

SAN JOAQUIN VALLEY DRAINAGE AUTHORITY

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October 29, 2014

Mr. Joe Karkoski
Supervising Water Resources Control Engineer
Irrigated Lands Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

**SUBJECT: Response to RWQCB Comment on Westside San Joaquin River Watershed
Coalition GAR Outline**

Dear Mr. Karkoski:

The Westside San Joaquin River Watershed Coalition (Westside Coalition) received the Regional Water Quality Control Board's (RWQCB) letter of September 19th regarding the Groundwater Quality Assessment Report (GAR) Outline submitted by the Coalition on June 13, 2014. We understand that the GAR Outline meets the requirements of the Waste Discharge Requirements (R5-2014-0002) General Order (as described in Attachment B provision IV.A.2), with one revision. Although the RWQCB suggests that the Coalition may address this revision when submitting the draft GAR, we wish to address the RWQCB's comment sooner to ensure that there is agreement on the proposed approach with respect to this requirement.

In the September 19 letter, the RWQCB staff comments that the General Order (Attachment B Section IV.A.2, page 14) requires that the GAR include "Groundwater recharge information, if readily available, including identification of areas contributing recharge to urban and rural communities where groundwater serves as a significant source of supply." RWQCB staff notes that the intent of this requirement is to identify areas contributing recharge to all rural and urban communities where groundwater serves as a significant source of supply, including those communities not served by a public water system.

On July 23rd, 2014, the Westside Coalition attended a meeting held with RWQCB staff and other agricultural coalition representatives to discuss comments received by the East San Joaquin Water Quality Coalition on its GAR. A key issue discussed at that meeting related to identifying the location of small disadvantaged communities reliant on groundwater through domestic well use or small water systems, where such information is available or can be inferred from existing information. At the July 23rd meeting, it was discussed that a map would be prepared based on a query of disadvantaged Census Designated Places (Disadvantaged Communities, or DACs) and that these areas, along with the public water systems reliant on groundwater as identified from

the California Department of Public Health's (CDPH's) California Environmental Health Tracking Program (CEHTP) Public Water Systems Boundary Tool (also referred to as Environmental Health Investigations Branch, or "EHIB"), would be used as the basis for defining communities reliant on groundwater for the East San Joaquin Water Quality Coalition Area.

Luhdorff and Scalmanini, Consulting Engineers (LSCE) [prime consultant], in conjunction with Davids Engineering and Larry Walker Associates (LWA) [subconsultants to LSCE], has been retained by the San Joaquin Valley Drainage Authority (SJVDA) to complete preparation of the Westside Coalition's GAR. This letter, prepared in consultation with the LSCE Team and on behalf of the Westside Coalition, provides a response to the RWQCB staff's comment on the GAR Outline and explains how DAC and public water system areas are identified and the plan for defining rural and urban communities reliant on groundwater for the GAR.

Response to RWQCB Comment on GAR Outline

The DACs have been mapped according to locations of Census Designated Places (CDPs) meeting the criteria for disadvantaged or severely disadvantaged status [PRC §75005 (g)] using data for the 5-year median household income from the US Census Bureau 2012 American Community Survey and based on the 2012 statewide median household income (MHI). CDP data are available from the U.S. Census Bureau and have been through an extensive QA/QC process.

Public Water System (PWS) boundaries are available on the California Department of Public Health website (EHIB site; <http://www.ehib.org/>), which are uploaded by the system operators. These have not been rigorously checked for errors prior to being made available to the public. These data were examined individually and several were found to be in error. Most notably, the service area for Patterson Irrigation District (which does not serve any residential water) was indicated as the service area for the City of Patterson and the Landale Mutual Water Company was mislocated in Merced County (actually located in Los Angeles County). Public water systems with one or more sources coded as groundwater in the CDPH Permits, Inspections, Compliance, Monitoring, and Enforcement (PICME) database were considered reliant on groundwater.

The EHIB/PWS boundaries and DACs within the Westside Coalition area were chosen as the basis to define the extent of communities reliant on groundwater in the GAR. Notably, most of these areas overlap to some extent; however, some EHIB/PWS boundaries are significantly different compared to the DAC boundaries. The Drinking Water Information Clearinghouse (DRINC) portal was used to assess the type of population served by each PWS. Systems with no residential population were excluded. Systems with residential populations were examined using recent (2012) aerial imagery to verify the presence of residential neighborhoods within the areas defined by these data. The EHIB/PWS boundaries were modified to exclude non-residential and transient areas where applicable. Additional contacts with several PWS operators were conducted to verify the reliance of areas on groundwater. Through this process, a number of EHIB/PWS boundaries were excluded or modified and a few CDP boundaries were included, where reliance on groundwater was indicated. The results of merging the DAC dataset with the

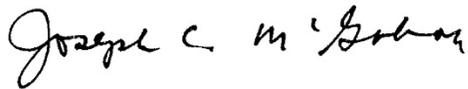
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modified Ehib/PWS datasets are presented in **Figure 1**. The enclosed **Table 1** outlines the process through which the final boundaries for communities reliant on groundwater were determined.

In summary, **Figure 1** shows the urban and rural communities reliant on groundwater within the Westside Coalition area to be used in the Coalition's GAR. The areas contributing recharge to these areas will be evaluated for purposes of the GAR.

We trust the above approach addresses the RWQCB's comment on the GAR Outline. Please contact me at 559-582-9237 (phone) or jmcgahan@summerseng.com if you would like to discuss the above response.

Sincerely,

A handwritten signature in black ink that reads "Joseph C. McGahan". The signature is written in a cursive style with a large initial "J" and "M".

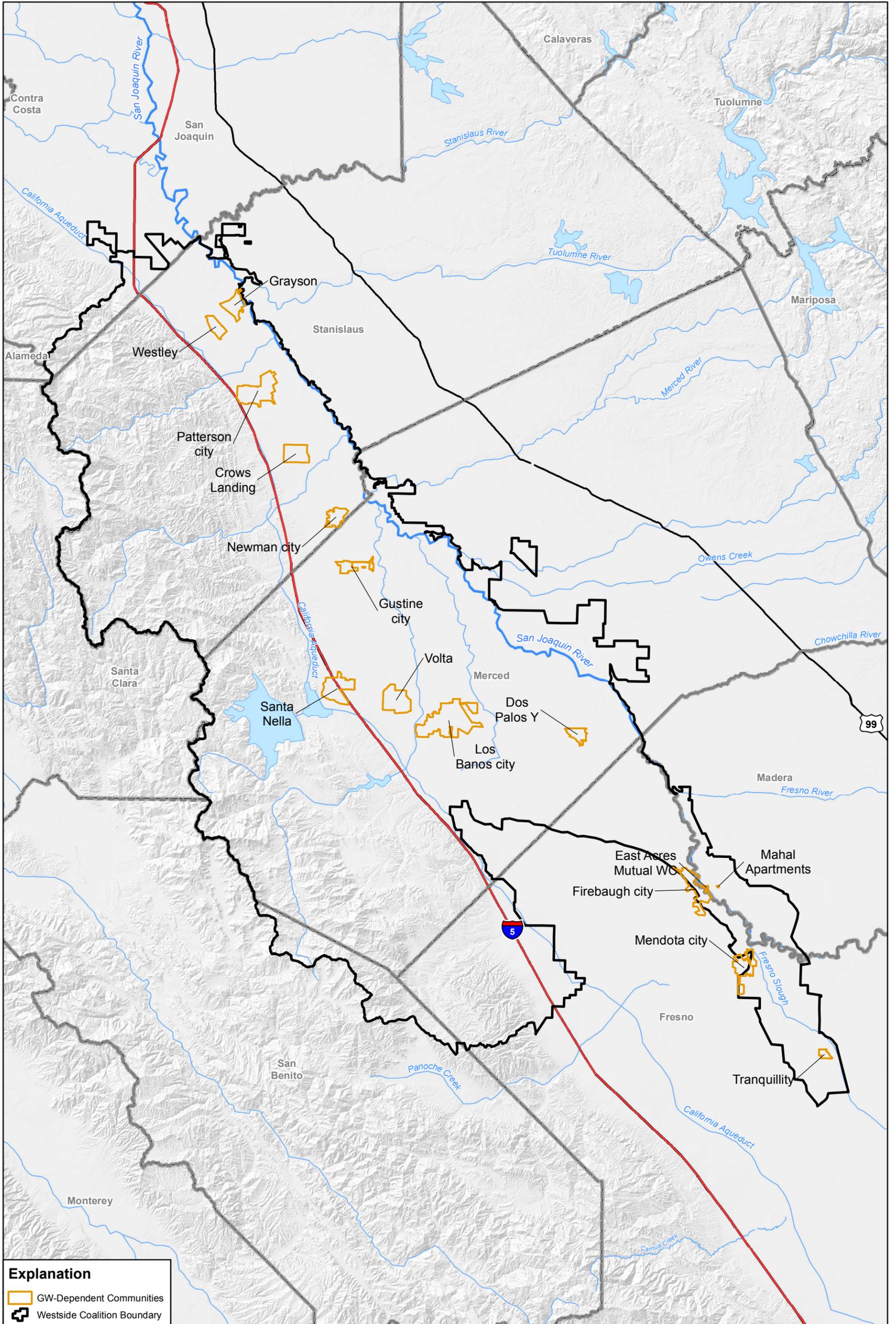
Joseph C. McGahan
SJVDA Project Manager
San Joaquin Valley Drainage Authority

Enclosures

cc: Vicki Kretsinger Grabert, Luhdorff & Scalmanini, Consulting Engineers
Nick Watterson, Luhdorff & Scalmanini, Consulting Engineers

Table 1
Boundaries for Designation of Communities Reliant on Groundwater

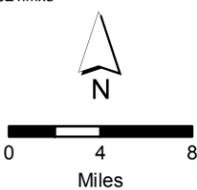
Name of Boundary	Source of Original Boundary	DAC if CDP	Final Boundary Status as Community Reliant on Groundwater	Information Sources Reviewed/Contacted
Crows Landing CDP	Census Designated Place	Yes	Included	DRINC - 5000005
Dos Palos Y CDP	Census Designated Place	No	Included	Darrell Fonseca, Dos Palos PWS
Firebaugh city	Census Designated Place	Yes	Included	DRINC - 1010005
Grayson CDP	Census Designated Place	Yes	Included	DRINC - 5010033
Gustine city	Census Designated Place	Yes	Included	DRINC - 2410003
Los Banos city	Census Designated Place	No	Included	DRINC - 2410005
Mendota city	Census Designated Place	Yes	Included	DRINC - 1010021
Newman city	Census Designated Place	Yes	Included	DRINC - 5010013; Koosun Kim, City of Newman
Patterson city	Census Designated Place	No	Included	DRINC - 5010017; Maria Encinas, City of Patterson
Santa Nella CDP	Census Designated Place	Yes	Included	DRINC - 2410018; Amy Montgomery, Santa Nella Co. WD
Tranquillity CDP	Census Designated Place	Yes	Included	DRINC - 1010030
Volta CDP	Census Designated Place	Yes	Included	DRINC - 2400201
Westley CDP	Census Designated Place	Yes	Included	DRINC - 5010007
East Acres Mutual WC	EHIB System Boundary	N/A	Included	DRINC - 2000512
Mahal Apartments	EHIB System Boundary	N/A	Included	DRINC - 2000800
Crows Landing CSD	EHIB System Boundary	N/A	Included - merged with Crows Landing CDP	DRINC - 5000005
Firebaugh City	EHIB System Boundary	N/A	Included - merged with Firebaugh City CDP	DRINC - 1010005; Aerial Imagery
Los Banos City	EHIB System Boundary	N/A	Included - merged with Los Banos City CDP	DRINC - 2410005
Mendota City	EHIB System Boundary	N/A	Included - merged with Mendota City CDP	DRINC - 1010021
City of Newman Water Department	EHIB System Boundary	N/A	Included - limited extent to Newman City CDP	DRINC - 5010013; Koosun Kim, City of Newman
Santa Nella County WD	EHIB System Boundary	N/A	Included - limited extent to Santa Nella CDP	Aerial Imagery; Amy Montgomery, Santa Nella Co. WD
Tranquillity ID	EHIB System Boundary	N/A	Included - limited extent to Tranquillity CDP	Aerial Imagery
Dos Palos city	Census Designated Place	Yes	Excluded - not reliant on groundwater	DRINC - 2410002; Darrell Fonseca, Dos Palos PWS
South Dos Palos CDP	Census Designated Place	Yes	Excluded - not reliant on groundwater	DRINC - 2410002; Darrell Fonseca, Dos Palos PWS
Dos Palos City	EHIB System Boundary	N/A	Excluded - not reliant on groundwater	DRINC - 2410002; Darrell Fonseca, Dos Palos PWS
Western Hills WD	EHIB System Boundary	N/A	Excluded - emergency groundwater use only, well located in Central Valley floor (per operator)	DRINC - 5010039; Patrick Garvey WHWD
Diablo Grande CDP	Census Designated Place	No	Excluded - served by Western Hills WD	DRINC - 5010039; Patrick Garvey WHWD
Cal Trans Erreca Rest Area	EHIB System Boundary	N/A	Excluded - no residences	DRINC - 2400057; Aerial Imagery
San Joaq.Valley Nat.Cemetery	EHIB System Boundary	N/A	Excluded - no residences	Aerial Imagery
SJR Farming Erreca Turner Island	EHIB System Boundary	N/A	Excluded - no residences	Aerial Imagery
Spreckles Sugar Co.	EHIB System Boundary	N/A	Excluded - no residences	Aerial Imagery
Jack's Bayou Resort	EHIB System Boundary	N/A	Excluded - PWS Class = Transient	DRINC - 2410005
Patterson City	EHIB System Boundary	N/A	Excluded - incorrect boundary (this is Patterson Irrigation District)	Maria Encinas, City of Patterson
Landale Mutual WC	EHIB System Boundary	N/A	Excluded - error in placement, not within Coalition area	DRINC - 1900809; http://www.lacountyland.com/antelope_valley_utility_companies.htm



Explanation

-  GW-Dependent Communities
-  Westside Coalition Boundary

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BOUNDARIES FOR DESIGNATION OF COMMUNITIES RELIANT ON GROUNDWATER
FIGURE 1
 WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION (WESTSIDE COALITION)
 GROUNDWATER QUALITY ASSESSMENT REPORT OUTLINE: RESPONSE TO COMMENTS