

OCWD Comments on the draft Santa Ana River Waste Load Allocation Model Update – Summary Report, dated July 19, 2019, prepared by GEOSCIENCE Support Services, Inc.

September 9, 2019

Following are comments from the Orange County Water District (OCWD):

1. OCWD previously submitted comments on the Waste Load Allocation Model Tech Memo #6. Please note that Comment #8 suggested changes to Tech Memo #6 that should also be considered as changes in the Summary Report.
2. Section 3.2.9.4: Please add a reference regarding the communication with OCWD staff.
3. Section 6.1.5: In the fourth sentence, what does “reflects flow” mean? Please describe in more detail.
4. Table 6-8 on page 95: Please explain why the Prado Basin Management Zone TDS concentrations for the 5-year average maximum values for the scenario runs in Table 6-8 are significantly different than the Santa Ana River below Prado Dam 5-year moving average TDS concentrations in Table 6-10. The differences seem to be greater than would be expected considering that the averages are calculated differently. Are all the flows from the Prado Basin Management Zone assumed to be discharged to the Santa Ana River Reach 2 without any losses due to evapotranspiration?
5. Table 6-10 on page 101: Why are the TIN scenario results italicized in the table?
6. Section 6.2.2: Suggest changing the second sentence as follows: There are currently no objectives for TIN ~~or ambient surface water concentrations~~ for Reach 2.
7. Figure 21: There is no reference to this figure in the text. Suggest adding this reference in Section 5.3.5.
8. Table 15: Suggest change the title of this table to refer to the Prado Basin Management Zone (PBMZ) rather than as a groundwater management zone.
9. In the text describing Table 15, there should be text that describes each inflow and outflow term in detail, including text that describes the relevant geographic area of each term and whether each term is a model-defined input or is calculated by the model.
10. Table 15: How is streambed percolation shown in the ‘Outflow’ portion of Table 15 if there is an assumption that there is no percolation in the PBMZ? (Section 6.1.8 states ‘Prado Basin is treated as surface water management zone since no percolation is thought to occur in this area’). Please describe how the ‘Streambed Percolation’ term in Table 15 is calculated in the model. Please describe the geographic area where the streambed percolation is calculated for in Table 15.
11. Table 15: Please add a column that provides a flow-weighted TDS of all the inflow sources and also a column that provide a flow-weighted TDS for all the outflow sources.

12. In the text describing Table 15, please add an explanation of the tributary area that is included in the “Upstream Inflow” flow numbers.
13. In the text describing Table 15, please add an explanation of the tributary area is included in the “Surface Runoff from Precipitation” flow numbers.
14. In the text describing Table 15, it should be noted that the diversion shown in Table 15 for the ‘OCWD Prado Wetland Diversion’ is not a diversion out of the PBMZ, since the water that flows through the OCWD Prado Wetland is returned as flow to Chino Creek within the PBMZ.