



October 3, 2017

submitted via e-mail

Mark Norton
Santa Ana Watershed Projects Authority
11615 Sterling Ave.
Riverside, CA 92503

RE: Proposal to Support Basin Monitoring Program Task Force Projects in FY17-18

Dear Mr. Norton:

Per your request, I am pleased to provide the following statement of work and cost estimate to assist the Basin Monitoring Program Task Force (BMPTF) with key regulatory tasks in FY17-18. During the next nine months, the BMPTF will be completing a number of important technical studies and preparing several related Basin Plan amendments.

Historically, Risk Sciences has provided regulatory support services for such basin planning activities. The BMPTF has requested that Risk Sciences prepare a Scope-of-Work (SOW) and cost estimate for similar efforts during FY17-18.

Services to be Provided by Risk Sciences

Task 1: SWRCB and OAL Approval of Basin Plan Amendment for Chino-South

In August of 2017, the Santa Ana Regional Water Quality Control Board approved a Basin Plan amendment to revise the water quality objective for nitrate-nitrogen in the Chino-South Groundwater Management Zone. That Basin Plan amendment does not become effective until it is also approved by the State Water Resources Control Board and the California Office of Administrative Law (OAL). EPA approval is not required for this Basin Plan amendment as it focuses exclusively on groundwater objectives. The State Board will soon post the Basin Plan amendment for public comment and an adoption hearing will probably be scheduled for late 2017 or early 2018. This amendment is not expected to be controversial. However, should significant public comments be received, Risk Sciences will assist the Regional Board staff in preparing written responses to these comments as directed by the Task Force.

Task 2: Triennial Update of Ambient Groundwater Quality (1996-2015)

In 2004, the Santa Ana Regional Water Quality Control Board adopted a Basin Plan amendment requiring various water and wastewater agencies to reassess groundwater quality every three years. The most recent update was recently completed by CDM-Smith and D.B. Stephens.

The triennial Ambient Water Quality (AWQ) Update must now be submitted to the Santa Ana Regional Board for review and approval. Historically, this approval process took the form of a formal Basin Plan amendment and must do so again this time. However, the Task Force is also recommending that the Basin Plan be amended so that, beginning in 2020, future AWQ Updates can be implemented needing to do so through a Basin Plan amendment each time. This approach will simplify the complicated and time-consuming process normally associated with Basin Plan amendments and eliminate the need for CEQA-Substitute Environmental Documents (SED) and Economics Analysis when the Regional Board is merely accepting the most recent estimate of current groundwater quality using previously approved methods. Formal Regional Board review and approval, including a public comment process, will still be required.

Risk Sciences will assist the Task Force and the Regional Board staff by preparing the draft Basin Plan amendment, and related staff report, to accept the most current AWQ Update and revise the approval requirements for all similar Updates in the future (beginning with the next AWQ Update scheduled for completion in the third quarter of 2020). Risk Sciences will not prepare the CEQA-SED or the Economics Analysis to support the proposed Basin Plan amendment should such documents be required. However, Risk Sciences will assist any contractor that the Task Force selects to prepare these additional studies if needed.

As with all other Basin Plan amendments, State Board and OAL approval will also be required. Risk Sciences will assist the Regional Board staff as necessary to ensure the proposed Basin Plan amendment is also endorsed by state authorities following Regional Board approval. Risk Sciences will aid in preparing written response to public comments if such assistance is requested by Regional Board staff and the Task Force.

Task 3: Revised Wasteload Allocation

Effluent limitations governing the discharge of nitrogen and TDS to surface and groundwaters of the Santa Ana Region are derived using a Waste Load Allocation Model (WLAM) that was developed by the BMPTF and previously approved by the Regional Board. In 2017, the BMPTF initiated a large-scale effort to update and expand the functionality of the WLAM and contracted with Geosciences, Inc. to perform the necessary technical work. Geosciences has completed the updated WLAM calibration and is preparing to run the model to evaluate various wastewater discharge and recycled water reuse scenarios. Risk Sciences will assist the Task Force in selecting which specific scenarios and conditions should be evaluated using the new WLAM tool. In addition, Risk Sciences will review the draft reports and suggest appropriate revisions.

When Geosciences completes its work, the final WLAM must be submitted to the Regional Board for review and approval. In the past, such approvals have taken the form of a Basin Plan amendment and must do so again. Risk Sciences will assist the Task Force by preparing the draft Basin Plan amendment, and related staff report, needed to revise and update the wasteload allocations for TIN and TDS. Risk Sciences will also assist the Regional Board staff, as necessary, to prepare written response to public comments received on the proposed Basin Plan amendment. Risk Sciences will not prepare the CEQA-SED or the Economics Analysis that may also be needed to support the Basin Plan amendment. However, Risk Sciences will coordinate with any contractor that the Task Force selects to prepare these studies should such documents be required.

Risk Sciences will attend all Regional Board workshops and hearings, and testify in support of the proposed Basin Plan amendment, as directed by the Task Force. State Board and OAL approval will also be required but it is not likely that these other state reviews will take place in FY17-18. Similarly, EPA approval may also be necessary but federal review will not occur until after the Regional Board, State Board and OAL have acted. Consequently, Risk Sciences is not proposing any budget in this SOW for state or federal regulatory reviews expected to occur in the next fiscal year (i.e. FY18-19).

Task 4: Annual Report of Santa Ana River Water Quality

Every year, the BMPTF prepares a report summarizing water quality in the Santa Ana River and its major tributaries. SAWPA has primary responsibility for assembling the necessary data and developing the annual report. Risk Sciences will continue to coordinate with SAWPA staff to review and update this report in preparation for final submission to the Regional Board. In addition, Risk Sciences will facilitate discussions at the BMPTF to determine what sort of spatial and temporal averaging procedure should be employed to evaluate and report data collected from multiple sampling points, on the same or different days, in a given stream segment. The Task Force must also resolve how samples from Reach 2 (below Prado Dam) should be used to assess compliance with water quality objectives established for Reach 3 (above Prado Dam).

Task 5: Regional Drought and Conservation Policy for TDS

The Task Force is partnering with the Southern California Salinity Coalition (SCSC) to investigate how long-term water conservation efforts and periodic droughts may affect TDS concentrations in treated wastewater. That study is now nearing completion and the results will soon be presented at an upcoming BMPTF meeting.

Using data from the SCSC study, Risk Sciences will draft various regulatory and permitting options for review and discussion by the Task Force. This may include, but is not limited to: (a) expressing effluent limits for TDS using longer-term averaging periods, (b) revising the current increment-of-use limits for TDS to account for higher water efficiency, and (c) adopting a temporary conditional variance from TDS limits during periods of prolonged drought.

If the Task Force elects to recommend a specific alternative, then Risk Sciences will prepare a formal written proposal for submission to the Regional Board. If the Regional Board generally agrees with the proposed approach, then it is likely that the Task Force will also be asked to help prepare the necessary regulatory documentation to adopt and implement the Drought Policy. However, the formal Basin Plan amendment process will probably occur in the following fiscal year (FY18-19) and is, therefore, not included in the SOW or proposed budget for FY17-18.

Task 6: Clarifications to Existing Water Quality Objectives in the Current Basin Plan

During the recent 303(d) water quality assessment process, it became apparent that there was some confusion regarding the purpose for several of the salinity-related water quality objectives in the Basin Plan. For example, for those unfamiliar with the Santa Ana region, it is not clear whether the TDS objectives are intended to be Use Protection Thresholds or Antidegradation Targets. Nor is it clear which specific Beneficial Use was determined to be "most sensitive" and how the TDS objective was derived to protect that use. In some cases, TDS objectives that were established to prevent degradation of high quality groundwaters have been misinterpreted as necessary to protect aquatic habitat in they overlying surface stream.

To avoid similar confusion in the future, and ensure proper application of water quality standards during the 303(d) assessment process, clarifying detail should be added to the existing Basin Plan. The sole purpose of this effort will be to better describe the basis for the existing requirements in the Basin Plan. No substantive changes will be proposed for consideration.

Risk Sciences will work with Regional Board staff to develop a list of candidate clarifications for review and discussion by the BMPTF. At the Task Force's direction, Risk Sciences will also prepare a draft Basin Plan amendment and staff report to add appropriate clarifying text and footnotes to the Basin Plan. Since these will be non-substantive clarification, no CEQA-SED or Economic Analysis will be required to support any Basin Plan amendment needed to make such changes.

The recommended revisions can be coordinated with the Basin Plan amendment to approve the AWQU (early 2018) or with the Basin Plan amendment to adopt the revised WLAM (mid-2018). The timing for this task must be discussed and coordinated with the Regional Board staff before finalizing the development schedule. Therefore, this is shown as TBD in the proposed Schedule of Deliverables on the following page.

Task 7: Monthly BMPTF Meetings

Risk Sciences will prepare for and participate in regular monthly meetings of the BMPTF. We plan to attend all but the December, 2017 Task Force meeting in-person. In addition, we expect that one Regional Board hearing (to approve the AWQU) will probably occur this fiscal year. Therefore, we have proposed a budget sufficient to cover the travel expenses for eight trips in the next nine months. As in the past, Risk Sciences will endeavor to coordinate meeting schedules so that travel expenses can be shared among several different projects in the area.

Schedule of Deliverables

Task #	Description of Deliverable	Est. Due Date*
2a	First draft of BPA & Staff Report for AWQU	Nov. 30, 2017
2b	Second draft of BPA & Staff Report for AWQU	Jan. 15, 2018
3a	First draft of BPA & Staff Report for WLAM**	Feb. 23, 2018
3b	Second draft of BPA & Staff Report for WLAM	Apr. 30, 2018
5a	Drought & Conservation Regulatory Alternatives	Mar. 30, 2018
5b	Drought & Conservation Policy Proposal to Reg. Bd.	May 31, 2018
6a	Summary of Basin Plan Clarifications	TBD
6b	Draft BPA & Staff Report for Clarifications	TBD
7	Task Force Meetings***	Monthly

* All delivery dates assume new contract is authorized to Risk Sciences by Oct. 18, 2017.

** Dates for Task 3a & 3b assume Geosciences delivers the WLAM in accordance w/ its contract terms.

*** Risk Sciences will attend all monthly Task Force meetings (except Dec., 2017) in person.

Requested Compensation

A total of 218 hours will be required to perform the tasks identified above. The professional fee to provide these services is \$66,670. Related travel expenses (airfare, hotel and rental car) are estimated to be \$7,000. Therefore, Risk Sciences proposes a total budget of \$75,670 for the nine months remaining in FY17-18 (Oct. 1, 2017 - June 30, 2018).

Task #	Task Description	Est. Hours	Est. Cost
1	SWRCB/OAL Review of Chino-South WQO	2	\$630
2	Draft BPA for Ambient Water Quality Update	48	\$15,120
3	Draft BPA for Revised Wasteload Allocation	48	\$15,120
4	Annual Report of SAR Water Quality	16	\$5,040
5	Petition for Drought & Conservation Policy	40	\$12,600
6	Draft BPA for Clarifications to Existing WQOs	32	\$10,080
7	Monthly Task Force meetings	32	\$10,080
Sub-Total for Professional Fees (218 hrs. * \$315/hr.)			\$68,670
Estimated Travel Expenses (8 trips * \$875/trip)			\$7,000
Total Proposed Contract NTE Value for FY17-18			\$75,670

Risk Sciences sincerely appreciates the responsibility entrusted to us by the Basin Monitoring Program Task Force and the fact that we are being considered for a sole-source contract using an abbreviate letter proposal process. Therefore, we are proposing no increase to our hourly rate, which has been in effect for the last two fiscal years, and will remain unchanged for a third year.

Please note that Risk Sciences' current contract for FY16-17 was scheduled to end on June 30, 2017. Although the current contract was administratively extended to January 31, 2018, all but \$300 of the original \$73,000 NTE value has been expended. We were able to cover the cost of addressing the proposed 303(d) listings for salinity within the current contract budget even though this task was not within the original scope-of-work. We were also able to stretch the FY16-17 budget to cover the first three months of FY17-18 (i.e. July, Aug. & Sept. of 2017). However, at present, there is no remaining authorized budget available for Risk Sciences to perform any additional work on behalf of the Task Force until a new contract is approved.

Please contact me if you have any questions regarding this letter proposal.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "T. Moore", with a long horizontal flourish extending to the right.

Timothy F. Moore

Risk Sciences

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