

MEETING NOTES

Basin Monitoring Program Task Force

August 12, 2020

STAKEHOLDERS PRESENT:

City of Beaumont, Thaxton VanBelle*

City of Corona, Melissa Estrada*

City of Corona, Jennifer McMullin*

City of Riverside, Bobby Gustafson*

City of Riverside, Robert Eland*

City of Riverside, Edward Filadelfia*

City of Riverside, Greg Herzog*

Eastern Municipal Water District, Al Javier*

Eastern Municipal Water District, Doug Edwards*

Elsinore Valley Municipal WD, Jesus Gastelum*

Elsinore Valley Municipal WD, Lenai Hunter*

Elsinore Valley Municipal WD, Parag Kalaria*

Elsinore Valley Municipal WD, Sudhir Mohleji*

Inland Empire Utilities Agency, Eddie Lin*

Inland Empire Utilities Agency, Joshua Aguilar*

Orange County Water District, Greg Woodside*

Orange County Water District, Kevin O'Toole*

San Bernardino Valley Municipal Water District, Bob Tincher*

San Bernardino Valley Municipal Water District, Matt Howard*

WMWD/WRCRWA, Mallory Gandara*

Yucaipa Valley Water District, Ashley Gibson*

Yucaipa Valley Water District, Madeline Blua*

OTHERS PRESENT:

GEI Consultants, Richard Meyerhoff*

Kahn Soares & Conway, LLP, Theresa (Tess) Dunham*

Risk Sciences, Tim Moore*

Rubidoux Community Services District, Yvonne Reyes*

Santa Ana Watershed Project Authority, T. Milford Harrison*

Santa Ana Watershed Project Authority, Mark Norton*

Santa Ana Watershed Project Authority, Haley Mulla*

Santa Ana Regional Water Quality Control Board, Cindy Li*

Santa Ana Regional Water Quality Control Board, Keith Person*

WEI, Samantha Adams*

WSC, Michael Cruikshank*

*Participated via conference call

STAKEHOLDERS ABSENT:

Beaumont-Cherry Valley Water District

Chino Basin Watermaster

City of Banning

City of Redlands

Irvine Ranch Water District

Jurupa Community Services District

San Geronimo Pass Water Agency

Temescal Valley Water District

Call to Order/Introductions

The Basin Monitoring Program Task Force (Task Force) meeting commenced at 1:03 p.m. in a virtual Zoom Meeting, in response to, and in compliance with, COVID-19 regulations. Brief introductions were made.

Approval of June 24, 2020 Meeting Notes

The June 24, 2020 meeting notes were approved as posted.

Draft Basin Plan Amendment Status – Risk Sciences/KSC

Tim Moore, of Risk Sciences, and Tess Dunham of, Kahn, Soares, and Conway, LLP, gave an oral status report on the draft Basin Plan Amendment (BPA), distributed previously to the Task Force for review prior to the meeting. It was noted that changes shown within the document have all been discussed within Task Force meetings starting last Fall (2019), are now being seen in the official Basin Plan Amendment context.

Most of the revisions surround the updated 2017 Wasteload Allocation Model (WLAM) developed by Geoscience Support Services for the Task Force. The discussion on the historical background on the Wasteload Allocation Model (WLAM) has been abbreviated with a more in-depth description of new model, including added statistics and data that present quantifiable measurement of the environment, that was not there in the previous modeling. Since the WLAM is meant to assist with the permitting process for dischargers, any exceedances that are shown in the maximum discharge scenarios may present a problem for the Basin Plan Amendment. One example is Prado Dam, which is unique in that the exceedances are attributable largely to the poor-quality rising groundwater, but much less so by the high-quality effluent discharged from upstream permittees.

Another concern about the updated WLAM was the need for the recent recalibration of the Upper Temescal Valley Groundwater Management Zone (GMZ), which created room for doubt in the model's accuracy. In

response to this concern, the Task Force set forth a condition in which any permittee/discharger that wished to change, but more specifically relax, their objectives/limits, the agency would need to complete additional studies/analysis to support the request, reflected on page 13 of the draft BPA document.

Some of the other areas of concern that were discussed:

- Drought cycles and the 120-month rolling averages that alleviate the concerns for brief periods of exceedances. This solution is already implemented in Yucaipa in the recent renewal of their permit with the Regional Board (Page 13 of the draft BPA).
- Maintaining compliance with the Recycled Water Policy (Page 21 of the draft BPA), as Tess Dunham noted that there requires confirmation regarding monitoring/reporting requirements for the Task Force prior to the 2024 deadline. It was suggested that the Scoping Committee may be able integrate this into their list of items to accomplish.
- The allocation of assimilative capacity in Riverside A.

A major relief to this process is the fact that the Basin Plan Amendment is not proposing any major changes, in fact it rather demonstrates that the current practices are beneficial, and sustainable, with minor clarifications of rationale to improve implementation of the current Basin Plan. This translates into a straightforward CEQA process since it will not be imposing any changes in how the dischargers are currently operating, meaning there is little to no economic effect; leaving only the environmental analyses to provide the backing of maintaining the status quo.

The Task Force was asked to thoroughly review the proposed document and submit any comments on the distributed draft Basin Plan Amendment by Friday, August 28th, 2020.

CEQA – Substitute Environmental Document and Possible Economic Analysis – GEI/LeClaire & Associates

Richard Meyerhoff, of GEI, provided a verbal report on the excerpted text from the draft Substitute Environmental Document in process. GEI and LeClaire & Associates have been tasked with completing the CEQA analysis and documentation process for adoption of the Basin Plan Amendment, which includes developing a Substitute Environmental Document (SED) with possible economic analysis. An excerpt of the draft document (section 2) was circulated to the Task Force to aid in discussion during the meeting.

5 Major Topics of the Analysis

- Adopting 2017 Wasteload Allocation Model (WLAM)
- Adopt Updated Wasteload Allocations (WLAs) for Permitted Facilities
 - References Table 5-5
 - Acknowledges potential assimilative capacity for Riverside A GMZ
- Establish Basis for Evaluating Compliance with TDS and TIN Effluent Limits
- Clarify Use of Mineral Increments in Establishment of Waste Discharge Requirements
- Clarify that the Antidegradation Review Conducted during the Permitting Process for Salinity-related Constituents will Focus on Total Dissolved Solids

The most time and energy will be spent on the environmental section evaluating the concerns of degradation of water quality. The other CEQA “checklist” items in Section 4 do not require the same level of analyses to be explained.

The Task Force will have until Friday, August 28th, 2020 to review and submit comments on the draft SED excerpt. It was suggested to read through the Basin Plan Amendment text prior to reviewing the SED.

Data Solicitation Notice for Next Round of 303(d) Listings – Risk Sciences/KSC

Tess Dunham of, Kahn, Soares, and Conway, LLP, and Tim Moore, of Risk Sciences, gave a verbal report on the next round of the 2024 Integrated Report cycle (i.e., 303 (d) listings in cycles) for the Santa Ana Region

(as well as San Francisco and Los Angeles). Any data that should be considered for this cycle needs to be submitted into CEDEN by **NOON** (12:00 p.m.) on **OCTOBER 16, 2020**.

Tim Moore, of Risk Sciences, reminded the Task Force of the likelihood of Prado Dam being included on the 303(d) lists due to the exceedances that have occurred there since 2010. The hope is that the Basin Plan Amendment, when approved, will address this issue, and avoid the listing altogether, if able. He also reminded the Task Force of an issue from 2016 surrounding an inaccurate 303 (d) listing of Reach 3 of the Santa Ana River supported by claims of adverse effects on aquatic organisms in that area.

Tim Moore suggested that the best course of action would be to request the raw data, from 2010 – present, that has already been uploaded into CEDEN and any other accessible databases. This will help the Task Force's ability to get ahead of any potential issues and provide explanation and analyses for what the data may demonstrate. Cindy Li, of the Regional Water Quality Control Board offered to help in obtaining that data as soon as possible. Tess Dunham, of Kahn, Soares, & Conway, LLP, prompted the Task Force to think about how the existing program can address any impairments and develop a practice of correcting any concerns, so as to avoid a TMDL or other corrective programming.

Schedule Future Meetings

The next Basin Monitoring Program Task Force meeting, which will be conducted virtually due to COVID-19, has been scheduled for Tuesday, September 22, 2020 at 10:00 a.m.

A Scoping Committee Meeting is scheduled for Monday, September 14, 2020 at 2:00 p.m.

Adjournment

The meeting adjourned at 2:50 p.m.