

Comment/Response Table - CEQA/Economics/Antidegradation Analysis Work Plans

| Comment No. | Workplan | Task | Commenter | Comment | Response |
|--|--------------------------|--------|-------------|---|--|
| Comments on Draft Work Plans - July 5, 2016 | | | | | |
| 1 | Antidegradation Analysis | Task 4 | Tess Dunham | The SNMP is focused on groundwater, and the policies are being written with respect to groundwater (with the exception of the SMCL policy). How much time and effort will be placed on anti degradation analysis for surface water v. groundwater? | Since the anti degradation analysis will be developed to assess the consistency of the proposed SNMP and corresponding BPA with state and federal antidegradation policies, the nature and content of the analysis will depend on the final, proposed elements of the SNMP and BPA. Thus, if the SNMP and related policies are more focused on groundwater, then the corresponding analyses will also tend to be more focused on groundwater. |
| 2 | Antidegradation Analysis | Task 4 | Tess Dunham | In bullet one, there is reference to individual discharger effluent quality. While that may be appropriate when referring to point source discharges, it is less applicable to agricultural discharges. It would be preferable to not refer to agricultural discharges as effluent. | Agreed. Comment incorporated. |
| 3 | Antidegradation Analysis | Task 4 | Tess Dunham | What will be the examples of quantitative changes in water quality based on existing CV-SALTS modeling scenarios? Is this basically the AID modeling or are there others that will be included as well? | That is correct. Due to the time and budget constraints, the analysis will use existing information that is available from the previous CVSALTS work with the AID Archetype. If CVSALTS approves the additional Restoration Scenario scope of work then this information may also be included (time allowing). |
| 4 | Antidegradation Analysis | Task 4 | Tess Dunham | What is the methodology that will be used to determine if existing regulations will result in a change in crops? | This will have to be determined by CV-SALTS as a part of the Policy development and/or by the PC as a part of the No Project description. |
| 5 | Antidegradation Analysis | Task 4 | Tess Dunham | For table 1, I thought that maximum benefit and assimilative capacity were going to be Guidance documents, not policy documents. As such, is it necessary to include them here? Table 1 should be expanded to include a salinity permitting strategy. | Table 1 includes those SNMP programmatic documents AND policies that may affect the analysis that will be conducted. Agree that the salinity permitting strategy document should be included in the table. |
| 6 | Economic Analysis | Task 4 | Tess Dunham | It discusses working with the Central Valley Board's basin planning legal staff to identify elements that will require economic analysis, which is fine. But should there be some consultation with the Project Committee too regarding those elements that need economic analysis? | Due to the significant time constraints to complete this work, there is limited opportunity to interact with the PC. However, as a part of Tasks 2 and 3 and 5 we identified key timeframes in which the LWA Team can seek input from the PC. Thus, we tried to include this important interaction while meeting the deadline of Oct 1. |
| 7 | Economic Analysis | Task 4 | Tess Dunham | Besides costs to the regulated discharge community, there will be other regional economic costs if agriculture is removed from the Central Valley. Will the economic analysis include discussion regarding these indirect economic factors? Would be very important for agriculture. Also, for example, if dairies were required to retrofit dairy lagoons, the cost per dairy would be very large and would have a multiplier effect on the Central Valley. Much of this information is already available in the Fact Sheet of the Dairy General Order and should be included here. There may also be economic information available from the Regional Board's previous Irrigated Lands EIR. | The first question that the PC will need to provide direction to the LWA Team is - what comprises the No Project alternative? If this includes the removal of ag from Central Valley then the LWA Team will provide existing information for those related regional costs. We would work with John Dickey and Dr. Howitt to identify relevant costs. Additional sources of information can be used for Task 4 including those listed within the comment. |
| 8 | Economic Analysis | Task 4 | Tess Dunham | What is considered a planning level cost for the final write up? | Given that the economic analysis will support the SNMP and BPA, which regulates the entirety of the Central Valley, and it is unclear what specific projects may be implemented on a regional or local level, the analysis must cover the programmatic aspects of the SNMP/BPA instead of project specific costs. Therefore, the planning level costs will include the general cost of implementation for the project alternatives on a valley-wide scale. With planning level costs, it is understood that other, site specific costs/factors may not be fully accounted for. |

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| 9 | Antidegradation & Economics Analyses Combined | General | Tess Dunham | These have been presented as two different work plans but are by the same team. Tasks 1, 2, 3 and 5 in both work plans are identical in work and in costs. It appears from the work plans that these tasks are duplicative of each other, and in fact means that the LWA Team costs for Tasks 1, 2, 3 and 5 are collectively \$30,000, \$20,000, \$20,000 and \$80,000 respectively. I am uncertain as to why each of these work plans includes duplicative tasks and costs. | The original authorization indicated that there would be two Work Plans. The LWA Team contemplated whether one Work Plan or two would be best and ended up settling on two Work Plans in order to keep the differences between the two work efforts separate and distinct from one another. As a result, the costs for Tasks 1, 2, 3, and 5 were cost shared between the two Work Plans. If CV-SALTS desires, the two Work Plans could be merged. |
| 10 | Antidegradation & Economics Analyses Combined | General | Tess Dunham | Both work plans refer to the individuals selected for the work, but the work plan does not identify the team members that will be conducting the work and the role that each team member plays. It would be useful to know the individuals that will be involved as well as the Strategic Advisors that will be relied on. | The proposal submitted to CV-SALTS identified who would be involved in this work, thus, it was not duplicated here. However, to address the comment, text was added to the Work Plans. |
| 11 | Antidegradation & Economics Analyses Combined | General | Tess Dunham | The use of acronyms for the project management plan was confusing, and I am not certain that all acronyms used are actually defined. | Comment incorporated. |
| 12 | Antidegradation & Economics Analyses Combined | General | Tess Dunham | It would be helpful if the role of the project committee was better identified for the tasks | The role for the Project Committee is stated within the Project Management Plan". The CV-SALTS Project Committee (PC) will provide technical/policy direction to the LWA Team. The PC will also provide approval for the deliverables." In addition, the specific reviews requested by the PC are included with each of the Task deliverables. Due to the significant time restraints, the reviews by the PC are, unfortunately, limited. |
| 13 | Antidegradation & Economics Analyses Combined | Task 2 | Tess Dunham | There may be some overlap with this task for these work plans and task 2 of the CEQA work plan. The two should be coordinated to the extent possible. Further, the work plan identifies the Basin Plans as the primary document for current regulatory programs. I don't believe that the Basin Plans will provide the level of information necessary to actually describe the current regulatory programs. For example, the Basin Plan does not describe in anyway the irrigated lands regulatory program. I believe that this is intended to be covered via bullet two, just want to be sure that we look beyond the Basin Plans for describing the baseline water quality regulatory programs as they are being implemented by the Regional Board. | Agreed. As stated within the Work Plans, the LWA Team and CDM Smith-RBI Team have already started to and will continue to collaborate on this project. Yes, we are planning on describing the current regulatory programs by utilizing the Basin Plans as well as the other documents and approaches currently used by the regulatory programs. We captured this concept by stating "...along with existing technical reports and associated information....". |
| 14 | Antidegradation & Economics Analyses Combined | Task 3 | Tess Dunham | Defining "No Project" and Proposed Project - For irrigated lands, it may be necessary to have the no project as the currently adopted WDRs, or as they WDRs might be changed by the State Board if they adopt the East San Joaquin Order. The program will change pretty dramatically if the State Board adopts the East San Joaquin order. For the proposed project alternative, Laurel Firestone has indicated that they are looking to develop an alternative for consideration. I think that we need a place saver to include analysis of an additional alternative in the event that Laurel, or anyone else, provides an alternative. I would of course expect that that would require the consultant team to come back to the EC to obtain approval for inclusion/analysis of another alternative, but I think it important to leave the door open for that to happen within a certain specified time frame. In other words, provide a deadline for alternatives to be submitted to be considered in these analysis. Same goes for the CEQA analysis. Will the Project Committee be given the opportunity to review the No Project and Proposed Project descriptions? I believe it is important for that to occur. | One of the most important tasks for the PC is to define the two alternatives currently contemplated by this work effort - the "No Project" and "Proposed Project" alternatives. While the LWA Team can provide a straw man for what we believe these two alternatives should include - this is ultimately a decision that will be made by the PC so that the PC provides clear direction to the LWA Team as to what should be assessed. In addition, given the timeframe under which this work needs to be completed (by Oct 1) - the LWA Team will need to know how many alternatives this analysis will include (right now we are only contemplating 2) and what each of the alternatives includes ASAP - this is the purpose of the conference call with the PC as stated within the deliverables for Tasks 2 and 3. The brief write up as stated in Task 3 should be reviewed by the PC, however the LWA Team can not start on Task 4 until we have final approval on Task 3. If we include a specific review - we should revisit the timeframes currently contemplated within the Work Plans. |

Comment/Response Table - CEQA/Economics/Antidegradation Analysis Work Plans

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| 15 | CEQA Analysis | General | Tess Dunham | Like comments above, how much time will be devoted to surface water? Concerned that limited time and resources get spent on surface water when the SNMP is groundwater focused. | Similar to the response to Comment #1, the CEQA assessment will address surface water vs. groundwater to the degree that elements of the final SNMP and related policies address are focused on addressing these two resources, and the degree to which changes in the environment are expected. |
| 16 | CEQA Analysis | General | Tess Dunham | Concept of restoring groundwater includes reasonably, feasible and practicable to do so. | Agree, Work Plan revised to be clear. |
| 17 | CEQA Analysis | General | Tess Dunham | References maximum benefit and assimilative capacity as policies - not guidance documents. Not sure they need to be included here. | Text revised to indicate these are guidance documents; degree to which they need to be considered can be determined in coordination with Project Committee |
| 18 | CEQA Analysis | General | Tess Dunham | Reference to the AGR policy puts salinity permitting strategy in parenthesis. These will be two separate documents. | Text revised to make this clear. |
| 19 | CEQA Analysis | Task 1 | Tess Dunham | Task 1 discusses coordination with Board staff and the LWA Team but does not include or describe coordination/communication with the project committee. Reference to how coordination with the project committee will occur needs to be included in task 1. | Work Plan revised to provide additional clarity regarding Project Committee coordination/communication. |
| 20 | CEQA Analysis | Task 2 | Tess Dunham | Task 2 may have some overlap with task 2 in the anti degradation/economic analysis. These efforts need to be coordinated to the extent feasible | Intent is to coordinate all three Work Plans closely. This will be facilitated by having a single Project Committee for all three projects. |
| 21 | CEQA Analysis | Task 2 | Tess Dunham | Task 2 also states that the draft regulatory and environmental settings will be prepared and submitted for CDM and Central Valley Water Board review. The project committee should also have the opportunity to review this deliverable. I don't believe it is sufficient just to say that the Project Committee will get to look at the list and participate in a conference call. Many Project Committee members have extensive knowledge on individual regulatory programs and they should be consulted as to the characterization of these various regulatory programs. | Work Plan clarified to show Project Committee involvement in all Tasks. Project Committee includes Central Valley Water Board staff person. |
| 22 | CEQA Analysis | Task 3 | Tess Dunham | Task 3 - Again, the consultants indicate that they will work with Board and staff and the LWA team but there is no reference to the project committee. Further, as indicated above, defining the No Project for irrigated lands in particular could be defined in two ways. There exist adopted WDRs, and there exists a revised program if the State Board's East San Joaquin Order is adopted. There should be discussion with the Project committee as to how best to determine what is the No Project. I am glad to see that these descriptions are scheduled for Project Committee review. That is an essential step. | See previous comment response. Regarding the No Project description, its development/description will be coordinated with the Project Committee. Text revised. |
| 23 | CEQA Analysis | General | Tess Dunham | As indicated above, we need some mechanism to allow for evaluation of other alternatives if they are submitted in a timely manner, and if additional analysis is authorized. | Agree - a placeholder for consideration of other alternatives has been incorporated in the Work Plan. The budget currently assumes a no project and project alternative. The degree to which the budget will be impacted by need to analyze additional alternatives will be evaluated when it is determined whether or not additional alternatives require analysis. |
| 24 | CEQA Analysis | Task 4 | Tess Dunham | There is a statement that it is not anticipated that implementation of the SNMP will result in any significant environmental impacts and thus assessment of alternatives will not be necessary. I think that we need to be careful to not prematurely reach conclusions prior to completion of the CEQA analysis. | Text revised to remove any suggestion of prematurely reached conclusions, and state that in the event that there are no significant impacts with the proposed project, that assessment of alternatives is not necessary. |

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| 25 | CEQA Analysis | Task 4 | Tess Dunham | It states that there will be a single round of review and comment by the Central Valley Water Board staff but what about the Project Committee? Important that the Project Committee be included in a round of review of the CEQA assessment. | See previous responses to related comments. Project Committee, which includes Board staff, will be leading review of draft documents. |
| 26 | General | General | Jeanne Chilcott | Agrees with Tess's comments, in particular: to echo her concern about the need for place holders for alternatives. With the tight timeframe, I'm doubtful we'll come complete consensus. We want to make sure we have a range evaluated so that we don't end up in an all or nothing situation when we're proposing a Basin Plan Amendment. If the alternative doesn't fall within the CEQA/Econ/Antideg evaluation, we won't be able to consider it. | Agreed, however we will need to have clear enough direction from the PC in a timely manner as to the number of alternatives and what each should generally include so that the LWA Team analyzes the right range of information. We simply do not have the time or budget to shift dramatically off of this initial input. |
| 27 | CEQA Analysis | Task 2 | Lysa Voight | In reference to "...Team will develop a list of regulatory plans and policies...": Is this a different policy/regulation list than the current list of related policies like the one mentioned on page 2 that have been drafted? | The reference here is to existing policies, regulations, plans that may be relevant to the analysis. The list on Page 2 covers the known CV-SALTS documents that will be considered as part of the project. |
| 28 | CEQA Analysis | Task 3 | Lysa Voight | Will there be just one proposed project, or will several be evaluated? Short term and long term? NIMS and the draft SNMP aren't definitive about a preferred volume of GW cleanup for impaired areas, or which performance targets, scenarios, or time frames are preferred. Also, is the proposed project actually a combination of two major project components - one for salts and one for nitrates? Is it difference for surface and groundwaters projects? | See response to Comment #14 |
| 29 | CEQA Analysis | Task 4 | Lysa Voight | With regards to list of resource categories on page 5: (a) will areas of multiple contaminants be addressed; (b) will the issue of decreasing groundwater levels (drought) be addressed or discussed? | (a) The effects of the proposed project on water quality degradation for all constituents of concern that may be affected by the proposed project will be addressed in a programmatic manner, supported with findings from the Antidegradation Analysis. (b) The CEQA checklist asks whether the project would substantially deplete groundwater supplies or interfere with recharge. Decreasing groundwater levels due to factors outside of the project (e.g., drought) would not be an impact of the proposed project, though discussion of groundwater conditions, and factors affecting those conditions, is relevant to the environmental setting. |
| 30 | CEQA Analysis | Task 4 | Lysa Voight | With regards to, "In approaching the CEQA assessment in this broad programmatic manner, it will allow for such refinements and the resulting modified project...": Would the "resulting modified project" actually be different projects in different areas? Would there be two major project components - one for salts and one for nitrates? What about a different project for surface waters and groundwaters? | The "project" is the adoption of the SNMP and related policies. The discussion of a "modified project" in the work plan is in reference to future refinements of the SNMP and its supporting policies and providing CEQA coverage for those modifications through the programmatic assessment approach. |
| 31 | Antidegradation Analysis | Sub-task 1.1 | Lysa Voight | How many meetings/calls, etc. are budgeted? Weekly, biweekly, other? | See response to Comment #41 |
| 32 | Antidegradation Analysis | Task 2 | Lysa Voight | This task is repeated in the Economic Analysis Work Plan. Same comments as the one on that plan : Does this mean that the WQ data from the other CV Salts reports will be consolidated? Or will more research be done to add to this data? Will areas that contain multiple contaminants be evaluated or identified? Confirm that budget and tasks aren't duplicated in the work plans. | See the response to comment #9; in addition, analysis will rely on existing data (see also #37). Although the tasks are titled the same, budgets are not duplicated between workplans. |

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| 33 | Antidegradation Analysis | Task 3 | Lysa Voight | This task is repeated in the Economic Analysis Work Plan. Same comments as the one on that plan : Will there be just one proposed project, or will several be evaluated? Short term and long term? NIMS and the draft SNMP aren't definitive about a preferred volume of GW cleanup for impaired areas, or which performance targets, scenarios, or time frames are preferred. Also, is the proposed project actually a combination of two major project components - one for salts and one for nitrates? Is it difference for surface and groundwater projects? Confirm that budget and tasks aren't duplicated in the work plans. | See the response to comment #9 & #14 |
| 34 | Antidegradation Analysis | Task 4 | Lysa Voight | Page 8, last full paragraph before last bullets, with regards to, "Implementation of the No Project alternative will also produce changes in salt and nitrate groundwater quality due to the Central Valley Water Board's requirement to regulate discharges to groundwater ...": And surface water (typical for this section)? | See the response to comment #1 |
| 35 | Economic Analysis | Intro | Lysa Voight | Regarding list of tasks on page 2, in reference to "'Proposed Project' Alternative" in 2nd bullet under Task 3: Will there be just one proposed project, or will several be evaluated? Short term and long term? NIMS and the draft SNMP aren't definitive about a preferred volume of GW cleanup for impaired areas, or which performance targets, scenarios, or time frames are preferred. Also, is the proposed project actually a combination of two major project components - one for salts and one for nitrates? Is it difference for surface and groundwaters projects? | See the response to comment #14. |
| 36 | Economic Analysis | Task 2 | Lysa Voight | Could add another bullet item for identification of data gaps | Comment incorporated. |
| 37 | Economic Analysis | Task 2 | Lysa Voight | Regarding "state of knowledge" in third bullet: Does this mean that the WQ data from the other CV-SALTS reports will be consolidated? Or will more research be done to added to this data? Will areas that contain multiple contaminants be evaluated or identified? | Due to the significant time constraints to complete this work, the LWA Team must use information that is currently available. No new data analysis is contemplated for this work effort. |
| 38 | Economic Analysis | Task 4 | Lysa Voight | See comment from Intro - applies to this section also. | See response to comment #14. |
| 39 | Economic Analysis | Task 4 | Lysa Voight | What time frame will be evaluated? 20 years, 50 years? | This should be determined by the Project Committee |
| 40 | Economic Analysis | Task 4 | Lysa Voight | What about consideration of proportional costs or for areas where there are multiple contaminants? Would this be evaluated? | Yes, however this would be considered on a programmatic scale. |
| 41 | Economic Analysis | Table 2 Budget | Lysa Voight | Does the consultant have an estimate for the number of calls & meetings? Biweekly, monthly, etc. | Given the tight timeframe for the project, it is anticipated that the calls may be weekly or every other week - thus the schedule was not pre-defined so that there is flexibility. |
| 42 | General | General | Phoebe Seaton | The analysis should be applied to all alternatives including an alternate project alternative if one is developed | See response to Comment #14 |
| 43 | General | General | Phoebe Seaton | The analysis must consider economic impacts on consumers of drinking water, including costs associated with treatment, purchasing bottled water, impacts to property values | Comment noted: The project teams will work closely with the Project Committee regarding specifics to be addressed by each analysis. |
| 44 | General | General | Phoebe Seaton | The analysis must include an analysis of health impacts on consumers of groundwater for drinking water | Comment noted: The project teams will work closely with the Project Committee regarding specifics to be addressed by each analysis. |
| 45 | General | General | Phoebe Seaton | The analysis must include quantitative assessments of nitrate impacts groundwater and drinking water quality. If no data exists, the analysis must include estimates based on existing data. A qualitative assessment is not adequate nor can it accurately inform a cost benefit analysis. | Comment noted: The project teams will work closely with the Project Committee regarding specifics to be addressed by each analysis. |

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| 46 | General | General | Phoebe Seaton | The analysis must assess best management practices that would be employed in the case of degradation. | Comment noted: The project teams will work closely with the Project Committee regarding specifics to be addressed by each analysis. |
| 47 | Economic Analysis | General | Debbie Webster | I am concerned there are still too many moving parts and that the recommendation to limit to just a preferred alternative may lock us to a path before we make decisions in the policy sessions. For example, just with the goals, what does goal 3 mean? What will it take to reach a balance? Does this mean everywhere within a basin? Will out of basin permitted be able to participate? If so are they still going to have to reach balance and restoration on their area of influence. To me these are huge policy issues that have significantly different price ranges depending on how they are answered. My biggest recommendation would be to ask the SWB for an extension of time. I would rather get this right than have to repeat it. | This is a comment for discussion by the Project Committee. However, also see the response to comment #26. |
| 48 | All | General | Debbie Webster | Looking over the other two documents, the same comments for the first applies. The background and characterization seems to be slightly different than the others or are least the supporting documents. That said, the verbiage seems better on the ceqa environmental documentation | Comment noted. While the documents are very similar in content, they were written by different authors. When the analysis is completed and the reports developed the LWA Team can ensure that the background/characterization piece is coordinated with the SED language. |
| 49 | General | General | Debbie Webster | We always have talked about developing local snmps. It seems as if this concept has been dropped without much if any discussion at the executive committee. I see this concept missing in the workplan too. This should be available as an option -especially as it relates to goals 2 and 3. | We agree that the idea is that local/regional SNMPs are developed and have not intentionally dropped this concept from the Work Plans. However, the Economic and Anti Deg analyses will be conducted at a programmatic scale for the SNMP and BPA and will only reference the fact that more project specific analyses may be conducted as a part of local/regional SNMP in the future. |
| 50 | General | General | Debbie Webster | I think that the analysis will also need to include individual dischargers too (well/septic). Especially as it relates to both salt and nitrate. One of the documents referenced the need to make ag legal. This goes beyond ag. Many areas in the CV exist where because of natural condition and/or water supply individuals could not add salt or nitrate, i.e. live there, since any mammal will add both those constituents. | The Economic and Anti Deg analyses may address categories of dischargers, but will not be able to address individual dischargers. |
| 51 | Antidegradation Analysis | General | Debbie Webster | On the antideg piece, it will need to be approached with at least bookend approaches, in areas with good gw quality degradation would be allowed per anti dev. In areas where first encountered exceeds the objective then how is it done | This is in line with the various policy documents and will be described as such in qualitative terms in the Antideg section of the Combined Report. |
| 52 | Antidegradation Analysis | Table 1 | Debbie Webster | On the antideg workplan Table 1, contains what I am concerned are predefined findings, some of these I have concerns with. On NIMS: highlight users over use. Better user protection. On SMCL: it assumes performance based limits. This should not be a broad based recommendation; used where appropriate rather than widespread. Some localized degradation can occur | The LWA Team paraphrased what the policies contain and what the analysis would focus on. If CVSALTS modifies the policies then the LWA Team can assess the revised policy, however this needs to be directed by CVSALTS. |
| 53 | Antidegradation & Economics Analyses Combined | Task 1 | Pam Buford | Data Management - include text that references will follow Central Valley Water Board reference format guidance (will provide) and references may include electronic versions or websites . | Comment incorporated. |
| 54 | Antidegradation & Economics Analyses Combined | Task 1 | Pam Buford | Task 1.1 Deliverables, LWA/CDM Smith RBI team calls documented monthly progress reports | This should already be covered in Task 1.4 |
| 55 | Antidegradation & Economics Analyses Combined | Task 1 | Pam Buford | Task 1.2 Deliverables, PM calls/coordination document in monthly progress reports | This should already be covered in Task 1.4 |
| 56 | Antidegradation & Economics Analyses Combined | Task 1 | Pam Buford | Task 1.3 Deliverables: Project files and data (as described in footnote 7) | Unclear what the comment is requesting since footnote 7 applies to this Task already. |

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| 57 | Antidegradation & Economics Analyses Combined | Task 2 | Pam Buford | Task 2 Deliverable: Provide draft write up for current regulatory and water quality setting by 8/8/16 that will be incorporated into Task 5 report | Comment incorporated. |
| 58 | Antidegradation & Economics Analyses Combined | Task 3 | Pam Buford | Task 3 Deliverable: Brief 3-4 page write up describing the range of alternatives (see Tess and Jeanne's comments) | The current deliverables covers a write up of the alternatives. Also see the response to comment #14. |
| 59 | Antidegradation & Economics Analyses Combined | Task 4 | Pam Buford | Task 4 Deliverable: Monthly Progress Report to include identification of the implementation elements for econ/antideg analysis being focused on during the month | This should already be covered in Task 1.4. The LWA Team plans on continuing the type of monthly progress reports with the detail that have been provided for the last 3 years. |
| 60 | CEQA Analysis | Task 1 | Pam Buford | Task 1 Deliverables: Document RBI/LWA team call in monthly progress reports | Work Plan revised to address comment |
| 61 | CEQA Analysis | Task 2 | Pam Buford | Task 2 & 3 Deliverables Document PC calls/meetings in monthly progress reports | Work Plan revised to address comment. |
| 62 | CEQA Analysis | Salinity in general | Elaine Archibald | <p>CUWA is concerned that these proposed changes could potentially increase salinity levels at our members' drinking water intakes. The proposed increase in the salinity objective could result in higher salinity levels in drinking water supplies that could affect the taste of the water. CUWA is also concerned that the proposed changes could result in more water being released from storage reservoirs to meet the salinity objectives in the Delta. This would decrease the amount of water that is available in the Delta to meet the water supply needs of the Bay Area and Southern California. Analysis should answer the following questions: (a) Which surface water bodies in the Central Valley exceed the TDS objective of 500 mg/L? (b) Which surface water bodies exceed site-specific objectives for TDS or EC? (c) Which dischargers exceed the TDS objective of 500 mg/L in their effluent or drainage water? (d) To what extent will salt load increase if the TDS objective is changed from 500 mg/L to 1000 mg/L? (e) Will that increased salt load result in the need for the release of more high quality from upstream reservoirs to meet Bay-Delta salinity standards? If so, what will be the reduction in water supplies as a result of increased Delta outflow? (f) Will that increased salt load result in increased TDS concentrations at Delta drinking water intakes? (g) If the TDS concentration increases at Delta drinking water intakes, will there be treatment implications?</p> | <p>Thank you for your comment. The proposed SMCL Policy is not self-implementing, but instead it will be implemented through the establishment of effluent limits in WDRs. The proposed policy establishes factors for permit writers to consider in the future when developing such effluent limits, which may include higher effluent limits for TDS, but only as consistent with other policies such as the State Antidegradation Policy. As noted in the Work Plan, the CEQA assessment will be programmatic in nature for the Proposed Project. The Work Plan has been modified to be clear that the water quality portion of the CEQA assessment will address constituents that may be affected by the Proposed Project, including constituents with secondary drinking water MCLs. Because the assessment is a programmatic assessment, it will be in qualitative terms and describe whether increases in certain constituent concentrations are expected to occur relative to Existing Conditions, and whether any predicted increases would result in adverse environmental effects to beneficial uses, including MUN uses. Key to this effort will be establishing the baseline regarding how SMCLs are currently being implemented in the region, e.g., with regards to issues such as salinity, metals and points of compliance. The Environmental Setting will provide a general characterization of the surface and ground water quality conditions within the affected environment of the Central Valley region, providing information on waters in compliance or out of compliance with current water quality objectives, as needed, to support the assessment.</p> |

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| 63 | CEQA Analysis | Metals in general | Elaine Archibald | The Secondary MCL Policy proposes to change the objectives for seven metals from the total amount of metals in the water to the dissolved fraction of metals. This change is described in the policy as simply a new way of measuring compliance with the objectives but in reality it is an increase in the objectives for these metals because it will allow for higher concentrations of total metals in receiving waters. CUWA is concerned that this proposed change in the metals objective could result in higher concentrations of metals at our members' drinking water intakes that may require changes in treatment to meet the secondary MCLs in treated drinking water. We request that the CEQA analysis include an evaluation to answer the following questions:(a) Which surface water bodies in the Central Valley exceed the secondary MCLs as total metals? (b) Which surface water bodies in the Central Valley exceed site-specific objectives for metals? (c) Which dischargers exceed the secondary MCLs (as total metals) in their effluent or drainage water? (d) To what extent will the metals load increase if compliance is based on dissolved metals rather than total metals? (e) Will the increased metals load result in increased metals concentrations at Delta drinking water intakes? (f) If the metals concentrations increase at Delta drinking water intakes, will there be treatment implications? | See response to Comment No. #62 |
| 64 | CEQA Analysis | Compliance at Nearest Downstream Intake | Elaine Archibald | The Secondary MCL Policy proposes to measure compliance with the salinity and metals objectives at the nearest downstream water treatment plant intake rather than in the discharge or at the edge of a mixing zone. This does not protect the MUN beneficial use throughout the water body, as required by the Basin Plans. We request that the CEQA analysis include an evaluation to answer the following questions: a) To what extent will the salt and metals load increase if compliance is measured at the nearest downstream intake, rather than in the discharge or at the edge of a mixing zone? (b) Will the increased salt and metals load result in increased concentrations at Delta drinking water intakes? (c) If there is an incremental increase in salinity as a result of measuring compliance at the nearest downstream intake, will that increased salt load result in the need to release more high quality water from upstream reservoirs to meet Bay-Delta salinity standards? If so, what will be the reduction in water supplies as a result of increased Delta outflow? (d) Will that increased salt load result in increased TDS concentrations at Delta drinking water intakes? | See response to Comment No. #62 |
| 65 | CEQA Assessment Work Plan | Task 2 | Elaine Archibald | The regulatory setting must include a discussion of the importance of secondary MCLs to drinking water providers and a discussion of the multi-barrier approach to public health protection. In addition to describing how the relevant plans and policies are implemented with respect to salt and nitrate, there needs to be a description of how they are implemented with respect to each of the secondary MCLs. The description of the environmental setting is currently focused on salt and nitrate in groundwater basins. The environmental setting must include a discussion of salt and nitrate in surface water supplies and a discussion of the existing quality of groundwater and surface waters with respect to each of the secondary MCLs. | As stated in the Work Plan, "The Regulatory Setting will focus on Central Valley Water Board water quality objectives, programs of implementation, and policies that would be changed by the SNMP, or otherwise relate to implementation of the SNMP (e.g., WDRs and Conditional Waivers)." The Basin Plan incorporates by reference secondary MCLs as water quality objectives for surface and ground waters with an MUN beneficial use designation. Because there is a proposed policy for implementation of secondary MCL-based water quality objectives in WDRs, there will be a description of this in the regulatory setting. Regarding the environmental setting, the analysis will be consistent with CEQA analysis requirements (also refer to response to Comment No. 62). |
| 66 | CEQA Assessment Work Plan | Task 4 | Elaine Archibald | It is inappropriate for the document to state, "It is not anticipated that implementation of the SNMP will result in any significant environmental impacts..." before the analysis is completed. CUWA does not know if there will be impacts to Delta water quality as a result of the proposed Secondary MCL Policy and we have requested that such an analysis be conducted many times. | See response to Comment No. #24 |
| 67 | Economic Analysis Work Plan | Task 2 | Elaine Archibald | This task is focused on salt and nitrate. It needs to include all of the secondary MCLs. | Comment incorporated. |
| 68 | Economic Analysis Work Plan | Task 3 | Elaine Archibald | Anticipated changes in the secondary MCL constituents need to be addressed in this task. | Comment incorporated. |

Comment/Response Table - CEQA/Economics/Antidegradation Analysis Work Plans

| Comment No. | Workplan | Task | Commenter | Comment | Response |
|---|------------------------------------|--------|------------------|--|--|
| 69 | Economic Analysis Work Plan | Task 4 | Elaine Archibald | Table 1, Secondary MCL Policy, needs to include the potential water cost associated with meeting BayDelta salinity standards if the salt load increases as a result of this policy. This needs to also cover the cost of providing alternative water supplies to CUWA's members if the Delta supply is reduced or degraded. | The potential impact on the salt load will be assessed on a programmatic basis. The results from this analysis will be used to determine the costs that should be included as a part of the Economic Analysis. |
| 70 | Antidegradation Analysis Work Plan | Task 2 | Elaine Archibald | This task is focused on salt and nitrate. It needs to include all of the secondary MCLs. | Comment incorporated. |
| 71 | Antidegradation Analysis Work Plan | Task 3 | Elaine Archibald | Anticipated changes in the secondary MCL constituents need to be addressed in this task. | Comment incorporated. |
| 72 | Antidegradation Analysis Work Plan | Task 4 | Elaine Archibald | This task is focused on salt and nitrate. It needs to include all of the secondary MCLs. A qualitative assessment of water quality is not appropriate for evaluating the potential salinity impacts of the Secondary MCL Policy. Modeling studies need to be completed to determine if there will be an increase in salinity at Delta drinking water intakes and if additional water will need to be released from upstream reservoirs to meet Bay-Delta salinity standards. In Table 1, Secondary MCL Policy, there is a statement, "Negligible water quality impacts with performance-based effluent limitations." How can the consultant team conclude there will be negligible water quality impacts if no analysis has been done? | Re the inclusion of all secondary MCLs - comment incorporated. Since the Economic Analysis and Anti Degradation Analysis are being conducted on a programmatic basis for the entirety of the CV region, many of the analyses will be qualitative. In addition, given the constraints on time and budget, the analyses must rely on existing data summaries. No new data analyses can be conducted as a part of this Work Plan. Re the statement in Table 1 - comment incorporated. |
| Comments on Revised Work Plans - July 11, 2016 | | | | | |
| 73 | All Work Plans | All | Tess Dunham | I have reviewed the revised work plans and I am believe them responsive to the comments received. I am fine with them as revised. | Thank you for the comment. |
| 74 | Antidegradation Analysis Work Plan | Task 4 | Pam Buford | There appears to be a broken footnote on page 10 (footnote 15) | This was intended to be a reference back to footnote on page 9. Text revised to make this more clear. |
| 75 | CEQA Assessment Work Plan | Task 4 | Jeanne Chilcott | Will the alternatives identified in Task 3 be assessed in Task 4? I really couldn't tell. I appreciate the edits that call out the identification and description of "true" project alternatives, but I couldn't tell where on page 7 any of them would be evaluated | Yes these alternatives will be assessed in Task 4; Section 4 revised text revised to be more clear. |