

APPENDIX C: Comments and Responses

EA/FONSI 11-071 was circulated for comment between March 13, 2013 and April 13, 2013. Because there was a discrepancy between the circulation dates listed in the environmental document and press release, Arvin Edison Water Storage District (AEWSD) did not have opportunity to submit their comments on time. This appendix includes AEWSDs comments and Reclamation's responses.

AEWSD Comment 1#: "Our primary concern of this subject program and the proposed discharges to the Friant-Kern Canal is the potential water quality impacts to AEWSD..."

Reclamation requires that the operation and maintenance of CVP facilities shall be performed in such a manner as is practical to maintain the quality of raw water at the highest level that is reasonably attainable. Water quality and monitoring requirements are established annually by Reclamation and are instituted to protect water quality in federal facilities by ensuring that imported non-CVP water does not impair existing uses or negatively impact existing water quality conditions. These standards are updated periodically. The water quality standards are the maximum concentration of certain contaminants that may occur in each source of non-CVP water. Monitoring standards also include measuring depth to groundwater to avoid localized impacts due to well drawdown.

AEWSD Comment 2#: "The District (AEWSD) believes the existing Reclamation Monitoring Policy is deficient and lacks sufficient protections (or standards) for discharges of (non-Millerton Lake)/foreign supplies into the FKC, does not currently have adequate protection for irrigation suitability, does not address the State's anti-degradation policy and does not set limits to the amount of degradation to be allowed in the Friant-Kern Canal."

Reclamation's 2013 Water Quality Assurance Plan which was written to ensure that the proposed water quality monitoring program for introduction of Non-CVP water in to the FKC and Madera Canal would provide accurate and reliable information. The list of constituents and maximum contaminant levels of each that can occur in each source of non-CVP water are based on both Title 22 (California Domestic Water Standards) and the stricter Irrigation Suitability Standards recommended by Ayers & Westcot. This list is dynamic and will be revised as necessary.

AEWSD Comment 3#: "As you are aware the Friant-Kern Canal is currently undersized under high flow conditions and prorate constraints are frequently in place when these high flow short duration supplies are available. Subsequently, almost any change in point of diversion has the potential to further restrict deliveries to current Friant-Kern contractors under those conditions."

Tiers of priority of water deliveries in those reaches of the Friant-Kern Canal that are affected during a canal capacity probate shall be as follows:

1. Class I water used by Friant-Kern long-term contractors;

2. Class I water transferred or exchanged from a Friant-Kern long-term contractor to a Friant-Kern long-term contractor or Cross-Valley contractor provided that the change in point of diversion does not cause a Class II contractor to suffer a loss;
3. Class II water used by Friant-Kern long-term contractors;
4. Class II water transferred or exchanged from Friant-Kern long-term contractors to a Friant-Kern long-term contractor or Cross-Valley contractor (including subcontractors).
5. Class I water transferred or exchanged from a Madera Canal long-term contractor to a Friant-Kern long-term contractor.
6. Class II water transferred or exchanged from a Madera Canal long-term contractor to a Friant-Kern long-term contractor.
7. Class I water transferred or exchanged from a Friant-Kern long-term contractor to a non-Friant-Kern long-term contractor;
8. Class II water transferred or exchanged from a Friant-Kern long-term contractor to a non-Friant-Kern long-term contractor;
9. Class I water transferred or exchanged from a Madera Canal long-term contractor to a non long-term contractor;
10. Class II water transferred or exchanged from a Madera Canal long-term contractor to a non long-term contractor;
11. Surplus water used by a Friant-Kern long-term contractor;
12. Cross Valley contractor contract water supply;
13. Surplus water used by Cross-Valley contractor;
14. Surplus water used by a non long-term contractor and non Cross-Valley contractors;
15. Non-Project water supplies used by non long-term contractor and non Cross-Valley contractors.