

**From:** Lee, Gene K [GLee@usbr.gov]  
**Sent:** Monday, September 27, 2010 3:23 PM  
**To:** ILRP Comments  
**Cc:** Adam Laputz (awla-putz@waterboards.ca.gov); Joe (jkarkowski@waterboards.ca.gov)  
**Subject:** ILRP Comments  
**Attachments:** ILRP\_Comments.pdf

Dear Ms. Smith,

Please find our agency's comments for the Draft Program EIR for the Long Term Irrigated Lands Regulatory Program in the attached letter. A copy of this letter will follow. If you have any question, please feel free to contact me. Thank you.

Gene Lee

[glee@usbr.gov](mailto:glee@usbr.gov)

Division of Planning  
Mid Pacific Region, USBR  
(916) 978-5092



# United States Department of the Interior

BUREAU OF RECLAMATION  
Mid-Pacific Regional Office  
2800 Cottage Way  
Sacramento, California 95825-1898

IN REPLY  
REFER TO:  
MP-740  
ENV-7.00

Ms. Megan Smith  
IFC Kaiser  
630 K Street, Suite 400  
Sacramento, CA 95814

Subject: Draft Program Environmental Impact Report (PEIR) for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley Region

Dear Ms. Smith:

The Bureau of Reclamation appreciates the opportunity to provide comments on the Draft PEIR for the Irrigated Lands Regulatory Program, dated July 2010.

Our goal is to balance the many competing and often conflicting needs among numerous water uses. These needs include urban and industrial, agriculture, fish and wildlife habitat, water quality, wetlands, endangered species issues, Native American tribal trust, power generation, and recreation. Reclamation's Mid-Pacific Region strives to develop and implement a balanced approach to water allocation, serving users while protecting the environment.

Specific concerns in the environmental document that need to be addressed include:

- The effects of various management actions that will reduce flow to receiving waters. State Water Resources Control Board involvement is crucial to ensure water quality actions from this program will not injure downstream users through reduced flows. For example, a major portion of the San Joaquin River is composed of agricultural flows due to wetlands and agricultural management practices.
- The effects of altering groundwater hydrology patterns and how they relate to adjacent surface water flows. Areas with greater potential for groundwater accretions to surface water flows, such as the Delta, may need more detailed analysis to determine impacts to surface water quality. The groundwater management strategy of this regulatory program should be consistent with the Central Valley Regional Water Quality Control Board's groundwater "Roadmap Program."
- The need for both coordination and integration with all regulatory programs in the affected watershed to eliminate or minimize redirected impacts. As new regulatory actions come into place for various watersheds or sub-watersheds, flexibility is necessary to allow multiple programs to function without redundant efforts.

We look forward to working with you to address our concerns. If you have any questions, please contact Mr. Gene Lee, Regional Water Quality Coordinator, at 916-978-5092 or [glee@usbr.gov](mailto:glee@usbr.gov).

Sincerely,



Michelle H. Denning  
Regional Planning Officer

cc: Mr. Adam Laputz  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114