



YOUR MOST VALUABLE RESOURCE - WATER

OFFICE OF
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October 22, 2014

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Mr. Lonnie M. Wass
Supervising Engineer
Central Valley Regional Water
Quality Control Board
State of California
1685 E Street
Fresno, CA 93706

RWQCB-CVR
FRESNO, CALIF.

Re: Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the Malaga County Water District Wastewater Treatment Facility

Dear Mr. Wass:

Thank you for the opportunity to review and comment on the subject documents for the Malaga County Water District (MCWD). As previously communicated to the MCWD and Regional Water Quality Control Board (RWQCB), the Fresno Irrigation District (FID) is willing to assist MCWD work towards eliminating the discharge to the FID's Central Canal by allowing for time to work on the issues.

FID would like the MCWD to work towards completely eliminating the discharge to the Central Canal in the future. While the discharge from the Wastewater Treatment Facility (WWTF) adds to our water supply, the discharge can be a significant nuisance at certain times. Some of our maintenance activities require the Canal to be dried out before performing the work activity. This is not possible if discharges are taking place year-round, including during our non-irrigation season. The discharge during our irrigation season is typically not an issue. The irrigation season typically takes place from March to August (six months) in an average year but can vary from two (2) months to nine (9) months long depending on the hydrology. Additionally, if FID is conveying stormwaters pumped in by the Fresno Metropolitan Flood Control District, discharges from the MCWD may be allowed if capacity exists, but these discharges would need to be handled on a case-by-case basis.

It is our understanding that the discharge from the WWTF to the Central Canal cannot be reduced or terminated currently without significant changes or investment by the MCWD. MCWD relies heavily, or almost exclusively, on this discharge to the

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Central Canal to balance the system and avoid capacity issues. It is FID's desire to have MCWD develop other alternatives for discharge other than to FID and to become self-sufficient in its operations without the discharge to the FID canal system.

We anticipate the discharge issue can be addressed within the next three (3) to five (5) years; therefore, FID is willing to allow MCWD to discharge to the Central Canal for up to five (5) years. At the end of this period, we anticipate the MCWD to be self-sufficient and/or have other alternatives available. After this period, FID is still open to accepting their discharges during the irrigation season; however, the discharges to the FID system outside of the irrigation season needs to be eliminated.

Should you have any questions in regard to the subject matter, please do not hesitate to contact Laurence Kimura at (559) 233-7161, ext. 7103 or at LKimura@fresnoirrigation.com.

Sincerely,



Gary R. Serrato
General Manager

cc: Matt Scroggins, Regional Water Quality Control Board
Laurence Kimura, Fresno Irrigation District
Bill Stretch, Fresno Irrigation District
James Anderson, General Manager, Malaga County Water District