

Western Riverside County Agriculture Coalition

September 14, 2009

Ms. Jayne Joy
Director, Environmental and Regulatory Compliance
Eastern Municipal Water District
2270 Trumble Road
Perris, CA 92572-8300

RE: Support for Basin Plan Amendment of the San Jacinto-Upper Pressure Groundwater Management Zone Total Dissolved Solids and Total Inorganic Nitrogen Objectives

Western Riverside County Agriculture Coalition (WRCAC) supports Eastern Municipal Water District's (EMWD) application to the California Regional Water Quality Control Board, Santa Ana Region (RWQCB) to amend the Basin Plan Amendment (BPA) for the San Jacinto-Upper Pressure Groundwater Management Zone. This amendment recognizes that recycled water is an alternative source of water and EMWDs proposed plan offsets the use of groundwater. The agricultural community is supportive of this action and concurs with EMWDs assessment.

This plan also recognizes that a comprehensive plan for groundwater management in the Hemet/San Jacinto area is in existence and supports the objectives of this plan.

The new Water Quality Objectives are protective of the beneficial uses in the area (the basin plan lists the beneficial uses as municipal, agricultural, industrial mining, cooling towers, gravel washing, fire protection) and process (product manufacturing/food preparation). Of these listed municipal has the most stringent standards of 500 mg/L for TDS and 10 mg/L for TIN.

WRCAC supports EMWDs application to amend the Basin Plan Amendment.

Sincerely,

Bruce Scott
WRCAC, Chairman
September 14, 2009



UNITED STATES OF AMERICA
DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS

Southern California Agency
1451 Research Park Drive, Suite 100
Riverside, California 92507-2154
Telephone (951) 276-6624 Telefax (951) 276-6641

IN REPLY REFER TO:
Water Resources

CRWQCB - REGION 8	
HAS	9/2

SEP 01 2009

AUG 31 2009

Santa Ana Regional Water Quality Control Board
3737 Main Street,
Suite, 500
Riverside, Ca 92501-1339

Attention: Ms. Hope Smythe

Subject: Substitute Environmental Document, Basin Plan Amendment, San Jacinto- Upper Pressure Groundwater Management Zone, for Total Dissolved Solids and Total Inorganic Nitrogen Objectives, City of San Jacinto, County of Riverside California.

Dear Ms. Smythe,

We are in receipt of your Executive Summary, as a substitute for an Environmental Document, to proceed with a Basin Plan Amendment of the San Jacinto-Upper pressure groundwater management zone, to relax the current standards for Total Dissolved Solids, (TDS) and Total Inorganic Nitrogen, (TIN), Objectives. It is our understanding that this is necessary from Eastern Municipal Water Districts, (EMWD), perspective in order to allow replenishment activities to occur for the underlying ground water basin. We understand that the source of replenishment water will be from the use of recycled water. It is also our understanding that this recycled water will allow EMWD to proceed with their water management plan.

The Bureau of Indian Affairs, (BIA), is interested in the effect this relaxation of standards will have on the Soboba Indian Reservation and how the use of recycled water to replenish the basin benefits the tribe. It is the opinion of the BIA that this Substitute Environmental Document does not address all concerns present in the valley and should be elaborated upon to address all issues both from a federal and state perspective. EMWD should consult directly with agencies responsible for implementing federal environmental laws and regulations prior to adoption of this basin amendment for this action will also not only affect state but federal water rights.

It is our understanding that recycled water will be introduced in the upper northern reach of the San Jacinto Pressure zone. It is requested at this time for EMWD to address ground water flow gradients as to how this water relates to the reservation located near the proposed recharge area. How does the proposed recycled recharge area interact with the state water recharge area

Post-It™ Fax Note	7671	Date	9/2/09	# of pages	2
To	Jayne Joly	From	Hope Smythe		
Co./Dept.		Co.			
Phone #		Phone #	951-782-4493		
Fax #		Fax #			

RE: [Handwritten signature]

downstream? How will this recycled water affect potable water wells located on the reservation? How does this recycled water dilute with State water recharge? Finally does the State Water Recharge area form a natural damming effect protecting EMWD water wells located downstream from enhanced TDS and TIN being introduced by this project?

The BIA believes that the quality of Tribal Trust water is superior to that of recycled water planned for recharge. It has not been demonstrated in this document how this does not impact federal water reserves.

These are a few concerns not clear to the BIA regarding this Substitute Environmental Document. We appreciate receiving this document and attending EMWD's Scoping meeting. We wish to gain a better understanding from EMWD of the ultimate effects this project will have on and beneath tribal trust lands in the San Jacinto area.

If there are any questions or clarification needed regarding the content of this letter, please do not hesitate to contact Ms. Christina Mokhtarzadeh, Hydrologist Southern California Agency at (951) 276-6624 ext. 257 or Mr. James Fletcher, Superintendent at (951) 276-6624.

Sincerely;



James J. Fletcher
Superintendent

Cc **Regional Geohydrologist, Pacific Region, Bureau of Indian Affairs**
Water Rights Specialist, Pacific Region, Bureau of Indian Affairs
Chairperson, Soboba Band of Mission Indians
Mr. Karl E. Johnson, Attorney at Law, Luebben, Johnson & Barnhouse LLP
Regional Solicitor, U.S. Department of the Interior
U.S. E.P.A., Tribal Water Protection Enforcement Manager

Regional Board Response to BIA letter on the Supplemental Environmental Document

As a general comment your letter referred to the recycled water project as a replenishment project for the basin, we would like to clarify that the recycled water used in the northern portion of the basin is for irrigation purposes only. While this practice has some incidental return flow, it is not a recycled water recharge project into the GMZ with the intended purposes for use as drinking water.

As an attempt to answer the series of the questions in your letter, it is thought that a clear description of the activities in the San Jacinto Upper Pressure Groundwater Management Zone that are part of the Hemet/San Jacinto Groundwater Management Plan will help address your concerns. Below are the descriptions of the activities taking place in this basin and the associated activity is shown on the enclosed site map.

- **Imported Water Recharge Area:** In this area, EMWD will recharge imported water and extract groundwater at a capacity to: satisfy prior and paramount Soboba Tribe water rights. This project will consist of several connected ponds covering approximately 35 acres within the San Jacinto Riverbed and provides up to 42 cubic feet per second (cfs) of recharge capacity. The San Jacinto Upper Pressure Management Zone is expected to receive a long-term average recharge of about 7,500 acre feet per year (AFY) of State Water Project (SWP) water with average TDS and TIN values of 250 and 0.6 mg/L, respectively. This recharge is anticipated to occur during wet years when the salinity of SWP water is typically very low. The recharge of higher-quality SWP water will result in a net benefit to the Tribe and the San Jacinto Upper Pressure Management Zone.
- **Recycled Water In-Lieu Project:** This project supplies recycled water from EMWD's San Jacinto Valley Regional Water Reclamation Facility for agricultural irrigation in lieu of pumping native groundwater from the San Jacinto Upper Pressure Groundwater Management Zone. This project is not a replenishment project and is only for agricultural irrigation. The Project provides up to 8,540 AFY of recycled water to Rancho Casa Loma and the Scott Brothers Dairy. Therefore reducing groundwater pumping by these entities by an equivalent amount.
- **Hemet Water Filtration Plant:** EMWD's Hemet Water Filtration Plant treats 11,000 AFY of State Water Project Water for potable supply and has offset the use of the native groundwater. Additionally, this source water reduces the TDS in the recycled water.

The locations of the projects and facilities are shown on the enclosed site map. In addition, this map shows the location of the Soboba Reservation and the general groundwater gradient in the San Jacinto Upper Pressure Groundwater Management Zone. This indicates that the recycled water irrigation project is clearly down gradient from the reservation and imported water recharge area protecting the groundwater wells used in the southern portion of the basin is next to the Tribe's San Jacinto Upper Pressure Groundwater Management Zone wells.

EMWD's Maximum benefit proposal is a request to relax the TDS and TIN objectives to levels that are higher than the 2004 Basin Plan Amendment for TDS and nitrate-nitrogen but lower than the protective levels for municipal sources. This action allows EMWD to provide recycled water into this basin so that the use of the groundwater is reduced. Reducing groundwater production and managing the groundwater production is a major component of the Soboba Tribe Settlement Agreement. As for the water quality, recycled water irrigation occurs on the surface of the basin in an area with clay soils, and the site is located in the furthest down gradient area of the basin so that this recycled water should not mix with the production well water. Finally, the imported water recharge and use of the State Water Project water at EMWD's Hemet Water Filtration Plant supplies the area with the highest quality water available from the imported water supply to protect the municipal use of this basin for the local communities as well as the Soboba Tribe.

In response to your specific questions (**italicized**) starting in the third paragraph of your letter the following information is provided:

How does the proposed recycled water recharge area interact with the state water recharge area downstream?

The recycled water irrigation project is located in the furthest downstream location of the basin. The recycled water is applied at the surface level in an area of known natural clay layers that will prohibit some of the vertical migration of the irrigated recycled water. Based on the downstream location of the reuse site and the clay soils in the area, the recycled water used in this area should not impact the imported recharge area nor the local production wells.

How will this recycled water affect potable water wells located on the reservation?

The recycled water irrigation project is located in the furthest downstream location of the basin. The recycled water is applied at the surface level in an area of known natural clay layers that will prohibit some of the vertical migration of the irrigated recycled water. Based on the downstream location of the reuse site and the clay soils in the area, the recycled water used in this area should not impact the imported recharge area or the local production wells.

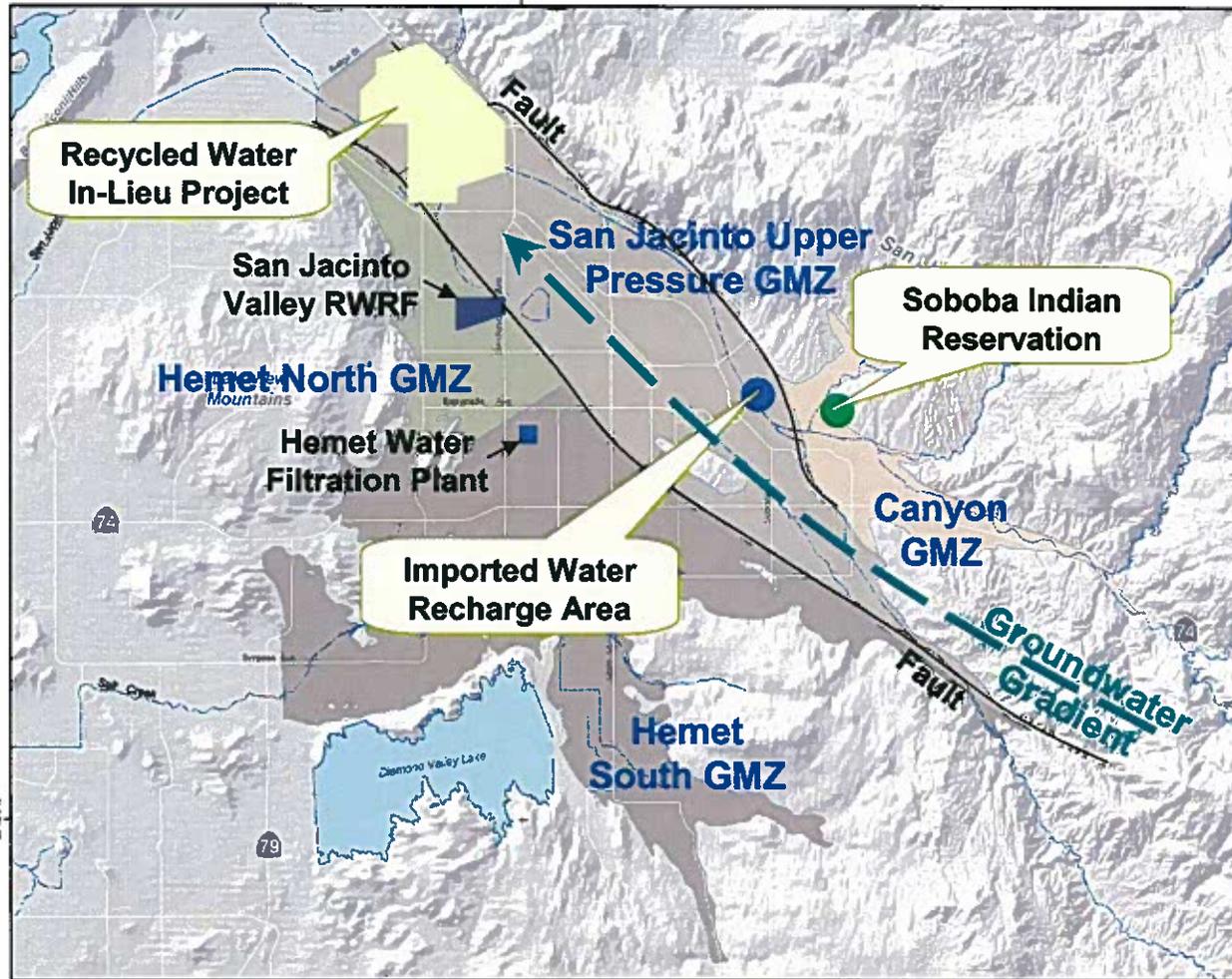
How does this recycled water dilute with State water recharge?

These activities are taking place in two distinct locations and are not expected to be mixed or diluted.

Finally does the State Water Recharge area form a natural damming effect protecting EMWD water wells located downstream from enhanced TDS and TIN being introduced by this project?

The recycled water irrigation project is located in the furthest downstream location of the basin. The recycled water is applied at the surface level in an area of known natural clay layers that will prohibit some of the vertical migration of the irrigated recycled water. Based on the downstream location of the reuse site and the clay soils in the area, the recycled water used in this area should not impact the imported recharge area or the local municipal production wells.

San Jacinto Upper Pressure Groundwater Management Zone (GMZ)



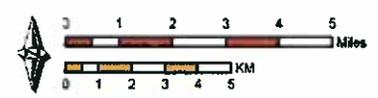
- Management Area**
- Canyon Management Zone
 - Hemet-South Management Zone
 - Hemet-North Portion of Lakeview - Hemet North Management Zone
 - San Jacinto-Upper Pressure Management Zone

SAN JACINTO UPPER PRESSURE GMZ	
Maximum Benefit Objectives	
TDS	500 mg/L
TIN	7.0 mg/L



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Author: KJ
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 File: Figure_1.mxd



Hemet/San Jacinto Groundwater Management Area
 Management Zone Boundary

Figure 1