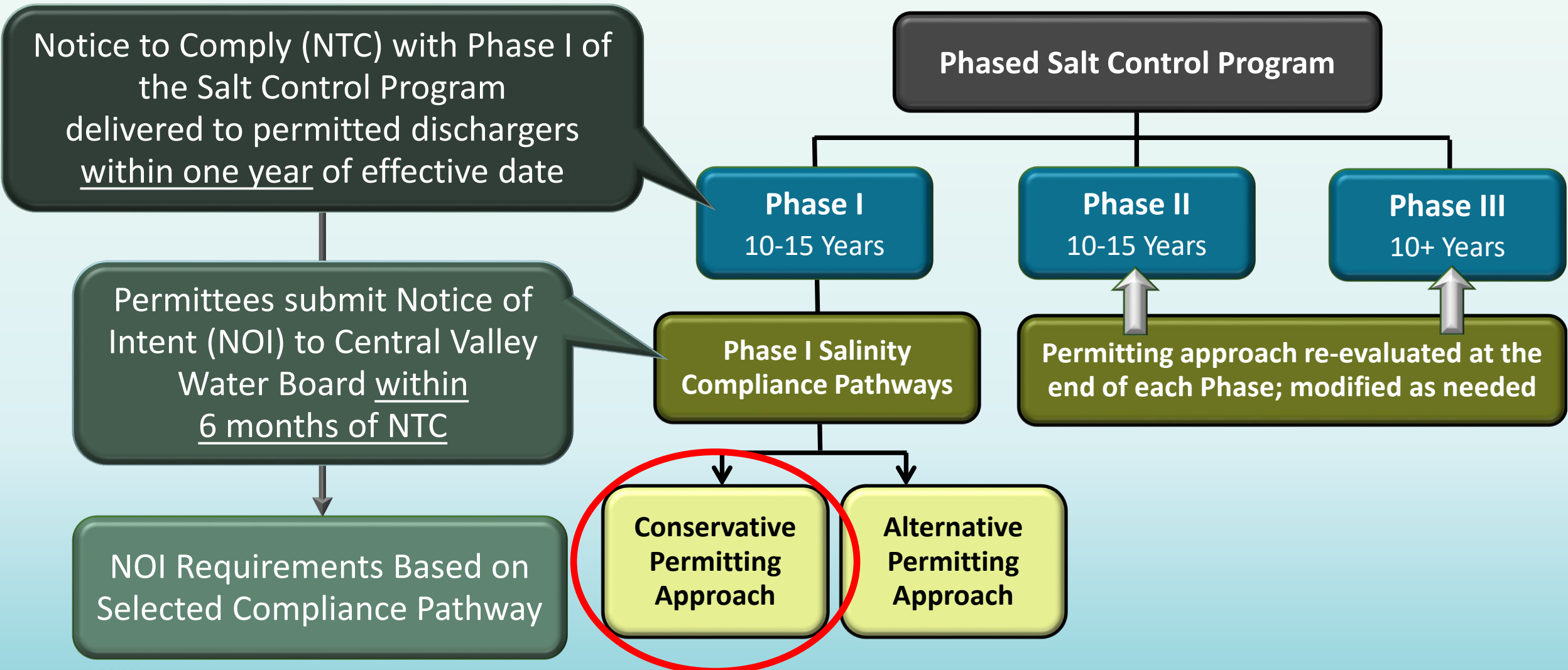
# SALT CONTROL PROGRAM – PHASE I



# SALT CONTROL PROGRAM – PHASES II & III



# PHASED SALT CONTROL PROGRAM – PERMITTING DURING PHASED IMPLEMENTATION



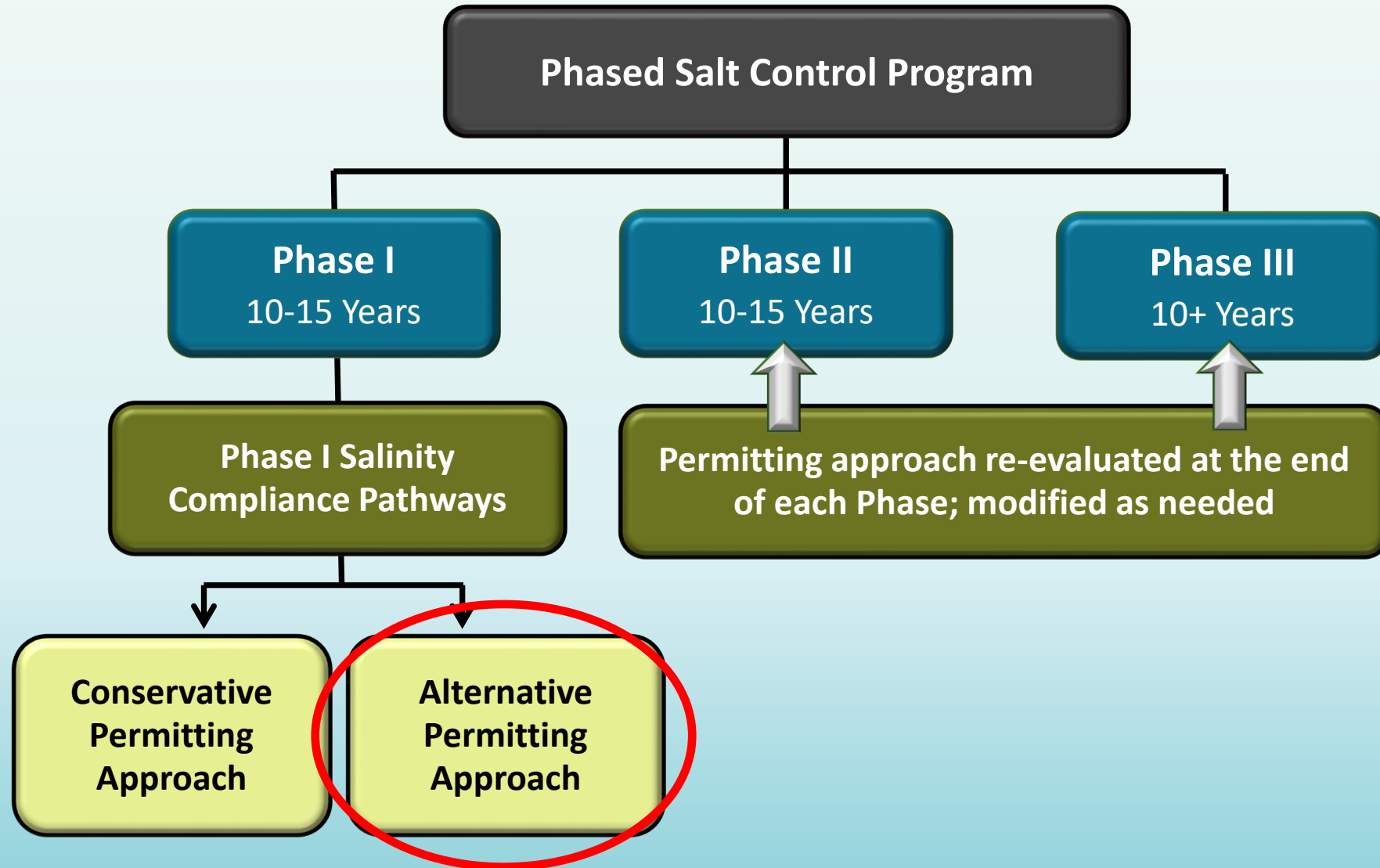
# CONSERVATIVE PERMITTING APPROACH – NOTICE OF INTENT SUBMITTAL

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- Demonstrate ability to comply with following conservative permitting requirements:
  - Conservative effluent limits: 700  $\mu\text{S}/\text{cm}$  Electrical Conductivity (EC) to protect AGR beneficial use (monthly average); 900  $\mu\text{S}/\text{cm}$  EC to protect MUN use (annual average) (or site-specific objective, if applicable)
  - Demonstrate no degradation in the receiving water now or in the future over a long-term planning horizon, under all anticipated hydrologic conditions
  - Compliance demonstration based solely on existing source water, treatment controls and current operations
- Discharger not eligible for an exception (groundwater) or a variance (surface water)
- Central Valley Water Board has limited discretion to authorize (a) new or expanded allocation of assimilative capacity; or (b) a compliance or time schedule order
- CV-SALTS is currently developing a *“Guidance for Demonstrating Compliance with the Conservative Permitting Approach”*



# PHASED SALT CONTROL PROGRAM



# ALTERNATIVE PERMITTING APPROACH – NOTICE OF INTENT SUBMITTAL

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- Support the Phase I P&O Study - Lead Entity: Central Valley Salinity Coalition (CVSC)
- NOI submittal to Central Valley Water Board - Documentation that your facility has provided the minimum required level of financial support to the CVSC to support implementation of the P&O Study
- Continue/maintain existing salt management program
- Participate as a stakeholder in the P&O Study at the level desired





# SALINITY CONTROL PROGRAM

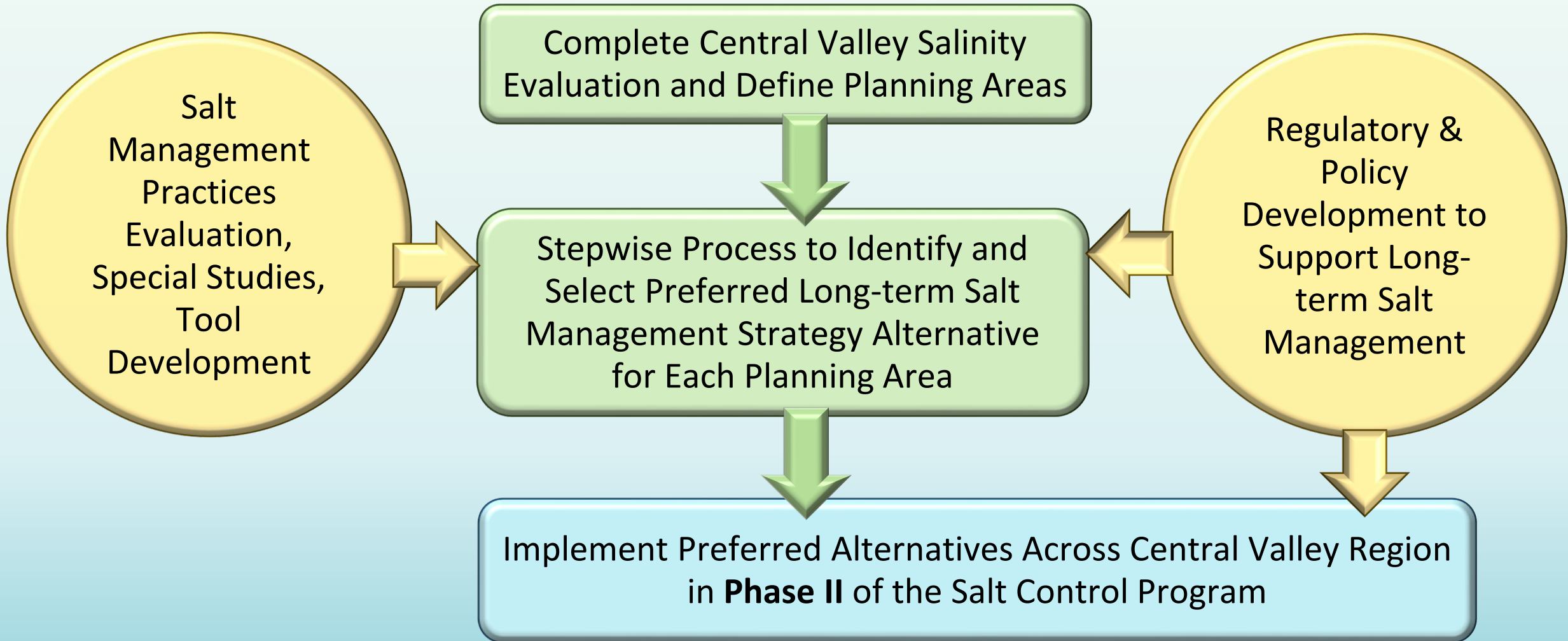
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## Prioritization & Optimization Study

# REGULATIONS ESTABLISH P&O STUDY MILESTONES/ DELIVERABLES

Milestones/Deliverables	Schedule per Notice to Comply (NTC)
Phase I Workplan	6 months from NTC
Phase I Funding & Governance Plan	Within 12 months of NTC
Special Studies (e.g., emerging salt technologies, trace constituents, recycled water management)	Per Workplan
Long-term Funding and Governance Plans for Phases II and III	9 years from NTC
Basin Plan Amendment Recommendations for Phase II	9 years from NTC
Initial, Interim and Final Project Reports – <i>Final Phase I Report – Plan to achieve long-term salt sustainability in the Central Valley Region</i>	<ul style="list-style-type: none"> <li>• Initial - 1 year after Workplan approval</li> <li>• Interim – Year 5</li> <li>• Final – Year 10</li> </ul>

# DRAFT P&O STUDY WORKPLAN – OVERVIEW

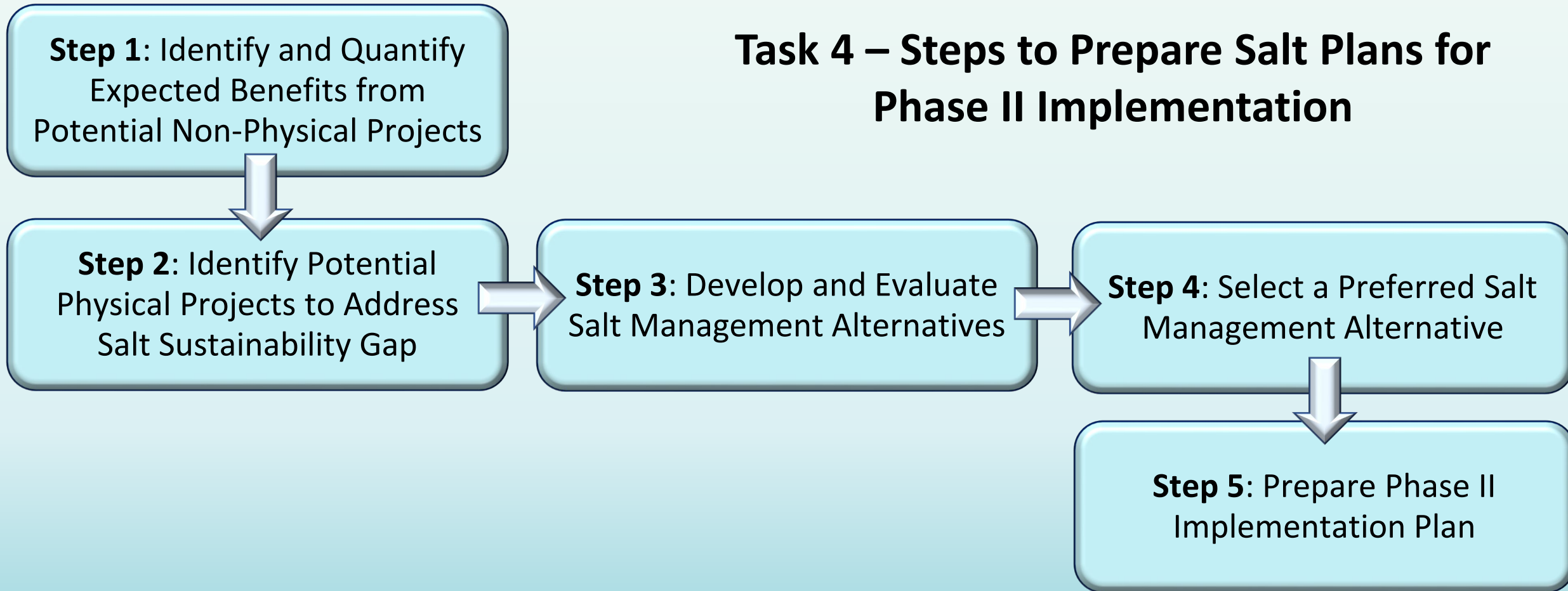


# DRAFT P&O STUDY WORKPLAN – TASKS

Tasks	Key Components
Task 1 – Stakeholder Coordination	<ul style="list-style-type: none"><li>• Phase I stakeholder process</li><li>• Outreach to economic sectors, planning areas</li></ul>
Task 2 – Programmatic Activities	<ul style="list-style-type: none"><li>• P&amp;O Study Workplan Management</li><li>• Phase I and Long-term Funding &amp; Governance Plans</li><li>• Reporting, Phase II Basin Plan Recommendations</li></ul>
Task 3 – Central Valley Salinity Evaluation	<ul style="list-style-type: none"><li>• Central Valley Region characterization (water quality, existing and planned salt management activities)</li><li>• Establish appropriate salt targets</li><li>• Special studies (e.g., treatment technology)</li><li>• Establish appropriate Salt Planning Areas</li><li>• Salt sustainability analysis</li></ul>
Task 4 - - Develop Long-term Salt Management Strategies for Salt Planning Areas	<ul style="list-style-type: none"><li>• Develop sustainable long-term salt management approach for each salt planning area (existing controls + non-physical/physical projects)</li><li>• Develop salt management plans for implementation in Phase II</li></ul>

# DRAFT P&O STUDY WORKPLAN – DEVELOPMENT OF LONG-TERM SALT MANAGEMENT STRATEGIES

## Task 4 – Steps to Prepare Salt Plans for Phase II Implementation





# CONCEPTUAL OUTCOMES OF P&O STUDY - SALT PLANS FOR PHASE II IMPLEMENTATION

## Area A Plan - Project Portfolio

- Implement existing/planned projects
- Supplement with non-physical projects I & II
- No new physical projects required

## Area B Plan - Project Portfolio

- Implement existing/planned projects
- Supplement with:
  - Non-physical projects III & IV (Collaborate with Areas C & D, respectively)
  - Five local physical projects
- Collaborate with Area C on subregional physical project

## Area C Plan - Project Portfolio

- Implement existing/planned projects
- Supplement with:
  - Non-physical project III (Collaborate with Area B)
  - Three local physical projects
- Collaborate with Area B on a subregional physical project
- Collaborate with Area D on a regional physical project

## Area D Plan - Project Portfolio

- Implement existing/planned projects
- Supplement with:
  - Non-physical project IV (Collaborate with Area B)
  - Five local physical projects
- Collaborate with Area C on a regional physical project





# PHASED SALT CONTROL PROGRAM - SUMMARY

- Phase I of the Salt Control Program will be initiated through a Notice to Comply - to be sent to all permitted dischargers in the Central Valley Region
- Permitted dischargers will have six months to submit their Notice of Intent to comply with the Program by selecting one of two compliance pathways:
  - **Conservative Permitting Approach** – Demonstrate ability to comply with stringent effluent limitations
  - **Alternative Permitting Approach** – Participate in the Phase I P&O Study
- Purpose of the P&O Study is to establish long-term sustainable salt management strategies for implementation in Phases II and III of the Salt Control Program



An aerial photograph of a vast agricultural field, likely a cornfield, with rows of crops stretching towards a range of snow-capped mountains in the background. The sky is clear and blue. The word "Questions" is overlaid in white text in the center of the image.

Questions

# ADDITIONAL SLIDES

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# ESTABLISHMENT OF SALT PLANNING AREAS TO BE CONSIDERED

- Annual precipitation declines while annual salt load increases from north to south
- Planning areas could be based on distinct hydrologic regions, e.g., Sacramento River, San Joaquin River, Tulare Lake
- Salt Plans could vary across the Central Valley Region to consider differences salt and water management

