

Summary of Key Changes in Workplan Organization

Task	June Draft Task Structure	Task/Revision in August Draft
1	Stakeholder Coordination	No changes
2	Programmatic Activities	Removed Task 2.1.3 (TAC); otherwise no changes
3	Non-Physical Projects	Renamed "Central Valley Salinity Evaluation"
3.1	Regulatory & Policy-related Projects	4.1
3.1.1	Establishment of Appropriate Numeric Salt Management Targets	3.2
3.1.2	Assessment of Central Valley Region Water and Salt Management Requirements & Responsibilities	3.4
3.1.3	Evaluation of Management Zone Approach to Manage Salt	4.1.2
3.1.4	Policy Discussions to Support Development of Preferred Salt Management Alternatives	4.1.1
3.2	Source Control Best Management Practices and Land Management	3.5
3.3	Numerical Salt Management Tool Development	No change
3.4	Special Studies	3.8
4	Develop Long-term Salt Management Strategies	No change
4.1	Develop Salt Management Planning Areas	3.6
4.1.1	Develop Salt Management Regions	3.6
4.1.2	Identify Potential Salt Management Areas	4.1.3
4.2	Characterize Salt Management Regions	3.6
4.2.1	Characterize Current Ambient Salinity Conditions	3.1
4.2.2	Sources of Salt Loading	3.1.2
4.2.3	Quantify Benefits from Ongoing and Planned Salt Management Activities	3.1.3
4.3	Sustainability Analysis	3.7
4.3.1	Quantify Benefits from Implementation of Non-Physical Projects in Each SMR	4.2
4.3.2	Estimate Remaining Load Reduction Required to Achieve Sustainability	4.2
4.4	Develop Salt Management Alternatives Appropriate for Each SMR	4.4
4.4.1	Identify Potential Physical Projects to Address the Sustainability Gap within SMRs	4.3.1-4.3.4
4.4.2	Evaluate Groundwater Recharge Options	4.3.5
4.4.3	Develop Concept for a Central Valley Brine Line	4.3.6
4.4.4	Consider Collaborative SMR Strategies or Projects	4.3.7
4.4.5	Develop SMR Salt Management Alternatives	4.4
4.5	Optimization Analysis and Selection of Preferred Salt Management Alternative for Each SMR	No change
4.6	Develop Phase II SMR Implementation Plans	No change

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No.	Commenter	Section or Task	Comment	Response
1	Rebecca Franklin Sacramento Regional County Sanitation District (Regional San)	General	1. We would like to see the preliminary work of characterizing current salinity conditions performed first, along with developing appropriate salinity targets and modeling tools. It seems like this work conceptually could be done before determining if the valley needs to be subdivided into SMRs. I have cut and pasted the detailed workplan tasks under Tasks 3 and 4 into a suggested revised order to reflect this approach.	Workplan has been reorganized as recommended.
2	Rebecca Franklin Regional San	General	2. I think it would be a good idea to explain up front that the tasks are being presenting in roughly the order that the CVSC anticipates that they will be completed, but that some tasks may be developed out of order based on periodic evaluation through the adaptive management process.	Edits made to descriptions of Tasks 3 and 4 in Section 2 to note this. With the structural revisions made per Comment Nos. 1 & 4, tasks will be implemented more sequentially in the revised draft than was true in June draft.
3	Rebecca Franklin Regional San	General	<p>3. Also, I see some mention of potentially adding tasks but are we anticipating that all of the currently listed subtasks will be completed, or would some potentially be dropped based on the periodic re-evaluation that will be part of the adaptive management process? I'm especially confused about some of the special studies outlined under Task 3, since I don't see those tasks/deliverables specifically called out in the Basin Plan. Since I'm relatively new to this group I may be misunderstanding the background on these tasks.</p> <p>San Regional proposes to move the early subtasks in Task 4 to Task 3.</p>	<p>Figure 1-3 in the Workplan is adapted from Figure S-2 in the Basin Plan amendment (BPA). Four special studies are shown. The origin of these recommended studies is work CV-SALTS did previously (see CV-SALTS 2016). These BPA studies and their corresponding tasks in the Workplan are as follows: Groundwater Quality Trace Constituent Study (Task 3.8.3); Recycled Water Imports Study and Stormwater Recharge Master Plan Study (combined in Task 3.8.1); and Emerging Tech Updates No. 1 and No. 2 (Task 3.8.2). A general schedule (Figure 5-1) has been added to the Workplan which shows the anticipated timing of the studies within Phase 1. It is possible that through the adaptive management process it could be recommended that one or more of these studies is unnecessary in the future or should be modified to meet the study needs at the time the study is planned. Also it is quite possible that additional special studies could be incorporated where a need is identified.</p>

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4	Rebecca Franklin Regional San	Cover email Task 2.4.2.	<p>The stepwise process needs to include understanding current salinity levels in surface and groundwaters and establishing appropriate objectives. Conceptually, these steps probably should occur before salt management regions are identified. Additionally, preliminary work may demonstrate that there is a preferred alternative approach than using SMRs. Recommend that this bubble be modified.</p> <p>We are proposing that the development of SMAs be moved to later in Task 4. If this proposal is followed, year 5 seems a bit premature for having SMAs designated.</p> <p>We are proposing that a number of tasks be performed earlier in the workplan, especially characterizing current conditions and developing a model. If these proposals are followed, 5 years would be a bit early to have alternatives identified.</p> <p>Rather than grouping all of the regulatory and policy-related projects under this task, we propose that they are spread out between Tasks 3 and 4 (some policy discussions will still be occurring during Task 4 as the group makes decisions on appropriate long-term management strategies for regions where existing practices will not achieve long-term sustainability). I would recommend breaking these tasks up and placing them in the workplan in the order in which we anticipate they will be completed.</p>	Workplan has been reorganized largely consistent with the recommendations.

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5	Rebecca Franklin Regional San	Figure 2-2	This workplan is assuming that the SMR approach will be the best approach to managing salt in the region. Based on preliminary characterization of ambient conditions and salt loading, there may be another approach identified so we recommend removing the term "SMR" from this timeline.	Adjusted figure to remove reference to SMR. Identification of salt management planning areas (SMRs) moved from Task 4 to Task 3 as recommended per comments regarding reorganization. We continue to use SMR terminology but have added text where appropriate to state that an SMR is a "planning area". In addition we have added a footnote to Task 3.6 (Develop Salt Management Areas) to make clear that the Workplan does not lock in establishment of SMRs. Instead the findings from Task 3.6 will determine the need. If an alternative approach is developed, then the Workplan would be revised through adaptive management process.
6	Safi. Samsor Regional San	Task 3	We recommend the title of this section should be Organizational Structure. Section 2 or 4 is more appropriate to be Workplan Approach/Summary. In addition, this section should clearly define each of the following entities.	Section 3 is now "Organizational Structure". Workplan summary with costs and schedule is now Section 5.
7	Safi. Samsor Regional San	Task 3	TPM –Although throughout the Workplan a lot of role and responsibility is attributed to TPM, this section should define TPM, how will it be selected, and who can possibly fill in this position.	TPM role will be similar to that role during SNMP development, in fact tasks are closely patterned after that TPM role. Some additional text added to Section 3 to better describe position. But note new footnote indicating that it is up to the CVSC to determine how much to contract management out to a TPM position or implement internally.
8	Safi. Samsor Regional San	Task 3	TAC – We recommend that TAC is unnecessary for this program. Between Executive Committee, CVSC, TPM, Ad Hoc Committee (Figure 3-1), and Consultant or Contractor, there is plenty of technical support. Creating TAC will inject unnecessary complexity to this organizational structure. Task 2.1.3	We agree. The TAC has been removed from the Workplan. Ad hoc committees can be established by the Executive Committee if needed for specific tasks.
9	Rebecca Franklin Regional San	Task 3.2 Deliverables	Recommend moving this to Section 2 or 4.	Moved to new Section 5
10	Rebecca Franklin Regional San	Task 2.1 Intro	Suggestion to move this description of the TPM to Section 2.2 of the workplan.	See response to Comment No. 7

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11	Rebecca Franklin Regional San	Task 2.2.1.1	The CVSC recently adopted a fee structure. Is this something different?	The fee structure recently adopted by the CVSC is noted in Task 2.2.1 (Phase I Funding Plan). Task 2.2.2 is to address long-term funding needs for implementation of Phases II and III of the Salt Control Program. The who and how of funding these later phases (which will likely include some very expensive infrastructure projects) will be the focus of this Task.
12	Cindy AuYeung Sate Water Resource Control Board (State Water Board)	Page 1-1, Section 1.1	<p>“The groundwater elements of these Basin Plan amendments (BPA) became effective following OAL approval. Surface water elements will become effective upon approval by the United States Environmental Protection Agency (USEPA).”</p> <p>This may need clarification. Salt Control Program applies to both surface and groundwater. Even though the groundwater portion may be approved at an earlier date, it will not be implemented until the program is adopted as a whole.</p>	Comment noted. At least initially, we don't see any restriction imposed on the Workplan tasks because of lack of or delay in EPA action. Any early surface water related tasks are associated with salt characterization or work on beneficial use targets. These can be implemented prior to EPA approval of the surface water elements of the Salt Control Program.
13	Cindy AuYeung State Water Board	Page 2-4, Figure 2-2	Year 10 Final Report green box is cut off at the bottom.	This figure has been revised.
14	Cindy AuYeung State Water Board	Page 4-26, Task 3.1.4	<p>Replace "develop" with "facilitate."</p> <p>“The CV-SALTS Executive Committee will develop discussions on policy issues...”</p>	The text has been revised.
15	Cindy AuYeung State Water Board	Page 4-26, Task 3.1.4	<p>Replace "to" with "on."</p> <p>“Contractor will assist the Executive Committee as requested to develop materials to support the discussion, e.g., preparation of white papers to various topics or the compilation...”</p>	The text has been revised.
16	Cindy AuYeung State Water Board	Page 4-27, Task 3.1.4	“The Contractor will assist the Executive Committee as requested to develop materials to support the discussion, e.g., preparation of white papers to on various topics...”	The text has been revised.
17	Cindy AuYeung State Water Board		Please keep ADA compliance in mind. Font size is quite small for some figures.	Comment noted; figures updated to make them larger.

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18	Bob Gore California Independent Petroleum Association (CIPA)	General	<p>The California Independent Petroleum Assn. (CIPA) appreciates the opportunity to participate in the Central Valley Salinity Coalition (CVSC) as we collaborate to obtain SWRCB approval of our pending BPAs and begin the hard work implementing the historic Salt Control Program with the draft Prioritization & Optimization Study (POS) Workplan.</p> <p>We offer comments, as requested, on the June 18 version. CIPA's 300+ members are predominantly small and medium employers, living and working in the South San Joaquin Valley, as you may recall. Our perspectives are from our significant technical experience as extensively regulated industrial groundwater discharge permittees.</p> <p>The Workplan is precise and well-crafted. CIPA provides these suggestions and appreciates your timely response (see subsequent comments)</p>	Comment noted and thank you for your careful review.
19	Bob Gore CIPA	General	<p>1. Reinforce CVWB Staff comments that CVSC participation will result in reduced costs of compliance. CVWB executive staff members, at several CVSC and other meetings over the past 2 years, have stated participation in the POS will result in faster permitting and reduced compliance costs, compared to proceeding individually. This is an essential point and is best referenced prominently in the Workplan.</p>	<p>The following text has been added to description of Alternative Salinity Permitting Approach in Section 1.1.1: "Compared to dischargers that select the Conservative Salinity Permitting Approach, participation in the P&O Study is expected to result in a faster, more streamlined permitting process and reduced compliance costs for the discharger. reduced cost of compliance."</p>
20	Bob Gore CIPA		<p>2. Increase Workplan references to projects and tasks of benefit to IND participants. On page 4-20, task 3.1.1 establishes appropriate numeric salt management targets for AGR beneficial uses by working with ag stakeholders. Including all stakeholders would be good. We support Tess Dunham's remark at the May CVSC meeting that verbiage needs to be added to include other sectors. Please see page 4-29 for an inclusive example – where the Workplan contractor will work with ALL sectors to establish BMPs for source control.</p>	<p>Additional text has been added throughout the work plan. For example, (a) this sentence was added to Task 1.1: "Stakeholder meetings and coordination will be inclusive of representatives of all economic sectors." (b) This sentence was added to Task 3.1.1: "A review of other existing uses and meetings with key representatives of all economic sectors will also occur to ensure AGR targets also are protective of other uses."; (c) And this sentence was added to Section 3.2.1: "It is critical to the success of the P&O Study that institutional knowledge held by representatives of all environmental sectors be acknowledged and accounted for; both from the aspect of technical knowledge in areas like BMPs and as highly-regulated entities."</p>

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21	Bob Gore CIPA	Task 3.1.1	<p>3. Coordinate closely with existing expert resources at SWRCB, DWR, DOC, USGS and the private sector to avoid costly duplication and delays. For example, on page 4-30, the contractor is responsible for development of combined numerical surface and groundwater models for supply and demand. Under SGMA, the SJV GSAs will develop the models and the databases; numerous hydrology models already exist, as noted in the text. We need to ensure valuable, relevant data and analytics are recycled, both to inform and to reduce the costs of compliance.</p>	<p>Coordinating with GSAs, resource agencies, and regulatory agencies to develop Salt Control Program alternatives in the most cost effective way possible is one of the highest objectives of the P&O Study. As an example, the following text is provided in Section 2.1: "Development and implementation of these salt management strategies will be supported where necessary by the establishment of appropriate regulations and policies, development of tools and salt management practices, reliance on previous work completed in the area, e.g., through development of the Initial Conceptual Model (ICM) to support the Central Valley SNMP CV-SALTS 2013b) or technical work to support GSAs , and findings from special studies to be completed under this Workplan."</p> <p>The following text is provided in Section 2.4.1: "Using existing work already completed in the Region (e.g., through development of CV-SALTS ICM project, CV-SALTS 2013b) and data analysis tools..."</p> <p>The following footnote was added to Task 2.1.2.2: "For the development of a long-term salt management alternative under Task 4, it is recommended that the services of a single contractor (or contractor team) be procured for each SMR to minimize duplication of effort and to ensure consistency of work. SMR contractors will attend Executive Committee meetings and coordinate with their SMR contractor counterparts and the TPM to ensure that substantially similar technical approaches are employed during the development of alternatives and selection of a preferred alternative.."</p> <p>The following text has been modified in Section 3.3.1: "To the extent possible, the Contractor will collaborate with the GSAs in order to avoid duplicating effort and to ensure consistency in the development of basin management tools."</p>

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22	Bob Gore CIPA	Section 4	<p>4. There are several instances of work that may be duplicative or “in addition to” existing studies and programs. For example, on page 4-33, a Technical Review Panel is proposed to peer review the POS modeling platform. If the CVSC were to deploy existing models, this would be unnecessary. And is the Panel necessary in the first place? On page 4-34, special studies for stormwater recharge and recycled water are proposed – both are the subject of ongoing, current reviews by state and academic authorities. Their work should be cited and included. On page 4-35, the contract will work with GSAs to evaluate recharge projects in salinity management areas...why? Why not accept the GSA work? On page 4-39, the contractor will periodically evaluate emerging salt management technology. What is an evaluation? We could simply catalog technology and allow the project owners to make choices as to which is locally most feasible. On page 4-50, the contractor will compile various surface water data for each Salt Management Region (SMR). Perhaps the CVSC could use existing data sources.</p>	<p>Implementation of the Salt Control Program alternatives in Phases II and III will cost tens of millions of dollars. To develop management strategies we have included development of a numeric modeling tool that will be rely on the use of other models. It is expected that a number of technical decisions will need to be made throughout the process to develop this tool for use in Task 4. We believe it is best to include technical peer review as a task at this time in anticipation of the need to have the tool independently evaluated prior to use. However, the CVSC does have the discretion to modify the Workplan through the adaptive management process and can modify this task if needed at a later date.</p> <p>As noted in the response to comment 21, the intent of the P&O Study is to utilize, to the extent possible, existing data, reports, knowledge, and the state of the science. As new information becomes available, it will be incorporated into the P&O Study. However, it is important to note that while the Workplan does stress the importance of avoiding duplicative efforts and highlights the potential to rely on GSA-related work, we have to keep in mind that the GSPs are focused on groundwater supply sustainability, while the Salt Control Program is focused on achieving salt sustainability.</p>

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23	Bob Gore CIPA	Section 4	5. Such as SMRs, various concepts may be needlessly layered over adequate existing regulatory constructs. Proposed on page 2-1, the SMR appears to be an overlay of existing aquifer data. Adding regulatory hooks is never a good idea = future friction and needless delays. This potential confusion is multiplied on page 4-47, where there is a task to identify Salt Management Areas. SMR...SMA...why not simply use existing aquifer designations?	<p>SMRs are intended to be a planning framework only for salt management in surface water and groundwater. We have assumed that alternatives to achieve salt sustainability will need to be done in areas smaller than the Central Valley Region as whole. They may be as large or small as needed - or they do not need to be used at all (see Task 3.6). This will be a decision made as an outcome of Task 3.6. For planning/budgeting purposes we have included the assumption that up to five salt planning areas will be delineated in the Central Valley Region.</p> <p>Note that SMA are distinctly different from SMRs. SMAs are defined by the Salt Control Program as (Task 4.1.3): "A defined groundwater basin or sub-basin that can be used to receive and contain water with elevated salinity concentrations in order to remove the salt from sensitive areas until such time that the collected salts can be removed from the area for disposal or use." Essentially an SMA is an approved salt sink that may be used, at least temporarily, as a place for salt disposal. Establishment of an SMA would require regulatory approval.</p>
24	Theresa A. Dunham Somach Simmons & Dunn (SSD)	Page 2-1	Perhaps this is discussed later on, but seems that we will need a step to determine how the SMR strategies work collectively together and not just individually.	Section 2.2.4 makes several references to this. There is also a specific task in the alternatives development process to address collaborative physical projects (Task 4.3.7) and Task 4.2 mentions collaboration on non-physical projects.

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25	Tess Dunham Somach Simmons & Dunn	Page 2-1	We should probably add a reference in text or footnote to the statutory provisions that established the GSAs.	The following text has been added to Section 2.2.1: "A key component of the stakeholder coordination effort will be working effectively with the Groundwater Sustainability Agencies (GSA) formed under the Sustainable Groundwater Management Act (SGMA), whose mission is to achieve groundwater supply sustainability (see Appendix B for overview of SGMA). This mission may become closely intertwined with the goals of the Salt Control Program. Coordination with GSAs is incorporated in a number of places in the Workplan to reduce the potential for duplication of efforts." Appendix B provides an overview and key citations for SGMA.
26	Tess Dunham Somach Simmons & Dunn	Page 2-3 Page 3-1	Establishment of a TAC.: Should we call out that one step would be to establish a TAC? I am not sure yet if the Executive Committee has agreed that a TAC would established. What do we anticipate the role of the TAC to be separate from the Executive Committee? Since this is a new TAC for this purpose, I think that it should be called out separately and described as to its purpose and role, assuming we go forward with having a TAC for the P&O study. I think that is a key question to put before the Executive Committee. It may be appropriate, but sometimes it is just an extra step and extra expense that is not necessary.	We have removed the TAC from the organization structure and as part of the review process. Inclusion of a TAC was deemed duplicative as the Executive Committee already has ability to establish ad hoc committees, which can be established to address any specific technical issues that come up through Workplan implementation. Also, the most likely place where we believe high-level technical review should occur is the development of the numerical modeling tool (Task 3.3). This Task already includes establishment of a peer review panel.
27	Tess Dunham Somach Simmons & Dunn	Page 2-5 Page 4-23	Cropping Patterns: If targets are developed based on existing cropping patterns then we may need some way to adjust the targets as cropping patterns will change in the future. How will we address future changes in cropping patterns? In particular, with the implementation of GSPs, there may be significant cropping pattern changes in the future.	Your postulate is correct; cropping patterns will change over time due to market influences, water availability, climate change, environmental factors (including increased salinity. In addition, fertilizer formulations, irrigation practices, and implementation of BMPs may change salt loads, as well. The SMR contractors will be responsible for determining if there are special studies of predictive tools for cropping patterns. In addition the model would have the flexibility to utilize various scenarios for cropping patterns and salt loads in a adaptive management paradigm.

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28	Tess Dunham Somach Simmons & Dunn	<p>Page 2-5, Section 2.2.4</p> <p>Page 2-5, Section 2.2.4</p> <p>Page 2-7</p> <p>Page 4-18</p> <p>Page 4-21</p>	<p><i>Physical versus Non-Physical Projects:</i> Perhaps the title is confusing as it lead me to believe that Element 4 was specific only to physical projects. See comment below. Wouldn't some (or all) of these steps apply to both non-physical and physical projects? Can't non-physical projects also be part of the Strategy? Seems to me that the non-physical project element is too separated out from the SMR strategies.</p> <p>See comment above but I see non-physical projects as a subset of the Salt Management Strategy. To the extent there are collective actions that need to be taken then perhaps we need to describe them as something different than non-physical projects. Perhaps "Region-wide Based Projects"</p> <p>So the more I look at this, the more convinced that I am that there are two different types of non-physical projects. There are those that may be SMR specific (e.g., source control, salt sinks, flow regimes, etc.). When you use the term non-physical projects, that is what I envision as it goes along with physical projects for the Salt Strategies. The activities identified here I don't see them as projects per se but actions/ activities/ studies that support development of the Salt Management Strategies for both physical and non-physical projects.</p>	<p>Commenter's observations are correct. Per this comment and others (e.g., see Comment No. 4) we have restructured/reorganized Tasks 3 & 4.</p>
29	Tess Dunham Somach Simmons & Dunn	<p>Figure 2-4</p> <p>Page 4-60</p>	<p>Central Valley Brine Line: I am not certain that this figure works here. I am afraid that calling out the brine line will lead some to presume that it is a foregone conclusion of needed physical project rather than an example. Shouldn't it first be determined if this is part of the Salt Management Strategies? Is there a step to bringing forward recommendations for all of the SMRs and then determining if more needs to be done on a larger scale such as this?</p>	<p>Figure was retained to provide an example of the anticipated outcome of the Workplan. However, the figure was modified to state "regional project" generically instead of "regional brine line project" specifically Task 4.3.6 is included to evaluate the concept so that it can be considered along with other potential physical projects during alternatives development.</p>

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30	Tess Dunham Somach Simmons & Dunn	Page 4-8	Is there one contractor or contractor team per SMR?	Yes, the thought was one contractor / contractor team for each SMR. This has been included as a recommendation for Workplan implementation where appropriate. Workplan also notes that the P&O Study requires close coordination among the contractors for SMRs so that there is the appropriate consistency among the approaches.
31	Tess Dunham Somach Simmons & Dunn	Page 4-15 Page 4-21, Task 3.1.1	I think another key consideration for the long-term governance is the expected source of revenue for long-term projects. Considering the significant cost, I am thinking that we will need some type of [Santa Ana Watershed Project Authority] SAWPA to take in significant state and federal funding to implement Phase II and III. Thus, funding sources needs to be a key consideration in establishing the long term governance structure. We may even need legislative authority to create a new state entity.	Comment noted. This is the reason we included a task that is intended to link development of long-term governance and funding plans (see Tasks 2.2.2.2 and 2.3.2.2). Will need to determine if linkage is strong enough.
32	Tess Dunham Somach Simmons & Dunn	Task 3.1.1	Can we weave in MUN here as well? With the new state funding of \$130 million for the next ten years, impairments for secondary MCLs is also possible. I would like to see if we can use some of that funding for salinity by stating that we are looking to protect both the AGR and MUN beneficial uses.	Portions of this task were revised to broaden beyond AGR (still have some very specific AGR-related tasks). Before finalizing Workplan, text will need further evaluation to determine if more edits needed to better develop MUN evaluation.

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33	Tess Dunham Somach Simmons & Dunn	Page 4-18	What is the difference between a SMR and a SMA? This is the first time the term SMA is being introduced as far as I can tell.	<p>SMRs are simply planning areas where projects will be identified for implementation to achieve sustainability. The term "SMR" was developed as a means to call out the expectation that there would be a need for such planning areas, i.e., something smaller than the Central Valley Region as whole. There have been edits made to clarify there purpose for the Workplan and that it will be up to the P&O Study to figure out what the appropriate planning area is (See Task 3.6) Richard...We can either bring SMRs / SMAs forward in the document, or provide a high-level summary and leave the tasks where they are.</p> <p>SMAs are defined by the Salt Control Program (see Task 4.1.3): "A defined groundwater basin or sub-basin that can be used to receive and contain water with elevated salinity concentrations in order to remove the salt from sensitive areas until such time that the collected salts can be removed from the area for disposal or use." Essentially an SMA is an approved salt sink that may be used, at least temporarily, as a place for salt disposal. Establishment of an SMA would require regulatory approval. Establishing SMAs would facilitate development of long-term salt management strategies.</p>

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34	Tess Dunham Somach Simmons & Dunn	Page 4-22 Page 4-23 Page 4-24 Page 4-24	<p>Develop Range of Potential Target EC Values: This seems to conclude that we will use the Lower San Joaquin approach. I think this is an Executive Committee decision that should be discussed first before committing to this approach in the Work Plan. Further, the Lower San Joaquin approach was specific to surface water. Does it work with groundwater as well?</p> <p>I see how this applies for surface water, less sure for groundwater. Will the salinity targets need to be different for surface water and groundwater?</p> <p>How do we prepare SMR salt management strategies if we don't know the salinity targets for each SMR?</p>	<p>Agree that this is an important decision for the Executive Committee to make as part of the Work Plan development process. This approach to establishing targets was discussed at several Executive Committee meetings to date. Key aspects of this approach are the consideration of the attainability of candidate targets and the impact of target selection on agricultural users and dischargers, to inform stakeholders in making target selection determinations. It is agreed that specific considerations in the application of this approach to groundwater and surface waters in archetype areas will need to be addressed with stakeholders as part of the process. This could lead to different targets for groundwaters and surface waters.</p> <p>Per proposed schedule targets would be developed early in P&O Study; salt management strategies would not be developed until after. Once a range of candidate targets is identified, management options to seek to achieve the full range can be developed and evaluated. The feasibility, costs and effectiveness of those management actions can then inform the target evaluation and selection.</p>

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35	Tess Dunham Somach Simmons & Dunn	Page 4-23 Page 4-36	GSA Coordination: We need to be certain that this step is done in concert/ coordination with activities that will be occurring under GSPs for critically overdrafted basins. May also be part of Nitrate Management Zone Implementation Plans.	<p>The following sentence was modified to provide clarity that the GSAs are stakeholders in P&O Study. From, "The Contractor will coordinate with stakeholders to determine a wide range of management scenarios that could be employed to impact the existing water quality baseline and use the selected modeling tools to identify a range of attainable future water quality conditions," to, "The Contractor will coordinate with stakeholders, including GSAs, to determine a wide range of management scenarios that could be employed to impact the existing water quality baseline and use the selected modeling tools to identify a range of attainable future water quality conditions."</p> <p>The text has been modified from, "In Task 3.8.1, the Contractor will evaluate the locations of existing and proposed groundwater recharge projects in the Central Valley Region. It is anticipated that groundwater recharge projects will be identified and evaluated by GSAs under the Sustainable Groundwater Management Act (SGMA), necessitating close cooperation and coordination between CV-SALTS and GSAs," to, In Task 3.8.1, the Contractor will evaluate the locations of existing and proposed groundwater recharge projects in the Central Valley Region. Groundwater recharge projects identified and evaluated by GSAs under the Sustainable Groundwater Management Act (SGMA) should be considered, necessitating close cooperation and coordination between GSAs and CV-SALTS for both the Salt Control Program and establishment of nitrate Management Zone Implementation Plans."</p>

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No.	Commenter	Section or Task	Comment	Response
36	Tess Dunham Somach Simmons & Dunn	Page 4-34	Is this necessary? [Formation of a Technical Review Panel]. Isn't more important that the Central Valley Water Board accepts the model platform.	Given the nature and challenges of models and the expectation that potentially expensive salt management decisions will be made based on the use of the models developed for use by the P&O Study, we recommend planning on having a technical review panel specific to this task - at least at the outset. Workplan could be modified later to remove this subtask if deemed appropriate at the time. Also note that we have removed the TAC as an specific committee named in the overall organization structure. Thus no potential duplication of effort between the two.
37	Tess Dunham Somach Simmons & Dunn	Page 4-37	Sac Regional is looking at recharge with recycled water. There was a WERF study for this prepared by Woodward Curran.	Text was modified where appropriate to note that recycled water recharge is occurring or planned throughout the state of California.
38	Melissa A. Thorme Downey Brand	Page 1-8 Page 2-1 Page 4-26 Page 4-31	<p>GSAs: Should there be anything in the text (and not just the timeline) about coordination with SGMA GSAs? It seems like that would be beneficial to discuss what SGMA is and how it would be beneficial for the jurisdictional areas to coordinate efforts for groundwater.</p> <p>GSAs have not been explained. See last note.</p> <p>Should this also incorporate SGMA to get all three on the same track?</p> <p>This should be consolidated with MZs so all coordinated.</p>	<p>The following text has been added to Section 1.2.1 and a description of SGMA has been added as Appendix C: "A key component of the stakeholder coordination will be working effectively with the Groundwater Sustainability Agencies (GSA) formed under the Sustainable Groundwater Management Act (SGMA) and whose mission is to achieve groundwater supply sustainability. GSAs and contractors and stakeholders implementing the SNMP Salt Control Plan must work cooperatively to effectively achieve both of their objectives. An overview of SGMA is provided in Appendix C and descriptions of GSA coordination are provided throughout this Workplan."</p> <p>The following text has been added to Section 3.1.3.2: "If implemented, the Nitrate Control Program Management Zone permitting approach, the Salt Control Program, and SGMA must be coordinated so that all program objectives can be achieved."</p>
39	Melissa A. Thorme Downey Brand	Page 2-2	Would a salt sink location be a physical project since there would need to be pipelines to that area? Not clear.	Yes a salt sink would be part of a physical project / alternative. This has been added in the description of physical projects.

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No.	Commenter	Section or Task	Comment	Response
40	Melissa A. Thorme Downey Brand	Page 4-3	Facilitation: Why would we pay a contractor for this?? Maybe they could assist, but I think they should not be the lead.	The text has been revised from, "Executive Committee meetings will be facilitated either through a Contractor or by the Chairperson of the Executive Committee," to, "Executive Committee meetings will be facilitated by the Chairperson of the Executive Committee, with support, as needed, provided by the Contractor." Although need for support will be decided later, we have included budget for facilitation support.
41	Melissa A. Thorme Downey Brand	Page 4-11	Funding: We will have this [Final Phase 1 Funding Plan] done by the time the NTCs go out. Why wait a year?	Agree that a plan is in place but because something formal does not need to be submitted until one year after NTC, we have left this in - in case after P&O initiation it is determined that changes to the existing plan are needed. Only small budget included for this task.
42	Melissa A. Thorme Downey Brand	Page 4-17; Page 4-44	SMR / SMA: What is difference between SMR and SMA? Seems like these should have been described much sooner in the document.	See Response to Comment No. 33. SMRs are first identified in Section 2. We don't explain SMAs until Task 4 because it is a specific regulatory task that can facilitate development of physical projects.
43	Melissa A. Thorme Downey Brand	Page 4-20; Page 4-23	AGR Targets: This [development of appropriate targets to protect the AGR beneficial use] needs to happen early in the process to know what we are shooting for. You call them targets, but then say they may be adopted as objectives – those are very different things.	The proposed approach is to conduct the targeting process early in the Phase 1 P&O study effort. As noted in the draft work plan, the step of moving from target selection to the adoption of those values as water quality objectives requires additional work to meet Water Code requirements and secure approval as part of a Basin Plan amendment. The proposed approach to setting targets is structured to enable compliance with Water Code Section 13241 and 13242 requirements for the adoption of water quality objectives, should that course be chosen. The schedule in the revised draft Workplan has the work start early in the P&O Study.

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No.	Commenter	Section or Task	Comment	Response
44	Melissa A. Thorme Downey Brand	Page 4-22	How do we deal with areas where groundwater cannot sustain uses without substantial blending? Is there any de-designation where uses are not feasible?	The intent is to develop salt management alternatives that will improve waster quality conditions over time, or at least decrease the rate of degradation. If there is not enough blend water than this will need to be considered in the alternatives development and evaluation. Elements such as de-designation or land fallowing (examples of non-physical projects) might need to be considered as part of comprehensive solution.
45	Melissa A. Thorme Downey Brand	Page 4-28	Unlikely the DPR regs will address and approve all these sources.	This may be correct; will need evaluation at the time such policy discussions are occurring
46	Melissa A. Thorme Downey Brand	Page 4-41	Not many will be able to accept this [Brine stream discharged to a WWTP].	Agree that the discharge of reject water to a WWTP is not likely; this disposal option was included for completeness of description of potential options.
47	Melissa A. Thorme Downey Brand	Page 4-41	Do we want to add these? [perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA)]...to the list of chemicals of emerging concern]	Seems to be prudent to understand trace constituents and contaminants of emerging concern. The text says "may" and the list is "e.g.". When the work is actually executed, these can be further evaluated so that an appropriate list is included in the study.
48	Melissa A. Thorme Downey Brand	Figure 4-1	Brine can also be piped out of the Valley – that is not included in the management list.	Due to significant reorganization of the tasks, Figure 4-1 was removed. However, Task 4.3.6 will look at piping brine out of the valley. This work will be completed to provide information to support selection of physical projects as part of the alternatives development process.
49	Melissa A. Thorme Downey Brand	Page 4-35; Page 4-51	Why focused on TDS when RWQCB regulates more on EC? Do we want to limit this to TDS? Do we need decision point for what we plan to use for “salinity”? Seems like keeping it broader would be better for now.	(d) and (e) Typically TDS is the parameter representing salinity in groundwater, while EC is the parameter characterizing salinity of surface waters. During CV-SALTS much of the water quality analysis (which was primarily groundwater) was presented as TDS; where data was EC it was translated.
50	Melissa A. Thorme Downey Brand	Page 4-59	Does this follow the oil pipelines from Kern County? Not sure where Panoche Junction is – may need to clarify location.	Panoche Junction is located near the 5 Freeway, about 20 miles south-southwest of Mendota. This pipeline alignment is a concept; other potential alignments will be identified and analyzed during the P&O Study.

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No.	Commenter	Section or Task	Comment	Response
51	Melissa A. Thorne Downey Brand	Page 4-37	This [In addition to reviewing relevant planning and water management information, the Contractor will work with the Division of Water Rights to investigate water rights in streams, reservoirs, and groundwater.] is a huge undertaking...	Comment noted and should be further evaluated for inclusion in Workplan. Budget placeholder included in revised draft Workplan.
52	Melissa A. Thorne Downey Brand	Page 4-39	Groundwater Recharge Projects: Although couldn't this help to dilute that water and improve water quality? I know Clay does not think this is true, but it could be possible in some situations, so I would not automatically strike them.	Agree with your changes from, "The Contractor will use GIS in conjunction with GeoTracker to ascertain the locations of point source and other groundwater quality issues, including areas that are undergoing groundwater remediation. Groundwater recharge projects would not be proposed in these areas, in order to not interfere with ongoing mitigation measures," to, "The Contractor will use GIS in conjunction with GeoTracker to ascertain the locations of point source and other groundwater quality issues, including areas undergoing groundwater remediation. Groundwater recharge projects should be carefully considered in these areas, in order to not interfere with ongoing mitigation measures."
53	Melissa A. Thorne Downey Brand	Page 4-49	Valley Water currently has litigation against the CVRWQCB about improper designations where MUN and AGR were imposed without evidence that these uses exist or could potentially occur in the Tulare Lake Basin, so we don't want to concede that exemptions from designation are not possible under the express language of at least the Tulare Lake Basin Plan.	Comment noted and agreed
54	Melissa A. Thorne Downey Brand	Page 4-50	Why would this [For reservoirs, the evaluation will also consider the availability of surface elevation and depth-related data.] be needed?	Deleted sentence. Original purpose of statement was to make sure appropriate data were used as salinity could vary by depth. Previous sentence referenced need for "relevant water quality" data. That would address need to be sure appropriate data are used in analysis.
55	Melissa A. Thorne Downey Brand	Page 4-52	It somehow seems like Task 4 [sources of salt loading] should have been closer to front of required tasks.	Tasks have been reorganized per a number of comments. This task now occurs much earlier in the document (Task 3.1.2).

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No.	Commenter	Section or Task	Comment	Response
56	Melissa A. Thorme Downey Brand		What about perc ponds in SMA areas? This allows evat, plus some soil aquifer treatment prior to discharge to groundwater.	The emphasis here was on evaporation ponds with liners to contain the salts to the smallest volume possible. Discharge to groundwater would create a larger area of salt-impacted soil and groundwater that would eventually need to be mitigated. Salinity is also a conservative set of constituents; with little to no soil aquifer treatment.
57	Melissa A. Thorme Downey Brand	Page 4-60	Don't want to exclude other options that might arise. [Fatal flaw analyses]	Comment noted and agree.
58	Debbie Webster Central Valley Clean Water Association (CVCWA)	Page vi	<p>If we are talking about the Central Valley plan, shouldn't it be the Salt and Nitrate Management Plan?</p> <p>I recommend separating UV from advanced oxidation. They are two separate processes and are not typically used together. I think in the long run, having the two separate definitions as they relate to salt will be helpful.</p> <p>May also want a definition for Water Recycling Requirements (WRR)</p>	<p>Acronym for SNMP corrected; Neither UV or AOP are being used in the document, so the acronyms have been removed from the text.</p> <p>Comment noted regarding WRR. Not using this term at this time; could add later if needed.</p>
59	Debbie Webster CVCWA	Page 1-2	Pg 33 of the Staff Report: A comprehensive solution to the salinity issues in the Central Valley will therefore need to rely on both local and sub-regional solutions as well as broad region-wide projects that will export salt out of the Central Valley.	We have noted in several places in the document that solutions may be a combination of local, subregional and regional projects, e.g., Section 2.2.4, opening paragraph of Task 4, and Task 4.4.
60	Debbie Webster CVCWA	Figure 1-2	<p>Regarding Figure 1-2, bullets much more needs to go in defining each of these. For example, we need to know both where a desalter is located, and the infrastructure needed to support and deliver salt to that area as well as a brine line. How then is that going to be regulated, collected, etc.?</p> <p>Evaluate State and Local policies and programs is another area where this is both identifying and providing suggestions if something needs to be changed to help implement this.</p>	<p>Thank you for the comment. We did not modify this figure at this time. The intent of Section 1 is to lay the groundwork for the Workplan. figure 1-2 comes from the Basin Plan amendment. We are purposefully trying to avoid rewording, restating, clarifying, etc. the actual Basin Plan amendment language in this section. Instead, any elaboration regarding what these bullets mean in practice is covered in the Workplan tasks in Sections 3 and 4. For example, locations of facilities/infrastructure needs is covered in Task 4.3; evaluation of state, local policies is covered in Task 3.4.</p>

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No.	Commenter	Section or Task	Comment	Response
61	Debbie Webster CVCWA	Figure 2-1	I am concerned that boxing the first step as identifying salt management regions doesn't recognize the integration of water and water use, and will box areas in regulatory wise. How does this end in coordination?	Figure has been modified to reflect reorganized tasks. Also removed SMR term here and instead say "define planning areas". Decision will need to be made during Study what these planning areas look like (see Task 3.6 in revised draft). Workplan assumes such planning areas will be defined, but it is not a requirement of the Workplan. Long-term salt management alternatives analysis could be on entire Central Valley Region.
62	Debbie Webster CVCWA	Section 2.2.1	Not reading where incorporation of stakeholder comments/suggestions, etc.	The following text in red was added to description in Section 2.2.1: "... and to have stakeholders review and comment on technical documents.
63	Debbie Webster CVCWA	Section 2.2.2	Need to include CVSC as part of the coordination as it will be the implementing agency.	Task 2.2.2 describes the programmatic activities included in the Workplan.. Roles and responsibilities are shown in Section 3 and within tasks in Section 4.
64	Debbie Webster CVCWA	Section 2.2.2	Is this defined who this [TAC] is?	The revised draft Workplan does not include a TAC. See response to Comments No. 8 & 26.
65	Debbie Webster CVCWA	Section 2.2.2	Would this [Governance plan] be part or in consultation with the CVSC, especially for? More detail would be good.	Section 2.2.2 intended to provide overview of programmatic activities included in the Workplan; Task 2.3 contains detailed information about the proposed governance structure, including the role of the CVSC.
66	Debbie Webster CVCWA	Section 3-1	CVSC will also have some primacy in developing the governance structure in Phase I	Section 3 provides overview of what CVSC is and their part in organizational structure. Task 2.3 states CVSC and Executive Committee participate in development of Governance Plan
67	Debbie Webster CVCWA	Section 3-1	Still have questions who is this [TPM]?	Description provided in Section 3. Specific duties in Section 4 task descriptions. A TPM was included given expected need to have someone managing overall work day to day. Role is similar to what the TPM role was in CV-SALTS. There is a cost to this; however, degree this role needs to be filled in P&O Study will be a decision of the CVSC and Executive Committee.

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No.	Commenter	Section or Task	Comment	Response
68	Debbie Webster CVCWA	Task 1.1	Add "hear feedback" to purpose of stakeholder coordination	Text added that states: "Hear and capture feedback from stakeholders."
69	Debbie Webster CVCWA	Task 2.1.1.5	The response needs to be more than just a one-way directed response for information	We envision the stakeholder coordination to be a collaborative and transparent endeavor. Added a statement to this section: "The TPM will also support efforts to share information among all stakeholders. This effort will be facilitated through implementation of Task 2.1.4." (Manage Data and Information)
70	Debbie Webster CVCWA	Section 3-1	Do we want the ability to sub certain areas?	Comment unclear, but work may be contracted in any way necessary to get work done. To facilitate this intent, "contractor" is broadly defined.
71	Debbie Webster CVCWA	Task 2.2.1	Isn't this CVSC [reference to "...financial support provided by the permitted dischargers]?	Yes, initial statement is to note that it is permitted dischargers that actually pay the fees, but a little further down in the paragraph: "The CVSC has determined the initial required level of funding to be provided by each permit type. The collection of these fees, which will provide general funds for implementation of the P&O Study, will be managed by the CVSC."
72	Debbie Webster CVCWA	Task 2.2.1	In reference to "others" in list of permit types comment regarding funding, grants, etc.	Section revised to include: "Grants and other sources of outside funding will be regularly evaluated and pursued during Workplan implementation to augment or offset this base funding source, including local, state and federal funding sources."
73	Debbie Webster CVCWA	Figure 2-2 Task 2.5.1	Regarding Basin Plan amendments: We should be more specific as to what level of development – is this going to be just recommendations or is it actual language/amendments? Given the timeline for future phases, the latter is recommended. Not enough time. Also we need to be talking targets and target analysis early..	See Task 2.5 for full description of work. Purpose of this BPA work is to fulfill requirement in Salt Control Program to make recommendations for modifications to the Basin Plan by Year 9. Task 2.5.1 focuses on recommendations first, then Task 2.5.2 is "Draft Proposed Basin Plan Amendment Language" to draft recommendations that move forward. Overall text has some revision regarding role of P&O Study vs. Central Valley Water Board. The work on AGR targets (now Task 3.2) will occur early in the P&O Study. Any need for BPA that comes out of this is a separate process not included in this Workplan.

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No.	Commenter	Section or Task	Comment	Response
74	Debbie Webster CVCWA	Section 2.2.3	This should also be taking into account the other factors that might effect salt such as conservation recycling etc.	Impact of recycling water will be considered in various tasks. See also Comment Nos. 37, 85, 106
75	Debbie Webster CVCWA	(a) Section 2.2.3 (b) Task 3 (c) Task 3.1.1	<p>Numeric Salt Targets:</p> <p>(a) This seems predetermined. Ranges may or may not be the way to go. Also, the target should be appropriate to the Beneficial Uses, which may vary or may compete. [Regarding establishing what the range of appropriate numeric salt targets should be throughout the Central Valley Region]</p> <p>(b) Normally, you would look a range of alternatives, not just one number, before determining a target or methodology. Options should be evaluated.</p> <p>(c) This almost sounds backwards from what was developed in the LSJR. High value was placed on water availability and it was understood that salt would be stored in the soil profile during those years, and flushed out later.</p>	<p>(a) The proposed approach would establish ranges of candidate target values for AGR and other beneficial uses. Candidate target values would be evaluated under the process described and appropriate values would be determined in coordination with stakeholders, with the goal of striking a balance between competing interests.</p> <p>(b) The option of asking the contractor to evaluate alternative methods for target development was considered and was discussed at the Executive Committee. Based on feedback received at the Executive Committee meetings, it was decided to put forward an approach similar to what had been used successfully in setting salinity water quality objectives in the Lower San Joaquin River. If desired, the scope could be expanded to evaluate optional approaches.</p> <p>(c) As noted in the introductory paragraph of this section, targets are to be determined that protect salt sensitive crops and other beneficial uses but also protect the ability to obtain agricultural water supplies and avoid overly stringent discharge requirements. The issue of salt buildup and release during wet years was addressed in setting targets during and after extended dry periods.</p>

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		(d) Task 3.1.1 (e) Task 3.1.1 (f) Task 3.1.1	Numeric Salt Targets (cont.) (d) Again, a range of options were looked at, not just one. (e) Did this also consider irrigation methods? (f) We discussed long term averaging for groundwater and possibly different averaging periods for surface water where appropriate.	(d) We agree that the proposed approach should consider a range of options in terms of candidate target values as well as management alternatives. That is the intent of the proposed task descriptions. (e) The Hoffman model that was employed in the Lower San Joaquin River effort did not take into account the actual irrigation methods used within the study area. The Hoffman model presumes flood irrigation, whereas irrigation in the study area was a combination of drip, micro spray and flood. Other models which take irrigation method into account should be considered in the performance of the tasks specified in the work plan. (f) Text has been added to the work plan to address the need to specify appropriate averaging periods in the establishment of targets.
76	Debbie Webster CVCWA	Page 2-5	Before even going here, I think it is important to understand the political, legal and regulatory constraints as well as what are the current salt problems and outlooks, what are the uses and what are there contributions. How is the water being used? [Regarding Step 1: Develop Salt Management Regions]	The tasks have been reorganized so that the decision regarding whether to establish planning areas, e.g., SMRs, occurs after a lot of up front salinity evaluation work is done. See revised Tasks 3 and 4.
77	Debbie Webster CVCWA	Page 2-5	It is important that the strategies also allow for additional recycling, conservation, growth or land change, crop changes, etc. Should it also define how people are using the water in the area?	Impact of recycling water will be considered in various tasks. See also Comment Nos. 37, 85, 106
78	Debbie Webster CVCWA	Page 2-5	Describing and Quantifying the Salt Problem: Isn't this what we may want to do/ Move the salt to where it can be exported?	The following sentence was deleted: "It may not be possible in some instances to simply export the salt out of the SMR, because it may create a new problem in the area where the salt is planned for export."

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No.	Commenter	Section or Task	Comment	Response
79	Debbie Webster CVCWA	Figure 2-4	In the past we have been having issues with numbering a project. Other than to benefit the consultant, I am not sure why it is here.	The purpose of the figure is to depict hypothetical arrays of options that could be part of a preferred alternative within a planning area. It shows that the outcome in any given area should be a combination of existing/planned practices, non-physical projects and physical projects. It also is intended to illustrate how collaboration could occur across Central Valley Region - some projects are local but others may be collaborative with other areas. Therefore it is intended to illustrate the intended outcome of the Workplan as written.
80	Debbie Webster CVCWA	Section 3-4	This has been high [annual inflation rate] for the last 10 years then 3 was reached in 2011.	Comment is correct about the historical inflation rates (ranged from 0.7% to 3% over last ten years). 3% was stated in draft to be conservative. Have revised document to say 2%. Cost tables in revised draft reflect this.
81	Debbie Webster CVCWA	Task 1.1.2	(a) This needs to be two full business days – not evening of the 2 days. [Agenda] (b) This should be within two weeks after the meeting, rather than with the agenda package, especially if going bimonthly. [Meeting Notes]	(a) "full" has been inserted in front of "business days": "A final agenda with attachments will be sent out to the participant list at least two (2) full business days prior to the meeting." (b) The following sentence was changed from, "Draft meeting notes will be submitted to stakeholders for review prior to the next scheduled stakeholder meeting," to, "Draft meeting notes will be submitted to stakeholders for review two weeks after the stakeholder meeting."
82	Debbie Webster CVCWA	Task 3.4.3.2	Executive Committee for review too, not just approval	The following sentence as modified from, "A revised draft SAP will be submitted to the Executive Committee and Central Valley Water Board for approval," to "A revised draft SAP will be submitted to the Executive Committee and Central Valley Water Board for review, comment and approval."
83	Debbie Webster CVCWA	Task 1.4.1	Bring back in PEOC coordination. [Regarding Outreach Planning and Materials Development]	Revised text to be more clear regarding role of PEOC in Task 1.4 and subtasks.

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No.	Commenter	Section or Task	Comment	Response
84	Debbie Webster CVCWA	Task 3.1.1.1	The archetype areas, if this approach is used, should cover the wide range of conditions found in the Central Valley – including arid, primarily surface sources, primarily groundwater, annual and tree crops, areas where little irrigation is needed. Additionally site not including the valley floor and high sierra may be appropriate.	The text of the work plan has been modified to cite these characteristics of potential archetype areas.
85	Debbie Webster CVCWA	Task 3.1.1.6 Task 3.4	There should also be a section that talks about recycling and reuse in this item. A goal is not to only use the water once, but encourage its reuse, slowly going to less salt sensitive crops. What type of regulatory framework can be used then? What will happen with the targets? Did I miss it, or is the workplan silent? [Regarding Recycled Water Imports]	The Recycled Water Policy will govern the permitting and antidegradation requirements pertaining to recycled water projects. Further discussion with the commenter is required to better understand the requested changes to the draft work plan. This can be further evaluated prior to preparation of a final Workplan. Recycled water imports are discussed in Tasks 3.3 and 3.4.1.
86	Debbie Webster CVCWA	Task 3.1.1.8	Enhanced from what baseline? Does it depend on size?	This is the paragraph in question: "The Contractor will develop and document a process which allows for site-specific refinement of regional salinity targets developed in Task 3.1.1.7, based on consideration of more refined regional data analysis, region-specific modeling outputs and enhanced stakeholder engagement." The baseline is the current level of stakeholder involvement. The text is anticipating an increased level of stakeholder involvement as project plans are developed. The purpose of the text is to note that any plan to refine salinity targets should consider potential need for more stakeholder engagement where targets may be proposed for refinement.
87	Debbie Webster CVCWA	Task 3.1.2	I really see this as part of being a first step – understanding the lay of the land before proceeding with targets, sma’s, etc.	Comment noted. Revised Workplan restructures order of tasks. This one is planned for implementation early in the P&O Study.
88	Debbie Webster CVCWA	Task 3.1.2	How we accommodate, potential with targets or implementation of different plans, can also play a role. Can this concept of non-physical options also be included, not just physical projects?	Final salt implementation plans for Phases II and III include both physical and non-physical projects. For example see Figure 2-4 and description of development of alternatives (Task 4.4) and description of implementation plans (Task 4.6.3).

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89	Debbie Webster CVCWA	Task 3.1.2.1	We may want to include some of the farming practices and requirements and air rules.	The following is revised text: "Areas to be evaluated include requirements related to, but not limited to: water quality and beneficial use protection (including aquatic life uses), including potential impacts to the Bay Delta; water rights/water transfers, groundwater sustainability, land use zoning/planning, minimum instream flow protections, recycled water use, stormwater recharge, water conservation, farming practices and AQMD requirements, and waste disposal.'
90	Debbie Webster CVCWA	Task 3.1.2.2	??? what document, and does it establish the requirement? I am confused.	Text revised to be more clear.
91	Debbie Webster CVCWA	Task 3.1.3	This goes to my question about SMRs and if they can be used and what we will be looking at – we need to be specific if surface water will work with groundwater (my opinion is that it has to). Within this task we probably need to be specific about this.	If SMRs are established as planning areas, they will have to consider both surface water and groundwater/
92	Debbie Webster CVCWA	Task 3.1.3	Surface or ground? In the case of water and water transfers, does this matter	The comment asks the question of the term "hydrologically" which is quoted from the definition of a Management Zone in the Basin Plan amendment for the Nitrate Control Program. Given that the nitrate program applies to groundwater it could be assumed that it only applies to groundwater but that does not have to be the case. A Management Zone could consider both if it affects nitrate in groundwater. We note below that consideration of the use of the Management Zone concept for salt should consider both surface and groundwater so that this task does not inappropriately focus only on groundwater.

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No.	Commenter	Section or Task	Comment	Response
93	Debbie Webster CVCWA	Task 3.1.3	What if the SMR approach is not the way to go?	Decision regarding SMRs will be made in what is now Task 3.6. Discussion of potential use of a Management Zone approach will now occur much later. The Workplan does assume there will be at least some subdivision of the entire Central Valley Region into smaller planning/management areas. What they are called and what they look like will be determined in Task 3.6. If no subdivision occurs, then the Workplan can be updated later to reflect this. Regardless Management Zones as a permitting approach could still be evaluated.
94	Debbie Webster CVCWA	Task 3.1.3.1	Need to also determine if this is feasible for surface waters and areas where there is no basins.	Now Task 4.1.2.1 - Added text regarding need to consider surface and ground waters and "non-discharger" participation
95	Debbie Webster CVCWA	Task 3.1.3.1	Also, we will need to understand what it will take to include all users of water, include exporters which may include state and federal governmental entities.	
96	Debbie Webster CVCWA	Task 3.1.3.2	And the viability of requiring all users, not just regulated entities to participate	Text revised (now Task 4.1.2.2) to note consideration of other water users
97	Debbie Webster CVCWA	Task 3.2	We need to remember that BMPs are a toolbox and not necessarily a checklist. We want to make sure that BMPs implemented are reasonable, feasible and effective. If treatment or salinity is addressed in another fashion, sometimes the BMPs are no longer needed.	The following sentence was added: "The objective is that BMPs implemented are reasonable, feasible, and effective."
98	Debbie Webster CVCWA	Task 3.3	Probably need a CV-wide balance [regarding scale of salinity balance analysis]	Modified text to state "or other scales as appropriate.
99	Debbie Webster CVCWA	Task 3.3.1	Shouldn't this also include the management zones? Since RO treats both salt and nitrate, shouldn't we keep both in this model	This task is specific to GSAs and their ongoing SGMA work. Task 3.3.2 brings in other modeling work.
100	Debbie Webster CVCWA	Task 3.2.1	Is this each individual BMP or is this a global reduction. Recommend the former and then where these BMPs are found to be appropriate, the overall salt reduction can be determined.	Yes, the salt load reduction would be estimated for each type of BMP.

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101	Debbie Webster CVCWA	Task 3.2.2	Seems that we need to have the estimate based on ground and surface, where it will be going, etc.	The estimated salt load reduction would be used by the SMT to understand resultant reductions in salinity for surface waters and groundwater.
102	Debbie Webster CVCWA	Task 3.3	What are we doing about areas where there is no groundwater basin?...Again are there tasks that are necessary where there is not a groundwater basin, but where there is movement along bedrock or other formations?	Model cells with no groundwater (e.g., exposed bedrock) can be turned off.
103	Debbie Webster CVCWA	Task 3.3	Should this be done considering a range of hydrologic conditions, and account for climate change?	The Workplan states: "incorporating requirements to manage climate change consistent with current state policy at the time of the P&O Study." And further, "The project baseline would include a scenario(s) for climate change (as appropriate at the time of the analysis)."
104	Debbie Webster CVCWA	Task 3.3.7	We should discuss this more – including the TRP, who is on it, how it is chosen. I agree it has to be solid, but one issue we had with the Drinking Water Policy was disagreement among the outcomes of the model, knowing no model is perfect, but it also needs to be a solid model with good data in. Concerned that this could be a huge cost item by misinterpretation of how heavy a lift this might be – will we need to define it more upfront? How do we have open ownership of the model and the data? Shouldn't this be included?	The model development or use of existing models will require significant coordination with GSAs, the USGS, DWR, and other stakeholders. To the extent possible data developed and models will be used. The TRP would be selected from a pool of invited surface water and groundwater modeling experts. A selection process will be proposed by CVSC for approval by the Executive Committee. The model (SMT) would be in the public domain and accessible to all stakeholders. The P&O Study is meant to be collaborative and transparent. Access to other stakeholders will be an important part of that process.
105	Debbie Webster CVCWA	Task 3.4.1	Is this necessary here or should they also look for other areas: [Regarding review and analysis of existing and proposed groundwater recharge projects at the SMR scale]	SMRs or their equivalent would include wherever salt management strategies are being developed. Intent here is to look at groundwater recharge projects for inclusion as physical projects (whether being implemented by GSAs or through SMRs)

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106	Debbie Webster CVCWA	Task 3.4.1.2.3	<p>(a) One area that is also being looked at, especially as it relates to nitrate is using surface water sources for drinking water supply in exchange for recycled/groundwater. Should this be evaluated here?</p> <p>(b) This may be a short list, most of the water is either produced in the Central Valley or exported from. Are you talking about valley floor only, then it needs to be specific.</p> <p>(c) We may need a process that new applications must be modeled and pay for this?</p>	<p>(a) This sentence has been added: "Surface water can be exchanged with groundwater or recycled water for drinking water purposes." (b) Comment noted. The task is to determine if there are any water transfer projects that would bring water into the Central Valley area. Note that most transfers are between farmers in the same groundwater basin. (c) This will be something to be considered by the CVSC/Executive Committee</p>
107	Debbie Webster CVCWA	Task 3.4.1.4	I think it is really important to understand the conveyance cost up front.	As part of the alternatives analysis, these types of issues would be considered; alternatives evaluation criteria include cost considerations.
108	Debbie Webster CVCWA	Task 3.4.1.4	If we are limiting to remediation sites, this may be overly broad. What like nitrate, where there could be both point and non-point contributions?	The premise here is that recharging or injecting water in close proximity to a groundwater treatment area may interfere with the mitigation of the pollutant.
109	Debbie Webster CVCWA	Task 3.4.2	It may be good to understand where optimal levels occur.	This sentence was added: "For RO optimal product water recovery rates will be determined based on site conditions."
110	Debbie Webster CVCWA	Task 3.4.2.1	Here is an area where we may really need to understand the climate/GHG impacts.	This sentence was added to 3.4.2.1 and 3.4.2.2: "To the extent possible, the effects of climate change and GHG on the technology criteria will be analyzed."
111	Debbie Webster CVCWA	Task 3.4.3	If we end up doing discharge within parts of the CV- or through blending, this will be important too.	Text revised: "For salt management projects that require delivery of a brine stream to a WWTP, it will be important to evaluate the potential for pesticides, nutrients, metals, and naturally-occurring trace elements, that could be found in brine streams, to not interfere with a WWTP's ability to meet permit requirements for discharge (e.g. discharge to San Francisco Bay or the Pacific Ocean or discharges to Central Valley streams or to discharge ponds)."
112	Debbie Webster CVCWA	Task 3.4.3.1	Concentration, location, waterbody, time, etc., source besides concentration, method, etc.	This sentence was added: "Metadata will also be compiled, including location, well information, analytical methodology, etc."

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113	Debbie Webster CVCWA	Task 3.4.3.1	Should they be working with DDW or looking at water reports?	This sentence was added: "The Contractor should review data submitted by dischargers under Water Code 13267 Orders to the Water Boards. The Contractor will also work with DWR and the USGS."
114	Debbie Webster CVCWA	Task 3.4.3.2	May need a QAPP or other document to address QA/QC too.	Text has been revised to include potential need for a QAPP.
115	Debbie Webster CVCWA	Task 3.4.3.4	Will this need modeling too or at least be integrated into the model?	Yes, trace constituent data can be incorporated into the model. However, there typically are not enough data to develop a robust transport model of trace constituents.
116	Debbie Webster CVCWA	Task 4.1	Considered, but maybe not. [Regarding SMRs]	Text revised to be more clear that decision will need to be made regarding subdivision of region into salt planning areas or SMRs. This occurs now in Task 3.6. However, to develop the Workplan tasks and budget it has been assumed that up to five planning areas will be identified and developed as it is presumed that development of long-term management strategies to be practical will be done in areas smaller than the entire Central Valley Region.
117	Debbie Webster CVCWA	Task 4.1.1	Before this is done and decided, there needs to be the upfront work to determine the lay of the land. Earlier tasks refer to this as being done already.	The draft final P&O Study work plan has been structurally reorganized. The "lay of the land has been moved forward in the tasks.
118	Debbie Webster CVCWA	Task 4.1.1.1	Why just valley floor? These regions are watershed areas...A regulatory framework will need to be established here too, so although they may not need projects, understanding the right level of beneficial use protection can be important.	Characterization (now Task 3.1.1) will occur t/o entire region. Considerations for establishment of planning areas includes need to consider how to handle areas outside the Valley Floor.
119	Debbie Webster CVCWA	Task 4.1.1.2	It may also be important to understand with trading, existing investment, etc. [in reference to text regarding characterization of economic attributes of potential salt planning areas]	Comment noted.
120	Debbie Webster CVCWA	Task 4.1.1.2	This may be a good upfront task with understanding of overlays that can then lead to SMRs or other means of identifying solutions.	Workplan reorganized so that it is clear characterization occurs before deciding salt planning areas or SMRs

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121	Debbie Webster CVCWA	Task 4.1.1.2	Would like to see some mapping overlays were important.	Comment unclear; point of text is that any characterization deliverables need to be in the data repository planned for the Study (see Task 2.1.4) and available.
122	Debbie Webster CVCWA	Task 4.1.2	I don't think we should exclude containment reservoirs with transport or deep well injection, etc. That should be evaluated.	Deep well injection and evaporation ponds are discussed in Task 4.3.4.
123	Debbie Webster CVCWA	Task 4.1.2.1	Don't we also need to make sure the remaining BU are protected? Are multiple uses besides MUN and AGR needed? What about tiered uses?	Yes. The focus is on AGR/MUN because these have objectives/targets that are currently applied. Other uses do not currently have objectives or targets (e.g., translation of a narrative objective). Regardless, in developing plans to achieve sustainability all uses will need to be considered given Salt Control Program objectives (as stated in Section 1.1.1).
124	Debbie Webster CVCWA	Task 4.1.2.1	Should also include evaluated of redesignation – limited, potential, etc., as well as new limits. Will other tools be needed or is there a need for variances or exceptions on an area basis?	It is unknown at this time what kind of regulatory process would be needed to establish an SMA consistent with the intent of the Salt Control Program. Only examples are noted where this work has recently been completed. Did not expand text at this time, given that tasks are focused on developing technical documentation to support de-designation and the need to be fairly generic in the description. The specifics of what elements to evaluate will depend on the area.
125	Debbie Webster CVCWA	Task 4.2.1.1	Incorporation into model [reference to SMRs]	Any information developed through water quality characterization (now Task 3.1) would support model.
126	Debbie Webster CVCWA	Task 4.2.1.1	Are other salt constituents also needed?	Added "...and major cation and anion data" to the text.
127	Debbie Webster CVCWA	Task 4.2.2	Somewhere in here, we need to define the loss of assimilative capacity as a way that sources are identified. Those that use water, whether by use in the valley or by exporting reduce the overall assimilative capacity.	The reduction of assimilative capacity will be modeled with the SMT, based on salt loads and salt reductions - salt and water fluxes in and out of a given model area.

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128	Debbie Webster CVCWA	Task 4.4	Alternatives Analysis: What happened to the cost benefit or economic evaluation of such actions and if they were reasonable/feasible/practicable? Are these five combinations or five individual strategies. Why is this the right number?	The alternatives evaluation criteria are discussed in Task 4.4.2 – Develop Alternative Evaluation Criteria. These include economic considerations. We have added "reasonable, feasible, and practicable" to lead paragraph before list of potential criteria to include in the evaluation criteria. Regarding "five" - these are five alternative long term management strategies (each one includes combinations of physical/non-physical projects). Five alternatives seemed like a number that was adequate to analyze and understand how the alternatives perform using the SMT, while not being overly burdensome. Other numbers of alternatives can be proposed before finalizing the Workplan.
129	Debbie Webster CVCWA	Task 4.4.1	What happened to other physical projects such as groundwater recharge, trading, land fallowing, etc.? This is really only aimed at desalters and should be expanded. Either a subtitle or another title is needed as the others seem to be described below. I feel as though this section is not flowing well in organization, or maybe it is just titles.	Some reorganization of the tasks has occurred to clarify project development process. Task 4.2 focuses on non-physical project identification (e.g., land fallowing); Task 4.3 focuses on physical projects (including potentially groundwater recharge). Task 4.4 brings these together in alternatives development.
130	Debbie Webster CVCWA	Task 4.4.1.1	The location may also be coinciding with nitrate and/or other water quality concerns, which we should not ignore. Because RO is the ultimate nitrate treatment, or pump and irrigate will accumulate salt, the two aspects of CV-SALTS may ultimately come together for longer term solutions. This should be recognized some how.	Other water quality issues will be identified and can be mitigated, perhaps in a treatment train. As an example, the Chino Desalter Authority is pumping and treating TDS, nitrate (both with RO) and VOCs with air stripping and vapor phase granular activated carbon.
131	Debbie Webster CVCWA	Task 4.4.1.4	We should be considering if allowing reuse so that the water can be reused but salt gets more concentrated may be an option. It may make sense, for example to install more tile drains in areas and collect where this is not occurring.	Comment noted and agree. Collecting and treating tile drain water before it reaches surface water or groundwater would be cost effective. These scenarios can be developed in Task 4.3.
132	Debbie Webster CVCWA	Task 4.4.3	Do we have the ability to look at other alignments? Was this already evaluated? I am not sure why these were chosen and what work has been done.	Yes, other potential alignments can be proposed. The alignments herein are concepts from SSALTS reports. Text states "at least 3 pipeline alignments an names the three to consider "at least". More can be considered.

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133	Debbie Webster CVCWA	Task 4.4.5.2	Other thoughts: -Does it address more than the salt constituent -Is it promoting CV-SALTS goals (not just sustainability) -Is it conducive with other policies and goals of the Central Valley & California?	These suggested evaluation criteria have been added.