



California Regional Water Quality Control Board Santa Ana Region



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Secretary for
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Arnold Schwarzenegger
Governor

January 12, 2009

San Gorgonio Pass Water Agency
Attn: Jeff Davis, General Manager
1210 Beaumont Avenue
Beaumont, CA 92223

San Timoteo Watershed Management
Authority
Attn: J. Andrew Schlange,
General Manager
560 Magnolia Avenue
Beaumont, CA 92223

Subject: Coordination of Water Management Agency Activities in the Pass Area

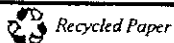
Gentlemen:

Thank you for attending the December 18, 2008 meeting in my office to explain the progress and status of total dissolved solids (TDS) and nitrate projections being prepared for the Beaumont Management Zone (BMZ) by both of your organizations. The San Gorgonio Pass Water Agency (Agency) and the San Timoteo Watershed Management Authority (Authority) are both involved in the management of the BMZ. It is my understanding that both entities are independently conducting modeling investigations that will result in the development of TDS and nitrate projections.

The Agency is a party to the January 18, 2008 Cooperative Agreement. As a party to this Agreement, the Agency must prepare 20-year TDS and nitrate projections that cover the period January 2008 through January 2027 and have these projections to the Regional Board by July 18, 2009. Notwithstanding provisions in the Agreement, the Agency will need to develop a new model or set of models that adequately represents the entire BMZ. At the December 18, 2008 meeting, the Agency's consultant indicated that they are recalibrating the USGS groundwater flow model developed a few years ago that covers a part of the Beaumont Basin which is part of the BMZ, and somehow this effort will need to be expanded to cover the remainder of the BMZ.

We also understand that the Authority is currently preparing a Title 22 Engineering Report for a recycled water recharge project for the new Beaumont Cherry Valley Water District recharge facility. As we heard in December, the Authority's consultants report that they are using recently developed groundwater flow and quality models to evaluate the response of several recharge scenarios and will include the results of the modeling work in the subsequent reports and documentation of this project. According to the Authority, they will develop projections of future TDS and nitrate-N concentrations for the BMZ and for selected wells in the BMZ, recycled water contribution at wells within one mile of the recharge facility, and the underground retention time of project recharge water for all wells within one mile of the recharge facility. The Authority has committed to developing 50-year projections. The Authority has indicated that they will submit their

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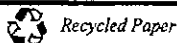
Title 22 Engineering Report to the Department of Public Health and the Regional Board in the next few months.

In the interest of efficiency and avoiding duplication of effort, it is worth exploring whether the Agency would consider withdrawing from the Cooperative Agreement process and joining with the City of Beaumont and the Authority in their Maximum Benefit Program. One of the Maximum Benefit commitments is to recharge State Water Project water, or imported water of similar TDS and nitrate concentrations, into the BMZ. Since the Agency is the wholesale provider of this water and the City and Authority are required to recharge, it would be natural for the Agency to enter into some kind of agreement with the City and the Authority to get regulatory coverage for the TDS and nitrate impacts under their Maximum Benefit commitments. The current ambient TDS concentration in the BMZ is about 260 mg/L, and the TDS antidegradation objective is 220 mg/L. There is no assimilative capacity for TDS for entities regulated under the antidegradation objective. Under the current Basin Plan requirements, the Agency's recharge will be regulated under the antidegradation objective and outside of the Maximum Benefit program. Outside of the Maximum Benefit program, the Agency will be required to mitigate the TDS contributions to the BMZ when the TDS concentration in the imported water exceeds the antidegradation objective of 220 mg/L which occurs during a significant portion of the time. As we have discussed, to participate in the Maximum Benefit program would relieve the Agency of the requirements of the Cooperative Agreement. The City and the Authority have the obligation to manage the TDS and nitrate concentrations in the BMZ and have committed to constructing desalters when the BMZ approaches the Maximum Benefit objective of 330 mg/L.

Seemingly, the Agency and the Authority have much to gain by working together using the existing tools and projected water management plans. I write this letter to both of you to encourage you to work together and prepare one set of projections, and to offer the assistance of the Regional Board staff in making this happen. Ideally, we would like to receive one set of projections endorsed by both of your agencies. Should you both work independently and produce significantly different results, then the Regional Board will likely delay the drafting the recycled water recharge permit for the Authority and reject the TDS and nitrate projections for both organizations, until the differences are evaluated and resolved. It is simply not logical, nor is it a good use of scarce public resources, for both organizations to work independently. Also, it seems that there are enormous regulatory benefits for the Agency to join with the City and the Authority in the Maximum Benefit program.

I would like to meet with both of you again as soon as possible to discuss this issue and to provide whatever assistance the Regional Board can in helping you coordinate your projections and successfully implement your recharge projects. To make the most of this effort, and in the interests of transparency and collaboration, it may be useful for

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both of you to bring the president of your respective board of directors to this meeting (and subsequent meetings if required). We hope that both organizations will consider this matter carefully and deliberately. Time is running out fast and this issue must be resolved soon. I will call you next week to determine if we can set up a meeting and facilitate coordination among you.

Sincerely,



Gerard J. Thibeault
Executive Officer
Santa Ana Regional Water Quality Control Board

cc. Regional Board

California Environmental Protection Agency

