

Davydova, Maria@Waterboards

From: Geraci, Jeff@Waterboards
Sent: Tuesday, May 1, 2018 7:52 AM
To: Davydova, Maria@Waterboards
Subject: Staff report SS

Follow Up Flag: Follow up
Flag Status: Completed

Hi Maria,

Took a quick skim over the draft staff report for Salton Sea, and noted a few things. These are merely suggestions for your consideration:

1. Top of pg 4, sec A: Tilapia are found throughout both irrigation and drainage canals, as are grass carp, common carp, flatheads, channels, LMB, SMB, bluegill, etc. Also, the sea currently has (3) fish species still living in it, not one.
2. Page 6, sec B: I would mention that the sea is 'federally designated' as a repository for ag drainage as opposed to 'serves as an ag reservoir'
3. Page 6, sec C: I don't know that precipitation is a 'predominant' contributor to replenishment. Unless we can quantify, I don't know if I'd make the claim
4. Top of pg 7: It may not be clear to the reader HOW discharging ag waste can maintain salinity balance (i.e. flushing)
5. Bottom pg 7: There is no 'official' TDS concentration for the sea, and it's certainly not 61,000 in 2017 (do you recall the source where you found that figure?). TDS varies throughout the sea, not just spatially but also along the depth profile. Best to provide a range using an approximate average.
6. Page 10, sec D: Selenium in water is <1ug/L, but in sediments it's above the threshold and increasing. How this will be affected as the benthic community changes due to increasing salinity has yet to be seen.
7. Page 11, sec B, 1st paragraph: This would not stabilize salinity . . . as you remove salt, the salt solids that previously precipitated out of solution will re-dissolve back into solution . . . it's a no-brainer

Hope this helps, thanks!

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May 8, 2018

Maria Davydova
Environmental Scientist
California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive
Suite 100
Palm Desert, CA 92260

Subject: **Proposed Non-Regulatory Amendment to the Water Quality Control Plan for the Colorado River Basin Region**

Dear Ms. Davydova:

This serves to respond to the Colorado River Basin Regional Water Quality Control Board (Regional Water Board) Request for Comments regarding the Proposed Non-Regulatory Amendment to the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan) dated 4/30/18.

1. Page 4-Section A-please add “and Coachella Canal” after All American Canal and delete the word “systems”.
2. Page 6-Section B-please add “for agricultural irrigation purposes,” after Colorado River.
3. Page 7, Page 12 and throughout-suggest using “agricultural land” in lieu of cropland and farmland to be more precise and consistent.

Another significant action since the last update of the Basin Plan in 1992 is the development of the Coachella Valley Water Management Plan (CVWMP). The CVWMP was first adopted along with its Programmatic Environmental Impact Report (PEIR) in 2002. The CVWMP was then updated in 2012 with and updated PEIR. CVWMP Status Reports were issued in 2015 and 2017. All of these documents are located at the Coachella Valley Water District (CVWD) website.

The goal of the CVWMP is to reliably meet current and future water demands of the Coachella Valley in a cost-effective and reliable manner. The CVWMP has five major elements:

- Water conservation (urban, golf course, and agricultural)
- Increasing surface water supplies for the Valley from outside sources
- Substitution of surface water supplies for groundwater (source substitution)
- Groundwater recharge
- Monitoring and evaluation of subsidence and groundwater levels and quality to provide the information needed to manage the Valley's groundwater resource

The CVWMP is an integral part of the Basin Plan and should be included in the Basin Plan discussion and referenced.

Thank you for the opportunity to comment.

Sincerely,



Mark L. Johnson

cc: Felicia Marcus, Chair, State Water Resources Control Board (SWRCB)
Darrin Polhemus, Deputy Director, SWRCB-Division of Drinking Water
Jose Angel, Executive Director, Colorado River Basin-RWQCB (R7)
Raul Ruiz, MD, Congressman-36th District-CA
Chris Harris, Executive Director, Colorado River Board of CA
Katherine Phillips, Director, Sierra Club California
Gaylon Parsons & Meghan Hertel, Audubon California
Sylvia Bermudez, Clerk of the Board, Coachella Valley Water District

Davydova, Maria@Waterboards

From: Geraci, Jeff@Waterboards
Sent: Thursday, May 10, 2018 7:52 AM
To: Davydova, Maria@Waterboards
Cc: Shukry-Zeywar, Nadim@Waterboards
Subject: TDS vs salinity

Hi Maria,

Just browsed the staff report revisions online. My comments are merely for your consideration, and of course you are free to totally disregard them. Anyway, with regard to using TDS and salinity interchangeably in the staff report, I just wanted to point out that there are notable differences between the two. Salinity is a measure of all dissolved salts, while TDS is a measure of all ion particles, not just salts. In other words, all salts are total dissolved solids, but not all total dissolved solids are salts. This difference is miniscule in "clean" water, but in sea water, especially one as polluted as Salton Sea, the difference can be significant.

The TDS section might also confuse the reader because it presents two historical concentrations in TDS units, then goes on to state an objective concentration in salinity units.

Hope this helps you- thanks

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May 30, 2018

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maria.davydova@waterboards.ca.gov

Subject: Comment Letter: Administrative Basin Plan Amendment

Dear Ms. Davydova:

The Imperial Irrigation District has reviewed the draft staff report and the proposed amendment to the Water Quality Control Plan for the Colorado River Basin (Basin Plan) and appreciates the staff effort involved in preparing these documents. The proposed amendment includes many modifications to the Basin Plan as summarized in the staff report. The modifications to the Basin Plan are described in the staff report as administrative changes to provide more up-to-date information and improve clarity throughout the Basin Plan, reflect the current conditions of the Salton Sea and related regulatory and legislative developments, as well as editorial changes. Nevertheless, the proposed amendment includes modifications throughout the Basin Plan, including each and every chapter, the cover page, the foreword and the table of contents. The magnitude of the modifications and the significance of the matter warrant additional time for public review and comment.

Based upon a preliminary review of the draft staff report and the proposed amendment, IID offers the following comments and revisions to the proposed amendment:

Foreword and page 1-2, Chapter 1, Section II, ¶ 1

The text includes: "...the Basin Plan: (i) identifies beneficial uses for surface and ground water, (ii) includes narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan." While this may be accurate for the Basin Plan, this language is copied verbatim from the basin plans for the San Diego and Los Angeles regions. Nevertheless, this statement of the purposes of the Basin Plan overlooks the specific statutorily required factors to be

considered in establishing the water quality objectives of the Basin Plan, which shall include “environmental characteristics of the hydrographic unit under consideration, including the **quality of the water available** thereto,” “water quality conditions that could **reasonably be achieved** through the **coordinated control of all factors which affect water quality in the area**” and “**economic considerations.**” If the Basin Plan is going to now list these specific purposes, it should identify the important factors that it must also take into consideration.

Page 1-17, Chapter 1, Section VI.F, ¶ 2

Revise the text of “...became an important recreation destination and wildlife habitat...” to “became a recreation destination and important wildlife habitat...” given recreational usage over the one hundred-year period has varied widely.

Revise text of “Replenishment of the Salton Sea is predominantly...” to “Inflows to the Salton Sea are predominantly...” and modify “...occasional inflows from storm runoff...” to “occasional flows from storm runoff...”

Page 2-2, Chapter 2, Section II, ¶ 3

The text notes that the Salton Sea receives drainage from agricultural land in the Imperial and Coachella valleys but fails to mention the Mexicali valley agricultural and industrial drainage, which also supply flows to the Sea.

The text notes that agricultural drainage from Palo Verde and Bard valleys discharges to the Colorado River, but fails to note that these discharges comprise part of the Colorado River water deliveries to the Imperial and Coachella valleys.

The text incorrectly classifies subsurface irrigated cropland drainage (agricultural tile drainage) as “excess groundwater.” The sentences are: “Agricultural discharges consist of run-off and agricultural tile drainage. Tile drainage comes from subsurface drain systems that remove excess groundwater thereby helping maintain adequate soil salinity balance for agriculture in the Region.” These sentences should be revised to read: “Agricultural drainage discharges consist of surface irrigation runoff and agricultural tile drainage, which comes from percolated irrigation surface water that is collected by subsurface drainage tiles placed beneath the agricultural fields. Subsurface tile drains facilitate the flow of surface water from the crop root zone to maintain field productivity and assist in lowering the composition of dissolved salts imported from the Colorado River source water, which can impair plant growth and yield. Due to the tile drainage system, this surface water never reaches the groundwater table.”

IID also takes exception with the conclusion that the agricultural drainage from irrigated cropland, including subsurface tile drainage “cannot be recognized as a beneficial use...” pursuant to 40 CFR Section 131.10a when no such conclusion is warranted or necessary and has not been determined as a matter of law. This section of the Basin Plan is intended to identify the beneficial uses, not to single out uses that may not be beneficial uses. This text is unnecessary and the modifications only highlight this issue warranting deletion of the last sentence.

Pg. 3-8, Chapter 3, Sec III.C.1 Salton Sea Total Dissolved Solids

The text regarding stabilization of the Salton Sea at 35,000 mg/L is a carryover from previous documents and is unachievable given current conditions and funding constraints. Consideration should be given to phrasing this previous objective in the past tense and incorporating updated text (after additional time to determine new objectives based on the state's Salton Sea Management Program and other long-term actions). The next to last sentence also states that salinity stabilization is a responsibility that “...must be shared jointly by all of the agencies which have direct influence on the sea’s fate,” but fails to acknowledge the financial limitations on this ‘responsibility’ to parties of the Quantification Settlement Agreement as outlined in the Legislature and the QSA Joint Powers Authority Creation and Funding Agreement (see <https://www.iid.com/home/showdocument?id=839>) outlined in Section 14.3:

“...The liability of the CVWD, the IID and the SDCWA for Salton Sea restoration costs shall not exceed the Salton Sea Restoration Limit. The *State shall defend, indemnify and hold harmless* the CVWD, the IID and the SDCWA, *individually or collectively as the case may be, with respect to any liability, requirement, expense, cost or obligation for restoration of the Salton Sea* the cost of which exceeds the Salton Sea Restoration Limit.”

Pg. 13, Chapter 4, Sec IV.B, ¶ 7 (identified as ¶ 2 in the staff report)

The next to last sentence states, “Between 2003 and 2017, a total of 800,000 acre feet of water were scheduled for release by IID in annual increments, commonly referred to as the ‘mitigation water transfer.’” This is incorrect. This water is referred to as “mitigation water deliveries.” This was not a “transfer” of water to the Salton Sea, but rather mitigation water delivered to the Salton Sea as mitigation for impacts to the Salton Sea. There are other uncorrected references to “mitigation water transfers,” which should be changed to “mitigation water deliveries.”

Pg. 4-22, Chapter 4, Sec IV.B, ¶ 7 (identified as ¶ 2 in the staff report)

The revised sentence beginning “Upon termination of the mitigation water transfers at the end of 2017...” should be corrected to read, “Upon completion of the fifteen-year Salton Sea mitigation water delivery requirement associated with the QSA water conservation and transfer in 2017, the inflows to the Salton Sea associated with Imperial Valley agricultural drainage are projected to decrease significantly.”

This next sentence states, “Any reduction in inflows to the sea causes the salinity to rise more rapidly.”

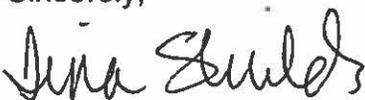
While this is generally true given existing inflows, it is a blanket statement that is more accurately phrased as “Reduction of inflows to the sea *from existing sources* causes the salinity to rise more rapidly.”

Page 4-22 to 4-24, Chapter 4, Sec IV.B.1, ¶ c

IID suggests additional time should be given to provide a better background and summary of the Salton Sea Management Program, including a better description of the Phase 1 SSMP 10-Year Plan commitments and acreage milestones, as well as the long-term proposals that are currently being vetted through a technical process. Given all of the recent developments including adoption of the stipulated order by the State Water Resources Control Board, this section should be greatly enhanced.

IID appreciates the opportunity to comment on the proposed amendment, but feels strongly that additional time is needed to fully consider the many modifications made by the proposed amendment to the Water Quality Control Plan for the Colorado River Basin. This would include a more thorough review of the Salton Sea discussions, including the drafting of additional text regarding the state’s restoration obligations and its Salton Sea Management Program commitments, particularly those specifically delineated in SWRCB Revised Order WR 2017-0134 (modifying Revised Order WRO 2002-0013 and adding conditions 19-29 related to Salton Sea restoration) which were not addressed in the 2017 Triennial Review or these amendments.

Sincerely,



Tina Shields, P.E.
Manager, Water Department



San Diego County Water Authority

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May 30, 2018

Via Email

maria.davydova@waterboards.com

MEMBER AGENCIES

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escandido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
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- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuima Municipal Water District
- OTHER REPRESENTATIVE**
- County of San Diego

Honorable Chair Nancy Wright
Honorable Board Members
California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

RE: COMMENT LETTER: ADMINISTRATIVE BASIN PLAN AMENDMENT

Dear Chair Wright and Honorable Board Members,

The San Diego County Water Authority (Water Authority) appreciates the opportunity to provide comments on the the proposed Amendment to the Colorado River Basin Water Quality Control Plan (“Plan Amendment”). The Water Authority understands that the Plan Amendment is intended to make non-regulatory editorial changes to the Basin Water Quality Control Plan (“Basin Plan”). In order to ensure the Basin Plan’s accuracy, the Water Authority submits the following comments:¹

- Page 4-18, second paragraph of IV.B.: Suggest replacing first sentence with:

Created in 1993, the Salton Sea Authority (SSA) is a Joint Powers Authority (JPA) responsible for working in consultation and cooperation with the State of California to oversee the comprehensive restoration of the Salton Sea.
- Page 4-19, first full paragraph refers to “WRO 2002-0013.” Should this reference be “Revised WRO 2002-0013?”
- Page 4-19, first full paragraph, last sentence: Suggest adding the words “the State” between the words “provide” and “enough.”
- Page 4-19, third full paragraph: Suggest replacing first sentence with:

In May of 2015, Governor Edmund G. Brown formed the Salton Sea Task Force with

¹ References are to the “clean copy” of the proposed revised Basin Plan, Attachment C to proposed Resolution No. R7-2018-0018.

principle staff and appointed members of the Governor's Office, Natural Resources Agency, California Environmental Protection Agency, State Water Resources Control Board, Air Resources Board and Energy Commission. The Task Force was directed to identify realistic short and medium-term goals to respond to air quality and ecological threats at the sea resulting from scheduled reduced flows of fresh water to the sea.

- Page 4-19. third full paragraph., second sentence. Our understanding is that the SSMP is led by the CNRA and the SSA is one of many stakeholders.
- Page 4-19, fifth full paragraph: Suggest deleting last three sentences of the last paragraph and replacing with:

The expiration of the QSA mitigation flows to the Salton Sea at the end of 2017, Mexico's diversions from the New River for reuse and changes in agricultural regulations are all factors in reduced inflows to the Sea and rise in salinity. Additionally, under the QSA, a mitigation program consisting of air quality projects is moving forward to address those impacts associated with the QSA.

The Water Authority appreciates the opportunity for public comment on the Plan Amendment. The Water Authority looks forward to working with the California Regional Water Quality Control Board, Colorado River Basin Region and is available for any questions or to discuss any concerns.

Sincerely,

A handwritten signature in blue ink that reads "Kelly Rodgers". The signature is fluid and cursive, with a large loop at the end.

Kelly Rodgers, Ph.D., P.E.
Colorado River Program Director
San Diego County Water Authority