















Inconsistent Averaging Periods

- ➤ Groundwater Objectives = 20 years
- Wasteload Allocation = 10 years (driest)
- Surface Water Objective for SAR-Reach 2 = 5 years
- NPDES Permits = 1 year (12 month rolling average)

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Drought Policy Options

- > Temporary Conditional Variance/Exception
- > Dual Effluent Limits: Normal and Drought Conditions
- ➤ Re-calculate Annual Average by Adjusting for Conservation Effect
- ➤ Increase Averaging Period to be Consistent w/ Wasteload Allocation
- Establish an Approved Offset Program:
 - Credits earned with desalter projects
 - Credits earned by being UNDER the effluent limits
 - Credits earned by increasing low-TDS stormwater rech1111arge

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