

Attachment B.1

Comments Received on Supplemental Environmental Document

And

Response to Comments

James J. Fletcher
US Department of the Interior
Bureau of Indian Affairs (BIA)
Letter dated August 31, 2009

As a general comment, the BIA letter referred to the recycled water project as a replenishment project for the basin. To clarify this, 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 San Jacinto Upper Pressure Management Zone with the intended purpose for use as drinking water.

As an attempt to answer the series of the questions in the BIA letter, the following is 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. 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.

The following are the specific comments from BIA and Staff's responses.

Comment

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

Staff Response

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.

Comment

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

Staff Response

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.

Comment

How does this recycled water dilute with State water recharge?

Staff Response

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

Comment

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?

Staff Response

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.

Bruce Scott, Chairman
Western Riverside County Agricultural Coalition (WRCAC)
September 14, 2009

Comment

Western Riverside County Agricultural Coalition (WRCAC) supports the proposed Basin Plan amendment. The amendment recognizes that recycled water is an alternative source of water and EMWD's proposed plan offsets the use of groundwater. The agricultural community is supportive of this action.

Staff Response

Board staff believes that revising the TDS and nitrate-nitrogen water quality objectives to allow for the use of recycle water for agricultural purposes is in the best interest of the watershed and will ensure protection of groundwater resources in the area.