



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Memorandum

Date: June 19, 2020
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2020050212
2020 Temporary Groundwater Substitution Water Transfer

The State Clearinghouse is forwarding the attached material from the Lead Agency regarding some ***additional*** information for the above-mentioned document. All other project information remains the same.

NEGATIVE DECLARATION

(Revised June 11, 2020)

The City of Sacramento, California, a municipal corporation, does hereby prepare, declare, and publish this Negative Declaration for the following described project:

2020 Temporary Groundwater Substitution Water Transfer - The City of Sacramento is participating with five other regional water agencies in a regional water transfer project to provide up to 18,500 acre-feet of water to Buyers in 2020. As part of a regional water transfer led by the City, Golden State Water Company (GSWC) will temporarily transfer up to 2,500 acre-feet of its pre-1914 water rights water supplies that have been quantified and are made available on a perpetual basis by the United States Bureau of Reclamation under a contract. The water demands that would otherwise be served by GSWC's delivery of this surface water to its customers will instead be satisfied by increased groundwater pumping by GSWC. That pumping will occur within existing historical baselines and the requirements of an existing groundwater management plan administered by the Sacramento Central Groundwater Authority (SCGA). The transfer water will be exported by DWR using existing State Water Project (SWP) facilities during the summer and fall of 2020. However, the transfer water may be temporarily stored in San Luis Reservoir for later delivery to an individual Buyer's service area.

The City of Sacramento provides wholesale and retail water service within the City of Sacramento's water rights place of use. Dudley Ridge Water District, Kern County Water Agency, Tulare Lake Basin Water Storage District, County of Kings, Palmdale Water District, and Alameda County Water Agency (collectively the "Buyers") manage and operate facilities for the distribution of State Water Project (SWP) water to customers in each respective agency's service area. Transfer water will be made available in the Lower American River, conveyed to the southern Delta via the American and Sacramento Rivers, pumped into the California Aqueduct through the Department of Water Resources' Harvey O. Banks Pumping Plant, and delivered to the Buyers via State Water Project facilities.

The Lead Agency is the City of Sacramento. The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project as identified in the attached Initial Study, will have a significant effect on the environment. This Negative Declaration reflects the lead agency's independent judgment and analysis. An Environmental Impact Report is not required.

This Negative Declaration has been prepared pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Sections 15000 et seq. of the California Code of Regulations), the Sacramento Local Environmental Regulations (Resolution 91-892), and the Sacramento City Code.

A copy of this document and all supportive is available on the City's EIR Webpage at:
<http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Due to the current emergency, the document is not available for review in printed form. If you need assistance in reviewing the document please contact Scott Johnson, Senior Planner at (916) 808-5842 or sjohnson@cityofsacramento.org.

Environmental Services Manager, City of Sacramento,
California, a municipal corporation

By: _____

City of Sacramento

Revised (6-11-2020) Initial Study Environmental Checklist

Revisions have been made based upon comments received during the public review process. Revisions consisting of additions to the discussion are shown in underline text and any deletions are shown in ~~strikethrough text~~. All revisions made, have been made based upon comments received that merely clarify, amplify, or make insignificant modifications and do not require recirculation pursuant to California Environmental Quality Act Guidelines Section 15073.5(c).

1. Project Title: 2020 Temporary Groundwater Substitution Water Transfer to Dudley Ridge Water District, Kern County Water Agency, Tulare Lake Basin Water Storage District, County of Kings, Palmdale Water District, and Alameda County Water Agency
2. Lead Agency Name and Address: City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95835
3. Contact Person and Phone Number: Scott Johnson, Senior Planner
(916) 808-5842
srjohnson@cityofsacramento.org
4. Project Location: The City of Sacramento provides wholesale and retail water services within the City of Sacramento's water rights place of use. Dudley Ridge Water District, Kern County Water Agency, Tulare Lake Basin Water Storage District, County of Kings, Palmdale Water District, and Alameda County Water Agency (collectively the "Buyers") manage and operate facilities for the distribution of water to customers in each respective agency's service area, including water purchased by each agency from the State Water Project (SWP). Transfer water will be made available in the Lower American River, conveyed to the southern Sacramento-San Joaquin River Delta (Delta) via the American and Sacramento Rivers, pumped into the California Aqueduct through the Department of Water Resources' Harvey O. Banks Pumping Plant, and delivered to the Buyers via State Water Project facilities.
5. Project Sponsor's Name and Address: City of Sacramento
Department of Utilities
1395 35th Avenue
Sacramento, CA 95822
6. Description of Project: The City of Sacramento is participating with five other regional water agencies in a regional water transfer project to provide up to 18,500 acre-feet of water to Buyers in 2020. As part of a regional water transfer led by the City, Golden State Water Company (GSWC) will temporarily transfer up to 2,500 acre-feet of water based on its pre-1914 water rights, which have been quantified and are delivered to GSWC on a perpetual

basis by the United States Bureau of Reclamation under a contract. The water demands that would otherwise be served by GSWC's distribution of this surface water to its customers will instead be satisfied by temporarily increased groundwater pumping by GSWC. That temporary pumping will occur within existing historical baselines and the parameters of an existing groundwater management plan administered by the Sacramento Central Groundwater Authority (SCGA). The transfer water will be exported by the California Department of Water Resources (DWR) using existing State Water Project (SWP) facilities during the summer and fall of 2020. However, the transfer water may be temporarily stored in San Luis Reservoir for later delivery to an individual Buyer's service area. The Buyers and the American River water agencies, through the auspices of the Regional Water Authority, have entered into an agreement to undertake the regional transfer, including the GSWC component described in this initial study.

7. Surrounding Land Uses and Setting (briefly describe the project's surroundings): GSWC provides retail water service to approximately 15,300 customer connections in Sacramento County, California. The service area is primarily urban and suburban. The Buyers include agricultural water suppliers in Tulare, Kings, and Kern Counties; an urban purveyor supplying the municipal needs of several non-contiguous communities in the Antelope Valley in northeastern Los Angeles County; and an urban purveyor serving urban and suburban demands in Alameda County.

8. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): The Buyers: Dudley Ridge Water District, Kern County Water Agency, Tulare Lake Basin Water Storage District, County of Kings, Palmdale Water District, and Alameda County Water Agency and DWR (for a conveyance agreement to use SWP facilities). Sacramento County will also need to approve of the project.

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture / Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology/Water Quality | ☐ Land Use / Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population / Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribe Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

III. DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR OR NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature
Scott Johnson

Printed Name


Signature



Date

For


Revision Date

IV. ENVIRONMENTAL CHECKLIST

Introduction

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended as appropriate as part of the proposed project.

For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less Than Significant With Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion

- a-d. The proposed project entails water being left in the American River below GSWC's point of diversion during July, August September, October and November of 2020, rather than being diverted into GSWC's intake. The Buyers will accept delivery of up to 2,500 acre-feet of transfer water at GSWC's point of diversion on the American River and control the water as it flows down the American River to the Sacramento River and across the Delta to the SWP's Harvey O. Banks Pumping Plant, where DWR will pump the water into the California Aqueduct for subsequent delivery to the various Buyers' service areas in Tulare, Kings, Kern, Alameda and Los Angeles Counties. This project will be implemented by operation of existing facilities, and does not involve construction of any additional structures or facilities. The proposed project would not affect views to or from a scenic vista or a State scenic highway, there would be no changes to the visual character of the area, and the project would not create any new sources of light and glare. The volume of water would add approximately 10 to 15 cubic feet per second (cfs) to flows in the lower American River during the transfer period. Typical flow rates in the lower American River during the summer and fall months exceed 1,650 cfs on average. This flow rate represents a less than one percent (1%) increase in flows and would not be aesthetically noticeable. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

- a-e. The water GSWC is transferring to the Buyers does not currently serve prime farmland or any other agricultural lands of significance. The transfer of water to the Buyers will aid in the retention of agricultural uses by helping to provide adequate water for existing agriculture serviced by water supplies that have been reduced to Dudley Ridge Water District, Kern County Water Agency, Tulare Lake Basin Water Storage District, and the County of Kings. The project will not conflict with agricultural zoning or existing Williamson Act properties. The project will not result in the loss of forest land or conversion of forest land to non-forest use as the transfer water does not serve forest land and the water will, in part, be used on existing agricultural lands. The water use will not cause changes to existing farmlands and will help preserve farmlands for continued use where 2020 water supplies would otherwise be limited. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Discussion

- a. The project does not involve any changes to current air district regulations or plans. Water will be transferred from GSWC to the Buyers using existing SWP facilities and is intended to help mitigate water supply shortages being experienced by the Buyers during 2020. No additional infrastructure will be required to accomplish this goal and use of SWP facilities to transport the water will still result in less use of such facilities than if the Buyers had adequate SWP supplies available for delivery in 2020. Therefore, **no impact** would occur.
- b-c. The project is a temporary transfer of surface water that would otherwise be diverted by GSWC and delivered to its customers for domestic and municipal uses. The project would result in a decrease of GSWC's electrical energy use in delivering surface water, with resulting commensurate decreases in emissions from sources of power supplied to the California electricity grid. The reduction will be achieved because GSWC will not need to pump the water from the Folsom South Canal at GSWC's water diversion facility to the water treatment plant and then repump the water into the distribution system. The project does involve temporarily increased pumping of groundwater, with related use of electricity to power GSWC's municipal groundwater wells. Emission increases associated with that temporarily increased pumping and the electricity required to power the pumping will generally be offset by emission decreases associated with GSWC's temporarily reduced surface water diversions and are thus not expected to cause any air quality standard violations. The project will not have an effect on air quality standards, criteria pollutants, or sensitive receptors. Therefore, **no impact** would occur.
- d. The project involves the movement of water from its usual point of delivery at GSWC's intake to the Buyers' service areas via the SWP. Objectionable odors will not be created due to the incremental increase in water amounts flowing from the point of delivery to the new temporary place of use. Therefore, **no impact** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

- a. The project involves the temporary transfer of water from GSWC via bypass of Folsom South Canal, down the American River and Sacramento River, through the Delta, to State Water Project (SWP) facilities, and eventual delivery to the Buyers' respective service areas. This water will be transferred consistent with all regulatory requirements the SWP must currently satisfy, including requirements of salmonid and smelt biological opinions and Decision 1641 applicable to Delta operations, and in compliance with all applicable existing regulatory requirements pertaining to American River flow requirements. The volume of water would add approximately 10 to 15 cubic feet per second (cfs) to flows in the lower American River during the transfer period. Typical flow rates in the lower American River during the summer and fall months exceed 1,650 cfs on average. This flow rate represents a less than one percent (1%) increase in flows and would not impact fisheries, habitat, or any other plan, policy or regulation related to the Lower American River, Sacramento River, and Delta. The regional Water Forum Agreement provides guidance to managing flow and fisheries in the Lower American River. The minimal augmented flows related to this project are within the operational flow criteria – both rate and temperature – established for the Lower American River. The project does not impact the key parameters of the Water Forum Agreement or flow operational criteria. Therefore, **no impact** would occur.
- b, c. This project will not cause disturbance of any riparian or sensitive habitat as no changes to the current riparian environment will occur as a result of the project. No wetlands will be disturbed as a result of this project. Therefore, **no impact** would occur.
- d. All environmental regulations that specify minimum flow requirements and operational constraints for listed fish and other considerations will be met. The transferred water will be in addition to and thus augment flows already provided to satisfy operational requirements in place for the lower American River during July, August, September, October and November.

To the extent that there is any perceptible change, the minor increase in flows downstream of Folsom Dam (less than 1% of the average monthly flow) may provide an incremental benefit to fisheries and wildlife in the Lower American River, Sacramento River and Delta, and may result in a small net positive effect to water users between Folsom Dam and the Banks pumping plant in the south Delta. Therefore, ***no impact*** would occur.

- e, f. The project will not interfere with any established Habitat Conservation Plan or conflict with local policies. Therefore, ***no impact*** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

Discussion

- a-c. CEQA provides that a project may cause a significant environmental effect where the project could result in a substantial adverse change in the significance of a historical resource (Public Resources Code, Section 21084.1). CEQA Guidelines Section 15064.5 defines a “substantial adverse change” in the significance of a historical resource to mean physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be “materially impaired” (CEQA Guidelines, Section 15064.5[b][1]). The project involves the temporary transfer of water through existing waterways and existing man-made canals. No disturbance to paleontological resources, archaeological resources, or human remains will occur as there will be no ground disturbance. Therefore, ***no impact*** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:					
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion

- a-b. The project will not result in wasteful, inefficient or unnecessary consumption of energy in furtherance of the project because the water transferred under this project will meet the critical need of the Buyers and the energy needed to deliver the water is a necessary component of the project. Relevant plans include the State's 2019 Integrated Energy Policy Report (IEPR) and Senate Bill (SB) 100, which focus on energy efficiency, demand response, renewable energy, and energy provisioning reliability and infrastructure (CEC 2020). Policies regarding these areas relate to commercial and residential energy use or electricity and natural gas provisioning and are not directly applicable to public services like water transfers. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Discussion

- a-f. The proposed temporary water transfer would involve the forbearance of water diversion at Folsom South Canal and delivery of water into existing waterways and existing SWP conveyance facilities. Groundwater to replace the transferred surface water will be pumped on a temporary basis from existing GSWC municipal wells that have been constructed to meet all required standards and will be operated within historical baseline pumping amounts in accordance with SCGA's existing groundwater management plan. In addition, the transfer will not directly or indirectly destroy a unique paleontological resource or unique geologic feature as no new facilities are involved with this temporary transfer. Therefore, **no impact** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion

- a-b. No construction-related activities are proposed and no GHG emissions would be directly generated by the proposed project. Agriculture and M&I operations generate GHG emissions yet, given that the purpose of the proposed project is to provide the Buyers with water to offset shortages due to a reduced allocation of SWP water for uses south of the Delta, the proposed project would not increase normal farming or M&I activities and would not increase GHG emissions compared to baseline conditions. For these same reasons, the project would not conflict with any plan, policy or regulation. Therefore, ***no impact*** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

a-c,

f-g. The project involves only the temporary transport and pumping of water through existing facilities, waterways and canals. No hazardous chemicals will be utilized as a result of the project. No construction would ensue that may accidentally create any hazard to the public or environment. The project will not expose people or structures to risk due to wildfires. Therefore, ***no impact*** would occur.

d. The project is not located on a site that is listed with hazardous materials under Government Code section 65962.5. Therefore, ***no impact*** would occur.

e. The project is not located within two miles of a school. Mather Air Field is located within two miles of GSWC's service area but the project would not change routine operations of GSWC's water system in any way that would result in a safety hazard or excessive noise. Therefore, ***no impact*** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:					
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i)	result in a substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii)	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv)	impede or redirect flood flows?	☐	☐	☐	☒
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

- a. This project will not violate any water quality standards or waste discharge requirements and appropriate SWP monitoring will be incorporated in the implementation of this project.

Groundwater in the vicinity of GSWC's wells has been historically contaminated by industrial activities on a site owned by Aerojet Rocketdyne, Inc. (AR) to the east of GSWC's service area. That site is subject to compliance orders by the U.S. Environmental Protection Agency and Regional Water Quality Control Board. GSWC has consulted with AR in preparing for the project, and AR has determined that the project is consistent with AR's groundwater extraction and treatment (GET) requirements, would not exacerbate existing groundwater contamination plumes, and would not result in substantial degrading of groundwater quality. Therefore, **no impact** would occur.

- b,e The proposed temporary groundwater pumping by GSWC to replace the transferred surface water will use locally available groundwater resources consistent with regional groundwater management and conjunctive use planning. Existing municipal wells that have been installed to help the region conjunctively manage surface and groundwater supplies to meet long-term water reliability goals will pump water in quantities consistent with the Sacramento Central Groundwater Authority's Groundwater Management Plan ("SCGA GMP"), which was adopted pursuant to Water Code section 10753.7 on November 8, 2006. The proposed temporary pumping by GSWC to support the transfer of surface water is consistent with the SCGA GMP's basin management objectives and would not adversely impact the groundwater basin. Pursuant to the SCGA GMP, GSWC conjunctively uses surface water and groundwater, which has helped stabilize groundwater levels in the South American

Subbasin. Since the mid-1990s, groundwater elevations in the Basin have stabilized due to these regional efforts and, in some cases, elevations have increased and are continuing to increase. By limiting the overall quantity of groundwater pumped based on conjunctive use, GSWC has helped maintain groundwater quality in its service area.

As described above, GSWC's proposed 2020 water transfer would comply with Water Code section 1745.10 because GSWC's temporary pumping of groundwater is consistent with the SCGA GMP. In addition, the proposed transfer complies with Water Code Section 1745.11 because the groundwater used to serve customer demands in order to make transferrable surface water available to the Buyers is groundwater generated by recharge through GSWC's operation of its conjunctive use program. Only wells that have been approved by DWR will be used to pump groundwater and make surface water available for the proposed temporary transfer. Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities. GSWC is participating in a regional groundwater monitoring, reporting, and mitigation plan for the water transfer, approved by DWR, which will ensure that the transfer does not result in any unreasonable and adverse impacts to the groundwater basin or third parties. Furthermore, notification has been provided to SCGA – the Groundwater Sustainability Agency organized for SGMA compliance – of the project. Therefore, **no impact** would occur.

- c, d. The project will not alter existing drainage patterns on any property or area. The project will increase flows in the lower American River and Sacramento River averaging about 10 to 15 cfs during July, August, September, October and November. This flow rate is less than one percent (1%) of the flow rate in the American River under existing flow management requirements. No noticeable alteration to the river will occur as a result of this project, and the project will not result in substantial erosion, increase of surface run-off, exceed the capacity of stormwater drainage systems, or have any effect on flood flows. The project will not require additional storm water facilities to be constructed. Furthermore, neither the GSWC nor the Buyers' service areas are located within an area that would be affected by a seiche, tsunami, or mudflow, and the project will not contribute to an increased risk of same. Therefore, **no impact** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

- a-b. The project would not divide an established community due to the fact that no changes to the built environment will occur. No conflict will occur with any land use plan or habitat conservation plan since water will be routed through the American River, the Sacramento River, the Delta, and existing SWP pumping facilities, canals and pipelines. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

- a, b. The project will utilize the existing water conveyance, American River, Sacramento River, Delta, and SWP facilities; no known mineral resources of regional, State, or local importance will be affected by implementation of this project. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

- a-c. No construction will occur as part of the project. Noise levels would remain consistent with current levels occurring during operations of GSWC's municipal wells, DWR's SWP facilities in the south Delta, San Joaquin Valley, and southern California, and within each Buyers' respective service area. Mather Air Field is located within two miles of GSWC's service area but the project would not change routine operations of GSWC's water system in any way that would result in excessive noise. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

- a-b. The temporary transfer of water is part of a larger regional transfer of water from other American River water agencies to the Buyers to aid the Buyers during water shortage conditions in 2020 resulting from drier than normal hydrological conditions reducing their allocations of imported surface water provided by the SWP. The temporary transfer is not anticipated to contribute to population growth in the receiving region due to the fact that no additional construction will occur and the Buyers will be using the temporary supply to mitigate shortages in their SWP water supply to serve existing needs. The temporary supply provided by GSWC and other sellers is not a reliable supply that could serve as a basis for long-term water needs planning and management by the Buyers. Infrastructure already exists for the project, so no persons or housing will be displaced. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
• Fire protection?	☐	☐	☐	☒
• Police protection?	☐	☐	☐	☒
• Schools?	☐	☐	☐	☒
• Parks?	☐	☐	☐	☒
• Other public facilities?	☐	☐	☐	☒

Discussion

- a. The water supplies provided by GSWC and other sellers are being transferred to Buyers as a dry-year supplemental supply and do not represent an increase in the amount of water supplies or capacity in the SWP normally available to Buyers. As a result, no change is required to the built environment to accomplish the project. For the same reasons, additional police patrols, fire services, schools or parks will not be required to accomplish the transport of water. No public facilities will be affected. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

- a, b. The project does not include, and would not contribute to the increased use of, recreational facilities or require the construction or expansion of recreational facilities. Therefore, ***no impact*** would occur.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:					
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b)	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☐	☒
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d)	Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

- a-d. The project will not affect traffic or transportation in any manner. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?	YES			
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X

Discussion

- a-b. ~~No Tribal Cultural Resources have been identified in the project area, and no ground-disturbing activities are proposed with the project. In addition, it is not anticipated that the proposed project would cause a substantial adverse change in the significance of a Tribal Cultural Resource given that changes in streamflow levels as a result of the water transfer would be within historical ranges, water would be transferred using existing waterways and infrastructure, and water delivered to the Buyers would be used to maintain existing agricultural activities and supply existing M&I water users. Due to the nature of the project, the transfer of water using existing facilities, there would be no impacts to Tribal Cultural Resources.~~ In compliance with AB 52, the City has reached out to Native American tribes that have requested to receive such notices and will consult as necessary if requested. At the time of preparation of this documentation, no tribes have responded. Subsequently, staff has received input and comments from several tribes and made some minor revisions to the initial study. These changes do not identify new potential effects and do not require recirculation.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

- a, c. Water temporarily transferred to the Buyers' service areas will be used to meet agricultural and urban demands that otherwise would have insufficient water supplies available in 2020 due to a dry winter and consequent reduction in available SWP supplies. For instances where the transferred water is treated and served to municipal customers, the generation of wastewater will result. This wastewater, however, would be consistent with expected flows under normal water supply conditions for each Buyer and would not require the expansion of capacity in any water or wastewater treatment plant. All existing wastewater facilities will continue to be operated by the Buyers consistent with all wastewater treatment standards and requirements. The temporary pumping of additional groundwater by GSWC to make surface water available for temporary transfer will use existing municipal wells routinely used by GSWC as part of its normal water system operations. Therefore, ***no impact*** would occur.
- b. GSWC possesses sufficient pre-1914 water right water supplies to accommodate this transfer. GSWC possesses other rights and entitlements sufficient to also meet its own demands. GSWC will temporarily pump groundwater within historic and planned sustainable operations of the groundwater subbasin, and has existing appropriative rights to pump groundwater. The temporary transfer will not be used as a long-term water supply. Therefore, ***no impact*** would occur.
- d, e. The project will not utilize solid waste disposal or alter state or local waste regulations. Therefore, ***no impact*** would occur.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
Has Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?	☐		<input type="checkbox" value="NO"/>	
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	<input type="checkbox" value="X"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	<input type="checkbox" value="X"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	<input type="checkbox" value="X"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	<input type="checkbox" value="X"/>

Discussion

- a-d. The water transfer would not require construction of any new structures and will be using existing facilities to transfer water. The project would not alter any emergency evacuation routes or impair an adopted emergency plan. There would be no new project occupants related to this project that could be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No other infrastructure (such as roads, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts to the environment are proposed. The proposed project does not have the potential to expose people or structures to potential substantial adverse effects from post-fire flooding, landslides, or slope instability.

Public Trust Resources

Under the public trust doctrine, certain resources are held to be the property of all citizens and subject to continuing supervision by the State. Public Trust Resources may include, but are not limited to, fish, wildlife, other aquatic dependent species, riparian areas, and recreation. This Initial Study evaluates potential impacts from the proposed water transfer on Public Trust Resources. The proposed project has no environmental impact. No mitigation measures are required because the water transfer has been proposed according to existing laws and regulations and no impacts (direct, indirect, or cumulative) were found to be significant or potentially significant. The ability to transfer water from a user with temporary water supplies to another user in need of additional water supplies has been recognized and encouraged by the State of California. The proposed project can be implemented without causing any unreasonable impacts to fish, wildlife, and other instream beneficial uses. Therefore, the proposed project is compatible with and complies with the public trust doctrine.

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.					
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	☒
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Discussion

- a-c. The project would not result in significant impacts associated with the CEQA mandatory findings of significance. Based on the analysis provided in this Initial Study, the temporary water transfer between GSWC and the Buyers would not substantially degrade or reduce wildlife species or habitat, result in significant cumulative impacts, or cause adverse effects on humans.

**2020 Temporary Groundwater Substitution Water Transfer
Revised Initial Study / Negative Declaration**

Appendix A

Comments and Responses List:

- Email correspondence with United Auburn Indian Community
- Comment Letter from Buena Vista Rancheria of Miwok Indians
 - Response Letter to Buena Vista Rancheria of Miwok Indians
- Comment Letter from CA Department of Water Resources
 - Response Letter to CA Department of Water Resources
- Comment Letter from U.S. Bureau of Reclamation
 - Response Letter to U.S. Bureau of Reclamation
- Email Comments from CA Department of Fish and Wildlife
 - Response to CA Department of Fish and Wildlife

From: [Scott Johnson](#)
To: [Anna Starkey](#)
Cc: [Brett Ewart](#); [Rebecca Allen](#)
Subject: RE: CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer
Date: Friday, May 8, 2020 3:57:00 PM
Attachments: [image001.png](#)

Hi Anna,

Thank you for your response, and yes, that is good point and we will revise that text.

I don't believe I have heard back on this project until this message; however, it was just a week ago, so is understandable.

Thanks again, and we'll make that change.

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Anna Starkey <astarkey@auburnrancheria.com>
Sent: Friday, May 8, 2020 3:41 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Brett Ewart <BEwart@cityofsacramento.org>; Rebecca Allen <rallen@auburnrancheria.com>
Subject: RE: CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer

Scott, thank you for providing the ND for review.

There is an issue in the tribal cultural resources chapter that I would like revised. The first sentence states "No Tribal Cultural Resources have been identified in the project area". I believe that this is misleading as UAIC was not provided with a project area map in which to check for the presence of TCRs. If you were to show all the areas where the water flows for this project (ex. American River), you would certainly find TCRs. I suggest stating that due to the nature of the project, the transfer of water using existing facilities, there would be no impacts to TCRs.

It also states that "At the time of preparation of this documentation, no tribes have

responded.” Correct me if I am mistaken but didn’t I respond on behalf of the tribe and requested additional information? Pardon me if I am incorrect as there are several of these water transfer projects happening right now. If UAIC did respond, this should be reflected in the ND. I will go back and check my records to be certain.

Please let me know if you have any questions regarding my comments.

Thank you and have a wonderful weekend,

Anna



Anna M. Starkey, M.A., RPA
Cultural Regulatory Specialist
Tribal Historic Preservation Department | UAIC
10720 Indian Hill Road
Auburn, CA 95603
Direct line: (916) 251-1565 | Cell: (530) 863-6503
astarkey@auburnrancheria.com | www.auburnrancheria.com

From: Scott Johnson <SRJohnson@cityofsacramento.org>

Sent: Friday, May 8, 2020 2:36 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Brett Ewart <BEwart@cityofsacramento.org>

Subject: CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer

The City of Sacramento, Community Development Department, Environmental Planning Services has completed preparation of a Draft Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer project and intends to present the document for adoption as part of project review. There is no physical development with this project.

The Notice of Availability / Intent to Adopt a Negative Declaration and the Negative Declaration are attached.

The document is now available for a 30-day public review and comment period. The comment period is from **May 8, 2020 to June 9, 2020**.

The Draft Negative Declaration is available online at:

www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports

Written comments regarding the Draft Negative Declaration should be received by the Community Development Department, **NO LATER THAN 4:00 p.m. on Tuesday, June 9, 2020** when the public counter closes. Written comments should be submitted to:

Scott Johnson, Senior Planner
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811
Email: srjohnson@cityofsacramento.org
Tel: (916) 808-5842

Thank you.

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

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May 12, 2020

City of Sacramento
c/o Scott Johnson, Associate Planner
Community Development Dept.
300 Richards Blvd.
Sacramento, Ca 95811
srjohnson@cityofsacramento.org

Re: NOI and NEG DEC for the 2020 Temporary Groundwater Substitution Water Transfer

Dear Mr. Johnson

Buena Vista Rancheria of Me-Wuk Indians received your notification regarding the 2020 Temporary Groundwater Substitution Water Transfer project and would like to offer the following insights and underscore the importance of statements made in the Negative Declaration for this project.

Buena Vista Rancheria of Me-Wuk Indians (The Tribe) understands this project to be a surface water transfer of 2,500 acre-feet from Golden State Water Company (GSWC) local customers to identified "Buyers," and a water substitution where, instead of surface water from the American River, the GSWC will pump groundwater to maintain a supply to its local customers. It is unclear where the remaining 16,000 acre-feet will be coming from to provide the "Water Buyers" with a total of 18,500 acre-feet of water. Though it is alluded to that the City of Sacramento is working with five other regional water agencies to provide 18,500 acre-feet to the "buyers." The Tribe is curious to know who the other five agencies are and why there is not a joint CEQA analysis to analyze the cumulative effect of water resources. Buena Vista Rancheria has not seen any other CEQA documents from other agencies regarding this project. In order to understand the full impact of this project it is important to understand the cumulative effect all five agencies water transfers may have on water resources.

The Tribe believes in government transparency and accountability and would like to underscore the importance of the following statements made in the Neg. Dec. It is stated that this is a temporary transfer. Please clarify under what conditions the city of Sacramento sells water to "buyers" and where that water is typically sourced when transferring water to other municipalities, and the reason for the "substitution." Also, the Tribe suggest the City establish a timeline for the transfer and explicitly state the end date. In the interest of transparency, the Tribe suggests the GSWC's well pumping rates, well levels, and water quality data be made available to the public. We also suggest that the Regional Groundwater Monitoring, Reporting and Mitigation Plan be available online for the public.

Lastly, it is understood in the Neg. Dec. that the water transfer is not anticipated to contribute to population increases. This is a very important point and it should be underscored that this temporary water transfer is not a mechanism for enabling new development, industry, or population growth as that would cause a need for increased water in an already water scarce region. This water sale is to be understood only as a temporary mechanism to assist municipal and agricultural needs in 2020.

1418 20th Street, Ste. 200
Sacramento, CA 95811
Tel. 916.491.0011 Fax 916.491.0012
www.buenavistatribe.com

The Central Sacramento County Groundwater Management Plan states that the long-term average annual sustainable yield of groundwater from the Central Basin is 273,000 acre-feet per year (AF/year), with current groundwater extractions estimated to be 250,000 AF/year. The GSWC must ensure that the water budget remains within sustainable bounds and that we do not set a precedent that Central Sacramento Groundwater will go into deficit in order to sell water to outside municipalities in other parts of the State.

Thank you for considering our suggestions,

Sincerely,

A handwritten signature in black ink, reading "Emily Moloney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Emily Moloney
Water Program Coordinator
Buena Vista Rancheria of Me-Wuk Indians
emily@buenavistatribe.com

May 20, 2020

Emily Moloney
Water Program Coordinator
Buena Vista Rancheria of Me-Wuk Indians
1418 20th Street, Suite 200
Sacramento, CA 95811
emily@buenavistatribe.com

Re: Buena Vista Rancheria Letter of May 12, 2020

Dear Ms. Moloney,

Thank you for your letter on behalf of the Buena Vista Rancheria of Me-Wuk Indians (Buena Vista) dated May 12, 2020. We appreciate your interest in the proposed regional water transfer and the City's ongoing cooperative relationship with Buena Vista. We are providing this letter to answer questions posed by your inquiry and clarify the issues that you raised.

The City of Sacramento (City) is the regional coordinating agency among a number of urban water purveyors that are engaging in a groundwater substitution water transfer.. The participating agencies besides the City from the American River watershed region include: Carmichael Water District (Carmichael), Fair Oaks Water District, Golden State Water Company (GSWC), Sacramento County Water Agency, and Sacramento Suburban Water District. Together, these agencies will make as much as 18,500 acre-feet of surface water available to the drought-stricken areas in our state from July through November this year. Each water supply that each agency contributes to this transfer is subject to independent rules that must be followed in order to complete the transfer. GSWC's water rights require California Environmental Quality Act compliance in order for the transfer to commence while the other agencies' water rights that are contributing to the transfer, including the City's, are subject to an express CEQA exemption.¹

As the regional coordinating agency for the transfer, the City agreed to prepare the CEQA documentation on behalf of GSWC. GSWC's 2,500 acre-foot contribution is exempt from other regulatory requirements that the other entities with surface water rights must complete. In this instance, the City and Carmichael have initiated a petition process with the State Water Resources Control Board where these entities must prove that the proposed transfer does not cause harm to other legal users of water or the environment. The City and Carmichael have prepared

¹ See Water Code section 1729.

extensive documentation on these items and, like the water transfers prepared in the past by these agencies, are engaging the State Board through a formal regulatory process.

In addition to the CEQA process and State Board process, the transferring agencies are also complying with the California Department of Water Resources and United States Bureau of Reclamation Guidelines for water transfers (Guidelines). These Guidelines provide specific rules related to water transfers and prevent actions that might otherwise cause harm to water users or the environment. For example, groundwater levels must be monitored at all times through identified and certified groundwater monitoring stations to determine if unforeseen harm might be incurred by a groundwater basin. Notably, the participants in this action have reduced groundwater extractions in recent years, which has led to increased storage in the basin. In addition, the surface water transfer volume is discounted by a significant percentage so that some of the water that would have been transferred, stays in the water system to percolate back into the groundwater basin. And last, the transferred water must augment flows already present in the river in order to be available for delivery downstream. All of these conditions are meant to prevent harm to other water users, maintain groundwater basin safe yield levels, and protect the environment.

Importantly, as you note in your letter, the transferred water will not contribute to population growth or urban sprawl in our state. The transferred water is being used by the Buyers to replace water supplies that are unavailable this year because of the drought conditions in California. Through this water transfer, the City and its regional partners have an opportunity to assist other areas in our state affected by drought conditions while still protecting the regional citizenry, other water users that depend on waters of the state, and environmental conditions in the American River and Sacramento River watersheds.

Please feel free to contact me directly if you have further questions or concerns.

Regards,

Scott Johnson
City of Sacramento
srjohnson@cityofsacramento.org
(916) 808-5842

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

**VIA EMAIL**

June 9, 2020

Mr. Scott Johnson, Senior Planner
City of Sacramento
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811
sjohnson@cityofsacramento.org

Subject: SCH# 2020050212, the Draft Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer Project

Dear Mr. Johnson:

The Department of Water Resources (DWR) has reviewed the Draft Negative Declaration (Draft ND) for the 2020 Temporary Groundwater Substitution Water Transfer project (Project). The Golden State Water Company (Golden State) will temporarily transfer up to 2,500 acre-feet of its pre-1914 water rights water supplies as part of the regional water transfer project led by the City of Sacramento (City) to provide up to 18,500 acre-feet of water to buyers who also have contracted to receive water from the State Water Project (SWP). Golden State will forgo surface water supplies diverted from the American River and make the transfer water available by additional groundwater pumping. Then the transfer water will be conveyed to the buyers using the SWP facilities.

DWR appreciates that the Draft ND recognizes that a conveyance agreement will be necessary to move the transfer water through SWP facilities. The conveyance agreement will include provisions related to groundwater substitution transfers that are consistent with the December 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper). DWR recommends, to the extent not already done, that the Draft Water Transfer White Paper approval criteria related to groundwater substitution transfers be incorporated into this proposed Project.

In addition to its CEQA comments, DWR would also like to note that it will continue to work with Golden State to establish a suitable streamflow depletion factor (SFD) for this transfer year. DWR believes a 13 percent SFD factor is appropriate for this transfer. If another SFD factor is being suggested for this transfer, DWR requests Golden State to provide technical information to support the suggested SFD factor.

Please contact me at (916) 653-0190 or Janice Wu at (916) 653-9467 if you have any questions.

Mr. Scott Johnson
June 9, 2020
Page 2

Sincerely,

Anna Fock

Anna Fock, Supervising Engineer
State Water Project Analysis Office
Program Development and Water Supply and Transfers Branch

Copies

Lisa Holm
Chief, Contracts and Water Rights Branch,
Division of Resource Management,
California-Great Basin Region,
U.S. Department of the Interior, Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825-1898
lholtm@usbr.gov

Briana Seapy
Water Program Supervisor,
North Central Region,
California Department of Fish & Wildlife
briana.seapy@wildlife.ca.gov

June 12, 2020

VIA E-MAIL

Ms. Anna Fock
Department of Water Resources
State Water Project Analysis Office
P.O. Box 942836
Sacramento, CA 94236
Anna.Fock@water.ca.gov

Re: SCGA 20200502, Draft Negative Declaration for the 2020 Temporary
Groundwater Substitution Transfer

Dear Ms. Fock,

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on June 9, 2020 on behalf of the California Department of Water Resources ("DWR"). By this letter, the City of Sacramento ("City") on behalf of Golden State Water Company ("GSWC") is providing a response to DWR comment letter.

The City and GSWC reiterate their common understanding that GSWC will be entering into a conveyance agreement to facilitate the transfer of water. In the comment letter DWR suggests that DWR guidelines be incorporated the project. The City is adding the following language to the final Initial Study to meet DWR's intent.

"Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities."

The City and GSWC appreciate DWR's commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority ("RWA"), which is helping coordinate technical aspects of the transfer, are working

cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans. GSWC proposes to utilize the streamflow depletion factor included in the Water Transfer White Paper of 13%. This in recognition that two of the GSWC wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

The City and GSWC appreciate DWR's cooperative engagement and anticipate finalizing the conveyance agreement in the coming weeks to the mutual satisfaction of all agencies.

The City appreciates the opportunity to provide this response to DWR's comment letter. Please contact me if you have any questions about this letter or would like further information regarding the American River Region's proposed 2020 groundwater substitution transfer.

Very truly yours,



Brett Ewart
City of Sacramento

cc: (Via email)
Paul Schubert, Golden State Water Company
Scott Johnson, City of Sacramento
Rob Swartz, RWA/SGA



United States Department of the Interior

BUREAU OF RECLAMATION
Interior Region 10
Central California Area Office
7794 Folsom Dam Road
Folsom, California 95630-1799



IN REPLY REFER TO:

CC-400

2.2.4.22

Mr. Scott Johnson
Associate Planner
City of Sacramento
Community Development Department
300 Richards Boulevard
Sacramento, California 95811

Subject: Notice of Intent to Adopt a Negative Declaration for A Temporary Water Transfer

Dear Mr. Johnson:

The Bureau of Reclamation is in receipt of the subject Notice of Intent (NOI) and the Initial Study/Negative Declaration (IS/ND) referred by the NOI from the City of Sacramento (City).

The City has prepared an Initial Study/Environmental Checklist for a transfer of 2,500 acre-feet of water from the Golden State Water Company (GSWC). According to the Initial Study, the City is participating in a water transfer project with five other regional water agencies to provide up to 18,500 acre-feet of water to various State Water Project (SWP) contractors. As part of a regional water transfer led by the City, GSWC will transfer up to 2,500 acre-feet of water based on its pre-1914 (pre-14) water rights. GSWC will meet the demands that would ordinarily be met by delivery of this surface water to its customers by increased groundwater pumping. The City states that this temporary pumping will occur within existing historical baselines and the parameters of an existing groundwater management plan administered by the Sacramento Central Groundwater Authority (SCGA).

The Initial Study states that water made available for transfer will be conveyed to the SWP contractors using SWP facilities during the summer and fall of 2020. This water may be stored in San Luis Reservoir for later delivery to an individual SWP contractor's service area. The SWP contractors and the regional water agencies, through the auspices of the Regional Water Authority, have entered into an agreement to undertake these transfers, including the GSWC transfer.

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CALIFORNIA*, NEVADA*, OREGON*

* PARTIAL

The Environmental Checklist for this transfer consists of 20 sections. Reclamation will focus its comments on Section X. (Hydrology and Water Quality). As noted above, the proposed transfer of 2,500-acre feet of GSWC's pre-14 water is part of a set of transfers totaling up to 18,500 acre-feet. All of these transfers are groundwater substitution transfers. However, Section X. only discusses the potential impacts of the GSWC transfer and makes no mention of the other transfers that are part of the overall project.

Reclamation recommends that the City consider and assess the potential effects on streamflow caused by increased groundwater pumping (known as the streamflow depletion factor). In petitions filed with the State Water Resources Control Board by the City and Carmichael Water District for other transfers that are part of the regional water transfer project, an eight percent (%) percent streamflow depletion factor was used. Reclamation stated in its comment letters on these petitions:

An eight % streamflow depletion factor was used to support a transfer of 8,200 acre-feet by the City in 2018. The proposed transfer of 14,000 acre-feet is almost twice the amount transferred by the City in 2018; the combined total of 18,500 acre-feet to be transferred is over 60% greater than the combined total for transfers from the lower American River for 2018. Due to this significant increase in the amount of water to be transferred, Reclamation requests that the City provide additional information (including recent modeling data) to support the continued use of an eight % streamflow depletion factor.

Reclamation requests that Section X. of the Environmental Checklist include a discussion of streamflow depletion for this and all other current regional transfers, and that this discussion include up-to-date information (including the most recent modeling data).

Reclamation appreciates the opportunity to comment on the NOI and IS/ND for this transfer. Please contact Brad Hubbard, Chief, Resources Management Division at bhubbard@usbr.gov, or (916) 537-7041, if you have any questions.

Sincerely,

Drew Lessard
Area Manager

INTERIOR REGION 10 • CALIFORNIA-GREAT BASIN

CALIFORNIA*, NEVADA*, OREGON*

* PARTIAL

June 12, 2020

VIA E-MAIL

Mr. Drew Lessard
United States Bureau of Reclamation
Central California Area Office
7794 Folsom Dam Road
Folsom, CA 95630
DLessard@usbr.gov

Re: SCH 20200502, Draft Negative Declaration for the 2020 Temporary
Groundwater Substitution Transfer

Dear Mr. Lessard,

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on June 9, 2020 on behalf of the United States Bureau of Reclamation ("USBR"). By this letter, the City of Sacramento ("City") on behalf of Golden State Water Company ("GSWC") is providing a response to the USBR comment letter.

The City understands that the primary inquiry in the comment letter relates to proposed streamflow depletion factors. This inquiry is consistent with USBR comments on other regional petitions to the State Water Resources Control Board which proposed an alternate streamflow depletion factor of 8% rather than DWR's default factor of 13%.

The City and GSWC appreciate DWR's commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority ("RWA"), which is helping coordinate technical aspects of the transfer, are working cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans. GSWC proposes to utilize the streamflow depletion factor included in DWR's 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper) of 13%. This in recognition that two of the GSWC

wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

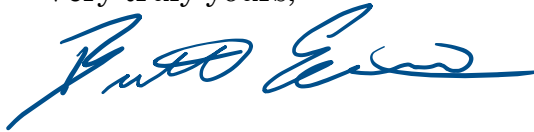
The City is adding the following language to the final Initial Study to reflect both the Draft Water Transfer White Paper and to meet USBR's request.

“Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities.”

The City appreciates USBR's cooperative engagement and hopes to coordinate with USBR to provide optimized release patterns of water that would have otherwise been subject to GSWC diversion rate in the Lower American River.

The City and GSWC appreciate the opportunity to provide this response to USBR's comment letter. Please contact me if you have any questions about this letter or would like further information regarding the American River Regions proposed 2020 groundwater substitution transfer.

Very truly yours,



Brett Ewart
City of Sacramento

cc: (Via email)
Paul Schubert, Golden State Water Company
Scott Johnson, City of Sacramento
Rob Swartz, RWA/SGA

From: [Wood, Dylan@Wildlife](mailto:Wood,Dylan@Wildlife)
To: [Scott Johnson](#)
Cc: [Wildlife R2 CEQA](#); state.clearinghouse@opr.ca.gov; cathy@carmichaelwd.org; [Brett Ewart](#); [Meza, Michael@Waterboards](#); [Drongesen, Jeff@Wildlife](mailto:Drongesen,Jeff@Wildlife); [McDougall, Lillian@Wildlife](mailto:McDougall,Lillian@Wildlife); [Fock, Anna@DWR](mailto:Fock,Anna@DWR); [Seapy, Briana@Wildlife](mailto:Seapy,Briana@Wildlife)
Subject: Comments on the Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer (SCH: 2020050212)
Date: Tuesday, June 9, 2020 4:41:54 PM
Attachments: [image001.png](#)

Dear Mr. Johnson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Negative Declaration (ND) from the City of Sacramento for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. ^[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

It is the mission and responsibility of the Department to manage viable populations of fish and wildlife resources throughout the State. Watershed and aquifer protection, fishery access to headwater reaches, and adequate instream flows for all life stages of fishery resources are focal points of the Department's efforts to manage native populations of fish and wildlife.

Project Description:

The City of Sacramento prepared a Draft Negative Declaration on behalf of Golden State Water Company (GSWC) for a 2020 temporary water transfer wherein GSWC will temporarily transfer up to 2,500 acre feet (af) of its pre-1914 water rights water supplies, made available by groundwater substitution, during the summer and fall of 2020. The proposed transfer is a component of a regional 18,500 af groundwater substitution transfer. Transfer water will be exported by DWR using existing State Water Project (SWP) facilities during the summer and fall of 2020. However, the transfer water may be temporarily stored in San Luis Reservoir for later delivery to an individual Buyer's service area.

Comments:

The GSWC Negative Declaration is submitted in concert with an additional 16,000 af of proposed groundwater substitution water transfers from the City of Sacramento and Carmichael Water District for a cumulative regional transfer of 18,500 af.

Surface Water

This proposed 18,500 af regional transfer is among several other proposed transfers that may impact the Folsom cold water pool in terms of timing and volume of releases to meet downstream diversions. The Department has concerns over the potential cumulative adverse impacts on the sensitive anadromous and/or resident fisheries within the Lower American River (LAR) from water transfer changes to the quantity, timing, and duration of flow. The LAR is considered temperature impaired (U.S. EPA 2003) and water temperatures frequently exceed optimal conditions for summer rearing of juvenile steelhead and for fall-run Chinook salmon (*Oncorhynchus tshawytscha*) spawning in October and November. Folsom Reservoir operations directly influence conditions in LAR. Releases out of Folsom to meet contracted LAR water diversions or 2020 water transfer needs can substantially influence conditions, including temperature, in the LAR. Water transfer releases from Folsom Reservoir can have both positive and negative effects on habitat quality and quantity in the river. Increasing reservoir releases in spring may encourage emigration of juvenile salmonids and improve survival whereas a high-volume transfer completed in summer or fall may cause rearing steelhead to redistribute to less desirable habitat (Snider 2001). The Department recommends close coordination with U.S. Bureau of Reclamation (USBR) and regulatory agencies on the release timing of transfer water out of Folsom to minimize cold-water pool loss associated with a water transfer.

In recognition that Folsom Reservoir summer releases affect LAR habitat quantity and quality and that warming associated with water residence time in Lake Natoma can be minimized at specific reservoir releases, the Department further recommends working closely with USBR on adaptively accounting for transfer water. As opposed to block releases of transfer water that can result in substantial flow fluctuations and a large usage of cold-water pool, the Department recommends optimizing releases to provide stable flows across summer and fall months at targeted release rates which minimize warming in Lake Natoma. Targeting a stable, optimized flow within which transfer water can be accounted for will better maintain rearing habitat for steelhead.

Groundwater

The Department is also concerned with potential cumulative impacts associated with proposed and future groundwater substitution water transfers within or adjacent to the Sacramento Valley - North and South American Subbasins (subbasin numbers: 5-021.64 and 5-21.65) that have the potential to impact groundwater dependent ecosystems. On September 16, 2014, Governor Brown signed into law a three-bill legislative package collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires Groundwater Sustainability Agencies (GSAs) to develop and implement Groundwater Sustainability Plans (GSPs) that will ensure long term groundwater sustainability in the state's medium and high priority groundwater basins, including the North and South American Subbasins.

Ecological communities or species that depend on groundwater emerging from aquifers or

on groundwater occurring near the ground surface are collectively known as groundwater dependent ecosystems (GDEs) (23 Cal. Code Regs. § 351(m)). These GDEs include seeps and springs; wetlands and lakes; rivers, streams, and estuaries; and terrestrial vegetation. Water transfers made available by groundwater substitution have the potential to affect groundwater hydrology due to increased groundwater extraction and reduced groundwater recharge. Correlating effects could be temporary and/or long-term declines in groundwater levels, reduction of groundwater storage, depletions of interconnected surface water, land subsidence, and degraded water quality. These effects have the potential to adversely impact GDEs in basins where water transfers are made available by groundwater substitution.

According to the Natural Communities Commonly Associated with Groundwater Dataset (DWR 2018), there are potential vegetated and aquatic GDEs overlying or adjacent to the project locations. SGMA requires GSAs to identify and consider impacts to beneficial uses and users of groundwater, including GDEs, during the development and implementation of GSPs (23 Cal. Code Regs. § 354.16 (g) and Water Code § 10727.4(l)). Therefore, Department staff believe it is essential for the City of Sacramento to ensure water transfer activities are considered in the development of the North and South American Subbasin GSPs to avoid long-term undesirable results to beneficial uses and users of groundwater. The City of Sacramento has the opportunity to provide information on how water transfer activities in the basin may impact GDEs and interconnected surface waters, thereby supporting the development of sustainability goals, minimum thresholds, and measurable objectives within the North and South American Subbasin GSPs.

As outlined in the DWR's 2015 Draft Technical Information for Preparing Water Transfer Proposals and acknowledged in the petition, the City of Sacramento must demonstrate that the proposed groundwater substitution water transfers are consistent with local requirements (DWR 2019). For groundwater substitution transfers, DWR also requires groundwater monitoring and a mitigation plan designed to alleviate possible injury to other legal users of water including environmental users. The Department respectfully requests the City of Sacramento provide groundwater monitoring plans, mitigation plans, documentation demonstrating the North and South American Subbasin GSAs have been notified of the proposed transfer, and details on how the proposed groundwater substitutions will be consistent with local requirements. Effective, comprehensive monitoring will help understand both hydrologic patterns and corresponding habitat/GDE trends to inform both project operations and GSP development. Accordingly, groundwater monitoring should be accompanied by habitat monitoring and designed and deployed to capture seasonal and operational variability and follow accepted technical procedures and best practices established by the USGS (Cunningham 2011) and DWR (DWR 2016) respectively. Monitoring plans and data should be made publicly accessible.

The Department appreciates your consideration of these comments when reviewing the water transfer petitions. If you have questions regarding these comments, please contact Briana Seapy, Water Program Supervisor, at (916) 508-3345 or Briana.Seapy@wildlife.ca.gov or Dylan Wood, Environmental Scientist, at 916-358-2384 or dylan.a.wood@wildlife.ca.gov.

Sincerely,

Dylan Wood

California Department of Fish and Wildlife
Environmental Scientist



REFERENCES

Cunningham, W. L., and C. W. Schalk. 2011. Groundwater Technical Procedures of the U.S. Geological Survey

Department of Water Resources. 2016. Best Management Practices for Sustainable Management of Groundwater.

Department of Water Resources. 2018. Natural Communities Commonly Associated with Groundwater Dataset.

Department of Water Resources. 2019. Draft Technical Information for Preparing Water Transfer Proposals.

Snider, B. 2001. Evaluation of effects of flow fluctuations on the anadromous fish populations in the lower American River. California Department of Fish and Game, Habitat Conservation Division. Stream Evaluation Program. Tech. Reports No. 1 and 2 with appendices 1-3.

U.S. Environmental Protection Agency. 2003. EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards. EPA 910-B-03-002.

^[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

June 12, 2020

BY EMAIL ONLY

Mr. Dylan Wood
California Department of Fish and Wildlife
Dylan.wood@wildlife.ca.gov

Re: Comments on the Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer (SCH: 2020050212)

Dear Mr. Wood:

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on behalf of the California Department of Fish and Wildlife (“CDFW”). By this letter, the City of Sacramento (“City”) on behalf of Golden State Water Company (“GSWC”) is providing a response to CDFW’s comment letter dated June 9, 2020.

CDFW’s letter makes comments on two general subject areas related to GSWC’s role in the proposed 2020 American River water transfer program. The transfer will be accomplished through groundwater substitution, which is an approved transfer method under the *Technical Information for Preparing Water Transfer Proposals (Water Transfer White Paper)* prepared by the Department of Water Resources (“DWR”) and U.S. Bureau of Reclamation (“USBR”) in December 2019. The first set of CDFW comments relate to matters concerning surface water resources. The second set involve groundwater resources. We address each of these subject areas in turn.

1. CDFW Comments on Surface Water.

CDFW’s comments regarding potential impacts on surface water resources generally concern potential changes in flows released from Folsom Reservoir into the Lower American River (“LAR”) to effectuate the 2020 regional water transfer and related potential impacts to the Folsom cold water pool and the LAR fishery. The City responds as follows:

The proposed regional water transfer will not affect storage levels or the cold water pool in Folsom Reservoir, due to the fact that the transfer does not change the amount of water released from the reservoir. Absent the transfer, the same amount of water would have been delivered from the reservoir to the GSWC point of diversion downstream. Below the GSWC point of diversion, and other diversion points for parties that are concurrently petitioning the

SWRCB for similar transfer—Carmichael Water District (CWD) and the City (the lowest diversion point that would be used without transfer)—, there will be a small increase in flow on the LAR, when compared to the without-transfer scenario, of approximately 70 cfs for the July 1 to September 30 period and approximately 40 cfs in October and November. This marginal flow compares to average flows in the American River for the 2015-2019 period of 4,091 cfs in July, 3,183 cfs in August, 2,266 cfs in September, 1,729 cfs in October, and 1,659 in November. The addition of 40 to 70 cfs to these flows would represent an increase over the five-year average flows of between 1.7% and 3.1% during the transfer period. Thus, these flow increases associated with the proposed transfer represent insignificant increases compared to without-transfer conditions.

In addition, these additional flows may provide minor temperature benefits to the LAR because they will maintain additional colder water in the river, which will mitigate the impact of heat transfer from ambient air.

Another aspect of this proposed transfer is that the groundwater deliveries and surface water supplies made available for transfer will be provided on a relatively regular pattern, rather than in block releases. As noted in the CDFW comment, a steady release rate from Folsom Reservoir is preferable to large variations. In fact, a steady-state release pattern is the release profile proposed for this transfer. GSWC, City, and CWD will be coordinating with USBR on release rates from the reservoir in order to minimize any temperature- and flow-related impacts on the LAR and meet CDFW's request for a stable, optimized flow. CDFW also requests an accounting of the transfer water. A template for accounting methods will be included in the required DWR conveyance agreement.

In separate CDFW comment letters sent to the State Water Resources Control Board, CDFW inquired about the region's proposed use of an 8% streamflow depletion factor for this transfer. In response, City and CWD have noted that the 13% factor stated in the DWR/USBR Water Transfer White Paper is based on general modeling that is not site-specific to the American River, and is addressing the unique technical aspects through those petitions. The City and GSWC appreciate DWR's commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority ("RWA"), which is helping coordinate technical aspects of the transfer, are working cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans.

GSWC proposes to utilize the streamflow depletion factor included in DWR's 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper) of 13%. This in recognition that two of the GSWC wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

All petitioners continue to work collaboratively with DWR technical staff to ensure adequacy of streamflow factors that will be ultimately be included in DWR's required conveyance agreement. Relevant technical information is being uploaded onto the state-sponsored Water

Transfer Information Management System (WTIMS), and interested parties are invited to review that content.

The City is adding the following language to the final Initial Study to reflect DWR's Draft Water Transfer White Paper.

"Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities."

2. CDFW Comments on Groundwater.

With respect to groundwater, CDFW expressed concerns with potential cumulative impacts on groundwater resources associated with the proposed transfer and future transfers related to Sustainable Groundwater Management Act ("SGMA") requirements to incorporate protection of groundwater dependent ecosystems ("GDEs") into groundwater sustainability plans ("GSPs"). CDFW comments that City should ensure that water transfers are considered in the development of GSPs for the North American and South American Subbasins currently under development by the respective Groundwater Sustainability Agencies ("GSAs"), SGA for the North American Subbasin and the Sacramento Central Groundwater Authority ("SCGA") for the South American Subbasin.

City's response to CDFW's concerns about groundwater resources is as follows. Groundwater to replace the transferred surface water will be pumped from existing municipal wells that have been constructed to meet all required state and local standards. All wells will be operated within historical baseline pumping amounts and the basins' respective safe yield amounts in accordance with the SGA's and the SCGA's existing AB 3030 groundwater management plans. The wells used in the transfer will be certified and approved by DWR staff, and all pumping will be in accordance with the mitigation, monitoring, and reporting plans that City, CWD, and GSWC will be required to comply with as a condition of the water conveyance agreements that each transferor will enter into the DWR.

In addition, there is an established water accounting framework administered by SGA in the North American Subbasin that accounts for the significant conjunctive use activities engaged in by City, CWD, and the other agencies participating in the 2020 water transfer. The participating agencies include SSWD, which alone has banked over 200,000 acre-feet of water in the North American Subbasin through in-lieu banking. City and CWD also have positive accounts in the SGA water accounting framework resulting from their conjunctive use activities. Most importantly, regional conjunctive use efforts in the past two decades have resulted in increasing groundwater levels, and continuing conjunctive use activities will ensure that groundwater levels return to their previous elevations quickly after a water transfer.

The most recent results were supplied to the SGA Board on April 9, 2020 and are attached to the end of this correspondence. The Water Accounting Framework program can be accessed on the SGA website as follows: <https://www.sgah2o.org/programs/groundwater-management-program/water-accounting-framework/>.

GSWC activities are exclusively occurring within the South American Subbasin over which SCGA is the exclusive GSA. SCGA does not maintain an accounting framework that matches SGA but does compile records and estimates of surface and groundwater usage within the service area. SCGA has been preparing and submitting basin reports consistent with SGMA, most recently submitted in 2019. These reports are publicly available on the SCGA website and demonstrate increased recharge of groundwater over recent years far in excess of proposed transfer amounts. This increase storage is due, in part to increased deliveries of surface water by transfer participants to allow for in-lieu recharge of groundwater resources.

As an example, the report and executive summary of the 2018 SGMA Annual Report includes the following data showing the cumulative change in storage.

2018 SCGA SGMA Annual report, Table 4

Table 4. Annual and Cumulative Changes in Storage

Year	Change in Storage (Ac-Ft)	Cumulative Change in Storage 2005 to 2018 (Ac-Ft)	Cumulative Change in Storage 2015 to 2018 (Ac-Ft)
2005	baseline	0	
2009	42,766	42,766	
2010	(16,046)	26,720	
2011	46,705	73,425	
2012	40,416	113,841	
2013	(16,458)	97,384	
2014	(111,930)	(14,546)	
2015	(58,717)	(73,263)	0
2016	28,833	(44,430)	28,833
2017	189,306	144,876	218,139
2018	70,480	215,356	288,619

Separately, Figure 8 in the Executive Summary compares extraction history to the presently understood sustainable yield.

2018 SCGA SGMA Annual report, Table 4

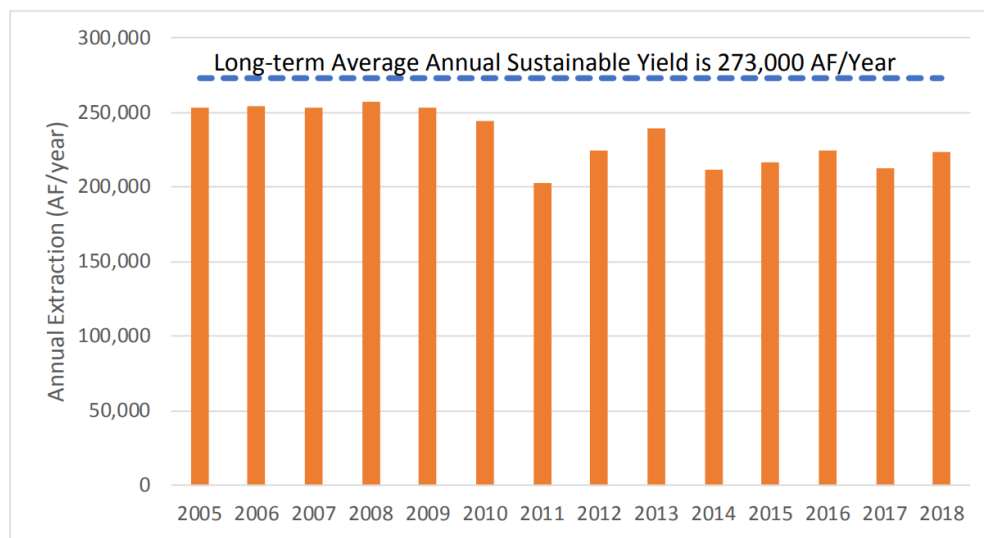


Figure 8. Verification of Annual Sustainability Goal

This 2018 SCGA SGMA report can be reviewed by interested parties at the following location: https://scgah2o.saccounty.net/Documents/2018%20SCGA%20Annual%20Report%20South%20American%20Subbasin%205-021.65_20180329.pdf.

As noted, all groundwater pumped and used from both the North and South American Subbasins to make surface water available for transfer will be within the safe yield figures for each subbasin as both established in the existing AB 3030 groundwater management plans and as currently forecasted in the GSPs under development for each subbasin. All transfer parties have notified the GSAs of the transfer as required, and neither GSA has objected to the proposed transfers. Thus, City, GSWC, and other parties outside of this ISND have coordinated the proposed transfer with the GSAs to ensure that they avoid any impacts on the basin. Consistent with the County Code, permits for the proposed transfer have been issued by Sacramento County to project participants. Per request by CDFW, accompanying this email is a copy of the GSA notification letter to SCGA and a copy of the board agenda when the letter was provided to the SCGA Directors. Other requested technical documents are being uploaded to the State Water Transfer Information Management System operated by DWR, which is intended to provide a common source of supporting data.

City and GSWC appreciate the opportunity to provide this response to CDFW's June 9, 2020 letter. Please contact me if you have any questions about this letter or would like further information regarding the American River proposed 2020 groundwater substitution transfer.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Brett Ewart", with a stylized, flowing script.

Brett Ewart
City of Sacramento

cc: (Via email)
Paul Schubert, Golden State Water Company
Scott Johnson, City of Sacramento
Rob Swartz, RWA/SGA

Water Accounting Framework, Phase III

Basin Sustainability Goal							Exchangeable Water				
Carmichael Water District	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		6,646									40,049
2012	9,895		1,580	5,066	0	5,066	8,315	0	0	5,066	45,115
2013	10,400		2,031	4,615	0	9,681	8,369	0	0	4,615	49,730
2014	8,517		3,575	3,071	0	12,752	4,942	0	0	3,071	52,801
2015	7,353		2,755	3,891	0	16,643	4,598	0	0	3,891	56,692
2016	7,696		1,419	5,227	0	21,870	6,277	0	0	5,227	61,919
2017	8,495		2,597	4,049	0	25,919	5,898	0	0	4,049	65,968
2018	8,614		2,947	3,699	0	29,618	5,667	408	0	3,291	69,259
2019	8,219		2,166	4,480	0	34,098	6,053	0	0	4,480	73,739
City of Sacramento	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		20,591									36,568
2012	38,084		13,554	7,037	0	7,037	24,530	0	0	7,037	43,605
2013	39,068		11,732	8,859	0	15,896	27,336	0	0	8,859	52,464
2014	31,724		13,602	6,989	0	22,885	18,122	0	0	6,989	59,453
2015	27,878		12,682	7,909	0	30,794	15,196	0	0	7,909	67,362
2016	28,962		17,151	3,440	0	34,234	11,811	0	0	3,440	70,802
2017	30,110		23,728	-3,137	0	31,097	6,382	0	0	0	70,802
2018	30,221		23,495	-2,904	0	28,193	6,726	2641	0	-2,641	68,161
2019	28,774		19,401	1,190	0	29,383	9,373	0	0	1,190	69,351
California American Water	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		17,995									7,115
2012	14,186		13,595	4,400	0	4,400	591	0	0	591	7,706
2013	14,110		14,110	3,885	0	8,285	0	0	0	0	7,706
2014	11,260		11,260	6,735	0	15,020	0	0	0	0	7,706
2015	9,581		9,581	8,414	0	23,434	0	0	0	0	7,706
2016	10,319		10,102	7,893	0	31,327	217	0	0	217	7,923
2017	11,220		9,203	8,792	0	40,119	2,017	0	0	2,017	9,940
2018	11,065		9,609	8,386	0	48,505	1,456	0	0	1,456	11,396
2019	10,724		9,241	8,754	0	57,259	1,483	0	0	1,483	12,879
Del Paso Manor Water District	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		1,465									0
2012	1,499		1,499	-34	0	-34	0	0	0	0	0
2013	1,571		1,571	-106	0	-140	0	0	0	0	0
2014	1,246		1,246	219	0	79	0	0	0	0	0
2015	1,052		1,052	413	0	492	0	0	0	0	0
2016	1,128		1,128	337	0	829	0	0	0	0	0
2017	1,239		1,239	226	0	1,055	0	0	0	0	0
2018	1,226		1,226	239	0	1,294	0	0	0	0	0
2019	1,158		1,158	307	0	1,601	0	0	0	0	0
Golden State Water Company	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		1,098									0
2012	1,119		1,119	-21	0	-21	0	0	0	0	0
2013	1,184		1,184	-86	0	-107	0	0	0	0	0
2014	896		896	202	0	95	0	0	0	0	0
2015	778		778	320	0	415	0	0	0	0	0
2016	793		793	305	0	720	0	0	0	0	0
2017	854		854	244	0	964	0	0	0	0	0
2018	836		836	262	0	1,226	0	0	0	0	0
2019	840		840	258	0	1,484	0	0	0	0	0

2019 Results

Water Accounting Framework, Phase III

Basin Sustainability Goal							Exchangeable Water				
Rio Linda / Elverta CSD	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		2,882									109
2012	2,882		2,857	25	0	25	25	0	0	25	134
2013	3,052		3,052	-170	0	-145	0	0	0	0	134
2014	2,249		2,449	433	0	288	0	0	0	0	134
2015	2,109		2,109	773	0	1,061	0	0	0	0	134
2016	2,236		2,236	646	0	1,707	0	0	0	0	134
2017	2,458		2,458	424	0	2,131	0	0	0	0	134
2018	2,506		2,506	376	0	2,507	0	0	0	0	134
2019	2,429		2,439	443	0	2,950	0	0	0	0	134
Sacramento County WA	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		4,288									0
2012	5,211		5,211	-923	0	-923	0	0	0	0	0
2013	5,316		5,316	-1,028	0	-1,951	0	0	0	0	0
2014	4,559		4,559	-271	0	-2,222	0	0	0	0	0
2015	3,887		3,887	401	0	-1,821	0	0	0	0	0
2016	4,064		4,064	224	0	-1,597	0	0	0	0	0
2017	4,756		4,756	-468	0	-2,065	0	0	0	0	0
2018	4,817		4,817	-529	0	-2,594	0	0	0	0	0
2019	4,582		4,582	-294	0	-2,888	0	0	0	0	0
Sacramento Suburban Water District	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		35,035									183,034
2012	38,089		27,530	7,505	0	7,505	10,559	0	0	7,505	190,539
2013	38,554		38,145	-3,110	0	4,395	409	3,068	0	-2,659	187,880
2014	32,561		32,561	2,474	0	6,869	0	0	0	0	187,880
2015	27,502		27,422	7,613	0	14,482	80	0	0	80	187,960
2016	29,311		17,863	17,172	0	31,654	11,448	0	0	11,448	199,408
2017	31,253		19,791	15,244	0	46,898	11,462	0	0	11,462	210,870
2018	30,873		20,423	14,612	0	61,510	10,450	5,253	0	5,197	216,067
2019	30,610		13,363	21,672	0	83,182	17,247	0	0	17,247	233,314
Central Area Total	Total Demand	Target Pumping	Actual GW Pumped	Target minus Actual GW	Transfer of Credits	Basin Sustainability Balance	Surface Water Use	Water Transfer (out of basin)	Credits transferred	Net Banked Water	Exchangeable Water Balance
		90,000									266,875
2012	110,965		66,945	23,055	0	23,055	44,020	0	0	20,224	287,099
2013	113,255		77,141	12,859	0	35,914	36,114	3,068	0	10,815	297,914
2014	93,012		70,148	19,852	0	55,766	23,064	0	0	10,060	307,974
2015	80,140		60,266	29,734	0	85,500	19,874	0	0	11,880	319,854
2016	84,509		54,756	35,244	0	120,744	29,753	0	0	20,332	340,186
2017	90,385		64,626	25,374	0	146,118	25,759	0	0	17,528	357,714
2018	90,158		65,859	24,141	0	170,259	24,299	8,302	0	7,303	365,017
2019	87,336		53,190	36,810	0	207,069	34,156	0	0	24,400	389,417



April 28, 2020
Mr. Darrell K. Eck
Executive Director
Sacramento Central Groundwater Authority
827 7th St., Rm 301 Sacramento, CA 95814

Transmitted via email.

RE: 2020 Water Transfer Notification

Dear Mr. Eck,

The City of Sacramento (COS), the Sacramento County Water Agency (SCWA), and Golden State Water Company (GSWC) have identified an opportunity to participate in a regional groundwater substitution transfer over the period of July 1st, 2020 to November 30th, 2020. In preparing the transfer document, the regional partners are following DWR's draft 2019 guidebook. See link below:

https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/Water-Transfers/Files/Draft_WTWhitePaper_20191203.pdf?la=en&hash=F0ACE02168387A77EDDD844545E7F7A4642A05F

We draw your attention to page 27, which identifies the expected components of a submittal. The last bullet reads:

"Demonstration that the transfer is consistent with the local requirements and applicable GSP(s) of the groundwater basins where the additional groundwater pumping would occur under the transfer proposal; or written notification to the relevant Groundwater Sustainability Agency/Agencies (GSA(s)) if a GSP has not been implemented at the time the transfer is being proposed."

Pursuant to DWR's latest draft guidebook for preparing water transfer proposals, this letter is designed to serve as notification of intent to participate by the COS, SCWA, and GSWC. Participation will be achieved in the following fashion:

- Sacramento County Water Agency will deliver approximately 1500 ACFT of groundwater to the City of Sacramento through the Franklin Intertie, thereby allowing the City to reduce surface water diversions.
- Golden State will preferentially utilize approximately 2500 ACFT of groundwater for its retail demands rather than rely on its own surface water entitlements.

The proposed extractions from Sacramento County Water Agency and Golden State Water are within historic extractions that have been reduced in recent years by a combination of reduced customer demand and/or reliance on surface water. The surface water remaining in the system will be conveyed to interested buyers in 2020. In near term future years, COS will fully return an identical quantity of surface water to SCWA thereby allowing recharge to occur when wells extractions are reduced. Similarly, GSWC will return to greater reliance on surface water diversions when hydrologic conditions are appropriate. The net impact on the basin will be neutral.

The guidebook also identifies a process by which a GSA can supply a "concurrence letter" when a Groundwater Sustainability Plan (GSP) is in place. At present, until the GSP is developed, we are submitting this notification letter to meet the intent of the guidebook. If SCGA, as the GSA for the affected portion of the South American Subbasin, has any questions about this notification or the transfer, we would be happy to address them.

Please note that other parties in the North American Subbasin, including the City of Sacramento, Sacramento Suburban Water District, Carmichael Water District, and Fair Oaks Water District are all considering participation in the Regional Transfer. The transfer volumes included in this notification letter would occur exclusively in the South American Subbasin.

In closing, we wish to highlight a key component of the planned water transfer; All additional groundwater extracted as part of the 2020 Water Transfer, will be returned in the form of greater reliance on surface water during appropriate hydrologic conditions.

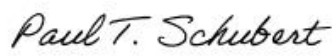
City of Sacramento:

By: 
Brett Ewart
Senior Engineer

Sacramento County Water Agency:

By: 
David Underwood
Principal Engineer

Golden State Water Company:

By: 
Paul Schubert
General Manager

**Application to Permit the Export of Groundwater or Surface Water out of Sacramento County
(SCWA Code, Title 3, Section 3.40.090 Groundwater and Surface Water Export)**

**Name and Address
of Applicant:**

Golden State Water Company
c/o Paul Schubert, General Manager
3005 Gold Canal Drive
Rancho Cordova, CA 95670

Owner of Source:

Same

**Owner of Place
of Use:**

Same

**Consulting Engineer:
(Plan and Design
of Work)**

Tully & Young, Inc.
965 University Avenue, Ste 222
Sacramento, CA 95825

**Description of
proposed action:**

Attached Transfer Proposal

Location of source(s):

American River

Point(s) of use:

Golden State Water Company American River point of diversion
Golden State Water Company Service Area as the place of use

**Justification for
proposed action:**

Attached Transfer Proposal

_____ **To Be Completed by the Sacramento County Water Agency** _____

Is proposal in conformance with County water planning policies adopted and revised from time to time by the County and the Sacramento County Water Agency?

☒ Yes ☐ No Comment: _____

Will proposal impose liability on the County or the Water Agency?

☐ Yes ☒ No Comment: _____

Does proposal cause adverse impacts on the source, the area of use, or the environment?

☐ Yes ☒ No Comment: _____

Is this proposal consistent with the general plan of the County of Sacramento, the water plan of the Sacramento County Water Agency?

☒ Yes ☐ No Comment: _____

Is this proposal consistent with a specific plan of the County or Water Agency which may be affected by the work or activity?

☒ Yes ☐ No Comment: _____

Pursuant to the findings contained herein, this Application is ☒ Approved ☐ Denied

Permit No: 2020-2 _____

Sacramento County Water Agency

Signature: _____

Name: _____

Title: _____

Date: _____



MICHAEL L. PETERSON

DIRECTOR / AGENCY ENGINEER

5-19-20