

Kern Water Bank Authority

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FAX TRANSMISSION

Date: September 15, 2003
To: Ms. Sammie Cevantes and Ms Delores Brown
From: Jon Parker
Subject: Comments on EWA EIR/EIS
Pages: 3, including cover sheet

KERN WATER BANK AUTHORITY

September 15, 2003

Sammie Cervantes
U.S. Dept of the Interior
Bureau of Reclamation
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Delores Brown, Chief
Mitigation and Restoration Branch
Division of Environmental Services
Department of Water Resources
3251 "S" Street
Sacramento, CA 95816-7017

Subject: Environmental Water Account Draft Environmental Impact Statement/Environmental Impact Report

Dear Ms. Cervantes and Ms. Brown:

The Kern Water Bank Authority appreciates the opportunity to review the draft EIS/EIR on the Environmental Water Account. Our comments follow.

Page 6-20 *Land Subsidence*

EIS/EIRText: "Both Arvin Edison WSD and the Kern Fan Element have experienced substantial drawdown in the past, with a maximum subsidence rate (as of 1970) in excess of 0.5 feet per year observed in the Arvin Maricopa area, and a total maximum approaching 9 feet (centered west of the Arvin Edison WSD within the eastern portion of the Kern-Delta WD)."

Comment: This is the only statement in the EIS/EIR regarding subsidence in the Kern Fan Element. We think it is important to note that the Department of Water Resources monitors subsidence in the Kern Water Bank area, and no significant permanent subsidence has been measured, nor is it likely to occur in the future (Personal Communication, Al Steele, Department of Water Resources).

Page 6-20 *Groundwater Quality*

EIS/EIRText: Groundwater in the Kern Fan Element is monitored routinely for TDS and constituents that may be of concern, including DBCP, EDB, and nitrates. These constituents

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have been detected at elevated concentrations in shallow groundwater north of the Kern River and West of Enos Lane.

Comment: The Kern Water Bank Authority has tested both monitoring wells and supply wells for DBCP and EDB, and none has been detected. In addition, nitrate concentrations in all wells on the Kern Water Bank are below Maximum Contaminant Levels established in Title 22.

We are also incorporating by reference comments submitted separately by the Kern County Water Agency. Please call me if you have any questions,

Sincerely,



Jonathan D. Parker,
General Manager

xc: KWBA Board of Directors
Ernest Conant