



Colorado River Basin Regional Water Quality Control Board

April 29, 2020

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MAY 04 2020

Matthew H. Litchfield
General Manager
Three Valleys Municipal Water District
1021 E. Miramar Avenue
Claremont, CA 91711-2052

THREE VALLEYS MWD

Re: Scoping Plan for Bonanza Spring Study (February 2020)

Dear Mr. Litchfield,

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Water Board) recently learned of Three Valleys Municipal Water District's (TVMWD) approval of a scoping plan to conduct a hydrological study of Bonanza Spring (Project) in connection with the Cadiz Project. Staff of the Regional Water Board have reviewed the *Scoping Plan for Bonanza Spring Study* prepared by Aquilogic and dated February 2020. The proposed study requires permitting from the Regional Water Board, and therefore we request that you contact our office to provide additional information.

1. Dredged or Fill Material Discharges

If the monitoring wells for the Project are located within the Bonanza Spring (waters of the state), well installation activities would likely be subject to the State Water Resources Control Board's (State Water Board) Order No. 2004-0004-DWQ, *General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction*. This General Order is restricted to discharges of dredged or fill material of not more than two-tenths (0.2) of an acre and 400 linear feet for fill and excavation discharges, and of not more than 50 cubic yards for dredging discharges. If the Project-impacted areas are greater than the General Order criteria listed above, individual Waste Discharge Requirements (WDRs) from the Regional Water Board will be required.

An "alternatives analysis" may be appropriate for this Project to avoid or minimize impacts to waters of the state. This analysis evaluates the least environmentally damaging practicable alternative with respect to impacts to waters of the state, and it may suggest that the wells be located outside of the spring to avoid discharges of dredged or fill material.

NANCY WRIGHT, CHAIR | PAULA RASMUSSEN, EXECUTIVE OFFICER

2. Discharges to Land with a Low Threat to Water Quality

During the monitoring well installation phase, drilling activities will result in discharge of boring waste and monitoring well purge water to land. These discharges to land likely will have a low threat to water quality and low volume with minimal pollutant concentrations, and therefore will likely be subject to State Water Board Order No. 2003-0003-DWQ, *Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality*.

3. Slug Test and Geochemical Assessment

The scoping plan for the Project also proposes to conduct a slug test and geochemical assessment by adding "tracer" to the groundwater. An inert-solid slug will be used for the slug test. Tracers for the geochemical assessment fall into the three categories: (1) general chemical parameters (i.e., major ions, TDS, pH, etc.), (2) conservative trace elements (i.e., boron or dissolved silica), and (3) isotopic analysis (e.g., water isotopes, ⁵³Cr/⁵²Cr, and potentially other isotopic measurements as appropriate). Because this activity triggers discharges that may impact the groundwater quality, individual WDRs may be required to conduct these tests.

Please note that State Water Board Resolution No. 68-16, *Statement of Policy With Respect to Maintaining High Quality of Waters in California* (Antidegradation Policy), states that discharges to existing high quality waters will be required to meet WDRs which will result in the best practicable treatment or control of the discharge necessary to assure that (a) pollution or nuisance will not occur, and (b) the highest water quality consistent with maximum benefit to the people of the state will be maintained.

In conclusion, further information concerning Project activities is necessary to determine how best to regulate the various discharges that are subject to Regional Water Board jurisdiction. Please contact Kai Dunn at kai.dunn@waterboards.ca.gov or 760-776-8986 at my office to discuss a path forward.

Sincerely,



Paula Rasmussen
Executive Officer
Colorado River Basin
Regional Water Quality Control Board

cc: Anthony Brown
Aquilogic, Inc
245 Fischer Avenue, Suite D2
Costa Mesa, CA 92626