

ARVIN-EDISON WATER STORAGE DISTRICT

20401 BEAR MOUNTAIN BOULEVARD
MAILING ADDRESS: P.O. Box 175
ARVIN, CALIFORNIA 93203-0175

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VICE PRESIDENT
EDWIN A. CAMP

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JOHN C. MOORE

ENGINEER-MANAGER
STEVEN C. COLLUP

ASSISTANT MANAGER
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JEEVAN S. MUHAR

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September 27, 2010

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DIVISION 8
DONALD VALPREDO
DIVISION 9
KEVIN E. PASCOE

VIA ELECTRONIC MAIL
ILRPcomments@icfi.com

<p>ILRP Comments Ms. Megan Smith 630 K Street, Suite 400 Sacramento, CA 95814</p> <p>Joe Karkoski California Regional Water Quality Control Board, Central Valley 11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670-6114</p>	<p>Katherine Hart, Chair Cheryl K. Maki, Vice Chair Julian C. Isham, Board Member Karl E. Longley, Board Member Sandra O. Meraz, Board Member Dan Odenweller, Board Member Robert G. Walters, Board Member California Regional Water Quality Control Board, Central Valley 11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670-6114</p>
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Dear Ms. Smith, Mr. Karkoski, Board Chair Hart and Board Members Maki, Isham, Longley, Meraz, Odenweller and Waters:

Arvin-Edison Water Storage District (District) hereby incorporates by reference the extensive comments submitted this date by the Southern San Joaquin Valley Water Quality Coalition (Coalition), among other things pointing out the deficiencies of the subject Draft Environmental Impact Report, Economic Evaluation, and Staff Report for the Irrigated Lands Regulation Program (ILRP). The District provides the following additional comments, including importing the Coalition comments, and on behalf of this District and our landowners, which covers approximately 130,000 acres in southeastern Kern County. The District defers to the expertise of the Coalition in these matters as it applies to the Southern San Joaquin Valley generally, and wishes to point out the "real world" factors as it relates to water quality in our area.

The District has been engaged in conjunctive use of surface and groundwater as well as groundwater banking projects since the mid '60s and since then has imported approximately 6.8 million acre-feet to the area for various purposes. As pointed out in the Coalition comments and particularly the engineering analysis, the best way to maintain

and improve groundwater quality is to import water. In our case, the base supply is high quality Friant-Kern water which the District aggressively and actively defends. Maintenance of this and other high quality supplies will have a better effect and potentially improve groundwater quality than any of the means proposed in the referenced DEIR and ILRP Staff Report, many of which proposals are draconian and unnecessary.

The District believes the best strategy for the Regional Board to pursue to maintain and improve water quality would be to encourage its sister agencies, like water districts, to take appropriate actions affecting their import of surface water to the San Joaquin Valley to insure those historical imports continue, to among other things, maintain groundwater quality. Irrigating agricultural lands by importing surface water is beneficial to the groundwater basin. Therefore the erroneous link, made by Regional Board Staff, that irrigated agriculture and resultant activities are a potential waste discharge to groundwater is greatly simplified and a false assumption.

The District encourages you to work with the Coalition and follow the advice of its comments to implement meaningful measures to help maintain water quality in our region.

Sincerely,



Steve Collup
Engineer-Manager

cc: Jeevan Muhar, P.E.
Ernest Conant, Esq.

~~IL91.~~ dup of letter 80

From: Arvin-Edison Water Storage District [arvined@aewsd.org]
Sent: Monday, September 27, 2010 1:59 PM
To: ILRP Comments
Cc: 'Jeevan Muhar'; 'Ernest Conant'; 'Steve Collup'; dorth@krcd.org
Subject: Irrigated Lands Regulation Program
Attachments: ILRP.Comments.09.27.10.pdf

Importance: High

Sherry Jauch, Executive Secretary
Arvin-Edison Water Storage District
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