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March 11, 2014

Dr. Jeong-Hee Lim
California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Dear Dr. Lim:

Subject: Comments on Proposed 303(d) List Revisions

The Imperial Irrigation District (IID) would like to submit comments regarding Proposed Revisions to the Clean Water Act Section 303(d) List of Impaired Water Bodies in the Colorado River Basin Region.

After reviewing proposed Resolution R7-2014-0025, it is our understanding that states must prepare a biennial update assessing waters of the state as required under the federal Clean Water Act. The IID recognizes this assessment process as an ongoing evaluation of water bodies which will continue to adjust in response to observed water quality conditions, whether it be improvement or deterioration. We can appreciate the proposed delisting of several constituents, as the action is in response to observed water quality improvement and/or revised objectives. However, we are concerned with new listings that are being proposed for the Alamo River and New River.

The concern associated with the new listing of chloride is particularly problematic. Positioned at the downstream terminus of the Colorado River, Imperial Valley canal water begins as a product that contains elevated salinity concentrations due to several upstream sources, including leaching of saline soils from the Colorado Plateau and upstream irrigation return flows. The IID is concerned that the addition of chloride on the 303(d) list could result in an effort to restrict future discharges of leach water from Imperial Valley's agricultural industry. Growers within the Imperial Valley rely upon the IID network of drainage facilities to convey salts away from their cropland to the Salton Sea. Excessive salinity decreases crop yields by reducing water and nutrient uptake by plants. Without the ability to leach salts from their land, the growers would be unable to sustain the production of crops, rendering the land unusable for agriculture.

Thank you for consideration of our concerns. If you have any questions regarding these comments, please contact Steve Charlton at 760-339-9143.

Sincerely,


ISMAEL GOMEZ
Interim Manager, Water

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