



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager

July 27, 2012

**Via e-mail and regular mail**

Mr. Oscar Biondi  
State Water Resources Control Board  
Division of Water Rights  
P.O. Box 2000  
Sacramento, CA 95812-2000

Dear Mr. Biondi:

Draft Water Quality Certification for the Eagle Crest Energy Company  
Eagle Mountain Pumped Storage Hydro-Electric Project, FERC Project No. 13123-002

The Metropolitan Water District of Southern California (Metropolitan) reviewed the State Water Resources Control Board (SWRCB) draft water quality certification (Draft) for the Eagle Mountain Pumped Storage Hydroelectric project, Federal Energy Regulatory Commission (FERC) Project No. 13123-002 (Project). Metropolitan previously provided comments on other environmental review documents by both FERC and the SWRCB.<sup>1</sup> To the degree such comments are relevant to the issues raised in the Draft or expand upon the points in these comments, Metropolitan asks that SWRCB at its discretion consider the previously filed related comments as incorporated by reference into this submittal.

Metropolitan has the following specific comments on potential environmental issues for consideration and incorporation into the final water quality certification:

1. *Groundwater Quality Monitoring.* One of the conditions in the Draft requires the Eagle Crest Energy Company (applicant) to conduct groundwater quality monitoring for the life of the Project, as was requested by Metropolitan during the Final Environmental Impact Statement (EIS) review. The applicant is required to monitor groundwater quality for a minimum suite of constituents. Although not listed in SWRCB's list of constituents, the Draft EIS identified that other groundwater quality concentrations (i.e., boron and fluoride) are higher than recommended levels for drinking water use. Also, historical data in the Chuckwalla Basin have indicated

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<sup>1</sup> Metropolitan previously submitted comments regarding:

1. Request for Use of Traditional Licensing Process, by pleading to FERC filed Feb. 11, 2008.
2. Draft License Application, by pleading to FERC filed Sept. 15, 2008.
3. FERC Scoping Document 1, by letter dated January 15, 2009.
4. SWRCB Draft EIR, by letter dated October 6, 2010.
5. FERC Draft EIS, by letter dated February 28, 2011.
6. FERC Final EIS, by letter dated March 19, 2012.
7. USFWS Biological Opinion, by letter dated July 11, 2012.

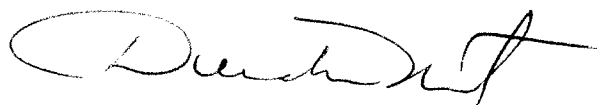
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elevated levels of hexavalent chromium and some radiological constituents. We recommend that SWRCB consider expanding the minimum suite of constituents to establish a broader set of baseline data for monitoring water quality impacts.

2. *Colorado River Aqueduct (CRA) Structural Tolerance & Subsidence.* Metropolitan is concerned about the Project's potential direct and cumulative impacts on water supplies, specifically potential impacts on the Colorado River and local groundwater supplies. The Final EIS, Mitigation Measure WS-2, stated an incorrect structural tolerance for subsidence for the CRA by using the wrong number for the maximum allowable movement.<sup>2</sup> The water quality certification should clarify mitigation requirements regarding mitigation monitoring for the three supply wells within the proposed project area that are near the CRA. Metropolitan expects that the Groundwater Level Monitoring Plan and Seepage Management Plan will address these concerns in greater detail.

We appreciate the opportunity to provide input to your planning process for this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213)217-7902.

Very truly yours,



Deirdre West  
Manager, Environmental Planning Team

BSM/bsm  
(EPT Job No. 2012071004)

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<sup>2</sup> Comment Letter dated March 19, 2012 in response to the Final EIS for the Eagle Mountain Pumped Storage Hydro-Electric Project, FERC Project No. 13123-002. To protect the structural integrity of the CRA, the maximum allowable movement, horizontally or vertically, of any locations along the CRA is 5mm (0.017 foot). Mitigation Measure WS-2 incorrectly refers to a "Maximum Allowable Changes threshold of 0.125 foot... ."