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February 19, 2020

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Santa Margarita Water District
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City of Tustin
City of Westminster
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Mr. Ed Warner
Area Manager
U.S. Bureau of Reclamation
445 West Gunnison Avenue, Suite 221
Grand Junction, CO 81501

Subject: Comment on the Draft Environmental Impact Statement for the Paradox Valley Unit of the Colorado River Basin Salinity Control Program - Support for Salinity Control

Dear Mr. Warner:

On behalf of the Municipal Water District of Orange County¹ (MWDOC), we thank you for the opportunity to provide input on the Draft Environmental Impact Statement (DEIS) for the Paradox Valley Unit (PVU) of the Colorado River Basin Title II Salinity Control Program (Program).

As the third largest member agency of the Metropolitan Water District of Southern California (Metropolitan), MWDOC relies on Colorado River supplies to meet the needs of our service area. The MWDOC service area is composed of retail member agencies with a diversity in water supply and demand. Approximately half of our member agencies are heavily dependent on imported sources, among them the Colorado River, with some nearly 100% dependent. Thus, our comments reflect our ongoing concerns with reliability and water quality of the Colorado River over time.

Protecting the Colorado River's water quality is of paramount importance to our member agencies and, as such, we support USBR's commitment to explore long-term alternatives to reduce salinity in the Colorado River from sources in the Paradox Valley. High salinity can impact the end-users of our water by: increasing the scaling potential of water-using devices; limiting groundwater recharge efforts; reducing the marketability and usability of reclaimed water; and reducing agricultural crop yields.

For the past 45 years, the Colorado River Basin Salinity Control Forum (Forum) has worked with federal agencies to reduce salinity in the Colorado River through the implementation of salinity control measures. We appreciate that salinity control

projects coordinated between the Forum and federal agencies have contributed to reducing total dissolved solids in the Colorado River by about 100 mg/L in Lake Havasu since the inception of the Program. Salinity control measures have included improved irrigation practices, rangeland management for non-point source control, and deep-well brine injection through the PVU.

Historically, the PVU has represented approximately 7 percent of salinity control in the upper Colorado River Basin and has been the largest single point-source control project for the Program. At this time, no other project, albeit a single or group of projects with equivalent salinity reduction benefits, is ready for implementation. Implementing a PVU replacement alternative is necessary to avoid significant basin-wide economic damages and to continue the success of the Program. Modeling indicates that the PVU reduces salinity-related economic damages to water users in the Lower Basin States by more than \$20 million annually.

We are in favor of the objectives and goals as outlined in the DEIS: to remove approximately 100,000 or more tons of salt per year that would otherwise enter the Colorado River; to optimize the annual cost per ton of salt removed; and to avoid and minimize adverse impacts on physical, biological, social, economic, cultural, and tribal resources in the affected environment. Therefore, **we do not support Alternative A – No Action**, whereby the existing deep injection well would not be replaced as this would represent no salinity control in Paradox Valley. Continued salinity control in the Paradox Valley is critical to reducing salinity levels in the Colorado River. **Thus, we support any cost-considerate long-term replacement alternative that continues or exceeds the salinity reduction achieved by the existing project.**

We recognize the considerable efforts taken by USBR to evaluate the environmental effects of salinity control alternatives in Paradox Valley. USBR has demonstrated a strong commitment to reducing salinity levels in the Colorado River and collaborated with stakeholders who depend on the Colorado River as a source of drinking water. We look forward to the Final EIS and Record of Decision that identify a cost effective alternative ensuring the long-term protection of the Colorado River and its tributaries.

Sincerely,



Robert J. Hunter
General Manager

¹Municipal Water District of Orange County is a member of the Metropolitan Water District of Southern California, providing imported water to over 3.2 million Orange County residents through 28 retail water agencies. MWDOC is a wholesale water supplier and resource planning agency whose efforts focus on sound planning and appropriate investments in water supply development, water use efficiency, public information, legislative advocacy, water education and emergency preparedness.

[ORGANIZATION LETTERHEAD]

February 19, 2020

Mr. Ed Warner
Area Manager
U.S. Bureau of Reclamation
445 West Gunnison Avenue, Suite 221
Grand Junction, CO 81501

Re: Support for Salinity Control in the Paradox Valley in Western Colorado

Dear Mr. Warner:

We submit this letter in response to the U.S. Bureau of Reclamation's (USBR) Draft Environmental Impact Statement (DEIS) for the Paradox Valley Unit (PVU) of the Colorado River Basin Title II Salinity Control Program (Program).

As the major providers of drinking water in Arizona, California, and Nevada, we closely monitor salinity levels in the Colorado River and support efforts to reduce salinity in the water we deliver to our member agencies, which, in turn, directly or through their sub-agencies, provide to over 25 million people in the American Southwest. High salinity can impact the end-users of our water by increasing scaling potential on water-using devices, reducing agricultural crop yields, limiting groundwater recharge efforts, and reducing the marketability and usability of reclaimed water, among other impacts. Protecting the Colorado River's water quality is of paramount importance to our agencies and, as such, we support USBR's commitment to explore long-term alternatives to reduce salinity in the Colorado River from sources in the Paradox Valley.

For the past 45 years, the Colorado River Basin Salinity Control Forum (Forum) has worked with federal agencies to reduce salinity in the Colorado River through the implementation of salinity control measures. We appreciate that salinity control projects coordinated between the Forum and federal agencies have contributed to reducing total dissolved solids (TDS, a synonym for salinity) in the Colorado River by about 100 mg/L in Lake Havasu since the inception of the Program. Salinity control measures have included improved irrigation practices, rangeland management for non-point source control, and deep-well brine injection through the PVU.

Historically, the PVU has represented approximately 7 percent of salinity control in the upper Colorado River Basin and has been the largest single point-source control project for the Program. No other single project or group of projects with equivalent salinity reduction benefits (i.e., removal of 100,000 tons of salt annually) is ready for implementation. Therefore, as operation of the existing PVU well faces challenges and its future operation is uncertain, we support planning for a long-term replacement to

continue reducing the salinity in the Colorado River. Implementing a PVU replacement alternative is necessary to avoid significant basin-wide economic damages and to continue the success of the Program. Modeling indicates that the PVU reduces salinity-related economic damages to water users in the Lower Basin states by more than \$20 million annually. The Partnership views continued salinity control in the Paradox Valley as critical to reducing salinity levels in the Colorado River, and we therefore support a long-term replacement alternative that continues or exceeds the salinity reduction achieved by the existing project.

We recognize the considerable efforts taken by USBR to evaluate the environmental effects of salinity control alternatives in Paradox Valley. We appreciate the opportunity to provide our support during the DEIS comment period and look forward to receiving the Final EIS and Record of Decision that identify an alternative ensuring the long-term protection of the Colorado River and its tributaries.

USBR has demonstrated a strong commitment to reducing salinity levels in the Colorado River and collaborated with stakeholders who depend on the Colorado River as a source of drinking water. We thank you for your support of these efforts and appreciate your consideration to provide the resources necessary to continue managing salinity in the Paradox Valley.

Sincerely,

[ORGANIZATION SIGNATURE BLOCK]