Optional Study	Justification to Leave Studies as Optional	Pilot Plant	Full-Scale Desalination Plant
Biological Resources Survey	Water Board staff is concerned that the short duration of the T.O. will constrain effective results from a well-planned study. Additional time is needed to: • Finalize the study design with all government agencies, • Conduct a study that considers all site-specific factors (i.e. populations, behavior, and water body), and • Review the scientific data and evaluate technologies that prevent or minimize impacts.	The T.O. limits the withdraw rate (velocity) of bay water at 150 gpm. This velocity and the intake screen comply with the Dept. of Fish & Game (DF&G) guidelines, and are protective of the biological resources during the short duration pilot project.	Currently, the District's draft Biological Resource Survey plan is being reviewed by U. S. National Oceanic and Atmospheric Agency (NOAA) and DF&G. A completed survey, including analysis and proposed design technologies to minimize impacts, will be required in the NPDES permit application.
Whole Effluent Toxicity Screening	The pilot plant's discharge (recombined bay water) is significantly different than the full-scale desalination plant's discharge (brine combined with Central Marin Sanitary Agency's (CMSA) wastewater). The appropriate dilution of brine with CMSA wastewater must be determined before conducting toxicity screening. This process may extend beyond the operation of the pilot plant as brine variances may affect determining the appropriate dilution ratio.	The T.O. establishes acute toxicity requirements for the Pilot Plant's discharge. The T.O. does not contain chronic toxicity requirements due to the short duration of the Pilot Plant project.	The T.O. requires acute toxicity testing of the brine combined with CMSA wastewater at various dilution ratios to identify the appropriate dilution ratio.
Salinity Study	The analysis of potential impacts and mitigation of a brine discharge can be performed outside the operation period of the pilot plant.	The T.O. does not require salinity monitoring of the discharge. The discharge is recombined bay water, so salinity level is not a water quality concern.	The T.O requires salinity measurements of the brine by monitoring conductivity.