



United States Department of the Interior

NATIONAL PARK SERVICE

Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, California 92277-3597

IN REPLY REFER TO:

1.A.1 (JOTR-RM)

April 9, 2013

Mr. Oscar Biondi
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, California 95812-2000
obiondi@waterboards.ca.gov

Subject: Comments for the Draft Final Water Quality Certification for the Eagle Mountain Pumped Storage Project, Federal Regulatory Commission Project No. 13123

Mr. Oscar Biondi,

Thank you for the opportunity to comment on the Draft Final Water Quality Certification for the Eagle Mountain Pumped Storage Project (DWQC). As approved in the notification for the release of the DWQC, we will be submitting our comments to the Board electronically with a follow-up hard copy. Presented below are some concerns that we would like to have clarified, amended or addressed in the final WQC.

- Page 7 In the first partial paragraph at the top of this page, the last sentence in this paragraph is confusing as to its intent. A nearly identical statement is made on page 11 (first paragraph beneath Table 2). Does the statement that “*seepage water quality shall be equal to or better than native groundwater beneath the reservoirs*” refer to the quality of the water seeping directly from the reservoirs (i.e., the quality of the reservoir water itself) or does it refer to the quality of the seepage that is intercepted downgradient of the reservoirs by the seepage control wells?
- Page 14 In the third and fourth bulleted items on this page, the inferred seepage estimates seemed to be flipped from the seepage estimates reported in Table 1 for the two reservoirs. The discussion in the second bullet indicates that without seepage control measures in place, annual seepage

rates of 1,200 AF and 1,730 AF are estimated for the upper and lower reservoirs, respectively. With the application of seepage control measures, the seepage estimate discussed in the third bullet suggests a resulting annual seepage volume of about 690 AF (1,200 AF – 510 AF) for the upper reservoir, compared to a value of 713 AF in Table 1. The seepage estimate discussed in the fourth bullet suggests a resulting annual seepage volume of about 730 AF (1,730 AF – 1,000 AF) for the lower reservoir, compared to a value of 689 AF in Table 1.

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In the discussion under the last bullet at the bottom of this page, a reference is made to maintaining project pumping levels at or below the range of historic pumping. Is this historic range related to a particular time period? We suggest that you clearly state what the intended range of historic pumping is in the certification document so as not to create any confusion. Historic annual pumping volumes have ranged widely in the valley over the years from <1,000 AF to over 20,000 AF.

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The descriptions of Conditions 18 and 21 appear to be nearly identical and therefore, are duplicative of each other. We suggest you remove Condition 21 from the document and re-number the subsequent Condition statements accordingly.

If you have any questions, please contact Physical Scientist Luke Sabala at 760-367-5563 or luke_sabala@nps.gov.

Sincerely,



Mark A. Butler
Superintendent