Appendix E: Public Comment Matrix

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Antelope Valley Region
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Executive Summary Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
ES-5		11/20/2013 Stakeholder meeting			Add footnote to the last sentence of the supply section: "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated on p. ES-5.
ES-4	3	A. Jaramillo (LACWD)	The amount of water supply available varies considerably due to changes in weather, rain and snow, and other conditions. All water supplies within the Antelope Valley Region come from two sources: (1) local rain and snow, or (2) imports of water from outside the Antelope Valley Region. The local water supplies come from rainfall and snowmelt that percolate into the groundwater aquifers or are captured in Littlerock Reservoir. Current estimates of water supplies made available from local rainfall and snowmelt vary widely. Imported water comes from the State Water Project, which has historically varied as well.	All water supplies within the Antelope Valley Region come from two sources: (1) local rain and snowmelt that percolate into the groundwater aquifers or are captured in Littlerock Reservoir, or (2) imports of water from outside the Antelope Valley Region via the State Water Project. The amount of water supply available varies considerably due to changes in weather, rain and snow, and other conditions.	The point is that supplies are variable and uncertain, not the estimates.	Comment is incorporated on p. ES-4.

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ES-5	3	A. Jaramillo (LACWD)			See comment in Section 3.1.6.4 re: WSSP2 extraction capacity	Comment is incorporated in Section 3.
ES-10	Table ES-4	T. Chen (LACWD)	Littlerock Creek Groundwater Recharge and Recovery Project		Not an implementation project, feasibility study is expected in 2015. Project is conceptual.	Comment is acknowledged. This project was considered to have sufficient information for a preliminary economic analysis and is therefore identified as an implementation project for the 2013 IRWMP Update.
ES-4	3	W. Deal (EAFB)	The local water supplies come from rainfall and snowmelt that percolate into the groundwater aquifers or are captured in Littlerock Reservoir		Does Amarogsa, 2 Fairmont dams, Big Rock Dam – provide a water source? Or harvesting?	Comment is acknowledged. Littlerock Reservoir is the only significant surface water facility addressed in the Plan.
ES-6	3	W. Deal (EAFB)	In addition, a salt and nutrient management plan is being developed that will help to monitor and maintain water quality conditions in the Antelope Valley groundwater basin.		Suggest moving to end of paragraph – currently stuck between two arsenic sentences.	Comment is incorporated on p. ES-6.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
ES-6	3	W. Deal (EAFB)	Portions of the Antelope Valley Region are also subject to flooding from uncontrolled runoff in the nearby foothills, which can be aggravated by lack of proper drainage facilities and defined flood channels. This runoff can negatively affect the water quality of downstream water bodies, and can create stagnant ponds in places where clay soils beneath the surface do not allow for percolation to occur. At the same time, the Region recognizes that downstream benefits of floodwaters are also important. The need for regional coordination of flood control efforts becomes more readily apparent as urban development and paved surfaces increase throughout the Antelope Valley Region along with the frequency of local flood events.	Much of the Antelope Valley Region is subject to flooding from natural runoff through alluvial fans in the nearby foothills. As these flood waters move into developed areas, many which of these developed areas lack sufficient proper drainage facilities creating sometimes, severe, impacts to infrastructure. The runoff across impervious developed surfaces can contaminate these flood waters with constituents common in developed areas such as petroleum products. The Region recognizes that downstream habitat benefits of floodwaters are important. The need for regional coordination of flood control efforts integrated with natural habitat protection becomes more readily apparent as urban development and paved surfaces increase throughout the Antelope Valley Region.	Provided suggested rewrite	Comment is incorporated on p. ES-6.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
ES-6	3	W. Deal (EAFB)	The actions identified in the AV IRWM Plan can help to preserve open space and natural habitats in the greater the Antelope Valley Region while maximizing surface water and groundwater management efforts.	The actions identified in the AV IRWM Plan can help to preserve open space and natural habitats in the greater Antelope Valley Region while maximizing surface water and groundwater management efforts.	Delete “the” before Antelope (editorial)	Comment is incorporated on p. ES-6.
ES-6	3	W. Deal (EAFB)	The Antelope Valley Region has many unique environmental features, and several plant and animal species are only found in this area. As the pressure for growth expands out into undeveloped or agricultural lands, the need to balance industry and growth against protection of endangered species and sensitive ecosystems requires difficult decisions and trade-offs, each resulting in a variety of unique impacts on water demands and supplies in the Region. The actions identified in the AV IRWM Plan can help to preserve open space and natural habitats in the greater the Antelope Valley Region while maximizing surface water and groundwater management efforts.	The Antelope Valley Region has many unique environmental features dependent on natural surface flow such as dry lakebeds (Rosamond, Buckhorn,Rogers), Piute Ponds, mesquite bosques, alkali mariposa lily, Joshua tree woodlands, desert tortoise, Le Contes thrasher, tricolored blackbirds, to name just a few. Part of the Antelope Valley wash areas are incorporated into a Significant Ecological Area designated by Los Angeles County intended to provide added protection to the sensitive natural resources within that area. As the pressure for growth expands out into undeveloped or agricultural lands, the need to balance industry and growth against protection of endangered species and sensitive ecosystems requires difficult decisions and trade-offs, each resulting	Fleshed out the environmental features with some specific facts to clarify the challenges.	Comments are incorporated on p. ES-6.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
				in a variety of unique impacts on water demands and supplies in the Region. The actions identified in the AV IRWM Plan can help to preserve open space and natural habitats in the greater Antelope Valley Region while maximizing surface water and groundwater management efforts.		
ES-6	3	W. Deal (EAFB)	***Water Management and Land Use*** What people do on the land of the Antelope Valley and how they do it directly impacts many aspects of life, including the water cycle, within the Antelope Valley Region. Historically throughout California, land use planning and water use planning have been done almost independently of one another. The challenges identified within the Plan clearly show a need for much closer collaboration between land use planning efforts and water management planning efforts. Continued development within the Antelope Valley Region depends heavily on the successful completion of the objectives presented in the Plan to meet the growing	***Water Management and Land Use*** What people do on the land of the Antelope Valley and how they do it directly impacts many aspects of life, including the water cycle, within the Antelope Valley Region. Historically throughout California, land use planning and water use planning have been done almost independently of one another. The challenges identified within the Plan clearly show a need for much closer collaboration between land use planning efforts and water management planning efforts. Continued development within the Antelope Valley Region depends heavily on the successful completion of the objectives presented in the Plan to balance the growing demand for development, and	Expanded last sentence – original didn't seem to address all the issues.	Comment is incorporated on p. ES-6.

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			demand for recreational opportunities while minimizing or avoiding the loss of local culture and values.	recreational opportunities while minimizing or avoiding major impacts to natural resources, agriculture, and the loss of local culture and values.		
ES-8	5	W. Deal (EAFB)	determine what regional water management strategies should be included in the IRWM Plan, the Region considered the RMS listed and defined in Section 5 of the IRWM Plan.	determine what regional water management strategies should be included in the IRWM Plan, the Stakeholders considered the RMS listed and defined in Section 5 of the IRWM Plan.	Replaced "Region" with Stakeholders	Comment is incorporated on p. ES-9.
ES-10	6,7	W. Deal (EAFB)	The projects proposed by stakeholders are expected to help the Region to meet the objectives and targets described in Section 4..	The projects proposed by stakeholders are expected to help the Region to meet the Water Supply Management and some of the Water Quality Management objectives and targets described in Section 4. Development of projects to address the Flood Management, Environmental Resource Management, Land Use Planning/Management objectives and targets need to be a priority in order to provide a true integrated water management effort.	Revised sentence to highlight important needs and weaknesses of the plan lest these issues get lost in all the words. This does not mean the best that could be done wasn't done it's just a recognition that a lot more still needs to happen.	Comment is incorporated on p. ES-10.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
ES-11	8	W. Deal (EAFB)	The Stakeholders and RWMG have chosen these projects because they directly address the objectives and targets to achieve better management of resources within the Antelope Valley Region.	The Stakeholders and RWMG have chosen these projects because they directly address the objectives and targets of what seems to be the most pressing issue and well developed projects to achieve better management of water supply and water quality resources within the Antelope Valley Region.	Clarified why the projects were actually chosen. These projects didn't come from a large pool as the best – they were the best from what was proposed perhaps but nearly all the proposed projects dealt with only two of the objectives.	Comment is incorporated on p. ES-11.

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Section 1 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
1-24	1.3.3	11/20/2013 Stakeholder meeting			Add footnote to Section 1.3.3 either after second sentence or end of paragraph: "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Footnote has been added to Section 1.3.3.
I-3	1	W. Deal (EAFB)	On November 23, 2009, the Antelope Valley Region successfully completed the Region Acceptance Process (RAP) with the Department of Water Resources (DWR). The RAP was the first step in becoming eligible for Proposition 84 grant funding and helps to define certain aspects of the Region. Specifically, the RAP documents describe contact information, governing structure, RWMG	On November 23, 2009, the Antelope Valley Region successfully completed the Region Acceptance Process (RAP) with the Department of Water Resources (DWR). The RAP was the first step in becoming eligible for Proposition 84 grant funding and helps to define certain aspects of the Region. Specifically, the RAP documents contact information, governing structure, RWMG	Deleted the word describe - note below the RAP documents ~~describe~~ contact information, governing structure, RWMG	This comment is incorporated in Section 1, but the language was changed to "… the RAP provides documentation of contact information …".
I-4	1	W. Deal (EAFB)	Recycled water and stormwater are secondary sources of water supply. A portion of the recycled water from the Antelope Valley Region's two large water reclamation plants, Los Angeles County Sanitation Districts' (LACSD) plants in Palmdale and Lancaster, are used for maintenance of wetlands, agricultural irrigation, landscape irrigation, and a recreational park. The expansion of recycled water use continues in the Region.	Recycled water and stormwater are secondary sources of water supply. A portion of the recycled water from the Antelope Valley Region's two large water reclamation plants, Los Angeles County Sanitation Districts' (LACSD) plants in Palmdale and Lancaster, are used for maintenance of the Piute Ponds wetlands, agricultural irrigation, landscape irrigation, and Apollo Park Lake. The expansion of recycled water use continues in	Specified the name of the "wetlands" and "recreational park"	This comment is incorporated in Section 1.1.

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				the Region.		
	1	W. Deal (EAFB)	Stormwater runoff from the Antelope Valley and the surrounding mountains and hills is usually carried by ephemeral streams. Except during the largest rainfall events, stormwater runoff quickly percolates into the stream bed and recharges the groundwater basin. Runoff that reaches the dry lakes carries sediment and provides soil resurfacing benefits to EAFB. Subsequently the runoff is generally lost to evaporation. Historically, water supplies within the Antelope Valley Region had been used primarily for agriculture; however, due to population growth beginning in the mid-1980s, water demands from residential and industrial uses have increased significantly and this trend is expected to continue. Projections indicate that approximately 1.17 million people will reside in the Antelope Valley Region by the year 2035, an increase of nearly 161 percent.	Surface flow (storm water runoff) from the surrounding mountains (San Gabriel, Tehachapi) and hills across alluvial fans and through deeply excised washes makes its way from the headwaters filling vernal pool like clay pan depressions, wetlands such as Piute Ponds, percolating into sand dunes where water is sequestered for summer use to the lowest point (Rosamond, Buckhorn, Rogers Lakebeds). As the surface flow makes its way to the lakes it drops the larger sediment and brings silty clay. The surface flow and clay fills in and re-establishes the surface structure which protects the lakes from wind erosion benefitting the Valley and Edwards AFB with cleaner air and sustains the surficial strength of the lakes which is important to the operational mission of Edwards AFB.	Reworded to reflect the natural environment, provide a more accurate perspective on what the surface water flow accomplishes. Stating is quickly percolates and is lost to evaporation leaves the reader with the sense that the runoff has little value. The agricultural portion of this paragraph has nothing to do with surface flow and should be its on paragraph or deleted. The structure of this section seems to be: 1. State Water Project 2. Surface Flow 3. Groundwater	This comment is incorporated into Section 1.1 with wording changes: “Surface flows (i.e., storm water runoff) from the surrounding San Gabriel Mountains, Tehachapi Mountains, and hills cross alluvial fans and flow through deeply excised washes. The flows make their way from the wash headwaters, filling vernal pool clay pan depressions and wetlands such as Piute Ponds, before either percolating into sand dune areas where water is sequestered for summer use or flowing to the lowest points in the Valley at Rosamond, Buckhorn, and Rogers dry lakebeds. As the surface flow makes its way to the lakebeds it allows the larger sediments to settle out first and transports smaller silty clay further into the Valley interior. The surface flow and silty clay helps to fill in and re-establish the soil surface structure, which protects the lakebed areas from wind erosion, sustains the surficial strength of the lakes (important to the operational mission of EAFB), and sustains local habitats. Some surface flows ultimately evaporate. structure, which protects the lakebed area”s

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						from wind erosion, sustains the surficial strength of the lakes (important to the operational mission of EAFB), and sustains local habitats. Some surface flows ultimately evaporate.
1-10	1	W. Deal (EAFB)	Operation of LACSD facilities influence the community and environment in the Antelope Valley by providing effluent to landscape and agricultural irrigation, industrial process water, recreational impoundments, wildlife habitat maintenance, and groundwater replenishment. Expansion of recycled water use in the Antelope Valley continues.	Operation of LACSD facilities influence the community and environment in the Antelope Valley by providing effluent to landscape and agricultural irrigation, industrial process water, recreational impoundments, wildlife habitat maintenance (such as Piute Ponds Complex and Apollo Park), and groundwater replenishment. Expansion of recycled water use in the Antelope Valley continues.	Added names to the wildlife habitat maintenance areas	This comment is incorporated in Section 1.2.1.6 with minor wording changes.
1-2		A. Jaramillo (LACWD)	…. accelerated development of the Antelope Valley Region and were attempting to identify appropriate actions to address the growing pressure on water services.	…. accelerated development of the Antelope Valley Region and were attempting to identify appropriate actions to address the increased need for water services.		This comment is incorporated in Section 1.
1-10	1.2.1.7	A. Jaramillo (LACWD)	LACWWD 40 has designed many of its groundwater wells so that excess treated imported water in the LACWWD 40's distribution system can be injected through the wells and stored until a future time when it is needed. This program is called aquifer storage and recovery.	LACWD 40 has implemented an aquifer storage and recovery program and equipped many of its groundwater wells so that excess treated imported water in the LACWD 40's distribution system can be injected through the wells and stored until a future time when it is needed.	Use new LACWD logo & replace all references to LACWWD 40 with LACWD 40	This comment is incorporated in Section 1.2.1.7.
1-10	1.2.1.7	A. Jaramillo (LACWD)	LACWWD 40 is also working with AVEK to utilize large undeveloped areas in the Antelope Valley to deliver imported water and allow it to infiltrate into the ground where it will be stored.	LACWD 40 is also working with AVEK to store water at their Water Supply Stabilization Project 2 water bank.		This comment is incorporated in Section 1.2.1.7.

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1-10 and 1-11	1.2.1.7	A. Jaramillo (LACWD)	LACWWD 40 also has an agreement with the Los Angeles County Sanitation Districts to use over 13,000 acre-feet of highly treated wastewater produced at their Palmdale and Lancaster Water Reclamation Plants on the North Los Angeles County Regional Recycled Water Project. This recycled water will be made available through construction of a completely separate distribution system for irrigation and other applications that do not require the water to be drinkable.	LACWD 40 also has an agreement with the Los Angeles County Sanitation Districts (LACSD) to purchase up to 13,500 acre-feet of tertiary treated recycled water produced at their Palmdale and Lancaster Water Reclamation Plants. The City of Lancaster and City of Palmdale are currently working with the LACSD on separate purchase agreements and LACWD 40 will subsequently modify their existing agreement. The recycled water will be made available through construction of the North Los Angeles County Regional Recycled Water Project which will be a completely separate distribution system for irrigation and other non-potable uses.	Re-word and add the suggested text	This comment is incorporated in Section 1.2.1.7.
1-12	Table 1-1	A. Jaramillo (LACWD)	LACWWD 40 Supplies water to portions of Los Angeles County	LACWD 40 Supplies water to portions of the Antelope Valley region in Los Angeles County		This comment is incorporated in Table 1-1.
1-24	1.3.3	A. Jaramillo (LACWD)	The IRWM Plan's water supply analysis is based on assumptions made regarding availability and reliability of the groundwater supply and was used to identify specific objectives and planning targets for the IRWM Plan. Thus it is possible that the outcome of the adjudication may require a change in the assumptions as well as the objectives and planning targets, which may delay implementation of the IRWM Plan.	The IRWM Plan's water supply analysis is based on estimates made regarding availability and reliability of the groundwater supply and was used to identify specific objectives and planning targets for the IRWM Plan. Thus it is possible that the outcome of the adjudication may require a change in the estimates as well as the objectives and planning targets, which may delay implementation of the IRWM Plan.		This comment is incorporated in Section 1.3.3.

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Section 2 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
2-8	2	J. Hoerricks (WVCWD)	Not listed	Map should list our district. 250th West to Three Points Road – from just south of the 138 to Ave A	You see the boundary on 2-29 as a residential rectangle in the extreme west LA County	Comment is incorporated in Section 2.2 and Figure 2-3.
2-24	2.4.2.2	T. Chen (LACWD)	TDS does not pose substantial health risks at drinking water concentrations, but high TDS concentrations can negatively impact sensitive crops and cause corrosion and scaling in pipes.	There are no known health effects associated with the ingestion of TDS in drinking water. However, high TDS concentrations can negatively impact sensitive crops and cause corrosion and scaling in pipes.	Per the World Health Organization (WHO), “no recent data on health effects associated with the ingestion of TDS in drinking-water appear to exist.” TDS affects aesthetics only.	Comment is incorporated in Section 2.4.2.2
2-24	2.4.2.2	T. Chen (LACWD)	As with TDS, chloride does not pose substantial health risks at drinking water concentrations. Elevated chloride concentrations do, however, have substantial negative impacts on sensitive crops and cause corrosion in pipes.	As with TDS, there are no known health effects associated with the ingestion of chloride in drinking water. Chloride concentrations in excess of about 250 ppm can affect taste in water. Also, elevated chloride concentrations have substantial negative impacts on sensitive crops and cause corrosion in pipes.	Per WHO, “chloride concentrations in excess of about 250 mg/litre can give rise to detectable taste in water, but the threshold depends upon the associated cations. Consumers can, however, become accustomed to concentrations in excess of 250 mg/litre. No health-based guideline value is proposed for chloride in drinking-water.”	Comment is incorporated in Section 2.4.2.2
2-24	2.4.2.2	T. Chen (LACWD)	Arsenic is an emerging contaminant of concern in the Antelope Valley Region and has been observed in Los Angeles County Waterworks District (LACWWD) 40, PWD, and Quartz Hill Water District (QHWD) wells.	Arsenic is a concern in the Antelope Valley Region and has been observed in Los Angeles County Waterworks District (LACWWD) 40, PWD, and Quartz Hill Water District (QHWD) wells.	Too close to Contaminants of Emerging Concern (CEC) which are unregulated and may be new contaminants or those that may have been present but not detected.	Comment is incorporated in Section 2.4.2.2

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
2-24 to 2-25	2.4.2.2	T. Chen (LACWD)	Drinking water standards have been set to protect consumers served by public water systems from the effects of exposure to chromium. In 2008, the USEPA began a review of chromium-6 health effects and when this human health assessment is finalized EPA will determine if the current chromium standard should be revised.	Drinking water standards have been set to protect consumers served by public water systems from the effects of exposure to total chromium. On August 23, 2013, CDPH proposed an MCL for chromium-6 of 10 ppb. Completion of the rulemaking process may take up to 12 months after the proposal.	The current drinking water standard is for ***total*** chromium. The State proposed a drinking water standard for Cr-6.	Comment is incorporated in Section 2.4.2.2
2-25	2.4.2.3	11/20/2013 Stakeholder meeting			Add footnote (need to change footnote and #): "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated in Section 2.4.2.3
2-26	2.4.2.4	11/20/2013 Stakeholder meeting			Add footnote: "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated in Section 2.4.2.4
2-29	2	J. Hoerricks (WVCWD)	No text	The residential areas described for our district are zoned A-1 2.5 and some residences have ranch/farm functions.		Comment is incorporated in Section 2.2 and Figure 2-3.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
2-32	2	J. Hoerricks (WVCWD)	2.5.3 Social and Cultural Values	Neenach is 34 miles NW of Lancaster. Neenach residents tend to associate more with the mountain communities than with the AV.	http://en.wikipedia.org/wiki/Neenach,_CA No AV Press delivery. We get the Mountain Enterprise in Neenach.	Comment is acknowledged. No response necessary. WVCWD is added to Figure 2-3.
2-35-2-36	2	J. Hoerricks (WVCWD)	Economics/population/demographics	Sharing a zip code with western Lancaster (93536), we get merged with their data.	Are customers are older and lower in income (fixed income retirees and off-griders) than those in western Lancaster.	Comment is acknowledged. No census data was available for Neenach.
2-37	2	J. Hoerricks (WVCWD)	No listing for Neenach	See above		Comment is acknowledged. No census data was available for Neenach.

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Section 3 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
		W. Deal (EAFB)	Figure 3-1 – surface runoff line (red) goes straight to water leaving	Add box interrupting this line for habitat usage - Piute Ponds, other wetlands, clay pan/vernal pools, sand dune water sequestration, dry lakebed resurfacing	The surface runoff as we have all agreed provides a beneficial use it does not just leave the system	Comment is incorporated in Section 3.1, Figure 3-1.
3-6	3.1.2	D. Chisam (AVEK)	Table A water is a reference to the amount of water listed in "Table A" of the contract between the SWP and the contractors and represents the maximum amount of water a contractor may request each year. AVEK, which is the third largest state water contractor, has a Table A Amount of 141,400 AFY. Approximately three (3) percent of AVEK's Table A Amount has historically been delivered to areas outside of the Antelope Valley Region leaving about 137,150 AFY available within the Region		Is this refereeing to delivery to AVEK customers outside the plan boundary if so that should be clarified	Comment is incorporated in Section 3.1.2.
3-7	3.1.2	D. Chisam (AVEK)	To accommodate the need to store water during the winter months for use in the dry summer months, AVEK has planned water banking projects to increase their ability to fully use their SWP allotment. AVEK recently completed the Water Supply Stabilization Project (WSSP-2) that allows them to store up to 23,000 AFY of water (35,000 AFY total storage for all of the parties involved) during winter months when M&I demands are low (AVEK 2011).		the actual capacity of wssp 2 is 150,000 af and we have 35,000 in storage at the present time	Comment is incorporated in Section 3.1.2.

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3-7	3.1.2	D. Chisam (AVEK)	SWP deliveries to AVEK do not incorporate conveyance capacity restrictions in this Plan since SWP reliability reduces delivery estimates to a low quantity. With the addition of the WSSP-2 water banking project, AVEK is able to beneficially use up to 104,750 AFY. This assumes 400 AF/day deliveries from June 15 to September 31 that are limited by conveyance capacity and 150 AF/day deliveries for the rest of the year that are limited by demands. This is equivalent to 81,750 AFY before the addition of the 23,000 AFY that can be stored in the completed WSSP-2 water storage bank. Because the SWP reliability is 60% for an average year, AVEK's estimated average year SWP delivery is only about 83,700 AFY, which is below the maximum conveyance capacity and thus is not affected. Higher SWP allocations may be constrained in wetter years, but such scenarios are not analyzed in this Plan. Future water banking projects will allow AVEK to maximize the amount of SWP deliveries they can put to beneficial use.		150,000 capacity storage and recover is currently 20 MGD that will increase to 50 MGD over the next 10 years	Comment is incorporated in Section 3.1.2.

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3-11	3.1.3.1	D. Chisam (AVEK)	Table 3-4		this chart is confusing the it would appear that there maybe 85,000 people but most would be using groundwater the the actual imported water per capita water would be closer to .314 I understand what your trying to do but this chart creates more confusion that it solves	Comment is incorporated with new language in Section 3.1.3.1. Population numbers in Table 3-4 do not include private well owners.
3-17	3	W. Deal (EAFB)	Lancaster WRP: ….. Approximately 3 mgd of effluent from the Lancaster WRP is used to maintain wetlands at the Piute Ponds and 0.5 mgd is reused at the Apollo Lakes Regional Park to maintain the water level in the lakes and for irrigation.	Lancaster WRP: ……. It is estimated between 5 and 7 mgd of effluent from the Lancaster WRP is used to maintain wetlands at Piute Ponds. Higher amounts are required in years when flushing than years of maintenance. Note: Amounts needed are in the process of being determined.	3 mgd is inaccurate please change	Comment is incorporated in Section 3.1.4.1.
3-17	3.1.4	Erika deHollan (LACSD)	Distribution Pipeline: As shown in Figure 3-5, the recycled water distribution system in Lancaster, which serves Apollo Lakes and Nebeker Ranch, has been expanded for urban reuse as part of the Division Corridor Project. Figure 3-5 also shows the LACWD 40 Recycled Water Backbone distribution pipeline which is intended to further expand urban reuse in the Antelope Valley Region. This expansion throughout the Antelope Valley Region is a direct result of the substantial coordination and cooperation between Kern and Los Angeles Counties. Lancaster WRP: The Lancaster	Distribution Pipeline: As shown in Figure 3-5, the recycled water distribution system in Lancaster, which serves sites such as Apollo Lakes ~~and Nebeker Ranch~~, has been expanded for urban reuse as part of the Division Street Corridor Project. Figure 3-5 also shows the LACWD 40 Recycled Water Backbone distribution pipeline which is intended to further expand urban reuse in the Antelope Valley Region. This expansion throughout the Antelope Valley Region is a direct result of the substantial coordination and cooperation between Kern and Los Angeles Counties.	3-17	Comments are incorporated in Section 3.1.4.1.

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			WRP, built in 1959 and located north of the City of Lancaster, is owned, operated, and maintained by Los Angeles County Sanitation District No. 14 (LACSD 14). Lancaster WRP, which has a permitted capacity of 18.0 mgd, treated an average flow of 14.1 mgd in 2012 to tertiary standards for agricultural irrigation, wildlife habitat, maintenance, and recreation. Approximately 3 mgd of effluent from the Lancaster WRP is used to maintain wetlands at the Piute Ponds and 0.5 mgd is reused at the Apollo Lakes Regional Park to maintain the water level in the lakes and for irrigation. Palmdale WRP: Palmdale WRP, built in 1953 and located on two sites adjacent to the City of Palmdale, is owned, operated, and maintained by LACSD 20. Palmdale WRP, which has a permitted capacity of 12.0 mgd. The plant treated an average flow of 9.04 mgd in 2012 to tertiary standards. All tertiary treated water is used for agricultural and municipal reuse.	Lancaster WRP: The Lancaster WRP, built in 1959 and located north of the City of Lancaster, is owned, operated, and maintained by Los Angeles County Sanitation District No. 14 (LACSD 14). Lancaster WRP, which has a permitted capacity of 18.0 mgd, treated an average flow of 14.1 mgd in 2012 to tertiary standards for agricultural and landscape irrigation, municipal and industrial (M&I) reuse, wildlife habitat~~,~~ maintenance, and recreation. ~~Approximately 3 mgd of effluent from the Lancaster WRP is used to maintain wetlands at the Piute Ponds and 0.5 mgd is reused at the Apollo Lakes Regional Park to maintain the water level in the lakes and for irrigation.~~ Recycled water produced at the Lancaster WRP and accounted for environmental maintenance and recreation reuse at Apollo Community Regional Park and Piute Ponds is not included in the potential availability (Table 3-11), since these flows will not likely be available for other M&I use in the Antelope Valley. Palmdale WRP: Palmdale WRP, built in 1953 and located on two sites adjacent to the City of Palmdale, is owned, operated, and maintained by LACSD 20. Palmdale WRP, which has a permitted capacity of 12.0 mgd. The plant treated an average flow of 9.04 mgd in 2012 to tertiary standards. All tertiary		

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				treated water is used for agricultural and ~~municipal~~ M&I reuse.		
3-17	3.1.4	Erika deHollan (LACSD)	Table 3-11	• Revise Lancaster WRP values: 2012 – 10,000 2015 – 11,000 2020 – 13,000 2025 – 14,000 2030 – 16,000 2035 – 17,000 • "Total Study Area" values will need to be recalculated (as well as references to these values throughout the Plan). • For Lancaster WRP, delete footnote "a" and change "b" to "LWRP water availability excludes water used for environmental maintenance~~includes 3.03 mgd (3,400 AFY) already contracted to users~~."	3-17	Comment is incorporated in Section 3.1.4.1.
3-18	3.1.4	Erika deHollan (LACSD)	Figure 3-15		3-18	Unclear on how to respond to this comment.
3-18	Fig 3-5	A. Jaramillo (LACWD)			The solid line between Ave M and the Palmdale WRP should be dashed since the facilities have not been constructed yet	Comment is incorporated in Figure 3-5.

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3-19	3.1.4	Erika deHollan (LACSD)	Table 3-12	• Change table title to: Summary of Current and Projected Recycled Water Use Demands (AFY) in the Antelope Valley • Delete lines for Piute and Apollo Park. • For North LA/Kern County Regional Recycled Water Project, 3 AF were used in 2010. • Recalculate "Total Recycled Water Demand" values. • Add footnote: "Demands do not include recycled water use for environmental maintenance."	3-19	Comment is incorporated in Section 3.1.4, Table 3-12.
3-19	3.1.4.2	Erika deHollan (LACSD)	Table 3-12 summarizes the existing and projected recycled water demand as listed in the 2014 Salt and Nutrient Management Plan for the Antelope Valley (Appendix F). While expanded recycled water use in the Antelope Valley Region is highly likely, only current recycled water uses are included in this IRWM Plan's supply and demand calculations to show the need for increased end use of recycled water supply. Current M&I recycled water demand for both the Lancaster and Palmdale WRPs is assumed to be about 5,332 AFY with only about 5,252 AFY in 2010. Current demands for recycled water include: • Apollo Community Regional Park (Apollo Park): Tertiary recycled water produced by	Table 3-12 summarizes the existing and projected recycled water demand as listed in the 2014 Salt and Nutrient Management Plan for the Antelope Valley (Appendix F). While expanded recycled water use in the Antelope Valley Region is highly likely, only current recycled water uses are included in this IRWM Plan's supply and demand calculations to show the need for increased end use of recycled water supply. Recycled water used for environmental and recreational area maintenance at Piute Ponds and Apollo Community Regional Park is not included in demands since it was excluded from the recycled water availability in Table 3-11. Current M&I recycled water ~~demand~~ use for both the Lancaster and Palmdale WRPs is ~~assumed to be about 5,332~~approximately 82 AFY.	3-19	Comments are incorporated in Section 3.1.4.2.

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			LACSD 14 at the Lancaster WRP is used to maintain a series of lined recreational lakes. Water from the lakes is used for landscape irrigation at the park as well. Apollo Park uses 250 AFY of recycled water. • Piute Ponds: Tertiary recycled water produced by LACSD 14 at the Lancaster WRP is conveyed to the Piute Ponds on the Edwards AFB where it maintains a marsh-type habitat. This includes discharge at the series of shallow impoundments just south of the Piute Ponds that are maintained in the winter for recreational duck hunting. The Piute Ponds use 5,000 AFY of recycled water. • North LA/Kern County Regional Recycled Water Project: To date, only a portion of the recycled water backbone project has been built. The Division Street Corridor uses an average of 2.0 AFY (personal communication with Aracely Jaramillo, LACWD 40) and the Palmdale Regional Recycled Water Authority's water line to McAdam Park in Palmdale using about 80 AFY (personal communication with Gordon Phair, City of Palmdale). The Palmdale water line	Approximately ~~with only about 5,2523~~ AFY was used in 2010. Current demands for recycled water include those for the ~~:~~ ~~Apollo Community Regional Park (Apollo Park): Tertiary recycled water produced by LACSD 14 at the Lancaster WRP is used to maintain a series of lined recreational lakes. Water from the lakes is used for landscape irrigation at the park as well. Apollo Park uses 250 AFY of recycled water.~~ ~~Piute Ponds: Tertiary recycled water produced by LACSD 14 at the Lancaster WRP is conveyed to the Piute Ponds on the Edwards AFB where it maintains a marsh-type habitat. This includes discharge at the series of shallow impoundments just south of the Piute Ponds that are maintained in the winter for recreational duck hunting. The Piute Ponds use 5,000 AFY of recycled water.~~ North LA/Kern County Regional Recycled Water Project: To date, only a portion of the recycled water backbone project has been built. The Division Street Corridor uses an average of 2~~.0~~ AFY (personal communication with Aracely Jaramillo, LACWD 40), with approximately 3 AFY used in 2010. ~~and t~~The Palmdale Regional Recycled Water Authority's water line to McAdam Park in Palmdale ~~using~~ uses about 80 AFY (personal communication with Gordon		

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			was not built until after 2010.	Phair, City of Palmdale), but ~~-T~~the Palmdale water line was not built until after 2010.		
3-19	3.1.4.2	A. Jaramillo (LACWD)	To date, only a portion of the recycled water backbone project has been built. The Division Street Corridor uses an average of 2.0 AFY (personal communication with Aracely Jaramillo, LACWD 40)	To date, only a portion of the recycled water backbone project has been built. The Division Street Corridor uses an average of 2.0 AFY (Erika DeHollan, LACSD)	Reference primary information source	Comments are incorporated in Section 3.1.4.2.
3-19	3.1.4.2	W. Deal (EAFB)	Piute Ponds: Tertiary recycled water produced by LACSD 14 at the Lancaster WRP is conveyed to the Piute Ponds on the Edwards AFB where it maintains a marsh-type habitat. This includes discharge at the series of shallow impoundments just south of the Piute Ponds that are maintained in the winter for recreational duck hunting. The Piute Ponds use 5,000 AFY of recycled water.	Piute Ponds: Tertiary recycled water produced by LACSD 14 at the Lancaster WRP is conveyed to the Piute Ponds Complex on Edwards AFB where it sustains the wetland area. It is currently estimated that Piute Ponds uses between 5,500 and 6,500 AFY of recycled water depending on flushing requirements. Note: Amounts needed are in the process of being determined.	Deleted shallow impoundments, corrected amounts	Comments from LACSD were incorporated into Section 3.1.4.2 and address this comment as well.
3-19	Table 3-12	W. Deal (EAFB)	5,000	5,500 to 6,500	Changed amounts	Comments from LACSD were incorporated into Section 3.1.4.2 and address this comment as well.
3-22	3.1.6.3	A. Jaramillo (LACWD)	Total sustainable yield (TSY) is composed of natural recharge and return flows	Total sustainable yield (TSY) is composed of natural recharge, supplemental recharge from imported water and associated return flows	Natural recharge and return flow only = Native safe yield	Comment is incorporated in Section 3.1.6.3.

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3-22	3.1.6.3	A. Jaramillo (LACWD)	These estimates are added to natural recharge to get TSY. As part of the current adjudication proceedings, the TSY has been determined to be 110,000 AFY (i.e., natural recharge and return flows). A list of documents that reference estimates for TSY, natural recharge, and return flows are included in Appendix H.	These estimates are added to recharge to get TSY. As part of the current adjudication proceedings, the TSY has been determined to be 110,000 AFY (i.e., recharge and return flows). A list of documents that reference estimates for TSY, natural recharge, and return flows is listed in Appendix H.	Delete natural from natural recharge, as appropriate	Comment is incorporated into Section 3.1.6.3.
3-23	3.1.6.3	11/20/2013 Stakeholder meeting			Add foot note to last paragraph, first sentence: "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated into Section 3.1.6.3.
3-23	3.1.6.3	A. Jaramillo (LACWD)	It is important to note that the value for TSY may be revisited by the Court after a period of monitoring and documentation. If the TSY number is revised in the future for any reason, the IRWMP will be updated to reflect those changes.	Although unlikely, it is important to note that the value for TSY may be revisited by the Court after a period of monitoring and documentation. If a motion is filed with the Court to revise the TSY, the IRWMP will be updated to reflect the subsequent decision.		Comment is incorporated into Section 3.1.6.3.
3-23	3.1.6.4	A. Jaramillo (LACWD)	AVEK's WSSP-2 project was completed in 2010 and can store up to 35,000 AFY. This project is a collaboration between several agencies. AVEK can store up to 23,000 AFY SWP water or water from water transfers with the remainder of the storage distributed between the other agencies	AVEK's WSSP-2 project was completed in 2010 and can store up to 500,000 AF. This project is a collaboration between several agencies. AVEK can recharge up to 23,000 AFY SWP water or water from water transfers with the remainder of the storage distributed between the other agencies	Verify WSSP2 storage volume and recharge capacity. Is 35,000 AFY the extraction capacity? from how many wells and will they all be completed by 2015?	Comment is incorporated into Section 3.1.6.4. Includes updated number from AVEK for WSSP-2 existing capacity of 150,000 AFY and withdrawal capacity of 23,000 AFY.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-23	3.1.6.4	D. Chisam (AVEK)	AVEK's WSSP-2 project was completed in 2010 and can store up to 35,000 AFY. This project is a collaboration between several agencies. AVEK can store up to 23,000 AFY SWP water or water from water transfers with the remainder of the storage distributed between the other agencies.		23,000 annually to a maximum of 150,000	Comment is incorporated into Section 3.1.6.4. Includes updated number from AVEK for WSSP-2 existing capacity of 150,000 AFY and withdrawal capacity of 23,000 AFY.
3-23	3.1.8.2 and 3.1.8.3	A. Jaramillo (LACWD)			Delete 'natural' from 'natural recharge'	Comment is incorporated into Section 3.1.6.3.
3-30	3.1.8.2 and 3.1.8.3	A. Jaramillo (LACWD)			Verify values based on confirmation of storage volume and extraction capacity	Comment is incorporated into Sections 3.1.8.2 and 3.1.8.3 based on input from AVEK.
3-30	3.1.8.3	D. Chisam (AVEK)	This Plan assumes that AVEK's WSSP-2 water bank will be in operation during the planning horizon and that a sufficient amount of wet years or water transfers will have occurred between dry year periods to keep the bank at full capacity prior to a four-year dry period. The full capacity of the bank is 35,000 AFY; therefore it is assumed that approximately ¼ of this amount would be used each year of the 4-year dry period (about 8,000 AFY). It is possible that banked water will not be available during a multi-dry year, in which case the mismatch would be more severe (up to 37,000 AFY).		150,000 a f capacity with a recovery capacity of 20 to 50 MGD	Comment is incorporated into Sections 3.1.8.2 and 3.1.8.3 based on input from AVEK.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-31 to 3-33	Fig 3-11 to 3-13 & Table 3-14 to 16	A. Jaramillo (LACWD)			Reference primary information source	Information sources were identified in Sections 3.1.1 through 3.1.4.
3-33	3.1.8.3	D. Chisam (AVEK)	Figure 3-12		assuming 50 MGD that would mean 56,000af or a 21,000 a f shortage in 3035	The Plan assumes only current projects will be operational, thus explaining the need for additional projects. The impacts of planned projects is discussed in Section 6.
3-35	3.1.9.4	A. Jaramillo (LACWD)	AVEK's Quartz Hill WTP will require an expansion to approximately 97 mgd to treat LACWD 40's projected demands (LACWD 40 1999). Furthermore, as previously mentioned,		Delete. I believe the expansion to 90 mgd was completed	Comment is incorporated in Section 3.1.9.4.
3-35	3.1.9.4	A. Jaramillo (LACWD)	LACWD 40's facilities improvements will include new wells, reservoirs and pipelines throughout its system to meet current and projected water supply requirements. Additional connections with AVEK will be needed to maximize use of available imported water. LACWD 40 is pursuing the use of recycled water as an alternative source for irrigation and recharge purposes.	LACWD 40's facilities improvements will include well efficiency and rehabilitation projects, reservoirs and pipelines throughout its system to meet current and projected water supply requirements. LACWD 40 is pursuing the use of recycled water as an alternative source for irrigation and recharge purposes.	Update.	Comment is incorporated in Section 3.1.9.4.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-35	3.1.9.4	D. Chisam (AVEK)	LACWD 40's facilities improvements will include new wells, reservoirs and pipelines throughout its system to meet current and projected water supply requirements. Additional connections with AVEK will be needed to maximize use of available imported water. LACWD 40 is pursuing the use of recycled water as an alternative source for irrigation and recharge purposes.		Also WW40 and other customers from AVEK could re regulate their water deliveries to use a more consistent annual supply deliveries in the winter months that would allow the use of all the table A water without any storage or recharge.	Comment is incorporated in Section 3.1.9.4.
3-43	3.2.2.1	A. Jaramillo (LACWD)			Add info regarding Quartz Hill WTP expansion to 90 mgd	Comment is incorporated in Section 3.2.2.1.
3-44	3.2.3	T. Chen (LACWD)	Tertiary treated effluent from the Region's three water reclamation plants will be of sufficient quality to meet unrestricted use requirements.		Verify the number of reclamation plants, I know of five: EAFB Main, EAFB Research Lab, LACSD 14, LACSD 20, and RCSD.	This comment is addressed in Section 3.2.3. EAFB plants are not included

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-47	3.3.1	W. Deal (EAFB)	**3.3.1 Regional Flood Management Issues and Needs** The key issues, needs, challenges, and priorities for the Antelope Valley Region with respect to flood management include the following, which are discussed in greater detail below: □ Lack of coordination throughout Antelope Valley Region; □ Poor water quality of runoff; □ Nuisance water and dry weather runoff; □ Difficulty providing flood control without interfering with groundwater recharge; □ Desire of EAFB to receive sediments into the dry lakes to maintain operations area. □ Baseline flooding and sediment/erosion not well defined □ No development guidelines for alluvial fans	**3.3.1 Regional Flood Management Issues and Needs** The key issues, needs, challenges, and priorities for the Antelope Valley Region with respect to flood management include the following, which are discussed in greater detail below: □ Lack of coordination throughout Antelope Valley Region; □ Poor water quality of runoff; □ Nuisance water and dry weather runoff; □ Difficulty providing flood control without interfering with groundwater recharge; □ Desire of EAFB to receive sediments into the dry lakes to maintain operations area. □ Baseline flooding and sediment/erosion not well defined □ No development guidelines for alluvial fans - Protection of habitat processes and sensitive habitats which rely on surface flow such as Antelope Valley Significant Ecological Areas (SEA), Piute Ponds, clay pans, mesquite woodlands, dry lakes	Added key issue at bottom to keep the downstream habitats on the table. Please add.	Comment is incorporated in Section 3.3.1.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-49	3.3.1.2	W. Deal (EAFB)	Ideally stormwater programs would be developed through stakeholder involvement as part of an integrated program that would identify concepts and projects developed to maximize flood control benefits, water quality benefits, and water supply benefits.	Ideally stormwater programs would be developed through stakeholder involvement as part of an integrated program that would identify concepts and projects developed to maximize flood control benefits, water quality benefits, water supply benefits, and protection of natural surface flow routes and levels thereby protection natural environment downstream.	Added natural environment protection downstream – last sentence	Comment is incorporated in Section 3.3.1.2.
3-49	3.3.1.5	W. Deal (EAFB)	**Desire of Edwards AFB to Receive Sediments into the Dry Lakes to Maintain Operations Area** Sediment carried by stormwater flows eventually ends up on the dry lake beds at EAFB that have been established as emergency landing runways. Flood waters and the resulting siltation act to "resurface" and naturally restore the elevations of the dry lake beds. Flood waters also provide benefits to local habitats and for dust control. The balance between these benefits and periodic flooding is currently being studied by EAFB, and once understood it will provide an indication of the amount of sediment and water needed. The results will provide the downstream constraints that will inform the development of a regional integrated flood management program that optimizes flood control, water quality and water supply benefits. It is also important to note that periodic flood flows	**Habitat and Lakebed requirements to protect natural processes** Stormwater runoff within the Antelope Valley is carried by ephemeral streams. Between 0.36 inches and 0.56 inches of rainfall in the first 24 hours is required to saturate the soils and initiate surface flow runoff. As runoff moves from the headwaters to the lakebeds it percolates into the stream beds recharging the groundwater, flows through well-defined washes changing to braided alluvial fan washes topping the channels and flowing as sheet flow across the lower valley floor filling clay pan depressions (similar to vernal pools and potholes), wetlands (most notable being Piute Ponds), percolating into sand dunes where the water is sequestered for later use, down the valley floor into the dry lakebeds at Edwards	Yes it is imperative to the operational mission at EAFB that the sediment load as well as the surface flow which provides the resurfacing is maintained. However, this should be addressed along with other downstream issues. Rewrote to reflect current issues and take this from an Edwards AFB only issue to reflect the AV issue of which Edwards is part. If these features are not maintained not only will EAFB suffer so will the surrounding communities. This should reflect the natural environment and processes, provide a more accurate perspective on what the surface water flow accomplishes. This could be shortened and tweeked of course but should relay to you the issue to be highlighted. EAFB would like and plans to continue to study how much is needed to keep the lakebeds healthy but that may not happen in the timeframe required by our surrounding communities. The surrounding communities may want to consider also developing a study which would assist in answering the outstanding questions to be used when moving forward with water banking projects and flood control.	Comments are incorporated in Section 3.3.1.5 and in the bullet list at the beginning of Section 3.3.1.

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			can have negative consequences at EAFB. For example, in 1983, stormwater flows were large enough to cause the runways to be out of operation (LADPW 1987).	AFB. The amount of flow depends on the size of the storm, how much rainfall has already occurred recently, etc. It has been documented in "Surface Flow Study Technical Report, Edwards Air Force Base, April 2012" that a 5 year storm (approximately 2.5 inches) is sufficient to provide 946 +/- 189 acre feet of surface water flow to Rosamond Lake with the peak discharge measured at 92 cfs. The total sediment discharge measured was 1,542 metric tons. However the error rate is pretty high at +/- 30%. Rogers and Buckhorn Lake were not measured. Stormwater runoff is important to downstream habitat values throughout the Valley and are seen at Edwards AFB as particularly valuable to sustain the surface structure of the dry lakebeds for their operational missions, the overall air quality of the Antelope Valley for both EAFB and the surrounding communities, and the Piute Pond Complex's wetland functions and values.	As to the LADPW, 1987 quote – this does not relay a true picture of the issue. Yes, in 1983 runways were out of operation but this happens whenever there is a 5 year plus storm, it is recognized at this point the need for this storm flow. It is recognized the negative longterm impacts caused when the flows are cut off. EAFB adjusts to these temporary flooding events for the long term benefit to the overall lakebeds.	

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3-50	3.4	W. Deal (EAFB)	However, the Antelope Valley Region is home to numerous desert washes (Little Rock Creek, Big Rock Creek), as well as man-made lakes (Little Rock Creek Reservoir, Lake Palmdale), sag ponds (an enclosed depression formed where active or recent fault movement results in impounded drainage), and areas of rising groundwater. Freshwater marsh and alkaline meadow habitat is found in the vicinity of Piute Ponds. While wetland and riparian areas are limited in the Antelope Valley Region, these areas are important resources to birds migrating along the Pacific Flyway (LACSD 2004).	However, the Antelope Valley Region is home to numerous desert washes (Little Rock Creek, Big Rock Creek, Amargosa Creek, Cottonwood Creek System), as well as man-made lakes (Little Rock Creek Reservoir, Lake Palmdale), sag ponds (an enclosed depression formed where active or recent fault movement results in impounded drainage), and areas of rising groundwater. Freshwater marsh, wetland, and alkaline meadow habitat is present within the Piute Pond Complex. Wetland and wash areas are found within the Mesquite woodland. While wetland and riparian areas are limited in the Antelope Valley Region, these areas are important resources to birds migrating along the Pacific Flyway (LACSD 2004).	Added more creeks to the list, reworded Piute sentence and added mesquite wetland/wash.	Comment is incorporated in Section 3.4.
3-53	3.4.1	W. Deal (EAFB)	**3.4.1 Regional Environmental Resource Issues and Needs** The following is a list of the key issues, needs, challenges, and priorities for environmental management within the Antelope Valley Region, as determined by the stakeholders: □ Conflict among industry, growth, and preservation of open space/Desire to preserve open space;	**3.4.1 Regional Environmental Resource Issues and Needs** The following is a list of the key issues, needs, challenges, and priorities for environmental management within the Antelope Valley Region, as determined by the stakeholders: □ Conflict among industry, growth, and preservation of natural areas and open space/Desire to preserve open space;	Reworded to add natural areas: Conflict among industry, growth, and preservation of natural areas and open space/Desire to preserve open space	Comment is incorporated in Section 3.4.1.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
3-55	3.5.1.1	W. Deal (EAFB)	**3.5.1.1 Growing Public Demand for Recreational Opportunities** The Antelope Valley Region offers many recreational opportunities. The Antelope Valley Region has over 410 acres of developed park land including 27 parks, 22 softball fields, five baseball fields, 21 soccer fields and 17 tennis courts. In addition there are over 3,000 acres of natural park land. Antelope Valley Region is also home to the 1,700 acre California Poppy Reserve and the Arthur B. Ripley Desert Woodland State Park.	**3.5.1.1 Growing Public Demand for Recreational Opportunities** The Antelope Valley Region offers many recreational opportunities. The Antelope Valley Region has over 410 acres of developed park land including 27 parks, 22 softball fields, five baseball fields, 21 soccer fields and 17 tennis courts. In addition there are over 3,000 acres of natural park land, and approximately 5,600 acres of upland and wetland natural areas at Piute Ponds. Antelope Valley Region is also home to the 1,700 acre California Poppy Reserve and the Arthur B. Ripley Desert Woodland State Park.	Added Piute Ponds to the list of areas. These are available to the community for nature based recreational pursuit with easy to obtain access letters to the area.	Comment is incorporated in Section 3.5.1.1.
3-58	3.5.1.4	W. Deal (EAFB)	Other environmental impacts from soil disturbance and vegetation cover loss include increased dust storms and lifestyle disturbance. Dust storms can cause road closures, a decline of populations in rural areas, and loss of utility services among other things. As land use in the Antelope Valley changes impacts to these resources need to be considered and balanced.	Other environmental impacts from soil disturbance and vegetation cover loss include increased dust storms and lifestyle disturbance. Dust storms can cause road closures, a decline of populations in rural areas, and loss of utility services among other things. As land use in the Antelope Valley changes impacts to these resources need to be considered and balanced. As flood control and surface flow runoff diversion is considered impacts to the dry lakebeds need to be considered and balanced as lack of surface water flow to maintain the cryptobiotic surface structure will cause breakdown of the lakebed surface structure and add to the AV dust storm issues.	3-58	Comment is incorporated in Section 3.5.1.4.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
ES-5	3	A. Jaramillo (LACWD)			See comment in Section 3.1.6.4 re: WSSP2 extraction capacity	Comment is incorporated in the Executive Summary.

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Section 4 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
4-9	4.3	Erika deHollan (LACSD)	Objective: Maximize beneficial use of recycled water.		Revise numbers based on revisions to Tables 3-11 and 3-12.	Comment is incorporated in Section 4.3.
4-9	4.4	Wanda Deal (EAFB)	In some areas of the Valley, underlying impervious soils will cause stormwater to pool and become nuisance water until it eventually evaporates. In addition, the Region recognizes that it may be vulnerable to potential increases in flooding due to projected changes in precipitation caused by climate change.	~~In some areas of the Valley, underlying impervious soils will cause stormwater to pool and become nuisance water until it eventually evaporates. In addition,~~ the Region recognizes that it may be vulnerable to potential increases in flooding due to projected changes in precipitation caused by climate change.	This appears to be referring to the clay pan depressions which provide wetland type habitat to many wildlife species. The invertebrates (such as fairy shrimp) depend on the surface flow filling of these areas with impervious soils to exist and subsequently provide food for migrating birds. So although it may eventually evaporate it isn't nuisance water and is providing a beneficial use. In addition sand dunes which exist beside these clay pans also have impervious soils beneath them which pools water and allows the dunes to maintain moist soils (sequestering it) to be used by the vegetation during the dry summers.	Comment is incorporated in Section 4.4.

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4-10	4.4	Wanda Deal (EAFB)	One example of the importance of maintaining natural flood flow areas is Rosamond Dry Lake at the lowest elevation in the watershed. This lake requires significant flooding to maintain the biological crust that protects the lakebed surface from breaking down during high wind events. By protecting the lakebed surface, the air quality in the Antelope Valley is protected, and the operational mission of Edwards AFB is protected by providing a suitable surface to test experimental aircraft and processes, which in turn provides jobs to Antelope Valley residents.	One example of the importance of maintaining natural flood flow areas is Rosamond Dry Lake at the lowest elevation in the watershed. This lake requires significant flooding to maintain the biological crust that protects the lakebed surface from breaking down during high wind events. By protecting the lakebed surface, the air quality in the Antelope Valley is protected, and the operational mission of Edwards AFB is protected by providing a suitable surface to test experimental aircraft and processes, which in turn provides jobs to Antelope Valley residents.	This example was on the money and also applies to Rogers and Buckhorn Dry Lakes.	Comment is acknowledged. No response necessary.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
4-10	4.4	Wanda Deal (EAFB)	None	While optimizing the balance between protecting existing beneficial uses of stormwater and capturing stormwater for new uses the natural habitats downstream, Piute Ponds as an example, is very dependent on the natural flows. Although sustained through the years by recycled water the dramatic stormflows are still a major component of the system providing more water in 4 days during a 5 year storm than the Sanitation District can in a month. The power of this stormflow provides needed clearing of vegetation, sediment, and water to wetland and wet meadow areas not reached by the Sanitation District but important to sensitive wildlife and plant life. A major alkali mariposa lily population exists in the Piute Pond Complex and requires surface water flow to maintain.	Suggest add Piute as an important natural area which needs to be considered in this equation.	Comment is incorporated into Section 4.4

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Section 5 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
5-7	5.2	D. Chisam (AVEK)	□ *System Reoperation* – increases reliability and control of water movement between imported water turnouts, surface and groundwater storage supply locations, and demand locations and therefore increases overall reliability of water supplies □ *Water Transfers* – increase the amount of imported water supplies available to the Region and therefore reduces the Regional gap between supply and demand; supports adaptation to climate change impacts that increase overall demands and/or reduce supplies		Consider using imported water as the first supply to maximize the use of imported water without capital facilities leaving the groundwater for future shortage periods.	Comment is acknowledged. The RMS discussion in Section 5.2 does not prioritize or recommend the order of implementation for the strategies. Maximizing imported water use before transfers or groundwater could be the best strategy for implementation.
5-8	5.2	D. Chisam (AVEK)	□ *System Reoperation* – increases reliability and ability to move water throughout the Region; greater flexibility allows for increased use of alternate supplies during a SWP disruption □ *Water Transfers* – may increase access to stored SWP water that could be delivered during a SWP disruption		(Same comment) Consider using imported water as the first supply to maximize the use of imported water without capital facilities leaving the groundwater for future shortage periods.	Comment is acknowledged. The RMS discussion in Section 5.2 does not prioritize or recommend the order of implementation for the strategies. Maximizing imported water use before transfers or groundwater could be the best strategy for implementation.

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
5-9	5.2	D. Chisam (AVEK)	□ *System Reoperation* – increases reliability and ability to move water throughout the Region; allows greater control of the draw and fill of water banks in relation to demands located throughout the Region and therefore allows for groundwater supplies to be obtained from areas that are managed □ *Water Transfers* – increases the amount of imported water supply that could be available for groundwater recharge or in-lieu supply		(Same comment) Consider using imported water as the first supply to maximize the use of imported water without capital facilities leaving the groundwater for future shortage periods.	Comment is acknowledged. The RMS discussion in Section 5.2 does not prioritize or recommend the order of implementation for the strategies. Maximizing imported water use before transfers or groundwater could be the best strategy for implementation.

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Section 6 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
6-2	6.1	11/20/2013 Stakeholder meeting			Add footnote to 4th sentence of 2nd paragraph (mid paragraph after "Therefore. . . water balance"): "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated in Section 6.1.
6-4, 6-5 & 6-14	Table 6-2 Table 6-3	T. Chen (LACWD)	Littlerock Creek Groundwater Recharge and Recovery Project	Status: Conceptual	Feasibility study for this project is expected in 2015. Project status should be conceptual (three locations).	Comment is acknowledged. This project was considered to have sufficient information for a preliminary economic analysis and is therefore identified as an implementation project for the 2013 IRWMP Update.
6-5	6.1	D. Chisam (AVEK)	Table 6-2 – Aquifer Storage and Recovery Project: Injection Well Development (WSSP-2) 12,000 AFY	150,000 AFY		This should refer to LACWD 40's ASR project. A correction was made in Table 6-2.
6-5	6.1	D. Chisam (AVEK)	Table 6-2 Eastside Banking & Blending Project 1,000 AFY	10,000 AFY		Comment is incorporated in Table 6-2.

6-6	6.1	Erika deHollan (LACSD)	The recycled water projects shown in Table 6-1 are classified as recycled water production, recycled water conveyance, recycled water conversion, and recycled water recharge. As discussed in Section 3, 26,000 AFY of recycled water is currently produced at water reclamation facilities. Of this 26,000 AFY, it is assumed that approximately 5,250 AFY are currently used for non-potable reuse, as described in Section 3). After current uses are removed from the 26,000 AFY of production, 20,750 AFY of unused recycled water remains. A number of implementation projects were identified that can utilize this water, including approximately 1,000 AFY of conveyance facilities, 625 AFY of conversion for non-potable reuse, and 5,000 AFY of groundwater recharge… …It is expected that by 2035, an additional 10,000 AFY of recycled water production will be available (as discussed in Section 3)…	The recycled water projects shown in Table 6-1 are classified as recycled water production, recycled water conveyance, recycled water conversion, and recycled water recharge. As discussed in Section 3, approximately 206,000 AFY of tertiary-treated recycled water is currently ~~produced~~ available ~~at water reclamation facilities~~for these recycled water projects, and only approximately 82 AFY of this supply is currently used for the completed recycled water use conversions . ~~Of this 26,000 AFY, it is assumed that approximately 5,250 AFY are currently used for non-potable reuse, as described in Section 3).~~ ~~After current uses are removed from the 26,000 AFY of production, 20,750 AFY of unused recycled water remains.~~ A number of implementation projects were identified that can utilize ~~this~~ the available recycled water, including approximately 1,000 AFY of conveyance facilities, 625 AFY of conversion for non-potable reuse, and 5,000 AFY of groundwater recharge. It is expected that by 2035, an additional 110,000 AFY of recycled water production will be available (as discussed in Section 3).		Comment is acknowledged and language has been revised in Section 6.1 to reflect most of these changes. Some AFY numbers for recycled water and water banks have also been updated.

6-7		11/20/2013 Stakeholder meeting			Add footnote to bottom of the page: "The number for TSY used in this 2013 IRWMP Update is selected strictly for long-term planning purposes and is not intended to answer the questions being addressed within the adjudication process."	Comment is incorporated in Section 6.1.
6-7	6.1	Erika deHollan (LACSD)	[first paragraph] In total, approximately 2,000 AFY of recycled water projects have been identified…		Should this number match the projected reuse in Table 3-12?	Comment is incorporated in Section 6.1.
6-9	6.1	A. Jaramillo (LACWD)	Actual stabilization of groundwater levels will be assessed from a Watermaster who will be appointed at a later time.	Actual stabilization of groundwater levels is expected to be monitored by the Court through a watermaster or other court appointed agent.		Comment is incorporated in Section 6.1.
6-13	6.1	Erika deHollan (LACSD)	[first paragraph] Since the use of recycled water is limited to landscaping and other non-potable uses, it would be important to identify uses for the water beyond those for which its uses are currently dedicated or planned.	Since the ~~use of~~ recycled water produced in the Antelope Valley is ~~limited~~ currently used only for ~~to~~ landscaping and other non-potable uses, it would be important to identify uses for the water beyond those for which its uses are currently dedicated or planned.	It seems like the intention is to note that there is a small number of actual uses of recycled water implemented in the AV today rather than indicate that there is a limit on what the water can be used for.	Comment is incorporated into Section 6.1.
6-16	6.2	Erika deHollan (LACSD)	[first sentence of last paragraph] Currently, the Region uses 21% of recycled water to meet demand, or 5,300 AFY of recycled water use out of the 26,000 AFY currently available.	Currently, the Region uses ~~21%~~a small amount (82 AFY) of the available 20,000 AFY of recycled water to meet recycled water project demand~~s, or 5,300 AFY of recycled water use out of the 26,000 AFY currently available~~.		Comment is incorporated in Section 6.2.

6-17	6.2	Erika deHollan (LACSD)	[first full sentence in top paragraph] The proposed recycled water conversion and recharge projects shown in Table 6-2 would increase the recycled water used to 12,300 AFY out of the 36,000 AFY recycled water projected to be available in 2035, or 34%. An additional 23,700 AFY of recycled water projects will need to be identified in order to meet this target. Groundwater recharge projects using recycled water are expected to fulfill much of this need.		Revise numbers based on revisions to Tables 3-11 and 3-12.	Comment is acknowledged. This language is deleted from Section 6.2.

6-16	6.2	T. Chen (LACWD)	**Identify Contaminated Portions of the Aquifer.** The planning target, which is provided in order to gauge success on meeting the water quality management objectives, is to identify and prevent migration of contaminated portions of the aquifer. The Salt and Nutrient Management Plan (SNMP) for the Antelope Valley, prepared concurrently with this IRWM Plan update, identified and mapped the concentrations of a number of pollutants present in the Region's aquifer, including TDS, nitrate/nitrite, chloride, arsenic, chromium and boron. Additional monitoring and evaluation efforts may be necessary to further study those contaminants found to be exceeding MCLs in the Region's aquifers. Refer to the SNMP for detailed information about contaminant identification.	**Identify Contaminated Portions of the Aquifer.** The planning target, which is provided in order to gauge success on meeting the water quality management objectives, is to identify and prevent migration of contaminated portions of the aquifer. The Salt and Nutrient Management Plan (SNMP) for the Antelope Valley, prepared concurrently with this IRWM Plan update, identified and analyzed various constituents found in the Region's aquifer. Additional monitoring and evaluation efforts may be necessary to further study those contaminants that jeopardize the Region's water quality objectives. Refer to the SNMP for information about the Region's groundwater quality.		Comment is incorporated in Section 6.2.

6-16	6.2	T. Chen (LACWD)	**Map Contaminated Portions of Aquifer.** The planning target, which is provided in order to gauge success on meeting the water quality management objectives, is to map the contaminated portions of the aquifer and monitor contaminant movement. As described above, the SNMP for the Antelope Valley identified and mapped the concentrations of a number of pollutants present in the Region's aquifer, including TDS, nitrate/nitrite, chloride, arsenic, chromium and boron. Additional monitoring and evaluation efforts may be necessary to further map those contaminants found to be exceeding MCLs in the Region's aquifers. Continued tracking and mapping of constituents may be necessary to better understand the Region's groundwater issues. Refer to the SNMP for detailed information about contaminant mapping.	**Map Contaminated Portions of Aquifer.** The planning target is to map the contaminated portions of the aquifer and monitor contaminant movement. The SNMP mapped the concentrations for select constituents. Additional monitoring, evaluation and mapping efforts may be necessary to better understand the Region's groundwater issues. Refer to the SNMP for available contaminant concentration maps.	May only have concentration maps for TDS, chloride and nitrate.	Comment is incorporated in Section 6.2.

6-17	6.2	T. Chen (LACWD)	**Develop Management Program for Nitrate and TDS.** TDS and nitrate are of particular… • TDS management measures: … • Nitrate management measures: … Development of a management program…	Development of a management program and projects for these pollutants of concern, as well as for other emerging contaminants as they are identified, would contribute to meeting the objective of protecting the aquifer from contamination. Additionally, the SNMP found that, based on the Antelope Valley Groundwater Basin's baseline water quality and project source water quality, managing salt and nutrient loadings on a sustainable basis is feasible with a minimal number of implementation measures.	Move sentence, "The SNMP…" to the end of the paragraph immediately after management measure lists. The current paragraph structure may infer that the TDS and nitrate management measures are suggested in the SNMP.	Comment is incorporated in Section 6.2.
6-18	6.2	T. Chen (LACWD)	A monitoring program was suggested during ongoing SNMP efforts for the Antelope Valley to ensure continuous tracking of dischargers' actions to reduce the impact on groundwater. It is suggested that monitoring wells be placed near existing drinking water wells, and near projects that may impact groundwater quality (such as recharge projects), and suggested a number of constituents to be monitored and reported (i.e., TDS, nitrogen species, chloride, arsenic, chromium, fluoride, boron and constituents of emerging concern).	The SNMP includes a monitoring component to ensure the groundwater quality is consistent with applicable SNMP water quality objectives. Select drinking water wells, near projects that may impact groundwater quality (such as recharge projects), will be used as monitoring locations. Refer to the SNMP for monitoring and reporting details.		Comment is incorporated in Section 6.2.

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Section 7 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
No comments submitted on Section 7						

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Section 8 Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
8-8	8.2.6	A. Jaramillo (LACWD)	For example, the RWMG elected LACWD 40 to interface with DWR for the Proposition 84 grant efforts.	For example, the RWMG elected the SWCA to interface with DWR for the Proposition 84 grant efforts.	Isn't this done by SWCA/PWD?	Comment is incorporated in Section 8.2.6.
8-12	Table 8-2	A. Jaramillo (LACWD)	Grant App Funds: 100% RWMG	Grant App Funds: 100% Project proponents or RWMG	Pert the MOU, RWMG only committed to funding grant applications for IRWM Plan updates. Funding project grant applications is voluntary	Comment is incorporated in Section 8.3.2, Table 8-2.
8-18	Table 8-3	A. Jaramillo (LACWD)	Groundwater Safe Yield Estimated range of the potential safe yield of the Antelope Valley Groundwater Basin	Total Sustainable Yield Total Sustainable Yield	Reference Appendix I instead of listed documents; I don't think there is groundwater safe yield discussion within the Plan	Comment is incorporated in Section 8.5, Table 8-3.
8-31	8.6.1	E. deHollan (LACSD)	Table 8-4 (first row on p. 8-31) Increase infrastructure and establish policies to use 33% of recycled water to help meet expected demand by 2015, 66% by 2025, and 100% by 2035.		Revise numbers based on revisions to Table 3-11.	Comment is incorporated in Section 8.6, Table 8-4.

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Appendices Compiled Comments

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
	App J	T. Chen (LACWD)	Multi-Use Wildlife Habitat Restoration Project (Antelope Valley Duck Hunting)	Contact info for Aracely Jaramillo Phone: (626) 300-3353 Email: AJaramillo@dpw.lacounty.gov	Wrong contact number and email. Delete "?" for co-sponsor.	Comment is incorporated (now Appendix K)
	App J	T. Chen (LACWD)	Littlerock Creek Groundwater Recharge and Recovery Project (PWD)		Do not see the similar Lancaster project referred to in the project description. Project should be conceptual, completed feasibility study is anticipated in 2015.	Comment is acknowledged. This project was considered to have sufficient information for a preliminary economic analysis and is therefore identified as an implementation project for the 2013 IRWMP Update.
	App J	T. Chen (LACWD)	Palmdale Power Plant Project (City of Palmdale)		Estimated date listed is 2014. According to Palmdale website, construction will take 27-30 months. Construction has not started.	Comment is incorporated (now Appendix K)
	App J	T. Chen (LACWD)	Solar Power System at K-8 Division	Project Description: The system **is** a 350-kilowatt…	Change sponsor to LACWD 40.	Comment is incorporated (now Appendix K)

Page No.	Section No.	Commenter	Original Text	Suggested Text	Comment	Response
	App J		Quartz Hill Storm Drain (LACDPW)	Construction of a storm drain, including several lateral connections and catch basins, to provide stormwater collection and conveyance. The project connects to existing and new drainage facilities, with the improvements located mainly along 50th Street, from Avenue M-8 to Avenue K-8.	Revise project description	Comment is incorporated (now Appendix K)
	App J		North Los Angeles/Kern County Regional Recycled Water Project – Phase 2 (LACWD 40, City of Palmdale)	The construction of the recycled water supply system would be phased overtime and it is anticipated that all phases of construction would be completed by **2014**.	Revise project description. The Estimated years of construction & start-up is not complete as noted, should be 2014	Comment is incorporated (now Appendix K)
	App J		North Los Angeles/Kern County Regional Recycled Water Project – Division Street Corridor		Change the project sponsor to City of Lancaster.	Comment is incorporated (now Appendix K)
	App J		Avenue K Transmission Main, Phases I-IV		This is an "implementation" project, not conceptual.	Comment is incorporated (now Appendix K)
	App J		North Los Angeles/Kern County Regional Recycled Water Project – Phase 3		Delete project	This will remain as a conceptual project per discussion with LACWD 40 on 12/31/2013 (now Appendix K)
	App J		North Los Angeles/Kern County Regional Recycled Water Project – Phase 4		Delete project	This will remain as a conceptual project per discussion with LACWD 40 on 12/31/2013 (now Appendix K)