

Memo



To: CV-SALTS Executive Committee
From: Richard Meyerhoff, GEI Consultants
Date: May 13, 2020
Re: Initial Responses to Central Valley Water Board Comments on Prioritization and Optimization (P&O Study) Workplan

The purpose of this memorandum is to provide an initial response to comments on the Final Draft P&O Study Workplan (February 2020) provided via email by the Central Valley Water Board on March 27, 2020. Following is a restatement of the comments and a proposed or preliminary response.

Comment - 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.

- Recommended Edits: Task 2.1.4 clarified (red text) to address comment (pages 4-8 and 4-9 in February 2020 Final Draft).

Task 2.1.4 – Manage Data and Information

The TPM will work with the CVSC and Executive Committee to implement the following activities to administratively manage data and information developed during implementation of the P&O Study:

- Establish an appropriate repository for data and information, including, but not limited to, task reports and technical memoranda, data files (including original raw data, if available), geographic information systems (GIS) shapefiles, committee meeting agendas, notes and presentations, and key documents identified through literature reviews or that provide key support to P&O Study recommendations (this includes any documents that may need to be part of an administrative record for future Basin Plan amendments). The data and information repository developed for the P&O Study should be (a) structured in a manner that facilitates data sharing between the P&O Study and the CV-SALTS Surveillance and Monitoring Program (SAMP); and (b) available to Central Valley Water Board staff.
 - Ensure that required Contractor deliverables, including data files used to support preparation of Contractor deliverables, and other related P&O Study documents are stored in the data repository.
 - Develop data management policies and procedures for access to data and information retained in the data repository.
 - Manage requests from stakeholders for access to deliverables per approved policies and procedures.
- Explanation: Task 2.1.4 is intended to ensure all P&O Study data, reports, etc. are housed in a central location (“data repository”) for access. Text was added to be clear that this repository is to be accessible to Regional Board staff. Also edited text to be clear that “data files” includes original raw data files, if they were available.

Comment - 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).

- Recommended Edits: Text edited (red text) in Task 4.5 to clarify language regarding purpose and expectations of "no-project" scenario (pages 4-64 and 4-65 in February 2020 Final Draft).

Task 4.5 – Optimization Analysis and Selection of the Preferred Salt Management Alternative for Each Salt Management Region

Once the top five alternatives have been selected (Task 4.4.3), the Contractor will propose an optimization analysis, which will consider at least two components (others may be requested by the Executive Committee): (a) removing as much mass as possible from the SMR and (b) achieving salt sustainability. The locations of SMR facilities and options for treatment, transport, and salt management will also be optimized based on conceptual-level cost estimates, taking into account the criteria developed in Task 4.4.2.

After the optimization analysis, the Contractor, working in conjunction with the Executive Committee, will select the top three (3) project alternatives out of five. **For each SMR, the Contractor will evaluate these three top alternatives or "Project" scenarios along with the "No-Project" scenario:**

- "No-Project" or no action scenario, which models each SMR for salt control activities in place in 2020. **The "No-Project" scenario provides a detailed analysis of impacts to downstream beneficial uses, economic or otherwise. The "No-Project" scenario provides a baseline of costs for all of the existing salt management projects. The costs and benefits associated with the "No-Project" scenario will be compared with the costs and benefits of each "Project" scenario.**
 - "Project" scenario, which models each SMR for proposed salt control activities 50 years into the future, beginning in 2030. Salt control projects would come on-line as proposed in **each of the three top project alternatives. These analyses** would include a scenario(s) for climate change (as appropriate at the time of the analysis).
- Explanation: Development of a preferred alternative for a planning area is completed over three steps: (a) identification of up to 10 alternatives; (b) screen those down to five based on developed criteria (which includes evaluation of costs and various types of benefits); and (c) select top 3 alternatives for final evaluation. It is in this last step that the "no action" scenario is evaluated alongside each of the three proposed alternatives. Text revised to relate "no action" to "no project" scenario and note that economics should be included in this evaluation.

Comment: Who will be responsible for selecting the Technical Review Panel? In addition, regional board staff representation should be considered for this Panel.

- Recommended Edits: Added text to Task 3.3.4 to address question/comment (page 4-30 in February 2020 Final Draft).

Task 3.3.4 - Technical Review Panel – Selection of the Model Platform

A Technical Review Panel (TRP) will be selected and convened to provide an independent review of the selection of the modeling platform to ensure its suitability for the intended purposes of the P&O Study.

The TRP, consisting of a minimum of three (3) recognized experts in surface water/groundwater modeling and or salinity issues, will provide the review of model platforms for each hydrologic region. Consistency in the choice of model platforms will be considered advantageous, unless region-specific issues support a different option. The model platform will not be accepted for use to support the P&O Study without concurrence from the TRP. **The Executive Committee will be responsible for selecting TRP members. Participation on the TRP is open to any person with the appropriate qualifications, including Regional Board staff.**

- Explanation: (a) Executive Committee (which includes Regional Board staff) will be responsible for selection of the Technical Review Panel (TRP) for review of the modeling platform selected for use in the P&O Study; and (b) representation on the TRP is open to those with appropriate qualifications (per Workplan: “recognized experts in surface water/groundwater modeling and salinity issues”), including Regional Board staff.

Comment - 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.

- Preliminary Response – Based on a follow-up discussion regarding this comment with Adam Laputz, Central Valley Water Board, it was agreed that before providing recommended edits to the Workplan to address this comment it would be best to have a broader discussion with the Executive Committee. Focus of the discussion will be on the expected outcomes from Task 3.2, “Establishment of Appropriate Numeric Salt Management Targets.” We will plan to have that discussion as soon as possible, likely at the June meeting.