

### Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

#### SITE DETAILS

Site: San Bernardino Valley College - California

Address: 701 S. Mt. Vernon, 92410, San Bernardino, California, UNITED STATES

Contact Person: Farrah Farzaneh AWS Reference Number: AWS-000775

Site Structure: Single Site

#### **CERTIFICATION DETAILS**

Certification status: Certified Core

Date of certification decision: 2025-Aug-12

Validity of certificate: 2028-Aug-11

#### **AUDIT DETAILS**

Audited Service(s): AWS Std 2025 New Certfication Requirements

Audit Type(s): Initial Audit Audit Start Date: 2025-Feb-25 Audit End Date: 2025-Feb-28 Lead Auditor: Gisela Galan

Audit team participants:

Monserrath Zamora

Gisela Galán, Lead Auditor

Site Participants:

Mark Shepherd, Consultant GWF, Product Manager Smart Water Solutions



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### **ADDITIONAL INFO**

Summary of Audit Findings: During the certification audit:

- 7 major non-conformities, 27 minor non-conformities and 1 observation were raised on requirements for Core level;

#### The audit teams recommends:

- Certification of San Bernardino Valley College at Core level pending approval of the corrective action plans for all non-conformities on Core indicators and closure of the major non-conformities on Core indicators:

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities on Core indicators and to submit these to WSAS within 30 days of receipt of the audit report by 08 June 2025. If it wishes to proceed with Further assessment to determine recommendation for advanced level, then it also needs to submit root cause analysis and corrective actions for non-conformities on Advanced indicators by the same date.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline:

- Evidence for Core indicators is to be submitted to WSAS (within75 days) by 23/07/2025 if the site wishes to proceed with Core level certification.

Minor non-conformities must be closed out by the time of the next annual audit.

#### CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformities and submitted the corrective action plans addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.



### **Alliance for Water Stewardship (AWS)**

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Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of San Bernardino Valley College (SBVC) against the AWS International Water Stewardship Standard Version 2.

The site is located in San Bernadino, California (coordinates: 34.087500 -117.310800). The SBVC is a tertiary education facility that offers a variety of degrees, certificates, and skill-building courses. The site includes buildings and sports facilities.

Water is utilized for student and staff consumption, irrigation, and the distribution of hot and chilled water from a central plant. The College receives its water from the San Bernardino Municipal Water Department (SBMWD). The wastewater is discharged into the SBMWD's sewer network for treatment, which ultimately discharges into the Santa Ana River after treatment (Santa Ana River catchment).

The facility is located in the Santa Ana River watershed. It is one of the most densely populated areas in the state, and continues to experience growth and urbanization, increasing demands on water supply, water quality, and flood management. Flooding is a common issue within the watershed.

Factors such as climate change, population growth, aging infrastructure, and heightened awareness of environmental degradation influence future water management strategies. The watershed has faced significant impacts from past droughts, resulting in reduced water availability and increased pressure on water resources, classifying it as a water-stressed catchment. Regarding inter-basin transfers, the Santa Ana River Watershed receives some of its water from the State Water Project and the Colorado River.

The audit was conducted onsite on February 25-26, 2025 and remotely on April 9-11, 2025.

The onsite site visit included the assessment of the aviation area, chemistry lab, cooling towers, WASH facilities, gardens, chemical storage areas and collecting area from washing aviation and mechanical equipment.

#### **FINDINGS**

Observation 1 Minor 27 Major 7



**Alliance for Water Stewardship (AWS)** 

Audit Number: AO-001478

FINDING DETAILS



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016762

Checklist Item No: 1.2.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Stakeholders and their water-related challenges shall be identified. The

process used for stakeholder identification shall be identified. This

process shall:

- Inclusively cover all relevant stakeholder groups including vulnerable,

women, minority, and Indigenous people;

- Consider the physical scope identified, including stakeholders,

representative of the site's ultimate water source and ultimate receiving

water body or bodies;

- Provide evidence of stakeholder consultation on water-related interests

and challenges;

- Note that the ability and/or willingness of stakeholders to participate

may vary across the relevant stakeholder groups;

- Identify the degree of stakeholder engagement based on their level of

interest and influence.

Findings: -Some water-related challenges have been identified through research;

however, consultations with catchment stakeholders have not yet occurred. Consequently, the stakeholder engagement process remains

incomplete.

-Evidence of stakeholder consultation on water-related interests and

challenges have not been identified.

Corrective action:

1. Identify and make contact with the correct contact person within the

following external stakeholders:

• San Bernardino Municipality Water Department (SBMWD)

Santa Ana Watershed Basin Technical Advisory Committee (BTAC)

San Bernardino Valley Municipal Water Conservation District

(SBVWCD)

• San Bernardino Area Chamber of Commerce (SBACC)

2. Join existing BTAC meetings as part of their open invitation for public

participation and meet relevant stakeholders\*

3. Join relevant SAWPA Round Tables/Task Forces

(sawpa.gov/task-forces/)

4. Schedule individual meetings with relevant stakeholders

5. Use document ST-003-K002 Catchment Stakeholder Briefing Document for initial stakeholder engagement, and keep record of all

electronic communication in SBVC's document management system

6. Use document ST-003-C008 Stakeholder Engagement Meeting Pro

Forma Agenda to guide stakeholder interaction

7. Update Stakeholders list and matrices

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#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016768

Checklist Item No: 1.3.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Water quality of the site's water source(s), provided waters, effluent and

receiving water bodies shall be quantified. Where there is a

water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.

Findings: -Data regarding the water quality of the effluent has not been quantified.

-Some water quality data for the receiving water body (Santa Ana River) has been identified in indicator 1.5.4; however, this information is outdated and does not reflect the current condition of the river.



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Corrective action:

In response to the TR comment the full CAP and the accepted breakdown of CAP activities was attached as a file hereto.

The actual Corrective Actions were included as being:

- 1. Make use of the SBMWD Water Board Meeting LiveStream service
- 2. Engage with SBMWD to find out more about their WRP and RIX Treatment Plants and Environmental Control Regulations
- 3. Use online databases and resources concerning water quality status, challenges and risks
- 4. Initiate water/wastewater/removed waste from site quality management system monthly quality reports for water recycling/re-use, records of waste product removed from site from existing contractor and changes to service provider contract to ensure compliance with relevant standards and proof of disposal into receiving water bodies

What was also included in the attached file were "Data and Evidence Required" as well as the "Prevention Strategy", both of which form part of a CAP. In collective response to the TR comments, and referring to the original attached file:

- 1. SAWPA Regional Water Quality Monitoring Task Force Regional Monitoring Program Data Viewer (web page https://sarwqmdashboard.org/dashboard?year=2025) will be used to obtain and document water quality data .csv files can be downloaded (uploaded as file)
- 2. SAWPA GIS Tools (sawpa.gov/gis-tools/) for Live Surface Water Monitoring and Annual Reports (dashboard screenshots uploaded as file)
- 3. SAWPA River Basin Management Plan (monthly published water quality data per sample site, dashboard screenshots uploaded as file). The Aqueduct Water Risk Atlas will also be used for seasonal variation data.
- 4. SBMWD Consumer Confidence Reports (in which both water and wastewater quality parameters are published for the WRP and Tertiary Treatment Facility) and are available on web site (https://www.sbmwd.org/Archive.aspx?AMID=38) for quantification of effluent water quality to the receiving water body (screenshots uploaded as file)
- 5. CAP Action 4 above is intended to comply with the Wastewater Discharge Regulations Rule & Regulation No. 1 (uploaded as file). This also includes the amendment of the current waste removal service provider's contract to ensure compliance with Rule and Regulation No. 26 (uploaded as file)



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016839

Checklist Item No: 1.5.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The catchment water-balance, and where applicable, scarcity, shall be

quantified, including indication of annual, and where appropriate,

seasonal, variance.

Findings: -The site has identified data regarding water quantification for various

areas within the catchment, but not for the catchment as a whole. While this information could be used to create a water balance equation, it does not constitute a comprehensive water balance quantification.

Corrective action: Amended Corrective Action:

1. Join existing BTAC meetings as part of their open invitation for public

participation

2. Join relevant SAWPA Round Tables/Task Forces

(sawpa.gov/task-forces/) - copy of the current task forces have been

uploaded

3. Obtain current and future reports/updates relating to catchment water balance. Details on data required for this was included in the original uploaded file under "Data and Evidence Required". The source document for meeting the requirements of this indicator is the Basin Technical Advisory Committee Regional Water Management Plan 2025, which includes Water Level Data and Catchment Water Balance Data (including annual and seasonal variance) in Appendix C. A copy of this

document has been uploaded.



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016840

Checklist Item No: 1.5.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Water quality, including physical, chemical, and biological status, of the

catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.

Findings: -Updated water quality data, including physical, chemical, and biological

status of the catchment, has not been identified or quantified. The information provided does not reflect the current water quality of the

catchment.

-It is unclear what the current water quality challenges in the catchment

are.

-An indication of annual, and where appropriate, seasonal, high and low

variances has not been identified.



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Corrective action:

Amended CAP (the original file uploaded as part of this CAP included a column "Data and Evidence Required" and "Prevention Strategy" which made reference to a number of actions/documents that should have been reduced to text here):

- 1. As explained in other indicators, the main catchment management plan is currently being updated and the draft due for publishing for comment later this year. The site has had to rely on the 2020 version of the Integrated Urban Regional Water Management Plan until such time as this new document has been published. This new document contains all the gaps identified in the TR comments.
- 2. The Upper Santa Ana Integrated Urban Regional Management Plan (uploaded under Indicator 1.5.3) contains Chapter 3 Regional Water Sources and Management (surface water, imported water and ground water, alternative water sources and water quality), Chapter 4 Regional Water Use, Chapter 5 Comparison of Regional Supplies and Demand, and Chapter 6 Water Management Regional Needs, Goals, Objectives ans Strategies. This report therefore includes catchment-level information on water quality; seasonal, annual and drought-condition variances; catchment challenges and regional responses
- 3. While this latest report is being finalized the site will join relevant SAWPA Round Tables/Task Forces (sawpa.gov/task-forces/) Basin Monitoring Program Task Force and Regional Water Quality Monitoring Task Force document uploaded) for active engagement and discussion on indicator-relevant information
- 4. Join the BTAC e-Notification mailing list and One Water One Watershed 2.0 Plan stakeholder list to update regular updates
- 5. Make use of the State Water Resources Control Board 2024 California Integrated Report
- (https://www.waterboards.ca.gov/water\_issues/programs/water\_quality\_assessment/2024-integrated-report.html)
- 6. Make use of the SAWPA Regional Monitoring Program Data Viewer (web page https://sarwqmdashboard.org/dashboard?year=2025)
- 7. Make use of the SAWPA GIS Tools (sawpa.gov/gis-tools/) for Live Surface Water Monitoring and Annual Reports (dashboard screenshots as per Indicator 1.5.3)
- 8. Obtain copies of the SAWPA River Basin Management Plan (monthly published water quality data per sample site, dashboard screenshots uploaded as per Indicator 1.5.3)
- 9. Become familiar with and make use of the Water Quality Control Plan for the Santa Ana River Beneficial Uses (document uploaded)
- 10. Engage with the SBVWCD concerning their Upper Santa Ana River Wash Habitat Conservation Plan Natural Resource Management Plan. This plan includes aquatic resources and threats to habitat function (document uploaded)
- 11. Engage with SBMWD to find out more about their WRP and RIX Treatment Plants and Environmental Control Regulations



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016841

Checklist Item No: 1.5.5

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Important Water-Related Areas shall be identified, and where

appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and

through stakeholder engagement.

Findings: -The site has identified and mapped various Important Water-Related

Areas (IWRAs) in the catchment using scientific information; however,

this was not done through stakeholder engagement.

-Some of these areas do not align with the definition of IWRAs, as they

are not water-related features. For example, disadvantaged

communities and other identified areas.



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Corrective action: Amended CAP:

1. The original audit document presented has been uploaded. The site prepared their response on the Standard's definition of an IWRA focusing on the following extracted sentences:

"The specific water-related areas of a catchment that, if impaired or lost, would adversely impact the environmental, social, cultural or economic benefits derived from the catchment....." "... include areas that are legally protected or under a conservation agreement....." ".....areas that are recognised as providing important ecosystem services.....". "The term 'water-related' includes not only water bodies, but encompasses areas or features that are linked to or dependent on water for their condition and protection. This includes wetlands, marshlands, riverbanks, riparian areas and floodplains". "The site should list all identified features along with their principal category, a short description, and why and to whom they are important".

- 2. The audit document covered these definitions under environmental, community, cultural and economic importance. It is noted that only some incorrect inclusions or misplaced categorisation in the audit document were highlighted and the finding based on these one or two only. It is understood that disadvantaged communities do not fall into this category and will be removed. From the existing audit document, source documentation used/available at the time without having the benefit of stakeholder engagement, CAP will investigate and comply with the Standard requirements.
- 3. As already included under IWRAs of Environmental Importance, the following will be re-investigated:
- Environmentally Protected Areas
- Areas of Critical Habitat
- Constructed Wetlands
- Artificial Recharge Basins and Desalters
- Artificial Groundwater Recharge Facilities
- Salt and Brine Management Facilities
- Flood Control Facilities
- Geological Fault Systems
- Ground Contaminant Plumes
- 4. IWRAs of Community Importance will need to be further investigated with the stakeholder engagement that will take place with the SBVWCD who is also responsible for the updating of the overall Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.
- 5. IWRAs of Cultural Importance will also need to be further investigated with the stakeholder engagement that will take place with the SBVWCD
- 6. IWRAs of Economic Importance will need to be re-investigated to include land use, agriculture and forestation, together with extended stakeholder engagement (SAWPA, SBVWCD, Roundtables, Working Groups, etc). Example document uploaded.
- 7. The initial uploaded CAP file for this indicator made reference to

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### Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

"Data and Evidence Required" and "Prevention Strategy" - additionally identified stakeholders and information will be assessed in the light of this indicator's requirements

7. The status assessment of each of these IWRAs will be carried out together with the stakeholders.

Finding No: TNR-016842

Checklist Item No: 1.5.6

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Existing and planned water-related infrastructure shall be identified,

including condition and potential exposure to extreme events.

Findings: -Current condition of the water related infrastructure is unclear.

-Planned water related infrastructure has not been identified.

Corrective action: 1. Once involved in the BTAC meetings it will be possible to obtain more

information on catchment information in this regard.

2. Once involved in the SBMWD Water Board meetings it will be possible to obtain more information on local municipality infrastructure.

#### Data and Evidence Required:

1. Data from the SBVMWD online dashboard (sbvmwd.maps.arcgis.com/apps/dashboards/) that includes real time delivery data and information/status on all current infrastructure projects.

2. Updated Chapter 3 of the Integrated Urban Water Management Plan concerning water infrastructure

3. List of existing and planned infrastructure projects from SARWPA (https://sawpa.gov/owow/owow-activities/)

4. Progress on SBMWD Facilities Master Plan

5. Appendix F of the Integrated Water Management Plan - Vulnerability to Catastrophic Interruption of Water Supply and Disaster Preparedness

6. SBMWD Water Shortage Contingency Plan

#### Responsible Person:

V Trinh

7. Recent Engineering Reports (eg. Engineering Investigation of the Bunker Hill Basin 2025, SMWD condition assessments of water and wastewater infrastructure)

#### Prevention Strategy:

- 1. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/) and keep records of agendas and minutes
- 2. Join the e-Notification mailing list for all BTAC announcements
- 3. Subscribe to the SBMWD Water Board Meeting Livestream service

#### WSAS

# WSAS WATER STEWARDSHIP ASSURANCE SERVICES

### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016845

Checklist Item No: 1.6.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Shared water challenges shall be identified and prioritized from the

information gathered.

Findings: -Shared water challenges have been identified through research;

however, they have not been identified through stakeholder

engagement. Additionally, although the documents provided by the site regarding the catchment indicate that flooding is a problem for the catchment, it has not been identified as a shared water challenge by the

site.

-The prioritization of these challenges is missing, along with the rationale

for their prioritization.

Corrective action: Amended CAP:

1. The site will only be able to obtain direction on defining shared water challenges once the stakeholder meeting with SBVWCD has taken place. In the meantime, in order to obtain history, more information and in-person background and information on shared water challenges:

2. The site will join the existing BTAC meetings as part of their open

invitation for public participation (document uploaded)

3. The site will join the SAWPA Basin Monitoring Program Task Force, Regional Water Quality Monitoring Task Force and Forest First (document uploaded)

- 4. The site will join the One Water One Watershed Steering Committee as a public observer (document uploaded)
- 5. The Upper Santa Ana River Watershed Integrated Regional Urban Management Plan is currently under draft publication and specifically includes a chapter on catchment water challenges and responses. The site was not part of the updating of the previous IRUMP where the challenges were identified, quantified and prioritised (similar to Chapters 6, 7 and 8 of the 2020 Plan). The stakeholder meeting with SBVWCD will provide the main guidance in conformance with this indicator 6. The site will also subscribe to all relevant stakeholder mailing lists
- 3. As part of the stakeholder engagement processes that were described under the responses to Indicator 1.2.1, a meeting will be scheduled with the SBVWCD, who is also responsible for the updating of the overall Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.
- 4. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016846

Checklist Item No: 1.6.2

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Initiatives to address shared water challenges shall be identified.

Findings: The identified initiatives do not incorporate stakeholder input. The site

should make an effort to engage with its stakeholders to understand their initiatives. Additionally, the site should indicate how it will contribute

to these initiatives.

Corrective action: Once the site has had an opportunity to engage with catchment

stakeholders and obtained the latest version of the Integrated Regional Urban Water Management Plan (Chapter 4), opportunities in which the

site can contribute will be identified.

#### Data and Evidence Required:

1. Basin Technical Advisory Committee 2025 Regional Water

Management Plan 2025

2. 2025 Santa Ana River Watershed Integrated Regional Urban Water

Management Plan

3. Minutes of attendance at BTAC meetings to listen to and contribute to

catchment related opportunities

#### Prevention Strategy:

1. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/) and keep records of agendas and minutes

2. Join the e-Notification mailing list for all BTAC announcements

3. Subscribe to the SBMWD Water Board Meeting Livestream service

#### Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017146

Checklist Item No: 1.7.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Water risks faced by the site shall be identified, and prioritized, including

likelihood and severity of impact within a given timeframe, potential

costs and business impact.

Findings: Water risks faced have been identified; however a given timeframe,

potential costs and business impact are unclear.

Corrective action: Update audit document ST-003-H026 and expand the Excel risk

management plan to include estimated time frames for risk duration, potential cost of remedying the risk and more clearly explaining business

impact. Business impact was included, but additional items were

discussed with the auditor

Data and Evidence Required:

Updated audit document and risk management plan

Prevention Strategy:

1. Ensure that water-related risks be included in monthly meeting

agenda for the Facilities Management meetings

2. Ensure that the portfolio of evidence forms part of the site's ISO 9001

and 14001 QMS

Responsible Person:

# WSAS WATER STEWARDSHIP ASSURANCE SERVICES

### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017100

Checklist Item No: 1.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Findings: Assessment and prioritization of potential savings, and business

opportunities of the water-related opportunities have not been identified.

Corrective action: The site will update its audit document ST-003-H027 to describe in more

detail each of the five identified site opportunities including how these opportunities will be assessed, in which order/priority the site views the addressing of the opportunities, and to better describe the business

opportunties (reputation, etc).

Once the site has had an opportunity to engage with catchment stakeholders and obtained the latest version of the Integrated Regional Urban Water Management Plan (Chapter 4), opportunities in which the site can contribute will be identified.

Data and Evidence Required:

1. Basin Technical Advisory Committee 2025 Regional Water Management Plan 2025

2. 2025 Santa Ana River Watershed Integrated Regional Urban Water Management Plan

3. Minutes of attendance at BTAC meetings to listen to and contribute to catchment related opportunities

#### Prevention Strategy:

- 1. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/) and keep records of agendas and minutes
- 2. Join the e-Notification mailing list for all BTAC announcements
- 3. Subscribe to the SBMWD Water Board Meeting Livestream service

#### Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Findings:

Finding No: TNR-016852

Checklist Item No: 2.1.1
Status: Closed
Finding level: Major

Due date: 2025-Aug-07

Checklist item: A signed and publicly disclosed site statement OR organizational

document shall be identified. The statement or document shall include

the following commitments:

- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water

stewardship outcomes

- That the site implementation will be aligned to and in support of

existing catchment sustainability plans

- That the site's stakeholders will be engaged in an open and

transparent way

- That the site will allocate resources to implement the Standard.

A signed and publicly disclosed site statement or organizational

document including all the AWS commitments has not been identified.

Corrective action: 1. Document text to be sourced from Audit Document ST-003-K003

Corrective Action Criteria 2 20250425

2. Signed and publicly available statement posted on SBCCD and SBVC

web page under a separate tab "Alliance for Water Stewardship"

Data and Evidence Required:

1. Signed statement by the President and Executive Director: Facilities

Planning, Construction, Sustainability and Local Outreach

2. Stand alone document to be included in SBCCD's web page under Facilities Planning, Construction, Sustainability and Local Outreach

Prevention Strategy:

Corrective Action already undertaken

Responsible Person:

F Farzaneh

Evidence of implementation: https://sbccd.edu/district-services/facilities-planning-construction/docum

ents/commitment-to-aws-2025-05.pdf



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-016847

Checklist Item No: 2.3.2
Status: Closed
Finding level: Major

Due date: 2025-Aug-07

Checklist item: A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the

achievement of best practice to help address shared water challenges

and the AWS outcomes.

Findings: -Baseline data for some goals has not been identified.

-IWRA targets are not specified.
-Water quality targets are unclear.

-Financial budgets for certain actions have not been allocated.

-Timeframes for actions are not clearly defined.

-Some targets are not SMART (Specific, Measurable, Achievable,

Relevant, Time-bound).

-Some on-site water governance initiatives have been implemented, but these actions are not set in the Water Stewardship Plan (refer to

comment in indicator 3.1.1).

-The link between each action and the achievement of best practices to address shared water challenges is not clearly established where

available.

Corrective action: 1. Updated Audit Document ST-003-N002 SBVC Water Stewardship

Plan 20240410

2. Updated Audit Document ST-003-H037

3. Ensure that baselines and targets are clearly stated, ensure that each activity has been clearly assigned budget, and that time frames for each

activity are realistic.

4. Change the format of the water stewardship plan when it comes to

targets/goals by aligning them to the SMART assessment

#### Data and Evidence Required:

- 1. Updated Water Stewardship Plan
- 2. Measurement and monitoring system

#### Prevention Strategy:

- 1. Ensure that the water stewardship plan is included in monthly meeting agenda for the Facilities Management meetings
- 2. Plan to be annually reviewed
- 3. Ensure that the portfolio of evidence forms part of the site's ISO 9001

and 14001 QMS

Responsible Person:

Y Patel

#### WSAS



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017147

Checklist Item No: 2.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: A plan to mitigate or adapt to identified water risks developed in

co-ordination with relevant public-sector and infrastructure agencies

shall be identified.

Findings: A plan to mitigate or adapt to identified water risks developed in

co-ordination with relevant public-sector and infrastructure agencies

have not been identified.

Corrective action: 1. Engage with SBMWD to share the site's plan and include information

from their plans to improve the site's plan

Data and Evidence Required:

1. Engagement with SBMWD

2. Updated Water Risk Mitigation Plan

3. Evidence of management system that allows record keeping and documentation of risk events, as well remedial actions (job cards, work

orders and incident closure notices

4. Clear communication plan that allows exchange of information

between the site and SBMWD

Prevention Strategy:

1. Ensure that the risk mitigation plan is included in monthly meeting agenda for the Facilities Management meetings

2. Plan to be annually reviewed

3. Ensure that the portfolio of evidence forms part of the site's ISO 9001

and 14001 QMS

Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017153

Checklist Item No: 3.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Evidence that the site has supported good catchment governance shall

be identified.

Findings: -Evidence that the site has supported good catchment governance (with

external stakeholders) has not been identified.

-Some on-site water governance initiatives have been implemented, but

these actions are not set in the Water Stewardship Plan (refer to

comment in indicator 2.3.2).

Corrective action: Amended CAP:

1. The Upper Santa Ana River Watershed Integrated Regional Urban Management Plan is currently under draft publication and specifically includes Chapter 1.3 on catchment Regional Governance and Stakeholder Involvement. The stakeholder meeting with SBVWCD will provide the site with more insight into the greater catchment governance

framework and operation, which can then be worked into the

requirements of this indicator

2. The site will join the existing BTAC meetings

3. The site will join the SAWPA Basin Monitoring Program Task Force, Regional Water Quality Monitoring Task Force and Forest First

4. The site will join the One Water One Watershed Steering Committee

as a public observer

5. The site's internal governance measures (updated in accordance with Indicator 1.5.1) will be defined in the updated water stewardship plan (Indicator 2.3.2) - it's management, monitoring and evaluation of water usage and quality, wastewater/effluent disposal and quality, water stewardship targets, resource and budget allocation as well as progress on its water stewardship journey will be assessed in the light of direction provided from external stakeholders, and improved to align itself for easy coordination and compatibility with larger catchment governance.

These measures will include the detailed activities requested.



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017098

Checklist Item No: 3.4.1
Status: Closed
Finding level: Major

Due date: 2025-Aug-06

Checklist item: Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

Findings: -Targets for water quality are unclear in the Water Stewardship Plan.

-No evidence of implementation has been provided.

Corrective action:

1. Records of on-site measures taken to comply with water discharge

quality (and/or water from boiler/chiller) and hazardous waste disposal

(including that from laboratories and cleaning) to be recorded.

2. Initiate water/wastewater/removed waste from site quality

management system - monthly quality reports for water recycling/re-use, records of waste product removed from site from existing contractor and changes to service provider contract to ensure compliance with relevant

standards and proof of disposal into receiving water bodies

#### Data and Evidence Required:

- 1. Targets (compliance) for water quality in terms of SBMWD's Rules and Regulations. This specifically refers to the removal or disposal of wastewater or process bywater for the wash bay and boilers, and from cleaning activities.
- 2. Monthly site records of water quality from all site sources
- 3. Event-based records from contracted parties for collection and disposal in compliance with their service contract

#### Prevention Strategy:

- 1. Contract terms and conditions to be amended to include record of volume, quanity, compliance and disposal
- 2. Site to keep records of all disposed materials from laboratories, cleaning and any boiler/chiller reuse
- 3. Annual review of compliance against this indicator to be recorded

#### Responsible Person:

Y Patel



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017154

Checklist Item No: 3.4.2
Status: Closed
Finding level: Major

Due date: 2025-Aug-06

Checklist item: Where water quality is a shared water challenge, continual improvement

to achieve best practice for the site's effluent shall be identified and

where applicable, quantified.

Findings: Although a plan is in place, the site has not yet implemented a

continuous improvement process to achieve best practices for its

effluent management.

Corrective action: 1. Understand the water quality requirements as legislated and

applicable to the site

2. Establish water quality monitoring and management system to keep records of compliance/breach of compliance, as well as mechanism of

physical quantification (water/wastewater indicators)

3. Engage with SBMWD Water Quality Control Department to get advice on how and what information/system could be implemented by the site

#### Data and Evidence Required:

1. SBMWD Rule & Regulation No. 26 - Wastewater Facility and Non-domestic Discharge Permits; Industrial Waste Pre-treatment Resolution No. 708 - Industrial User & Liquid Waste Hauler Fees; Wastewater discharge regulations Rule & Regulation No. 1

2. SBMWD reports for compliance with the State of California Title 22 tertiary standards and discharge standards as specified in the NPDES pormit for the PLY facility.

permit for the RIX facility

3. Site documentation of water/wastewater quality reports in alignment with SBMWD obligations

Prevention Strategy:

1. Establish monthly report exchange between site and SBMWD Water Quality Control Department

Responsible Person:

Y Patel



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017095

Checklist Item No: 3.5.1
Status: Closed
Finding level: Major

Due date: 2025-Aug-06

Checklist item: Practices set in the water stewardship plan to maintain and/or enhance

the site's Important Water-Related Areas shall be implemented.

Findings: -There are no targets set for IWRAs in the catchment in the Water

Stewardship Plan.

-No evidence of implementation has been provided.

Corrective action: 1. Once the required stakeholder meetings have been held with

SBVWCD and Upper Santa Ana River Sustainable Resource Alliance (uppersarhcp.com), appropriate targets shall be included in the water

stewardship plan.

2. Activities in which the site can contribute towards enhancing IWRAs

to be agreed with SBVWCD and USARSRA

#### Data and Evidence Required:

1. Record of engagements with SBVWCD and USARSRA

2. Agreed list of contributing activities

3. Progress reports on identified contributing activities

4. Data from the USARSRA dashboard (uppersarhcp.com/dashboard) - this includes species status, monitoring, threats and stressors

#### Prevention Strategy:

1. Join and participate in the Forest First Work Group

2. Subscribe to the newsletter from the Upper Santa Ana River

Sustainable Resource Alliance

3. Include activities in the annual updating of the water stewaqrdship

plan

Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017114

Checklist Item No: 3.8.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Evidence of engagement, and the key messages relayed with

confirmation of receipt, shall be identified.

Findings: A plan to engage with and notify the owners of any shared water-related

infrastructure about any concerns the site may have has not been implemented. Additionally, evidence of engagement, including the key messages relayed and confirmation of receipt, has not been identified.

Corrective action: 1. Standing concerns to be raised at BTAC, Round Table or Water

Board meetings by ensuring that they are agenda items 2. Immediate concerns to be communicated via written, email

correspondence or minuted agreement from a stakeholder engagement concerning any site concerns to be captured in document management

system

Data and Evidence Required:

1. Minutes of BTAC, Round Table or Water Board meetings

2. Documentation of correspondence exchange

Prevention Strategy:

1. Site to act on its water-related emergency response plans

Responsible Person:



#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

Finding No: TNR-017137

Checklist Item No: 3.9.1 Status: Closed Finding level: Major

Due date: 2025-Aug-06

Checklist item: Actions towards achieving best practice, related to water governance, as

applicable, shall be implemented.

Actions towards achieving best practice, related to water governance, Findings:

have been not implemented.

1. As part of the stakeholder engagement processes that were Corrective action:

> described under the responses to Indicator 1.2.1, a meeting will be scheduled with the SBVWCD, who is also responsible for the updating of the overall Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. This includes an update of Chapter 1.

2. Once the site has had an opportunity to engage with catchment stakeholders and obtained the latest version of the Integrated Regional Urban Water Management Plan (Chapter 1), opportunities in which the site can contribute towards catchment governance will be identified and

the site commence their contributions.

3. Join existing BTAC meetings and relevant SAWPA Round Tables/Task Forces (sawpa.gov/task-forces/) where governance issues are ostensibly discussed so that the site can agree actions where contributions to best practice can be made.

#### Data and Evidence Required:

- 1. Basin Technical Advisory Committee 2025 Regional Water Management Plan 2025
- 2. Minutes of attendance at BTAC meetings to listen to and contribute to catchment related challenges that may be identified
- 3. Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan 2025
- 4. Updated Audit Document ST-003-N002 SBVC Water Stewardship Plan 20240410

#### Prevention Strategy:

- 1. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)
- 2. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes. Join the e-Notification mailing list for all BTAC announcements
- 3. Subscribe to the One Water One Watershed 2.0 Plan stakeholder list (sawpa.gov/owow/owow-irwm-plans/owow-2-0-plan/)

#### Responsible Person:



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017133

Checklist Item No: 3.9.3
Status: Closed
Finding level: Major

Due date: 2025-Aug-07

Checklist item: Actions towards achieving best practice, related to targets in terms of

water quality shall be implemented.

Findings: Actions towards achieving best practice, related to targets in terms of

water quality have not been implemented.



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Corrective action:

- 1. As part of the stakeholder engagement processes that were described under the responses to Indicator 1.2.1, a meeting will be scheduled with the SAWPA Regional Water Quality Monitoring Task Force (who also form part of the BTAC meetings)
- 2. Once the site has had an opportunity to engage with RWQTF, opportunities in which the site can contribute towards water quality best practice will be identified and the site commence their contributions (which in all probability will be assistance with data collection at catchment level that could contribute to Wash Habitat Plan
- 3. Join existing BTAC meetings and relevant SAWPA Round Tables/Task Forces (sawpa.gov/task-forces/) where water quality issues are ostensibly discussed so that the site can agree actions where contributions to best practice can be made.
- 4. Ensure that records of on-site measures taken to comply with water discharge quality (and/or water from boiler/chiller) and hazardous waste disposal (including that from laboratories and cleaning) are recorded and shared with the relevant Round Table / Task Force

#### Data and Evidence Required:

- 1. Minutes of BTAC, Round Table or Water Board meetings
- 2. Documentation of correspondence exchange
- 3. Agreed list of contributing activities
- 4. Progress reports on identified contributing activities
- 5. Site compliance for water quality in terms of SBMWD's Rules and Regulations. This specifically refers to the removal or disposal of wastewater or process bywater for the wash bay and boilers, and from cleaning activities.
- 6. Monthly site records of water quality from all site sources and event-based records from contracted parties for collection and disposal in compliance with their service contract
- 7. Inclusion of activities in the annual review of the SBVWCD Habitat Wash Plan
- 8. SAWPA River Basin Management Plan (monthly published water quality data per sample site)
- 9. Updated Audit Document ST-003-N002 SBVC Water Stewardship Plan 20240410

#### Prevention Strategy:

- 1. Regular scheduled meetings with SAWPA Regional Water Quality Monitoring Task Force
- 2. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)
- 3. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes. Join the e-Notification mailing list for all BTAC announcements
- 4. Subscribe to the One Water One Watershed 2.0 Plan stakeholder list (sawpa.gov/owow/owow-irwm-plans/owow-2-0-plan/)
- 5. Subscribe to the SBMWD Water Board Meeting Livestream service

#### Responsible Person:

Y Patel



#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

Finding No: TNR-017145

Checklist Item No: 3.9.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Actions towards achieving best practice, related to targets in terms of Checklist item:

the site's maintenance of Important Water-Related Areas shall be

implemented.

Actions towards achieving best practice, related to targets in terms of Findings:

the Important Water-Related Areas have not been implemented.

1. Together with SBVWCD, a meeting with the Upper Santa Ana River Corrective action:

Sustainable Resource Alliance (who actively populate and maintain data on habitat conservation and restoration, species translocation and habitat management and monitoring) and the Forest First Program (a collaborative venture between the U.S. Forest Service and downstream stakeholders that focuses on developing methods to ensure that the forests and headwaters within the Santa Ana River Watershed are kept

as healthy as possible) - latest update

2. Once the site has had an opportunity to engage with SBVWCD, opportunities in which the site can contribute towards maintenance of IWRAs will be identified and the site commence their contributions (which in all probability will be assistance with data collection at catchment level that could contribute to Wash Habitat Plan)

3. Join existing BTAC meetings and relevant SAWPA Round Tables/Task Forces (sawpa.gov/task-forces/) where IWRA issues are

ostensibly discussed so that the site can agree actions where

contributions to best practice can be made.

#### Data and Evidence Required:

- 1. Minutes of SBVWCD, USARSRA and Forest First meetings
- 2. Documentation of correspondence exchange
- 3. Agreed list of contributing activities
- 4. Progress reports on identified contributing activities
- 5. Inclusion of activities in the annual review of the SBVWCD Habitat Wash Plan
- 6. Updated Audit Document ST-003-N002 SBVC Water Stewardship Plan 20240410

#### Prevention Strategy:

- 1. Regular scheduled meetings with USARSRA and Forest First
- 2. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)
- 3. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes. Join the e-Notification mailing list for all BTAC announcements
- 4. Subscribe to the One Water One Watershed 2.0 Plan stakeholder list (sawpa.gov/owow/owow-irwm-plans/owow-2-0-plan/)

#### Responsible Person:

Y Patel

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

Finding No: TNR-017151

Checklist Item No: 3.9.5

In Progress - CA plan approved Status:

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Actions towards achieving best practice related to targets in terms of

WASH shall be implemented.

Actions towards achieving best practice related to targets in terms of Findings:

WASH have not been implemented.

1. As part of the stakeholder engagement processes that were Corrective action:

> described under the responses to Indicator 1.2.1, a meeting will be scheduled with the SBVWCD, who is also responsible for the updating of the overall Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. This includes an update of Chapters 4

This same meeting will allow an opportunity for the site to join the Wash Plan Task Force and Wash Plan Implementation Team as part of the

Upper Santa Ana River Wash Habitat Conservation Plan

2. Once the site has had an opportunity to engage with SBVWCD. opportunities in which the site can contribute towards improving WASH

will be identified and the site commence their contributions

3. Where relevant, join existing SAWPA Round Tables/Task Forces (sawpa.gov/task-forces/) where WASH issues are ostensibly discussed so that the site can agree actions where contributions to best practice can be made.

#### Data and Evidence Required:

- 1. Minutes of SBVWCD Wash Plan Task Force and Implementation Team meetings
- 2. Documentation of correspondence exchange
- 3. Agreed list of contributing activities
- 4. Progress reports on identified contributing activities
- 5. Inclusion of activities in the annual review of the SBVWCD Habitat Wash Plan
- 6. Updated Audit Document ST-003-N002 SBVC Water Stewardship Plan 20240410

#### Prevention Strategy:

- 1. Regular scheduled meetings with SBVWCD and the Wash Task Force and Implementation Team
- 2. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)
- 3. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes. Join the e-Notification mailing list for all BTAC announcements
- 4. Subscribe to the One Water One Watershed 2.0 Plan stakeholder list (sawpa.gov/owow/owow-irwm-plans/owow-2-0-plan/)

#### Responsible Person:

Y Patel

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017107

Checklist Item No: 4.1.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Value creation resulting from the water stewardship plan shall be

evaluated.

Findings: Value creation resulting from the water stewardship plan has not been

evaluated.

Corrective action: 1. The site will review it's commitments after completing the corrective

actions from Criteria 3.9 and implementing the various aspects of contributing towards best practices for governance, water quality,

IWRAs and WASH.

2. Other means of value creation, such as public reputation and sharing the AWS Standard water stewardship principles with the Chamber of Commerce as well as within relevant prospectus modules will also be

included and evaluated

#### Data and Evidence Required:

- 1. Possible photo opportunities or acknowledgement in monthly newsletters
- 2. Stakeholder consensus on site activities and the value created through identified contributing activities to be documented/recorded, throughRound Table and Working Group meetings
- 3. Recognition of activities in the annual review of the SBVWCD Habitat Wash Plan and BTAC River Basin Plan.
- 4. Record of any activities planned by the site's Community Outreach program, as well as report on activities and means of value creation 5. Proof of joining the Santa Ana Watershed Ambassador Program

(www.legacy.civicwell.org/sawpa/)

#### Prevention Strategy:

- 1. Ensure that the value created by implementing water stewardship plan is included in the Facilities Management Division Annual Report as well as in the SBCCD Annual Report
- 2. Inclusion of this item in the standing Facilities Management monthly management meetings

Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017119

Checklist Item No: 4.1.3
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The shared value benefits in the catchment shall be identified and where

applicable, quantified.

Findings: The shared value benefits in the catchment have not been identified

and/or quantified.

Corrective action: 1. The site will review it's commitments after completing the corrective

actions from Criteria 3.9 and implementing the various aspects of contributing towards best practices for governance, water quality,

IWRAs and WASH.

#### Data and Evidence Required:

1. Possible photo opportunities or acknowledgement in monthly newsletters from SBVWCD, Forest First and the Watershed Ambassador newletters

2. Stakeholder consensus on site activities and the value created through identified contributing activities to be documented/recorded, throughRound Table and Working Group meetings

3. Recognition of activities in the annual review of the SBVWCD Habitat Wash Plan and BTAC River Basin Plan.

4. Notices and announcements on the site's web page as well as write-ups in the "Latest News" section

5. Mention of the site's contribution in SBCCD's Annual Report

#### Prevention Strategy:

- 1. Create a quarterly or annual report under the site's new web page layout (there is a new section related to the Alliance for Water Stewardship)
- 2. Inclusion of this item in the standing Facilities Management monthly management meetings

#### Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017096

Checklist Item No: 4.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: A written annual review and (where appropriate) root-cause analysis of

the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future

incidents shall be identified.

Findings: A written annual review and (where appropriate) root-cause analysis of

the year's emergency incident(s) has not been prepared and the site's response to the incident(s) has not be evaluated and proposed preventative and corrective actions and mitigations against future

incidents have not been identified.

Corrective action:

1. In accordance with ISO 9001 requirements, a system shall be put in

place that logs every on-site water-related event (such as leaks and leak repairs, sewage events, flooding events, etc), including "fault close-out".

2. The site's water-related response plan shall use a version control system after each event where lessons learned or improvements related

to the response to events, can be included to improve the plan.

3. An annual review of water-related incidents shall be produced as part of annual reporting from the Facilities Management Department and will

form part of the ISO 14001 reporting system.

#### Data and Evidence Required:

- 1. Job cards for remedial works undertaken in response to emergency incidents, as well as digital/photographic evidence of work completed
- 2. Log sheet of all incidents that occur on an annual basis, logged by classification of incident
- 3. Updated Site Water-Related Emergency Response Plan (Audit document ST-003-H006)
- 4. Annual Review Report that includes root cause analysis, response, quantification of events as well as lessons learned and subsequently implemented mitigating measures. This will be split into different categories related to water, wastewater, effluent, pollution and flood related events.

#### Prevention Strategy:

1. Annual update of existing site Water-Related Emergency Response Plan, in line with ISO 14001, and signed by a senior representatiave

Responsible Person:

A Favela



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017132

Checklist Item No: 4.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Consultation efforts with stakeholders on the site's water stewardship

performance shall be identified.

Findings: Consultation efforts with stakeholders on the site's water stewardship

performance have not been identified.

Corrective action:

1. Request that the site's water stewardship performance be included in

relevant BTAC Round Tables, Task Force and Work Groups agenda on

an annual basis.

2. This would extend to the Sustainability Alliance as well

Data and Evidence Required:

1. Meeting agendas

2. Meeting minutes

3. Record of communications

Prevention Strategy:

1. Ensure that the site's stewardship performance is included as an

agenda item on the various forum year-end meetings

Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017124

Checklist Item No: 4.4.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The site's water stewardship plan shall be modified and adapted to

incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.

Findings: It is unclear how the site's water stewardship plan will be modified and

adapted to incorporate any relevant information and lessons learned from the evaluations in this step and how these changes will be

identified.

Corrective action:

1. In accordance with ISO 9001 requirements, the site water

stewardship plan will at least be reviewed and updated on an annual

basis

2. The site's water stewardship plan shall use a version control system after each update/amendment where lessons learned or improvements related to the any developments, can be included to improve the plan.

3. The annual water stewardship plan will become a performance management and performance indicator for the Facilities Management Department annual review, and signed by the Executive Director

**Facilities Management** 

4. Annual Water Stewardship shall be published on the Facilities

Management web page

#### Data and Evidence Required:

1. An approved and signed updated Site Water Stewardship Plan (Audit document ST-003-H037) with version control

#### Prevention Strategy:

1. The annual water stewardship plan will become a performance management and performance indicator for the Facilities Management Department annual review

#### Responsible Person:



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017099

Checklist Item No: 5.1.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The site's water-related internal governance, including positions of those

accountable for compliance with water-related laws and regulations shall

be disclosed.

Findings: The site's water-related internal governance, including positions of those

accountable for compliance with water-related laws and regulations

have not been disclosed.

Corrective action: 1. The audit document ST-003-H084 has been approved and will form

part of the audit review

Data and Evidence Required:

1. Approved audit document ST-003-H084

Prevention Strategy:

1. Updating of audit document ST-003-H084 under version control when

staff changes occur, or when new legislative and/or regulatory

changes/introducyions are made.

2. Should the site governance framework be amended for any reaosn,

then audit document ST-003-H084 must be updated accordingly.

3. The document must be filed and accessible in accordance with the

site's ISO 9001 and 14001 requirements

Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017136

Checklist Item No: 5.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to

relevant stakeholders.

Findings: While some water stewardship goals have been publicly included in the

sustainability plan, the plan has not yet been communicated to relevant stakeholders. Additionally, the disclosure does not specify how the water

stewardship plan contributes to AWS Standard outcomes.

Corrective action: 1. Request that the site's water stewardship plan be included in relevant

BTAC Round Tables, Task Force and Work Groups agenda on an

annual basis.

2. An electronic copy of the site's water stewardship plan to be sent to relevant stakeholders, and acknowledgement of receipt requested

Data and Evidence Required:

1. Meeting agendas

2. Meeting minutes

3. Record of communications

Prevention Strategy:

1. Ensure that the site's stewardship performance is included as an

agenda item on the various forum year-end meetings

2. Prepare a group mailing list for communication of the site's water

stewardship plan

Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017127

Checklist Item No: 5.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: A summary of the site's water stewardship performance, including

quantified performance against targets, shall be disclosed annually at a

minimum.

Findings: A summary of the site's water stewardship performance, including

quantified performance against targets, have not been yet disclosed.

Corrective action: 1. The summary of the site's water stewardship performance to be

included in the SBCCD Annual Report under their Sustainability

achievements

2. The summary of the site's water stewardship performance to be

published on the site's Facilities Management web page

Data and Evidence Required:

1. Copy of SBCCD Annual Report

2. Proof of published summary on Facilities Management web page

Prevention Strategy:

1. Summary report to be included in the SBCCD annual report as a

standing item

Responsible Person:

Y Patel



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017113

Checklist Item No: 5.4.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: The site's shared water-related challenges and efforts made to address

these challenges shall be disclosed.

Findings: The site's shared water-related challenges and efforts made to address

these challenges have not been disclosed.

Corrective action:

1. The summary of the site's water stewardship performance and efforts

made to address shared water-related challenges to be included in the SBCCD Annual Report under their Sustainability achievements

2. The summary of the site's water stewardship performance including identified shared water-related challenges efforts to be published on the

site's Facilities Management web page

3. Site efforts can be shared with Round Tables, Work Groups and Task

Forces

#### Data and Evidence Required:

1. Possible photo opportunities or acknowledgement in monthly newsletters from SBVWCD, Forest First and the Watershed Ambassador newletters

- 2. Recognition of activities in the annual review of the SBVWCD Habitat Wash Plan and BTAC River Basin Plan.
- 3. Notices and announcements on the site's web page as well as write-ups in the "Latest News" section
- 4. Mention of the site's contribution in SBCCD's Annual Report

#### Prevention Strategy:

1. Efforts, completed activities and success stories to be included in the SBCCD annual report "year in review" as a standing item

#### Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017110

Checklist Item No: 5.4.2
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Efforts made by the site to engage stakeholders and coordinate and

support public-sector agencies shall be identified.

Findings: Efforts made by the site to engage stakeholders and coordinate and

support public-sector agencies have not been identified.

Corrective action: 1. Site to join the Wash Plan Task Force and Wash Plan

Implementation Team as part of the Upper Santa Ana River Wash

Habitat Conservation Plan

2. Where relevant, join existing SAWPA Round Tables/Task Forces

(sawpa.gov/task-forces/)

Data and Evidence Required:

1. Minutes of SBVWCD, USARSRA and Forest First meetings

2. Documentation of correspondence exchange

Prevention Strategy:

1. Ensure that the site is included in all relevant catchment meetings distribution list for both agendas and minutes eg. Subscribe to SAWPA calendar for notices of meetings (https://sawpa.gov/sawpa-calendar/)

and keep records of agendas and minutes

2. Join the e-Notification mailing list for all BTAC announcements

3. Subscribe to the SBMWD Water Board Meeting Livestream service

4. Ensure that the portfolio of evidence forms part of the site's ISO 9001

and 14001 QMS

Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017125

Checklist Item No: 5.5.1
Status: Closed
Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Any site water-related compliance violations and associated corrections

shall be disclosed.

Findings: It is unclear whether there were any water-related violations in 2024.

Corrective action: 1. Audit documents for indicator 1.5.2 (audit document ST-003-H018,

2.2.1 (ST-003-H035) and 3.2.1 (audit document ST-003-H052), as well as the annual review of water-related incidents  $\,$  under indicator 4.2.1  $\,$ 

shall be merged into one report.

2. This report will be produced as part of annual reporting from the Facilities Management Department and will form part of the ISO 14001

reporting system.

### Data and Evidence Required:

1. Summary details of water-related compliance violations included in

Facilities Management Department Annual Report.

2. Detailed log of all individual violations to be kept in register along with

corrective action plan

#### Prevention Strategy:

1. Ensure that this requirement is made part of the ISO 9001 QMS

#### Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017134

Checklist Item No: 5.5.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Necessary corrective actions taken by the site to prevent future

occurrences shall be disclosed if applicable.

Findings: It is unclear whether there were any water-related violations in 2024.

Corrective action: 1. Audit documents for indicator 1.5.2 (audit document ST-003-H018,

2.2.1 (ST-003-H035) and 3.2.1 (audit document ST-003-H052), as well as the annual review of water-related incidents under indicator 4.2.1

shall be merged into one report.

2. This report will be produced as part of annual reporting from the Facilities Management Department and will form part of the ISO 14001

reporting system.

Data and Evidence Required:

1. Summary details of water-related compliance violations included in

Facilities Management Department Annual Report.

2. Detailed log of all individual violations to be kept in register along with

corrective action plan

Prevention Strategy:

1. Ensure that this requirement is made part of the ISO 9001 QMS

Responsible Person:



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Finding No: TNR-017103

Checklist Item No: 5.5.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2026-Feb-25

Checklist item: Any site water-related violation that may pose significant risk and threat

to human or ecosystem health shall be immediately communicated to

relevant public agencies and disclosed.

Findings: It is unclear whether there were any water-related violations in 2024.

Corrective action: 1. The existing plans to be updated annually or on an event-based

violation to allow for inclusion of summary details of serious water-related incidents relating to environmental or public health

2. Detailed log of all individual violations to be kept in register along with

corrective action plan.

3. Summary to be included in Facilities Management Department

Annual Report.

#### Data and Evidence Required:

1. Summary details of water-related compliance violations included in

Facilities Management Department Annual Report.

2. Detailed log of all individual violations to be kept in register along with

corrective action plan

3. Record of correspondence with SBMWD and EPA where necessary

#### Prevention Strategy:

1. Ensure that this requirement is made part of the ISO 9001 QMS

#### Responsible Person:



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

R	ер	ort	Det	ails

Report	Value
Report prepared by	Monserrath Zamora
Report approved by	Ozge Gokmen
Report approved on (Date)	08/05/2025

#### Surveillance

#### Proposed date for next audit

2026-Apr-07

Comment

#### **Stakeholder Announcements**

Date of publication 16/12/2024		https://a4ws.org/wp-content/uploads/2 024/12/AWS-000775_SBVC_Stakeho IderAnnouncement_February2025_V 3.0-1.pdf	
Comment	The stakeholder announcement was published of San Bernardino Community College District.	on the following websites: WSAS, AWS and	

#### Stakeholder interviews

Name	Organisation/Role/Relationship
Miguel Guerrero	San Bernardino Municipal Water
	Department/ General Manager

### **Main Outcome of Stakeholder Interviews**

Interview Date: April 9th, 2025 (one stakeholders was interviewed).

Stakeholder interviews are confidential.



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### **Catchment Information**

#### **Catchment Information**

The site sits in the Santa Ana River watershed in California. It is one of the most densely populated areas in the state, and continues to experience growth and urbanization, increasing demands on water supply, water quality, and flood management. Flooding is a common issue within the watershed.

Factors such as climate change, population growth, aging infrastructure, and heightened awareness of environmental degradation influence future water management strategies.

The watershed has faced significant impacts from past droughts, resulting in reduced water availability and increased pressure on water resources, classifying it as a water-stressed catchment.

Regarding inter-basin transfers, the Santa Ana River Watershed receives some of its water from the State Water Project and the Colorado River.

#### **Client Description and Site Details**

#### Client/Site Background

The site is located in the City of San Bernadino, California (coordinates: 34.087500 -117.310800) in the Santa Ana watershed.

The site is a tertiary education facility that offers a variety of degrees, certificates, and skill-building courses. The site includes buildings and sports facilities.

Water is utilized for student and staff consumption, irrigation, and the distribution of hot and chilled water from a central plant. The College receives its water from the San Bernardino Municipal Water Department (SBMWD).

There are no water or wastewater treatment facilities on site. The wastewater is discharged into SBMWD's sewer network for treatment, which ultimately discharges into the Santa Ana River after treatment (Santa Ana River catchment). Stormwater runoff is discharged into the city's stormwater network.

Comment

### **Summary of Shared Water Challenges**

#### **Summary of Shared Water Challenges**

The following shared water challenges were identified:

- -Diversify Supply Portfolio: reliability issues due to vulnerabilities such as: periods of statewide drought, imported water cost increases and others.
- -Improved Groundwater Management: reduce the risk of liquefaction and others.
- -Protection of Water Quality: primary groundwater quality concerns in the region, including TDS, nitrogen, PCE, TCE, perchlorate, and contaminants of emerging concern (CECs), such as per- and polyfluoroalkyl substances (PFAS).
- -Disaster Preparedness: the region is in a seismically active area.
- -Climate Change Resilience: increased temperatures would result in increased water demand for landscape irrigation.

WSAS



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	Eligibility Criteria	
0.1.2		
0.1.2.1	Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.	<b>⊘</b> Yes
Comment	The discharge point of the mechanics area was visited during the on-site audit.	
0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	<b>⊘</b> Yes
Comment	The site sits in the Santa Ana River watershed.	
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	<b>⊘</b> Yes
Comment	The scope of the proposed certification is under the control of a single management syste	m.
0.1.1.3	The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	<b>⊘</b> Yes
Comment	The scope of the proposed certification is homogeneous with respect to the primary production system, water management, product range and the main market structures.	



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### STEP 1: GATHER AND UNDERSTAND

1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.

**1.1.1** The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:



- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization:
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source:
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Comment

The site has identified and mapped its physical scope, including:

-Map with site boundaries, including water-related infrastructure and piping network: the site has mapped the following water-related infrastructure: water inflow and outflow points, stormwater outfalls, catch basin for special waters (auto department), water meters, pumping house, cooling tower, boiler, the domestic water, sewer, chilled and heating water distribution systems, and the stormwater and irrigation systems. The site sits on an earthquake fault, clearly mapped with red lines. There is no water storage on site.

Map of the Catchment:

- -Site: the site is situated in the Santa Ana River Watershed.
- -Sources: the water service provider is the San Bernardino Municipal Water Department (SBMWD), which sources water from the Bunker Hill Basin aquifer, concentrated at the northwestern end of the city and replenished with rain and snowmelt from the San Bernardino Mountains. Additionally, the SBMWD imports water from the State Water Project and the Colorado River Aqueduct and distributes it in local basins to recharge the groundwater. Water is sourced from 51 deep wells relying solely on groundwater from the Bunker Hill Basin.

The California State Water Project primarily draws water from the Feather River watershed, and the Colorado River Aqueduct is part of the Colorado River Basin.

- -Discharge: the wastewater is discharged into SBMWD's sewer network for treatment, which ultimately discharges into the Santa Ana River after treatment (Santa Ana River catchment). Stormwater runoff is discharged into the city's stormwater network.
- -The "special water" from the auto department is treated by a certified HAZMAT contractor, who ensures proper handling, transport, and disposal of this non-domestic wastewater in compliance with environmental regulations. Disposal of materials occurs at SBMWD's Water Reclamation Plant (WRP), which discharges back into the Santa Ana River.
- -The San Bernardino Water Reclamation Plant (SBWRP) and the Colton/San Bernardino Rapid Infiltration and Extraction Tertiary Treatment Facility (RIX) have been mapped.
- -The receiving and ultimate receiving water bodies have been mapped: Santa Ana River and the Pacific Ocean.

#### WSAS



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

- 1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.
- **1.2.1** Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:



- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

Comment

A stakeholder mapping exercise was conducted during an internal workshop, identifying stakeholders as either 'internal' or 'external'. The site has identified 15 distinct external stakeholders, encompassing the public sector, water supplier, a tribal group, and others.

Some water-related challenges have been identified through research; however, consultations with catchment stakeholders have not yet occurred. Consequently, the stakeholder engagement process remains incomplete.

The emails presented serve as evidence of an intent to engage and pertain only to three stakeholders. Letters of engagement were sent on November, 2024, with the primary objective of informing stakeholders about San Bernardino Valley College activities, rather than identifying their water challenges.

The site has identified the degree of stakeholder engagement using a matrix based on their level of interest and influence.

Finding No: TNR-016762

**1.2.2** Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.



Comment

The current and potential degree of influence between site and the stakeholders has been identified, it includes the following methods of influence:

- -Key Players for Driving Change
- -Collective Engagement
- -Raise Awareness
- -Monitor
- 1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.
- **1.3.1** Existing water-related incident response plans shall be identified.



Yes



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### Comment

The site has identified the following water-related incident response plans:

-Emergency Operations Plan (January, 2024): the plan outlines the site's emergency planning, organization, and response policies and procedures. It helps the site to prepare for and recover from any emergency; including: earthquakes, wildfires, floods, drought, dam inundation, storms and climate change.

-Water-Related Emergency Operations Plan (January, 2024): provide a structured response protocol for water-related emergencies including broken water lines, sewer overflows, flooding, and supply interruptions.

-Chemical Hygiene Plan (Revised: December 2023): this plan contains emergency telephone numbers and spill response contacts for the college.

**1.3.2** Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped



Comment

The site has identified and mapped its inflows, losses, and outflows in a schematic diagram, detailing the flow of water throughout the facility.

There is no storage on-site.

1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high



Comment

A graph showing the total annual inflow from 2020 to 2024 has been identified and year-on-year variance for each of the outflows has been quantified.

The site has quantified its water balance for 2024.

and low variances shall be quantified.

The water use breakdown on site (fire service, irrigation, water/sewer and water) was provided. As irrigation forms the bulk of water use at the site, the relationship between irrigation use and total site use was presented.

The site's total water usage is decreasing overall. The variance from 2023 to 2024 is due to higher student enrollment. Domestic wastewater variance is driven by enrollment, while irrigation water retention, stormwater runoff, and evapotranspiration are influenced by rainfall and temperature, making annual variance not a concern.

1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where

appropriate, seasonal, high and low variances shall be quantified.





## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### Comment

-Water quality of the water sources (groundwater) and the provided waters was quantified including physical, microbiological and chemical parameters. The "2023 Consumer Confidence Report" (reporting period from January to December 2023)" from the City of San Bernardino Municipal Water Department was provided and no violations were identified. Additionally, the site has provided evidence from previous year's reports, demonstrating that no violations have occurred. Therefore, the water quality of the sources is not a challenge.

- -The wastewater is discharged into SBMWD's sewer network for treatment, which ultimately discharges into the Santa Ana River after treatment (Santa Ana River catchment). Stormwater runoff is discharged into the city's stormwater network. The site is not required to have a discharge permit. This was confirmed during the stakeholder interviews with the City of San Bernardino Municipal Water Department.
- -The site does not conduct on-site water quality monitoring.
- -The "special water" from the auto department is treated by a certified HAZMAT contractor, who ensures proper handling, transport, and disposal of this non-domestic wastewater in compliance with environmental regulations. Disposal of materials occurs at SBMWD's Water Reclamation Plant (WRP), which discharges back into the Santa Ana River.
- -Data regarding the water quality of the site's effluent has not been quantified.
- -Some water quality data for the receiving water body (Santa Ana River) has been identified in indicator 1.5.4; however, this information is outdated and does not reflect the current condition of the river.

Finding No: TNR-016768

1.3.5 Potential sources of pollution shall be identified and if applicable,

mapped, including chemicals used or stored on site.

Yes

Comment The site has identified and mapped the following potential sources of pollution: the boiler

house/chiller room, the workshops, and the waste storage areas.

A list of the chemicals and their storage locations has been identified.

1.3.6 On-site Important Water-Related Areas shall be identified and mapped,

including a description of their status including Indigenous cultural values.



Comment No IWRAS were identified on site.

**1.3.7** Annual water-related costs, revenues, and a description or

quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to



inform the evaluation of the plan in 4.1.2.

Comment The site has identified and quantified annual water-related costs, including water supply,

water projects (e.g., the landscaping project), wastewater, maintenance, grounds (irrigation),

and supplies.

A description or quantification of the social, cultural, environmental, or economic water-related value generated have been identified.

Levels of access and adequacy of WASH at the site shall be identified.



The level of access and adequacy of WASH facilities has been identified and quantified, including toilets, hand wash stations, showers, and urinals.

The site complies with all local and state building, plumbing, and sewer codes.

The access of WASH facilities was verified during the site visit by the auditor.

#### WSAS

1.3.8

Comment



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.

**1.4.1** The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.

**⊘** Yes

Comment The site has identified its primary inputs. It indicates that the primary inputs supporting the delivery of education constitute less than 5% of the site's costs and are sourced entirely from commodity markets. Supporting evidence for this statement has been provided.

**1.4.2** The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.

Yes

Comment There are no on-site service providers that utilize embedded water.

1.4.3 Advanced Indicator

The embedded water use of primary inputs in catchment(s) of origin shall be quantified.

Yes

Comment The primary inputs supporting the delivery of education constitute less than 5% of the site's

costs and are sourced entirely from commodity markets. Supporting evidence for this

statement has been provided.

**1.5** Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related

Areas, infrastructure, and WASH

1.5.1 Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.

Yes

Comment The site has identified various water governance initiatives, some of them are:

-Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan

-State Water Quality Control Plan for Santa Ana River Basin

-Santa Ana Water Project Authority - Climate & Water Supply in the Santa Ana River

Watershed

-San Bernardino Valley Regional Water Agency - Annual Change in Groundwater Storage for

the San Bernardino, Rialto-Colton & Yucaipa Basins

-City of San Bernardino Municipal Water Department - Strategic Plan

**1.5.2** Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified

Yes

customary water rights.

The site provided a list of water related legal/regulatory requirements, some examples are:

-California Safe Drinking Water Laws

-California Code of Regulations (CCR): WASH regulation: the specific WASH requirements

for the site have been provided.

-California Sustainable Groundwater Management Act

1.5.3 The catchment water-balance, and where applicable, scarcity, shall be

quantified, including indication of annual, and where appropriate,

seasonal, variance.

in progress

Comment



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### Comment

The site has identified data regarding water demands, groundwater storage, imported water, recycled water, storage, and surface water for various areas within the catchment, but not for the catchment as a whole. While this information could be used to create a water balance equation, it does not constitute a comprehensive water balance quantification.

The site has utilized the Aqueduct Tool from the World Resources Institute to identify that water depletion is an extremely high concern in the Santa Ana watershed. Water stress has also been identified as a significant issue. Additionally, seasonal and interannual variability has been quantified. It is noted that the groundwater table is not a concern.

Finding No: TNR-016839

#### 1.5.4

Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.



Comment

The site has identified the following information regarding water quality in the catchment; however, this information is outdated and does not reflect the current water quality of the catchment:

- -Water quality impairments for different water bodies, including the Santa Ana River (surface water)
- -Water quality of the imported water from the Colorado River Aqueduct.
- -Water quality for the groundwater.

The current water quality challenges in the catchment are unclear. However, based on the information provided for indicator 1.6.1, the site has identified primary groundwater quality concerns in the region, including TDS, nitrogen, PCE, TCE, perchlorate, and contaminants of emerging concern (CECs), such as per- and polyfluoroalkyl substances (PFAS). No updated evidence was provided to confirm this information, nor were any variances identified.

An indication of annual, and where appropriate, seasonal high and low variances has not been identified.

Finding No: TNR-016840

#### 1.5.5

Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.



Comment

The site has identified and mapped various Important Water-Related Areas (IWRAs) within its catchment. Examples include:

- -The Santa Ana River (SAR) Corridor
- -Constructed wetlands
- -Recharge zones

The status of these areas has been assessed, including any threats to human populations or the natural environment.

However, this identification and assessment of IWRAs was conducted solely through research and did not involve stakeholder engagement.

Additionally, some of these areas do not align with the definition of IWRAs, as they are not water-related features. For example, disadvantaged communities and other identified areas.

Finding No: TNR-016841

**1.5.6** Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.



in progress



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Comment Existing water-related infrastructure has been identified, for example:

- -Regional infrastructure for water and wastewater
- -Recycled water infrastructure
- -Dams
- -Piping network
- -Flood control infrastructure

Potential exposure to extreme events, such as droughts, wildfires and earthquakes, has been identified.

The current condition of the water related infrastructure is unclear.

Any planned water related infrastructure has not been identified.

Finding No: TNR-016842

1.5.7 The adequacy of available WASH services within the catchment shall be identified

Yes

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The adequacy of available WASH services within the catchment has been identified. The site utilized the Aqueduct Tool to determine that the levels of unimproved or no access to drinking water, sanitation, and untreated/connected wastewater are low.

Additionally, the stakeholder interview confirmed that the community enjoys full access to clean water and sewer services, although some remote areas rely on septic systems.

1.5.8 Advanced Indicator

Comment

Efforts by the site to support and undertake catchment level water-related data collection shall be identified.

Yes

Comment The Advanced Indicators have been removed from the audit scope.

1.5.9 Advanced Indicator

The adequacy of WASH provision within the catchments of origin of

primary inputs shall be identified.

Yes

Comment The Advanced Indicators have been removed from the audit scope.

1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders

with the site's water challenges.

1.6.1 Shared water challenges shall be identified and prioritized from the

information gathered.

in progress

Comment The following shared water challenges have been identified:

- -Diversify Supply Portfolio: reliability issues due to vulnerabilities such as: periods of statewide drought, imported water cost increases and others.
- -Improved Groundwater Management: reduce the risk of liquefaction and others.
- -Protection of Water Quality: primary groundwater quality concerns in the region, including TDS, nitrogen, PCE, TCE, perchlorate, and contaminants of emerging concern (CECs), such as per- and polyfluoroalkyl substances (PFAS).
- -Disaster Preparedness: the region is in a seismically active area.
- -Climate Change Resilience: increased temperatures would result in increased water demand for landscape irrigation.

The shared water challenges have been identified through research; however, they have not been identified through stakeholder engagement.

The prioritization of these challenges is missing, along with the rationale for their prioritization.

Finding No: TNR-016845

#### WSAS



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

<b>1.6.2</b> Initiatives to address shared water challenges shall be idea	ntified.
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#### Comment

Initiatives to address the shared water challenges have been identified, some examples include:

- -Improve water supply reliability: increase stormwater capture and recycled water use.
- -Balance flood management and increase stormwater recharge: identify urban stormwater capture projects to increase recharge and improve surface water quality.
- -Improve water quality: proactively address new constituents of concern as MCLs are developed.
- -Address climate change through adaptation and mitigation: complete the SBVMWD Climate Adaptation and Resilience Plan (CARP).

The identified initiatives do not incorporate stakeholder input. The site should make an effort to engage with its stakeholders to understand their initiatives. Additionally, the site should indicate how it will contribute to these initiatives.

#### 1.6.3 Advanced Indicator

Future water issues shall be identified, including anticipated impacts

Yes

and trends

The Advanced Indicators have been removed from the audit scope.

#### 1.6.4 Advanced Indicator

Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.



Comment The Advanced Indicators have been removed from the audit scope.

#### 1.7 Understand the site's water risks and opportunities: Assess and

prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues

and future risk trends identified in 1.6.

#### 1.7.1 Water risks faced by the site shall be identified, and prioritized, including

likelihood and severity of impact within a given timeframe, potential costs and business impact.

No

Comment

Comment

Water risks have been identified and prioritized based on their likelihood and severity of impact. These risks have been classified into regulatory, reputational, financial, environmental, and physical categories.

However, a specific timeframe, potential costs, and business impacts have not been identified.

Finding No: TNR-017146

#### 1.7.2 Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and business opportunities

in progress

business opportunities.

Comment Water-related opportunities have been identified, some examples are:

- -More water-efficient irrigation techniques
- -Rainwater harvesting

Assessment and prioritization of potential savings, and business opportunities of the water-related opportunities have not been identified.

Finding No: TNR-017100

## 1.8 Understand best practice towards achieving AWS outcomes:

Determining sectoral best practices having a local/catchment, regional,

or national relevance.

#### WSAS



## Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

**1.8.1** Relevant catchment best practice for water governance shall be identified.



Comment Relevant best practices for water governance have been identified, some examples are:

-Water resources optimization: improve operational efficiency and transfers.

-Stakeholder workshops: the watershed community at large is involved through the 10 Pillar workgroups.

-Stormwater resource and risk management: improve flood management.

**1.8.2** Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.



Comment The site identified relevant sector/catchment best practices for water balance, for example:

-Natural Water Retention Measures (NWRM): wetland restoration to enhance natural water storage and reforestation to restore forests, increase infiltration and reduce runoff.

-Technological innovations: Smart Water Management Systems.

-Water efficiency measures: promote water-saving technologies in households and industries, such as low-flow fixtures and water recycling systems.

**1.8.3** Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.



Comment The site identified relevant sector and/or catchment best practices for water quality, some examples are:

-Improving water quality at source: reduce the volume of chemicals used, and disposed of

posi-treatment.
-Catchment monitoring of water quality: real-time, high-resolution data to maintain the quality

of the water and provide alerts to threats that the catchment might be exposed to.
-Public education and outreach: educate the public on the importance of water quality and ways to reduce pollution, such as proper disposal of household chemicals and reducing

plastic use.

**1.8.4** Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.



Comment Examples of the best practices identified for the maintenance of the Important Water-Related Areas are:

-Habitat restoration: restore and create wetlands to enhance natural water filtration, provide wildlife habitat, and improve water quality.

-Community involvement and education: engage local volunteers in clean-up events, tree planting, and monitoring activities to foster a sense of stewardship.

-Vegetation management: regularly inspect and remove invasive plant species that can disrupt local ecosystems.

**1.8.5** Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.



Comment The site has identified relevant best practice for the provision of equitable and adequate WASH, some examples are:

-Community education and training: educate communities about good hygiene practices, such as handwashing with soap and safe water storage.

-Sustainable infrastructure (Eco-Friendly Solutions): Use environmentally sustainable technologies, such as composting toilets and rainwater harvesting systems.



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

	CTED 2: COMMIT 9 DI ANI Committe har a second library
2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:  - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes  - That the site implementation will be aligned to and in support of existing catchment sustainability plans  - That the site's stakeholders will be engaged in an open and transparent way  - That the site will allocate resources to implement the Standard.
Comment	A signed and publicly disclosed site statement or organizational document including all the
	AWS commitments has not been identified.  Finding No: TNR-016852
2.1.2	Advanced Indicator  A statement that explicitly covers all requirements set out in Indicator  2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.
Comment	The Advanced Indicators have been removed from the audit scope.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including:  - Identification of responsible persons/positions within facility organizational structure  - Process for submissions to regulatory agencies.
Comment	The system to maintain compliance obligations was identified (document management system and permit documentation management system), including:
	-Identification of responsible persons/positions within the facility organizational structureProcess for submissions to regulatory agencies.
	There are no specific permits required by the site for any water-related function or feature. All necessary documentation and permits required currently are procured through professional service providers (in this instance architects) for each project or facility as required.
	Submission reports to regulatory agencies were provided.
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good  Yes

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

water stewardship in line with this AWS Standard.



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

#### Comment

The San Bernardino Community College District Sustainability Plan 2023 encompasses the vision, mission, and goals related to sustainability. Among the key focus areas is water management, for which a comprehensive strategy has been established.

#### 2.3.2

A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored



- Actions to achieve and maintain (or exceed) it

- Planned timeframes to achieve it

- Financial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

#### Comment

The site has presented its Water Stewardship Plan, which includes 6 goals and corresponding actions, along with a matrix indicating the implementation timeline for each action.

Some of the AWS outcomes have been incorporated into the plan, and the positions of individuals responsible for achieving these goals have been identified.

However, the following points require further clarification:

- -Baseline data for some goals has not been identified.
- -IWRA targets are not specified.
- -Water quality targets are unclear.
- -Financial budgets for certain actions have not been allocated.
- -Timeframes for actions are not clearly defined.
- -Some targets are not SMART (Specific, Measurable, Achievable, Relevant, Time-bound).
- -Some on-site water governance initiatives have been implemented, but these actions are not set in the Water Stewardship Plan (refer to comment in indicator 3.1.1).
- -The link between each action and the achievement of best practices to address shared water challenges is not clearly established.

Finding No: TNR-016847

#### 2.3.3 Advanced Indicator

The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.



Comment The Advanced Indicators have been removed from the audit scope.

#### 2.3.4 Advanced Indicator

The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.



Comment The Advanced Indicators have been removed from the audit scope.

#### Advanced Indicator 2.3.5

Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.



Comment The Advanced Indicators have been removed from the audit scope.

#### Demonstrate the site's responsiveness and resilience to respond to 2.4 water risks

#### A plan to mitigate or adapt to identified water risks developed in 2.4.1

co-ordination with relevant public-sector and infrastructure agencies shall be identified.





## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Comment The site presented a list of risks in indicator 1.7.1; however, a plan to mitigate or adapt to

identified water risks developed in co-ordination with relevant public-sector and infrastructure

agencies have not been identified.

Finding No: TNR-017147

Yes

2.4.2 Advanced Indicator

A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and

infrastructure agencies shall be identified.

Comment The Advanced Indicators have been removed from the audit scope.



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.
Comment	The site has provided evidence of implementing actions to maintain and enhance the on-site water governance. Some examples of activities are:
	<ul> <li>-The site published its Sustainability Plan 2023 which presents its goals on water (these goals are set in the Water Stewardship Plan).</li> <li>-For the renovation, the community voted on the budget (evidence seen during the on-site audit).</li> <li>-College dashboards: data monitoring and sharing.</li> </ul>
	Evidence that the site has supported good catchment governance (with external stakeholders) has not been identified.
	Some on-site water governance initiatives have been implemented, but these actions are not set in the Water Stewardship Plan (refer to comment in indicator 2.3.2).  Finding No: TNR-017153
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.  Yes
Comment	The site ensures compliance with human rights by complying all the water related laws/regulations. Additional measures have been identified as well.
3.1.3	Advanced Indicator  Evidence of improvements in water governance capacity from a  site-selected baseline date shall be identified.
Comment	Evidence of improvement in water governance capacity has been provided:
	-The initiatives that are included in the Sustainability Plan to support the realization of these goals were arrived at through stakeholder engagement from the student body, faculty, staff, and facility personnel (a timeline was identified)Facilities Master Plan.
3.1.4	Advanced Indicator  Evidence from a representative range of stakeholders showing  consensus that the site is seen as positively contributing to the good  water governance of the catchment shall be identified.
Comment	The Advanced Indicators have been removed from the audit scope.
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. Yes
Comment	The implementation of the process to verify full legal and regulatory compliance was verified in indicator 2.2.1.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Yes Indigenous peoples, shall be implemented.

#### WSAS



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

Con	nment	Water rights a	re part of the site	e's legal and i	regulatorv	requirements.	The enforcement of the

State of California Statutory Water Rights Law is carried out by the State Water Board. The State Water Board, through its Division of Water Rights, is responsible for administering water

rights and ensuring compliance with state water laws.

3.3 Implement plan to achieve site water balance targets.

3.3.1 Status of progress towards meeting water balance targets set in the

water stewardship plan shall be identified.

Yes

Comment Status of progress towards meeting water balance targets have been identified. The site is

supporting sustainable water balance by:

-Upgrading or improvement to boiler house/cooling tower for return water use.

-Turf replacement.

-Leak repair - reticulation network.

-Leak repair - plumbing network.

-Replacement of faucets with water efficient faucets.

-Replacement of toilets to ultra-low flush.

-Replacement of urinals with low flush/motion-activated.

3.3.2 Where water scarcity is a shared water challenge, annual targets to

improve the site's water use efficiency, or if practical and applicable,

reduce volumetric total use shall be implemented.

Yes

Comment The site has proactively set and successfully met a specific water efficiency target (Total

Potable Water Use per Student: g/p/d).

**3.3.3** Legally-binding documentation, if applicable, for the re-allocation of

water to social, cultural or environmental needs shall be identified.

Yes

Comment The site does not have a legally binding document for reallocation of water to social, cultural

and environmental needs.

3.3.4 Voluntary Advanced Indicator

The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.

Yes

Comment The Advanced Indicators have been removed from the audit scope.

3.4 Implement plan to achieve site water quality targets

3.4.1 Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

closed

Comment -Targets for water quality are unclear in the Water Stewardship Plan.

-No evidence of implementation has been provided.

Finding No: TNR-017098

**3.4.2** Where water quality is a shared water challenge, continual improvement

to achieve best practice for the site's effluent shall be identified and where applicable, quantified.

closed

Comment Although a plan is in place, the site has not yet implemented a continuous improvement

process to achieve best practices for its effluent management.

Finding No: TNR-017154

3.5 Implement plan to maintain or improve the site's and/or catchment's

Important Water-Related Areas.

#### WSAS



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	closed
Comment	-There are not targets set for IWRAs in the catchment in the Water Stewardship Plan.	
	-No evidence of implementation has been provided.  Finding No: TNR-0	17095
3.5.2	Advanced Indicator	
3.3.2	Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.5.3	Advanced Indicator	
	Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	<b>⊘</b> Yes
Comment	The provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers on site has been confirmed, as per indicator 1.3.8. This waverified during the on-site tour.	
3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes
Comment	The site adheres to all relevant water-related laws and regulations.	
3.6.3	Advanced Indicator  A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.	<b>⊘</b> Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.6.4	Voluntary Advanced Indicator: In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.7	Implement plan to maintain or improve indirect water use within the catchment:	

#### WSAS



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	<b>⊘</b> Yes
Comment	In this case, the primary inputs represent less than 5% of the total costs of the site (refer tindicators 1.4.1 and 1.4.2). Therefore, no indirect water use targets have been set in the Water Stewardship Plan.	0
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	<b>₹</b> Yes
Comment	Refer to comment in indicator 3.7.1.	
3.7.3	Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	<b>V</b> Yes
Comment	Refer to comment in indicator 3.7.1.	
3.8	Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	
3.8.1	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	<b></b> ≠ ogress
Comment	A plan to engage with and notify the owners of any shared water-related infrastructure about any concerns the site may have has not been implemented. Additionally, evidence of engagement, including the key messages relayed and confirmation of receipt, has not been	
		<b>,</b> 111
	identified.  Finding No: TNR-0	
3.9	identified.	
3.9 3.9.1	identified.  Finding No: TNR-0  Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	
	identified.  Finding No: TNR-0  Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not implemented.	17114 ② closed
3.9.1	identified.  Finding No: TNR-0  Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not	17114 ② closed
3.9.1	identified.  Finding No: TNR-0  Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not implemented.	17114 ② closed
3.9.1 Comment	identified.  Finding No: TNR-0  Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not implemented.  Finding No: TNR-0  Actions towards achieving best practice, related to targets in terms of	17114 ② closed  17137
3.9.1 Comment 3.9.2	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not implemented.  Finding No: TNR-0  Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  Actions towards achieving best practice, related to targets in terms of water balance have	17114 ② closed  17137
3.9.1 Comment 3.9.2	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.  Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  Actions towards achieving best practice, related to water governance, have been not implemented.  Finding No: TNR-0  Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  Actions towards achieving best practice, related to targets in terms of water balance have been implemented, some examples are:  -Upgrading or improvement to boiler house/cooling tower for return water useTurf replacement with desert landscaping in Lots 2, 3, 8, and 10 to reduce water consumptionCollege dashboards (technological innovations and monitoring and evaluation).  Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	17114 ② closed  17137

Finding No: TNR-017133



# Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	in progress
Comment	Actions towards achieving best practice, related to targets in terms of Water-Related Areas have not been implemented.	f the Important
	Water-Related Areas have not been implemented.	Finding No: TNR-017145
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	in progress
Comment	Actions towards achieving best practice related to targets in terms of implemented.	WASH have not been
	implemented.	Finding No: TNR-017151
3.9.6	Voluntary Advanced Indicator : Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.7	Voluntary Advanced Indicator: Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	<b>₹</b> Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.8	Voluntary Advanced Indicator: Achievement of identified best practices related to targets in terms of water quality shall be quantified	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.9	Voluntary Advanced Indicator: Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.10	Voluntary Advanced Indicator: Achievement of identified best practice related to targets in terms of WASH shall be quantified.	<b>₹</b> Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.11	Voluntary Advanced Indicator : A list of efforts to spread best practices shall be identified.	<b>⊘</b> Yes
Comment	The Advanced Indicators have been removed from the audit scope.	
3.9.12	Voluntary Advanced Indicator A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	Yes
Comment	The Advanced Indicators have been removed from the audit scope.	



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

**3.9.13** *Voluntary Advanced Indicator:* 

Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall

be identified.

Comment The Advanced Indicators have been removed from the audit scope.





# Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

4	STEP 4: EVALUATE - Evaluate the site's performance.
	OTEL AL EVALUATE - Evaluate the site s performance.
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be Yes evaluated.
Comment	Performance against targets in the site's water stewardship plan has been evaluated for implemented projects. Some examples of the evaluation include:
	-Utilize native and adaptive vegetation to minimize irrigation water use: progress is ahead of schedule and early impact has been made in this regard. Reducing the volume of water for nonpotable water use has already contributed towards a sustainable water balance.
	-Reduce potable water use by 25% by 2030: one of the initiatives relates to the re-turfing of three lots on the campus. Progress is on track and is not expected to be a challenge.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.
Comment	Value creation resulting from the water stewardship plan has not been evaluated.  *Finding No: TNR-017107*
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Comment	The shared value benefits in the catchment have not been identified and/or quantified.  Finding No: TNR-017119
4.1.4	Advanced Indicator  A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.
Comment	The Advanced Indicators have been removed from the audit scope.
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) has not been prepared and the site's response to the incident(s) has not be evaluated and proposed preventative and corrective actions and mitigations against future incidents have not been identified.
	Finding No: TNR-017096
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.

#### WSAS



## Alliance for Water Stewardship (AWS)

Audit Number: AO-001478

**4.3.1** Consultation efforts with stakeholders on the site's water stewardship

performance shall be identified.

in progress

Comment Consultation efforts with stakeholders on the site's water stewardship performance have not

been identified.

Finding No: TNR-017132

4.3.2 Voluntary Advanced Indicator

: The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for

Yes

continual improvement.

Comment The Advanced Indicators have been removed from the audit scope.

**4.4** Evaluate and update the site's water

stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.

**4.4.1** The site's water stewardship plan shall be modified and adapted to

incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.

**₩** 

Comment During the remote audit, the site implemented some changes to the current plan.

However, it is unlcear how the site's water stewardship plan will be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and

how these changes will be identified.

Finding No: TNR-017124



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Comment	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations have not been disclosed.  Finding No: TNR-017099
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Comment	While some water stewardship goals have been publicly included in the sustainability plan, the plan has not yet been communicated to relevant stakeholders. Additionally, the disclosure does not specify how the water stewardship plan contributes to AWS Standard outcomes.  Finding No: TNR-017136
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Comment	A summary of the site's water stewardship performance, including quantified performance against targets, have not been yet disclosed.
	Finding No: TNR-017127
5.3.2	Advanced Indicator  The site's efforts to implement the AWS Standard shall be disclosed in  Yes the organization's annual report.
Comment	The Advanced Indicators have been removed from the audit scope.
5.3.3	Voluntary Advanced Indicator ; Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.
Comment	The Advanced Indicators have been removed from the audit scope.
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Comment	The site's shared water-related challenges and efforts made to address these challenges have not been disclosed.
	Finding No: TNR-017113



## **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001478

5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Comment	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies have not been identified.
	Finding No: TNR-017110
5.5	Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.
Comment	It is unclear whether there were any water-related violations in 2024.
	Finding No: TNR-017125
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Comment	It is unclear whether there were any water-related violations in 2024.
	Finding No: TNR-017134
5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.
Comment	It is unclear whether there were any water-related violations in 2024.  Finding No: TNR-017103

### **Previous Findings**

All non-conformities raised in the previous audit have been satisfactorily closed.

