

# Appendix A: Comment Letter



## Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (559) 224-1523, FAX (559) 241-6277

July 25, 2017

Bureau of Reclamation

Attn: Stacy Holt

1243 N Street

Fresno, CA 93721

Transmitted via email to [slholt@usbr.gov](mailto:slholt@usbr.gov)

Subject: EA-16-011 City of Huron Land Use Authorization

Dear Ms. Holt,

Thank you for the opportunity to comment on the draft Environmental Assessment of the City of Huron Land Use Authorization (Project). Westlands Water Quality Coalition (Coalition) serves as the third-party entity that represents growers in the Western Tulare Lake Basin Area and fulfills the requirements and conditions of the Waste Discharge Requirements General Order R5-2014-0001 (General Order) issued by the Central Valley Regional Water Quality Control Board (Regional Board).

The General Order regulates both landowners and operators (members) of irrigated lands where there are discharges of waste that could affect the quality of waters of the state, including surface water and groundwater. As a part of the monitoring and reporting plan associated with the General Order, the Coalition must monitor levels of nitrate in the groundwater within the jurisdictional boundary. Particularly, monitoring will occur in areas that have been identified as "high-vulnerable" as described by the Coalition's Groundwater Assessment Report. The parcel identified in the Project is in an area that is considered high-vulnerable. A copy of the Groundwater Assessment Report can be downloaded at [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/water\\_quality/coalitions/westlands/ground\\_water/2015\\_0217\\_westlands\\_gar.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/water_quality/coalitions/westlands/ground_water/2015_0217_westlands_gar.pdf).

The Coalition is concerned that the levels of nitrate in the effluent water could potentially impact the groundwater. If nitrates are found in high-vulnerable areas, the Regional Board could impose additional requirements on the Coalition. The Project is using alfalfa to uptake nitrogen from the treated effluent to prevent nitrogen from seeping into the groundwater. However, the Project's current Waste Discharge Requirements and Environmental Assessment do not include monitoring the groundwater directly for nitrogen impacts. To provide adequate information on the impacts to groundwater, the Project operators should install monitoring wells and provide water quality results to the Coalition or enroll in the Coalition's irrigated lands program. Members of the Coalition are expected to complete a Nitrogen Management Plan, Farm Evaluation and a Nitrogen Summary Report each year to provide the Coalition information to analyze the potential nitrogen application impacts to groundwater associated with irrigated agriculture. The analysis is provided to the Regional Board annually, as required by the General Order. Current rates for members of the Coalition are \$2.15 per acre. Additional information on the Coalition and enrollment can be found at <http://wwd.ca.gov/resource-management/irrigated-lands-management-program/>.

If there are any questions or comments, please contact me at (559) 241-6244 or [cgallock@westlandswater.org](mailto:cgallock@westlandswater.org).

Sincerely,



Charlotte Gallock, P.E.

Resources Engineer

Westlands Water Quality Coalition Program Manager

## **Response to Westlands Water District Comment Letter, July 25, 2017**

WWD-1      The comment expresses concerns that the levels of nitrate in the City of Huron's effluent water could impact groundwater under the Proposed Action and that the City's Waste Discharge Requirements and the Environmental Assessment prepared for the Project do not include groundwater monitoring for nitrogen impacts. The commenter requests that the City either install monitoring wells and provide water quality results to the Westlands Water Quality Coalition (Coalition) or enroll in the Coalition's irrigated lands program.

The City has confirmed that they will join the Coalition's irrigated lands program in order to monitor nitrogen impacts of the Project. Reclamation has added this requirement as an environmental commitment to the Final EA (see Table 1) and as a condition of its land use authorization. Reclamation will annually monitor continued compliance with this commitment, including water quality results from monitoring, to ensure compliance with the Waste Discharge Requirements of the Regional Water Quality Control Board's General Order R5-2014-0001.