

2021 AWQ Pilot Study – Comments on Draft Report

September 25, 2023

Agenda

- Comments on the 2021 AWQ Pilot Study
- Discussion of any final verbal comments?
- Next steps to deliver final report

- Written comments received from:
 - Tess Dunham
 - OCWD (Kevin O'Toole)
- Verbal comments received from:
 - Chino Basin Watermaster
 - SAWPA staff (clarifying questions only)

- Editorial and minor language changes. These changes were made, where appropriate. Some of these changes include:
 - Revised the 2021 Basin Plan amendment language to match the final version approved by the OAL in July
 - Refinements on how Basin Plan or other policy language is described
 - Edits for improved readability
- Clarify questions some comments were questions seeking minor clarifications on the information presented. The response to comments document will provide responses to the questions, and where helpful, the text was modified to.
- A few substantive comments

Comment

Response

Tess – Sec. 4.1.3 (Simplified Approach Results)

The use of "Decreasing" and "Increasing" to describe various metrics makes the text difficult to follow (i.e., Decreasing assimilative capacity versus Decreasing AWQ have different implications).

 Additional text was added in the introductory section to provide clarity on interpreting the key observations (e.g. language used for describing trends)

Tess – Sec. 4.1.4 (Simplified Approach)

Regarding recommendation to analyze data and trends for all GMZs to make an initial assimilative capacity finding, should we exclude maximum benefit SNMP since they are required to perform the standard AWQ computation?

 What is documented in this part of 4.1.4 is the initial recommendation we made to the Task Force. The final recommendation in Section 6 (method for 2026 AWQ) excludes the step to make an "initial assimilative capacity finding". No change made to text.

Comment

Response

Tess – Section 4.1.4 (Simplified Approach)

Regarding the bullet "If used as a screening level analysis, there are likely 21 GMZs where the simplified approach could be used reliably to make findings and still support permitting decisions...". Please include an explanation for this.

 Additional text was added to the text, and it also refers the reader to the Task Force meeting PowerPoint included in Appendix A where this topic was discussed.

CBWM - Section 4.2.3 (Standard AWQ Results)

Watermaster performed a review of the TDS and nitrate trends, statistics, and contours because the significant increase in TDS concentration was not intuitive (increased 30 mgl from 2018 to 380 mgl). Requested WSC support to review findings.

 Through working with WSC to review the TDS statistics, contours, and interpolations, an interpolation error was identified and corrected and the TDS AWQ result recomputed. The corrected result is 360 mgl.

Comment

Response

OCWD – Section 5.1.4 (Yucaipa GMZ Storage Pilot)

Where storage updates may result in changes to Basin Plan objectives or permits, there should be considerations to protect downstream surface and ground water quality and objectives. Downstream stakeholders should be involved in the discussions of changes. Suggest updating the last paragraph to include this consideration.

 It is the Regional Board's standard process when updating the Basin Plan, or permits, to ensure consideration of downstream beneficial uses and users (through Task Force meetings or other means). The text was updated to clarify this.

Comment

Response

Tess – Section 7 (Implementation Plan)

For the three scoping items suggested to be completed by March 2024, should this only include the storge model updates and tools needed to support annual data collection, and defer the annual data collection and review scope?

Let's discuss

- o FY 2023/24
 - Oct 31, 2023 Complete Data Gaps Analysis
 - Mar 31, 2024 Develop scope of work and cost estimates to (1) update storage models over a three-year period (2) develop tools in support of performing annual data collection and (3) perform annual data collection and review

Discussion – Any additional Feedback?

Next Steps

- Finalize report, including response to comments document, to include anything substantial from today's discussion
- Compile electronic database of TDS/N data and AWQ statistics
- Deliver report package to SAWPA on 9/27

THANK YOU

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