

**ADDITIONAL CENTRAL VALLEY WATER BOARD COMMENTS TO THE DRAFT PRIORITIZATION
AND OPTIMIZATION STUDY WORK PLAN AND DRAFT EARLY ACTION PLAN**
March 27, 2020

P&O STUDY COMMENTS

- **Raw Data.** The P/O study will involve collection, synthesis, and assessment of substantial data. There is no indication in the study that the raw data would be made available to board staff. We ask that, to the extent possible, raw data be provided to Board staff.
- **Salinity Targets.** Task 3 and 4 involve development and consideration of salinity targets. The discussion in these sections are generally centered around AGR and MUN consideration. This is most likely going to capture the most sensitive beneficial use in most Salt Management Regions (SMR). However, there should be an initial consideration of the most sensitive beneficial use within the differing SMRs. In the Delta, for example, AGR would most likely not be the most sensitive, it could be habitat. The document should be broadened to clearly indicate that most sensitive beneficial use should be considered.
- **Economics.** It isn't clear if economics of "no action" will be considered in reference to the economics of implementing the recommended actions. We recommend an economic consideration of the costs of salinity to infrastructure, downstream users (e.g. agriculture, residents, etc.), be compared with the economic picture as recommended actions are implemented. This type of analysis could go a long way in helping the Board support the projects; especially where there is joint SMR consideration (e.g., source control in an upstream SMR).
- Who will be responsible for selecting the Technical Review Panel? In addition, regional board staff representation should be considered for this Panel.

EAP

- **Focus on Public Water Stations.** These pilot plans do focus on developing water delivery stations as the primary means of providing replacement drinking water. During the Management Zone Pilot Study meetings, some Environmental Justice group representatives supported this in concept due to concerns that some people would not favor bottled water home delivery due to privacy concerns. However, the EAP should be clear that the water delivery options should be chosen by each management zone considering the results of robust public outreach and community needs in that management zone.
- **Public outreach.** The public outreach process in the EAP should incorporate the use of the best practices being developed by the State Board Office of Public Participation (OPP). This recommendation recognizes that the draft EAP was prepared before the OPP best practices document was prepared.

- **Deadlines for Initial Community Outreach.** The pilot EAP does not provide a deadline for initial community outreach to help develop the plan other than within 180 days of effective date. Initial outreach deadlines should be required before the EAP is completed.
- **Temporal De-clustering.** It appears that for focused outreach for domestic wells, that the existing upper zone data set was averaged (long term average of annual averages) to estimate where there is the potential for groundwater to be greater than 10 mg/L. They did estimate how this fit with the existing data set, and it fits rather well. However, this data should be re-analyzed once the ag coalition data set is available. There may be substantially more data available to provide a better estimation for this outreach. In addition, an approach using 10 mg/L as the trigger for outreach may not fully meet the Basin Plan requirement: "...where those drinking water supplies are impacted by nitrates and exceed or are likely to exceed nitrate drinking water standards in the foreseeable future, Management Zone participants will ensure the provision of safe drinking water..."
- **Station Timing.** The EAP specifies that they will seek permits and planning within 180-days of EAP effective date for stations 1 and 2. Installations would begin within 90-days of receiving permits. For the first 2 stations, we'd be looking at having water available at best in two years from NTC mailout. Stations 3, 4, 5, and 6 would be at least 200-days after (so approximately 2.5 - 3 years after NTC). To expedite the process, management zones should begin the siting and permitting process for the initial stations before the EAP is approved. In addition, the EAPs should include justification that the proposed schedule is moving as quickly as feasible.
- **Bottled Water Outreach Aligned with Stations 1&2.** If water delivery stations are proposed for a management zone, roll out of an alternative delivery method (e.g. a bottled water home delivery program) should be implemented simultaneously.
- **Well Data Obtained by MZIP.** The MZIP includes potential for sample collection to verify whether someone needs or qualifies for water. It is not specified where this data would be housed. The data should be placed in Geotracker so that it becomes part of the public record.
- Footnote on page H-40 is confusing. Why would water with concentrations of nitrate 3 mg/L be treated?