

QA Table – WAR Appendix C – Data Gaps Memo – Draft B

Note: This table includes all comments pertaining directly to the Data Gaps Memo, which is now Appendix C of the WAR. Listed comments on Draft A of the Lessons Learned Memo were presented and discussed at the second WAR workshop. The numbering of these comments is retained from the comment tables developed for this TM for easy cross-referencing.

Order Number	Subgroup or Group providing comment	Page(s) / Paragraph(s).	Text Suggested or General Comment	Response to Comment (as discussed at Assessment Workshop)
1	Frances Brewster-SCVWD, Water Quality Unit	Data Gap Tables	<p>Why does the list of MUN indicators change from reach to reach? It should be consistent</p> <p>How were the MUN indicators selected? There is a much larger list of constituents that we must monitor to meet Department of Health Services' requirements for a drinking water source.</p> <p>What reach are the reservoirs? Is there any way to name the reaches or give a physical description along with the number (i.e. Guadalupe Creek between X Road and Y Avenue)?</p>	<p>This error has been remedied. The MUN indicators were selected based upon a review of the DHS requirements as a part of the original process used to identify Quantifiable Parameters for use in assessing Basin streams. Additional parameters may be considered if the MUN assessment protocol is revised. The parameters chosen were believed to be the most likely to be critical in Basin streams and reservoirs.</p> <p>The reservoir reaches are those without numbers (e.g., SF/SL for Searsville Lake). Reach limits have been added to the reach summary tables in Appendix 4-B, 5-B, and 6-B of the WAR text. These tables also contain the same information on data gaps that is presented in this memo.</p>
2	Luisa Valiela, EPA	Chap 2 / and Data Gaps Memo (comment also included in Chap. 2 comment table)	<p>WAC clearly distinguishes between reaches that do or do not have support and at what level of uncertainty, and one wants to know after reading through the technicalities each time just how many of each we are talking about– can that total just be inserted into the discussion? It is referenced in the data gap memo under Section 3 as “number of reaches characterized as “data poor” by watershed for each use” so it shows up here? But could we also get a summary (i.e. number of) of data rich reaches and did or did not support and have that inserted into Chap 2 as the types are discussed? Or maybe have a table that summarizes it all?</p>	<p>This information is contained in Tables 6-8 of this memo. The same information is now presented in Chapter 2 as well as 4-6 of the WAR text.</p>
3	Geoff Brosseau-Watershed Captain	p.1	<p>Need to recognize and integrate all the lessons learned about the assessment framework as they relate to data "gaps" up front in this memo and/or elsewhere in the WAR. In other words, as others and I commented on chapters 2, and 4-6, the lessons learned should be addressed BEFORE the WMI goes any further with data collection and assessments. In fact, the lessons learned about the framework call into question what is a data gap? We can identify data gaps based on the framework as it was designed but now that we've used it and want to change at least parts of the framework, it seems we need to do that revision to the framework before confirming data gaps. Obviously, we can't do that immediately so as I noted at the beginning of this comment, we just need to recognize this dynamic and couch our statements about gaps accordingly.</p>	<p>This comment has been added to the discussion in Chapter 2 of the WAR text and is also addressed in this memo.</p>

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4	City of Sunnyvale	Technical memorandum- Data gaps, p. 1, Section 1.3	It is important to highlight the need for the support and updating of the MDDB for future assessment and revisions to current pilot assessments. We need to list this very prominently in the suggestions for future watershed assessments.	This is in the memo and is also prominently discussed in Appendix B and the Chapter 2 text.
5	Geoff Brosseau-Watershed Captain	p. 2, Section 1.4, 1st para, last sentence	Data are plural so change "was" to "were" and check rest of WAR.	Revision addressed.
6	Geoff Brosseau-Watershed Captain	p. 3, section 2.1	Need to discuss data that never made it to the first phase of data sufficiency evaluation -- that which was not "readily available."	In some cases, data custodians simply did not respond to repeated letters and phone calls. In others, the data initially identified in the MDDB turned out to be unavailable from the sources listed. This information has been added to the text.
7	Geoff Brosseau-Watershed Captain	p. 3, section 2.1, 4th line	Considering the data mentioned in the previous comment, the concept of "presence/absence" might be better expressed as "readily available/not readily available."	Unsure whether this would be an appropriate change as there was doubt expressed over whether some of the missing data sets even exist. The "present/absent" distinction has been retained for now but some discussion of this has been added to the text.
8	Geoff Brosseau-Watershed Captain	p. 4, first full para, line 8	Delete "above"	Revision adopted.
9	Geoff Brosseau-Watershed Captain	p. 4, first full para, last sentence	If it is not impossible or too expensive, the tables should reflect all the data sets used in the assessment, whether they were received late or not.	Revision adopted. The numbers were correct; the text was left in Draft A by error.
10	Geoff Brosseau-Watershed Captain	p. 5, section 2.3, second to last sentence	This is an example of an activity (raised in lessons learned comments) that could have been done by junior staff with senior staff oversight or help, as needed.	This comment is being addressed in the RPT/WAS portion of Appendix B (Lessons Learned).
11	Geoff Brosseau-Watershed Captain	p. 9, 3rd para, 1st sentence, Excel "tables at the end of this memorandum..."	If it doesn't take up too much room, for completeness sake, it would be instructive to see a list of the data that were of "good" quality in each of these worksheets.	This information has been added to Chs. 4-6 in Appendix C to each chapter. By cross-referencing the data set ID number in the reach summary tables (in Appendix B to each chapter) with the list in Appendices 4-, 5-, and 6-C, one will have information concerning all of the data sets judged to be of use in developing the assessment results. This comment is addressed in Chs. 4-6 and NOT in the Data Gaps TM though a cross-reference has been provided.

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12	City of Sunnyvale	Technical memorandum- Data gaps, p. 9, Section 3.1	<p>In order to prioritize the collection of data to fill in the gaps, these gaps should be identified in a table or matrix of some kind. Going through the extensive lists of tables provided for the data gaps memo is not an easy thing to do for the average reader. It would be better to compile some of that information on a reach (or cluster of reaches) for each pilot watershed so that someone could see at a glance, which areas needed information to support COLD, PFF, etc.</p> <p>The statements made in this section are very general. We need to know where some of the specific gaps (and ones that are critical to making support statements) are so that agencies could focus on what needs to be collected to assist with future assessments or revisions to the pilot assessments.</p>	<p>A new table (Table 9) has been added to identify at a glance reaches/uses with limited data (uncertainty C and D). Reaches with no data at all are listed in Appendices 4-B, 5-B, and 6-B but are not included in this table.</p> <p>In general, the “middle group” of reaches – those with enough data to make support statements for a use but not enough to make confident support statements – would benefit most from data collection activity. This thought has been captured in the specific data gap recommendations in Sections 4.4, 5.4, and 6.4 of the WAR text and is mentioned here as well.</p>
13a	Paul Randall SCVURPPP	P. 2, para 1	SCVURPPP is developing a database to document information relevant to NPDES permit requirements, which includes watershed assessment. The database will include the archived MDDB contents. It will also include a broader range of information to include data types that are relevant to watershed analyses beyond the pilot assmt framework (i.e. primary uses and associated data types).	Discussion about this effort has been added to the memo.
13b	Paul Randall SCVURPPP	P. 2, para 5, 6	The stream segmentation approach for determining whether existing data is useful to assess certain uses across a reach will be strengthened when the reach breaks are based on geomorphic factors. Interpreting data within and between reaches that have similar functions would reduce uncertainties in the use support analysis.	Comment noted; a recommendation to this effect is contained in Chapter 2 and Appendix B.
13c	Paul Randall SCVURPPP	P. 6, para 2	It would be useful to be able to track which data source and associated data types (identified as primary, secondary and tertiary indicators) listed in the MDDB were used to make a support statement, either as a separate table or within the MDDB itself.	This information has been added to Chs. 4-6 in Appendix C to each chapter. By cross-referencing the data set ID number in the reach summary tables (in Appendix B to each chapter) with the list in Appendix C, one will have information concerning all of the data sets judged to be of use in developing the assessment results. This comment is addressed in Chs. 4-6 and NOT in the Data Gaps TM.
13d	Paul Randall SCVURPPP	P. 9, para 2	It would also be useful to have a map that shows location of reaches with data gaps as defined by 4 bullets on page 9.	Maps illustrating data gaps and uncertainty for each reach are included in Chapter 2 (Figures 2-1 through 2-4). These maps are NOT included in the memo. A listing of data gaps specific to each reach/use has been added to the reach summary tables in Appendices 4-B, 5-B, and 6-B.
14	Terry Neudorf-Guadalupe Watershed Captain	p. 9, section 3.1, the last line on the page	: "To do so would be cost-prohibitive and wasteful of scarce resources. The long-term data...." To play by the strict interpretation of the "rules" where one is to make decisions or evaluations based on data, I can't see where that is "wasteful". Presumably data to collect would only be that related to the variables agreed upon to generate a rating of impairment based on those same variables. Probably what should be captured in this paragraph is a more general	This text has been reworded.

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			realization there is certainly a price to be paid for data acquisition; however, the cost should be considered in terms of the importance of the decisions that rely upon the data. Also, in the future, we can be looking for better efficiencies for metrics of testing ecological, hence, beneficial use impairment.	
15	Trish Mulvey		Trish is requesting a linkage in the data gap memo to the report sections. 4.4, 5.4 and 6.4.	Reference to all of the appendices (tech memos) has been made in multiple locations in Chapters 4-6 of the report.