



UNITED STATES
DEPARTMENT OF THE INTERIOR

NT,
5/18/15

BUREAU OF INDIAN AFFAIRS
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MAY 19 2015

IN REPLY REFER TO:
Natural Resources
Hydrologist

Attn: Patti Reyes
Coachella Valley Salt and Nutrient Management Plan Technical Group
Planning and Special Programs Manager
Coachella Valley Water District
P.O. Box 1058
Coachella, CA 92236

Subject: Comments of the Bureau of Indian Affairs Southern California Agency regarding the Draft Salt and Nutrient Management Plan For the Coachella Valley – April 2015

This letter is provided by the U.S. Bureau of Indian Affairs Southern California Agency, (BIA), to review and comment on "Draft Salt and Nutrient Management Plan For the Coachella Valley – April 2015" located at the CVWD website. The BIA understands that this technical memorandum is to be used in preparation for the requirements of the State Water Resources Control Board Resolution No. 2009 011 (http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2009/rs2009_0011.pdf), which establishes the Recycled Water Policy.

The BIA is the oldest bureau of the United States Department of the Interior. Established in 1824, the BIA provides services to approximately 1.7 million American Indians and Alaska Natives. Among the many duties of the BIA, as established by the United States Congress, is to serve as an advocate for the sovereignty and rights of tribes in dealing with other governmental entities and, to fulfill and execute the Federal Government's trust responsibility to American Indian Tribes. *All federal agencies share in this trust responsibility.*

Below are specific comments for consideration regarding the draft document, and responses should be addressed to the included parties below.

- 1) Tribal lands, federal lands, and other lands set aside for conservation represent a significant proportion of the Coachella Valley, and in many cases can represent areas of significant water input outside the jurisdiction of the various water management agencies. In many cases, the management

zones include a significant portion of these lands. Included as Figure 1) is a simple map representing federal land holdings, including tribal trust lands, within the Coachella Valley basin. We encourage the inclusion of similar maps within the basins and sub-basins described by the plan as this may assist in explaining where data gaps may exist due to lands outside the jurisdiction of the various management agencies.

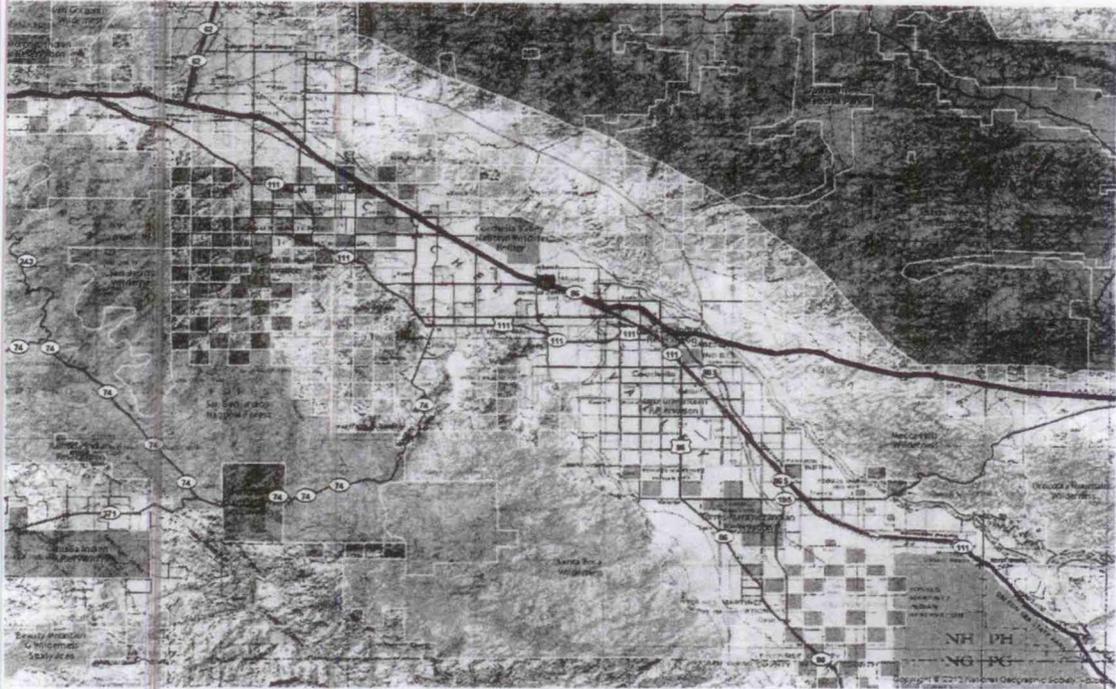


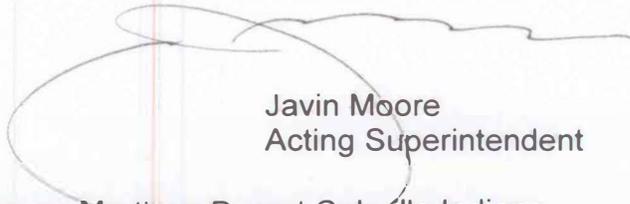
Figure 1) Federal Lands within the Coachella Valley.

- 2) The calculations of the water budgets within the differing management zones appear incomplete. The west whitewater management zone does not contain any outflow due to phreatophyte evapotranspiration. Given that this is the second largest management zones, it is unrealistic that the smaller management zones have measureable phreatophyte evapotranspiration while large one containing a river system is without evapotranspiration.
- 3) The calculations of the water budgets within the differing management zones appear inaccurate. It is understood that calculations of water budgets over spatial areas is a challenging task, however the implication that water budgets during any given year are accurate to a single acre foot is simply not realistic. For example in Table 6-4, the natural recharge to the West Whitewater River Management Zone is listed at 40,823 acre-feet for 2013. Calculations of natural groundwater recharge are difficult to measure directly, and estimations can be highly variable, so these numbers of often inferred and highly variable depending upon the estimation technique utilized, not accurate to such a high degree.

- 4) Planned projections for the estimates of future water quality are based upon potential impacts of 10% to 20% of estimated assimilative capacity depending upon project qualifications. The choice to use a single AWQ for the water management zones within the SNMP, without ranges or standard deviations, requires faith in the veracity of the estimates. A quick review of the draft document however shows some basic flaws in the estimates leading to questions of its veracity. One a missing component in a water balance (bullet 2), and the second an inferred calculation to an unreasonable level of accuracy (bullet 3). Lastly high levels of natural variability of the TDS and Nitrate concentrations exist within the management zones (For example, shown in the layers 1-3 of Table 5-4). Explaining natural variability via ranges or standard deviations for predictive measures is common, much the same way a weather forecast includes a range of temperature or precipitation amounts rather than a single number, where utilizing a single number for this purpose is far more likely to lead to inaccuracies. Consequently, it is recommended that ranges or standard deviations be included within the predictive tool to eliminate potential misunderstandings of the accuracy of AWQ value.

If any clarification is needed, please do not hesitate to call Mr. Patrick Taber, Agency Hydrologist at 951-276-6624 x 256.

Sincerely;



Javin Moore
Acting Superintendent

Cc: Chairperson, Torres Martinez Desert Cahuilla Indians
Chairperson, Agua Caliente Band of Cahuilla Indians
Chairperson, Twenty-Nine Palms Band of Mission Indians
Chairperson, Cabazon Band of Mission Indians
Chairperson, Augustine Band of Cahuilla Indians