



6075 Kimball Avenue • Chino, CA 91708
P.O. Box 9020 • Chino Hills, CA 91709
TEL (909) 993-1600 • FAX (909) 993-1985
www.ieua.org

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Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager
Orange County Water District
18700 Ward Street
Fountain Valley, CA 92708

Subject: Review Comments on the Prado Basin Ecosystem Restoration and Water Conservation Study, Final Integrated Feasibility Report

Dear Mr. Markus:

The Inland Empire Utilities Agency (IEUA) appreciates the additional data and the U.S. Army Corps of Engineers (Corps) responses to IEUA's comments on the Prado Basin Feasibility Study Integrated Feasibility Report (IFR). The additional information reinforces concerns raised by our previous comments in the three areas outlined below:

1. Of greatest concern is the response to issue "C" beginning on Page 11 related to water consumption from the creation of riparian/wetland habitat, primarily within the Chino Creek watershed but also potentially within the Mill Creek watershed. Both creeks depend on wastewater discharges from IEUA Water Reclamation Facilities (WRFs), especially in the summer period. A review of the locations proposed for invasive species management (Figure 3-5) demonstrates that this management effort will not occur within the Chino Creek watershed and only minimally within the Mill Creek watershed. Thus, the net benefit from invasive species management efforts, which IEUA supports, will not directly support the proposed riparian/wetland habitat within these two watersheds; however, continuous discharges from IEUA's WRFs into Chino and Mill Creeks, will support this new proposed habitat. These flows are currently in balance with the existing established habitat, and they are the main source of IEUA flows required to meet Chino Basin flows at Prado Dam in accordance with the 1969 Judgment. This existing balance will be altered by the addition of substantial new riparian and wetland habitat water demand, particularly along Chino Creek. The act of invasive plant removal may provide additional water for the Santa Ana River Basin but does not offset or compensate for the reduction in flows (primarily supplied by IEUA particularly during summer and fall) within Chino Creek to support the additional habitat. This concern was not analyzed in the IFR and was not adequately addressed in the Corps' response to issue "C". IEUA does not believe it should carry the primary burden of supporting this new habitat which under current circumstances appears will be the case. A more detailed water balance needs to be developed and mitigation in some form must be included in the IFR to address this key concern regarding water resource management.

Water Smart - Thinking in Terms of Tomorrow

Jasmin A. Hall
President

Michael E. Camacho
Vice President

Steven J. Elie
Secretary/Treasurer

Paul Hofer
Director

Marco Tule
Director

Shivaji Deshmukh
General Manager

2. The second issue of concern is hydraulic control (response to comment A). The proposed action will permanently alter the water storage elevation behind Prado Dam. IEUA does not disagree that fluctuations in groundwater levels have and may occur in the future; however, after reviewing the additional data provided by the Corps, we are still concerned about the impact increasing the storage elevation would have on managed groundwater levels. This is a critical issue that is connected to the ability of all Chino Basin stakeholders to maintain future recharge of recycled water in the Chino Basin and is currently being managed and monitored through the Prado Basin Habitat Sustainability Program (PBHSP). With this proposed action, which would create a permanent change, the Corps and/or OCWD need to commit to support the PBHSP groundwater monitoring efforts by the Chino Basin Watermaster. By partnering on the PBHSP the Corps and/or OCWD will assist in compiling data essential for ongoing groundwater management, including adaptive management should the current hydraulic control balance be disturbed in the future. Although groundwater levels may incur only minimal future change attributed to the new surface water storage elevation, we believe it is essential to compile a sufficient data base to identify and monitor contributing factors to possible future changes in groundwater levels. OCWD's and the Corps' commitment to support this effort is considered an important contingency measure to support IFR programs.

3. Finally, IEUA still has concerns that the IFR is being evaluated without considering the programs developed under the Upper Santa Ana River Watershed Habitat Conservation Plan (HCP). The HCP environmental documents are near release for public review and most participants, including OCWD, have had opportunity to review the drafts. IEUA recommends evaluating the interactions and cumulative effects of the two programs. Both programs focus on protecting endangered species and their habitat with several management activities overlapping, such as removal of invasive species. IEUA recognizes that both the Corps and OCWD are nearing decisions on implementing the IFR, but the synergies between these two programs should not be overlooked.

If you should have any questions pertaining to the comments provided in this letter, please contact Sylvie Lee, Manager of Strategic Planning & Resources at slee@ieua.org or 909.993.1646.

Sincerely,
INLAND EMPIRE UTILITIES AGENCY



Shivaji Deshmukh, P.E.
General Manager