



Appendix E: RWMG and Public Comment Matrix

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**2019 Antelope Valley IRWM Plan Update
Administrative Draft Comments**

	Date	Commenter	Organization	Section	Comment	Response
1	10/17/2019	Brach Smith	RCSD	1.2.1.10	Remove public parks maintenance from services provided.	Removed "public parks"
2	10/17/2019	Brach Smith	RCSD	1.2.2.9	Should RCSD be included in this section since we provide wastewater services to Rosamond?	Included RCSD
3	10/17/2019	Brach Smith	RCSD	3 (pg 12)	Should state: Rosamond WWTP: The Rosamond WWTP, located in the City of Rosamond, is owned, operated, and maintained by the RCSD. Rosamond WWTP has a permitted capacity of 1.27 mgd. RCSD is currently implementing a Wastewater Treatment Facility Wastewater Treatment Plant (WWTP) Rehabilitation and Groundwater Protection Project. The upgrade to the plant will allow it to treat raw wastewater to undisinfected secondary treated water with denitrification acceptable for percolation disposal. The Waste Discharge Permit was approved by the State Water Board on July 10, 2019.	Incorporated edit
4	10/10/2019	Mike Shahbakhti	City of Palmdale	Project Table	Contact names are outdated.	Updated contact names (if information available).
5	10/10/2019	Evelyn Ballesteros	LACWD 40	3	Edit: LACWD 40 has 50 active wells with an extraction capacity of 30,000 AFY .	Incorporated edit
6	10/10/2019	Evelyn Ballesteros	LACWD 40	1.2.1.7	Remove sentence starting with "LACWD 40 has implemented an aquifer storage and recovery...". We do not have an ASR program anymore.	Incorporated edit
7	10/10/2019	Evelyn Ballesteros	LACWD 40	1.2.1.7	"...and serve the proposed Palmdale Hybrid Power Plant" - is this still a project?	This is still a project listed on the AV IRWM Plan Project List. It was last updated on 1/24/2019.
8	10/10/2019	Evelyn Ballesteros	LACWD 40	pg. 3-7	Notes under Table 3-2: LACWD 40 UWMP should be 2015 and not 2017.	Updated all UWMPs to 2015.
9	10/10/2019	Evelyn Ballesteros	LACWD 40	pg. 3-9	Remove LACWD 40 in sentence starting with "Portions of the Backbone have already been...". LACWD 40 is not part of constructing the RW Project anymore.	Incorporated edit
10	10/10/2019	Evelyn Ballesteros	LACWD 40	pg. 3-16	Remove "LACWD 40 is currently exploring the use of ASR to store recycled..." - we are not doing this.	Incorporated edit
11	10/10/2019	Evelyn Ballesteros	LACWD 40	Table 7-4	Remove the following conceptual projects: - North Los Angeles/Kern County Regional Recycled Water Project - Phase 3 - North Los Angeles/Kern County Regional Recycled Water Project - Phase 4 - Ultra-Low Flush Toilet Change-out Program - Waste Water Ordinance	Incorporated edit
12	10/10/2019	Bob Large	Stakeholder and member of the A-Team	Section 2.8.4	From a rural perspective, particularly in the West Antelope Valley, no activity has had more impact since the 2007 initial AVIRWMP than the alternative energy projects [especially the solar farms]. They were essentially not a factor in the 2007 Plan, but became a significant factor for the rural communities since then. Section 2.8.4 does mention several projects, but the 2014 satellite map (Figure 2-16) is outdated. As a result, the overall impact is downplayed. I attempted to find a source, but the best I could do was the CEC list of solar energy projects in California, which does not code for area. Just going by the project names provided, I was able to identify 32 projects in our basin. The installed capacity of these projects totaled over 730 MW and just the four biggest projects were cited as having produced over a GWh. If each residence were using 10 MWh/year, and this were one-year's production, this means the equivalent of over 100,000 homes were supplied with electricity. I know that my list is too short, because the project names don't necessarily reflect their locations. We need to have a good current list of projects and a current map. Why am I emphasizing we address this in a water planning document? First, because there is a close tie between power and water—lifting SWP water over the Tehachapi's is a significant power impact on the system and results in an embedded cost in the water delivery. Second, the State has a huge interest in alternative energy—part of our message should be the major contribution that the AV is making to support that objective. Third, I suspect, but don't have the data to support it at this point, that land owners previously involved in farming are, or will be, finding that leasing or selling their land for solar farms is a better economic choice for them (which could be reflected in the lower farming area numbers). Fourth, potential dust from solar farms in operation will have to be countered by some watering of the underlying plants, but I would argue that this water use, plus that needed for cleaning the panels and other ancillary needs, is significantly less than farming or supplying a housing development would be. We need to quantify that.	The map is a few years old and changes may have occurred in the Region since the map was developed in 2014. However, we were also unable to locate an updated map with more current alternative energy projects in the Region and are unable to make assumptions on project locations solely based on project names. The 2019 IRWM Plan Update will continue to use the map developed in 2014 as this task is outside of scope the IRWM Plan, but would encourage submittal of updated materials in the future, if they become available. The 2019 IRWM Plan Update acknowledges that alternative energy production is a growing and important industry in the Region (Section 2.8.4). Water use for cleaning solar panels is imbedded in either the UWMP projections or adjudication Production Rights.
13	10/10/2019	Bob Large	Stakeholder and member of the A-Team		On the broader issue of Climate Change, merely complying with DWR directives just doesn't hack it. The latest International Panel on Climate Change report lays out the grim reality: we are suffering now from the accumulating effects of using the atmosphere as the dumping ground for our GHG's--to avoid worse consequences, (and maybe even a tipping point where we totally lose control), we have to reduce global emissions by half within eleven years and get to net-zero emissions by 2050. Our current strategy of "no regret" decisions has to be replaced by an aggressive move toward zero carbon. For example, the natural gas component of the Palmdale Power Plant needs to be cancelled (in the process, freeing the water it was going to use).	The 2019 IRWM Plan Update acknowledges that climate change is an important issue for the Region. The analysis provided in the IRWM Plan follows the specifications outlined in the 2016 IRWM Grant Program Guidelines, and the tools used to project climate change impacts are specific to the AV IRWM Region. The plan reflects current approaches to climate change mitigation and adaptation.
14	10/10/2019	Bob Large	Stakeholder and member of the A-Team	Figure 2-4	A "nit": In Figure 2-4, the legend shows Edwards Airforce Base, it should be either Edwards Air Force Base or, if you do not have enough room, Edwards AFB.	Updated figure to "Edwards Air Force Base"
15	10/10/2019	Bob Large	Stakeholder and member of the A-Team	2.8.4	The Alternative Energy discussion (Section 2.8.2) on page 2-36 discusses the Lancaster Choice initiative, which is good, but fails to mention the regional energy choice of the Clean Power Alliance. Since this was a default offering on the SCE bill, I am assuming many people are on this plan, so we should at least address it.	Clean Power Alliance has been included in Section 2.8.4.

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16	10/10/2019	Bob Large	Stakeholder and member of the A-Team	General	I am puzzled about the UWMPs—my understanding was that all of our participating cities have just completed their UWMPs, and this information had been provided to Woodard and Curran. If so, then I would think the current UWMPs would be dated 2019. So why are we referring to UWMPs dated 2016 to 2017?	UWMPs are prepared by water suppliers every five years. The most recent set of UWMPs available were updated to comply with the 2015 UWMP guidelines. However, some UWMP updates were not finalized until 2016 or 2017. We have cited the UWMPs for the year they were finalized.
17	10/10/2019	Bob Large	Stakeholder and member of the A-Team	Pg. 3-8	The statement on page 3-8 that AVEC is developing the High Desert Water Bank in the AV, but not for the purpose of serving the IRWMP region is puzzling, and needs more explanation.	Updated language with a little more detail. Project is still in preliminary design stage; final details currently unknown.
18	10/10/2019	Bob Large	Stakeholder and member of the A-Team	General	Recycled water is addressed in several different sections, but I am having trouble connecting the dots. We say 33% use was the target for 2015, but only 350 AFY were used. The implication was that, due to infrastructure limits we missed that goal, but by how much? If we are not finding "beneficial" uses for treated wastewater (which I assume is increasing with increasing population), then what happens to it—does it just evaporate, or are there some "non-beneficial" uses that are not discussed?	Uses for recycled water are described in Section 3.1.1.3.
19	10/10/2019	Bob Large	Stakeholder and member of the A-Team		From the start of this planning process, I have been uncomfortable with the open-ended nature of the "new water" discussion (i.e., the acquisition of water rights from individuals or organizations outside of the Antelope Valley). The tradeoff with downstream agencies doing desalination I understand, although I think it would be very costly to pay for their developments. It is the upstream acquisition of water rights (either by our water agencies or by telling developers to go freelance) that concerns me. Uncontrolled overplanting by the Central Valley industrial farms has badly damaged their aquifer and increased demands for future water. There has to be some limit on the Northern California "excess" water. Major corporations and billionaires that control the industrial farms may find it profitable to sell their water "rights" and shut down their farms, but there needs to be a discussion of the societal costs of displacing farm labor and forcing the buyers of farm products to obtain food from outside the US borders. I would think this needs to be a discussion headed by DWR.	The 2019 IRWM Plan Update acknowledges that there may be costs associated with "new water." However, providing a cost and benefits analysis for "new water" acquired from outside the Antelope Valley IRWM Region is outside the scope the IRWM Plan.
20	10/10/2019	Bob Large	Stakeholder and member of the A-Team		I will finish with another easy "nit"—in paragraph 3.5.1.1 you are missing a zero—164,00 should probably be 164,000.	Incorporated edit
21	11/14/2019	Mike Shahbakhti	City of Palmdale	ES, Sections 6, 7, 8	The City of Palmdale don't have the Power Plant Project any more.	Incorporated edit
22	11/14/2019	Mike Shahbakhti	City of Palmdale	Section 1	Under Introduction 1-9 The city of Palmdale is maintaining the sewer services with the LACSD. The same as the City of Lancaster.	Incorporated edit
23	11/14/2019	Mike Shahbakhti	City of Palmdale	Section 1	Also Public Works Department is maintaining the sewer system.	Incorporated edit