



ARVIN-EDISON WATER STORAGE DISTRICT

May 7, 2018

Via email (Adam.Laputz@waterboards.ca.gov)
Via Fax (916-464-4780) & USPS

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Adam Laputz, Assistant Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans) to Incorporate a Central Valley-wide Salt and Nitrate Control Program

Dear Mr. Laputz:

Thank you for providing Arvin-Edison Water Storage District (AEWSD) the opportunity to comment on the proposed Central Valley-wide Salt and Nitrate Control Program (Proposed Project).

AEWSD's primary concern about the Proposed Project relates to the significant water quality impacts that it may have on AEWSD's surface water supplies, particularly its Friant-Kern Canal supplies, water management programs, and the associated negative impacts on crops in AEWSD among other concerns. The Water Board Staff Report and Environmental Checklist conclude that the Salt and Nitrate Control Programs will have significant impacts due, in part, to the less stringent requirements embodied in the Proposed Project. The Environmental Checklist finds that the Proposed Project, "may reasonably be expected to cause potentially significant impacts due to exceedances of applicable water quality standards and due to water quality degradation. This degradation will primarily occur because the Proposed Project will involve extending compliance timelines under which discharges that are not fully compliant with pre-Amendment regulatory requirements will be allowed to persist."

The Water Board Staff Report contends that salt concentrations in surface waters of the Central Valley "are not expected to be substantially worse and, in fact, are expected to remain at similar levels or improve somewhat, relative to existing conditions, due to implementation of the Central Valley Salt and Nitrate Control Program and other Central Valley Water Board actions." No support is provided for this statement particularly with regards to the high-quality water from Millerton Lake that supplies the Friant Kern Canal (FKC). Multiple current and proposed groundwater banking projects by Friant Division Central Valley Project members and others discharging into the FKC to improve water management entail introduction of groundwater and/or non-Millerton Lake supplies into the FKC. Table 1 compares total dissolved solids (TDS) concentrations of water originating from Millerton Lake to current TDS concentrations in these other sources of water. Allowing continued degradation of FKC water for decades to come ensures that the quality of surface water in FKC will worsen.

Table 1 – Average TDS Concentrations of Source Waters Introduced into the FKC (2010 – 2017)

Source	Average TDS (mg/L)
Millerton Lake	29
Kern River	103
Cross Valley Canal	175
CA Aqueduct	243
Groundwater ¹	350 to >1,000

¹TDS concentrations based off data from the State Water Board's GAMA database for wells in the vicinity of the FKC.

The Water Board proposes to address this situation by granting use of assimilative capacity and issuing variances. AEWSD obtains water at the end of the FKC and will suffer adverse direct, indirect and cumulative effects, including the effects of assimilative capacity and variances assigned to upstream users by the Water Board. The CEQA evaluation and the proposed mitigation measures in the Substitute Environmental Document (SED), including relevant portions of the Water Board Staff Report, are inadequate and must be re-examined to, among other things, identify and evaluate feasible alternatives and mitigation measures necessary to avoid or reduce significant and potentially significant impacts on FKC and AEWSD water quality. Moreover, if the Water Board allows degradation of quality of FKC water received by AEWSD, then the Water Board must recognize that compliance with provisions of Salinity Control Program will be more difficult for AEWSD customers.

Thank you, and again we appreciate the opportunity to provide input into the Proposed Project. If you have questions or comments, please don't hesitate to call or email.

Sincerely,



Jeevan Muhar
Engineer-Manager

cc: Board of Directors
Steve Collup, Director of Water Resources
Ernest Conant, Esquire
Anona Dutton, EKI

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