

NOTICE OF PREPARATION

DATE: March 12, 2021

TO: State Clearinghouse; Responsible and Trustee Agencies; and Other Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report

PROJECT: Groundwater Pumping and Conveyance

LEAD AGENCY: Westlands Water District
3130 N. Fresno Street
Fresno, CA 93703

Westlands Water District (District) intends to prepare an Environmental Impact Report (EIR) for its proposed Groundwater Pumping and Conveyance Project (Project). The District is the Lead Agency under the California Environmental Quality Act (CEQA). The District invites written comments on the scope of the environmental analysis and identification of potential environmental issues to be included in the EIR.

Notice of Preparation: This Notice of Preparation (NOP) has been sent to the Office of Planning and Research, responsible and trustee agencies, other public agencies, and interested members of the public to inform them that the District is preparing an EIR and to solicit information that will be helpful in the environmental review process. This notice includes a description of the Project and information regarding how to provide comments to the District.

Comment Period: The District is requesting input from responsible and trustee agencies, other public agencies, and interested members of the public regarding the scope and content of the environmental information to be included in the EIR. Agency responses should identify the issues to be considered in the EIR, including significant environmental issues, and reasonable alternatives and mitigation measures, and other pertinent information consistent with CEQA Guidelines Section 15082(b).

State law mandates that responses must be sent at the earliest possible date, but postmarked within 30 days from this notice. The 30-day public review period for this NOP extends from **March 12, 2021** to **April 10, 2021**. Please provide any written comments (either by mail or electronically) no later than **5:00 pm on April 10, 2021**. Please direct all comments to the following address:

David Vang
Westlands Water District
3130 N. Fresno Street
Fresno, CA 93703
dvang@wwd.ca.gov

Document Availability: Due to the ongoing COVID-19 pandemic, portions of the environmental review process must be conducted online. This NOP is available for review on the District's website: <https://wwd.ca.gov/news-and-reports/environmental-docs/>.

Scoping Meeting: A virtual public meeting will be held during the 30-day review period to solicit comments on the scope and content of the EIR. The meeting will be held from 3 p.m. to 4 p.m. on **March 19, 2021** via the Microsoft Teams web conference application. To join the meeting, please click the following link or join by phone:

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

[+1 559-512-3730,,883661411#](#) United States, Fresno

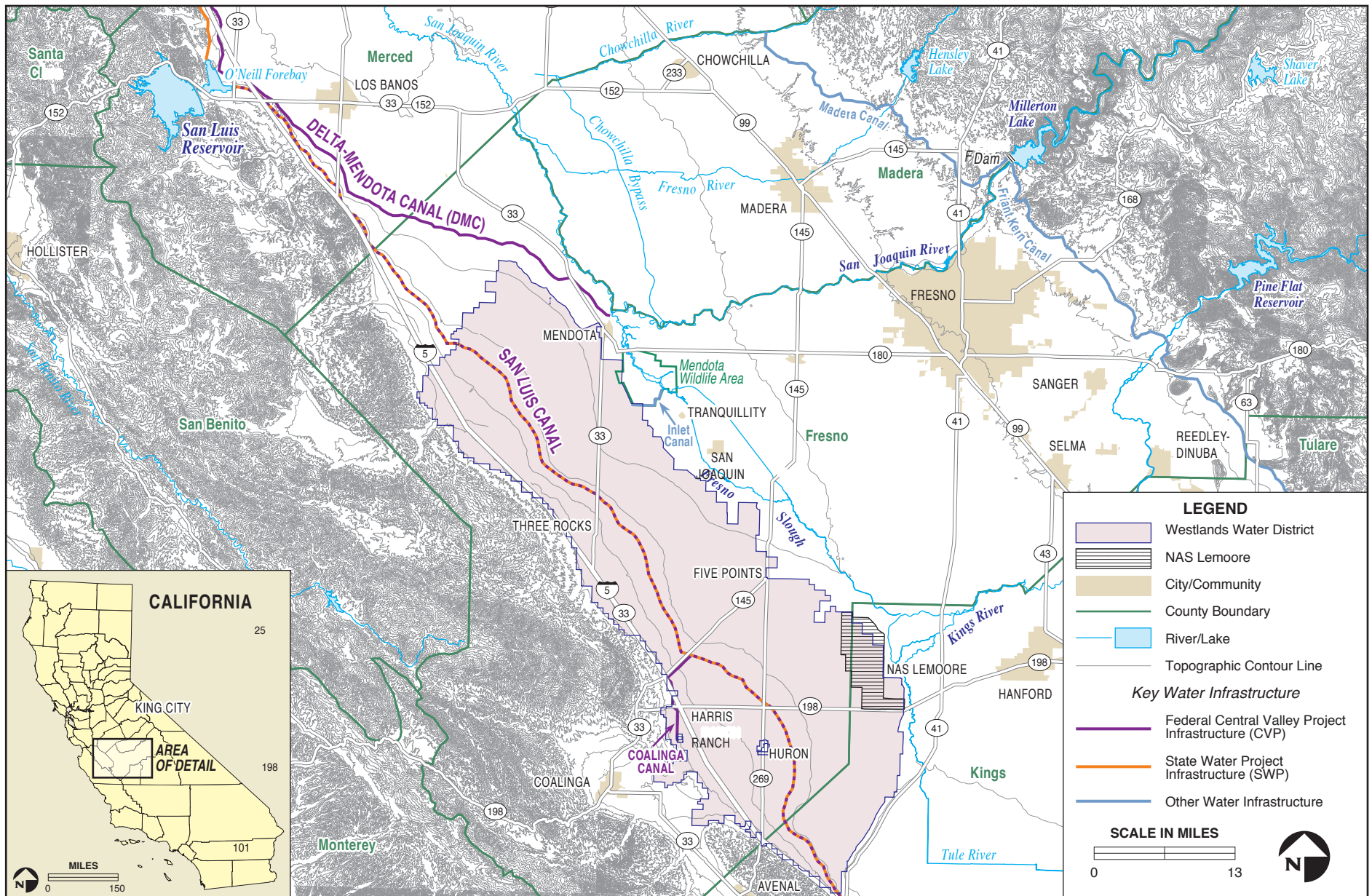
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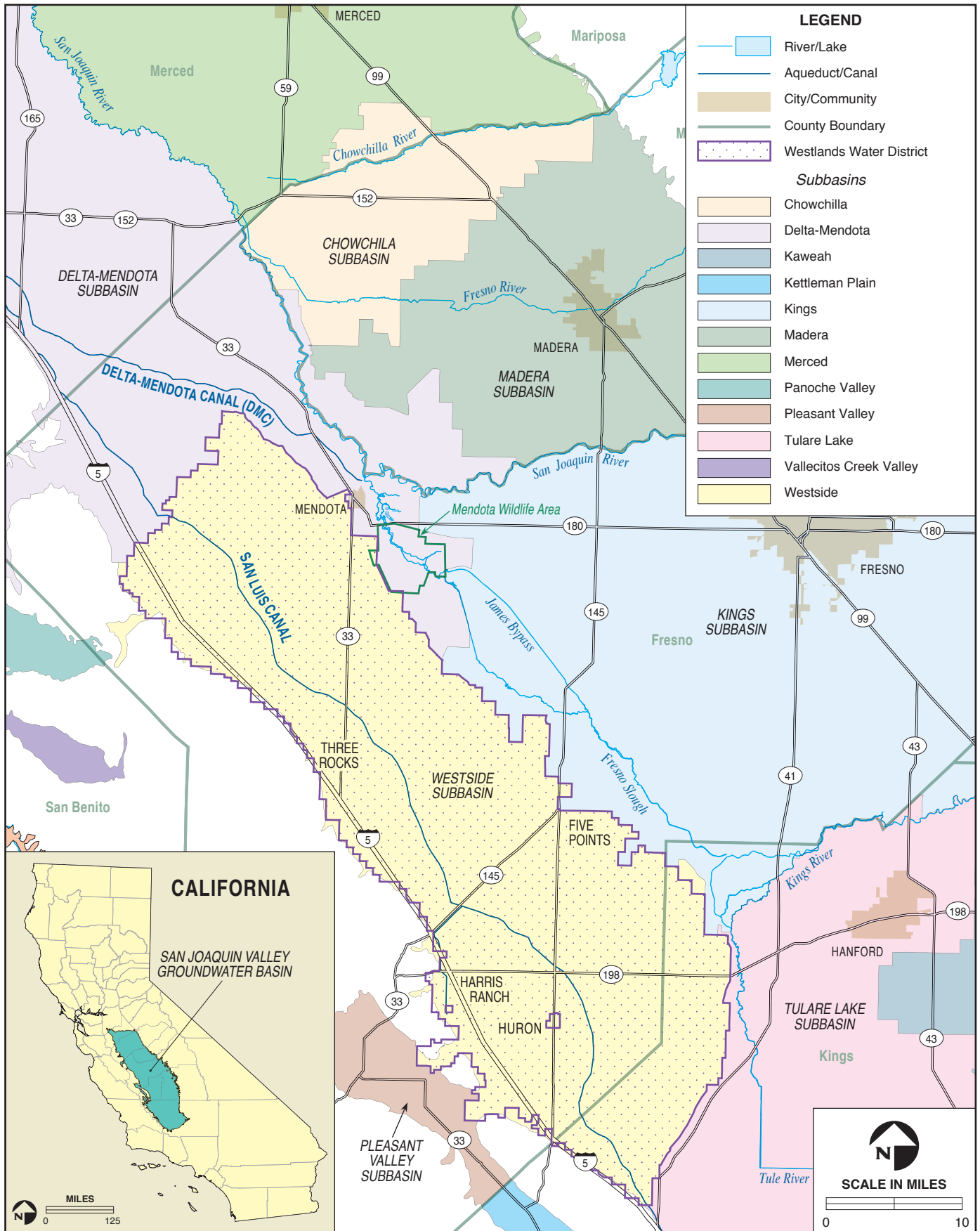
To ensure the best experience for this meeting, please join via the Desktop or mobile Teams application. The dial-in audio conferencing number should only be used if other options do not work or are not available.

The scoping meeting will include a brief presentation, providing an overview of the Project. After the presentation, comments will be accepted. Individuals wishing to provide comments during the meeting are encouraged to first register by emailing David Vang at dvang@wwd.ca.gov (please include "**Westlands Water District Groundwater Pumping and Conveyance Project Scoping Meeting Comment Registration**" in the subject line).

Project Location and Overview: The Project is located in Fresno and Kings Counties, within the District on the westside of the San Joaquin Valley. The groundwater wells proposed for pumping are located within the District, which overlies the Westside Subbasin of the Tulare Lake Groundwater Basin. Water conveyance throughout the District consists of existing licensed water integration (introduction) locations along the San Luis Canal (SLC), although private pipelines may also be used (Figure 1).

The Project would complement the United States Bureau of Reclamation's (USBR's) most recent approval of the Five-Year Warren Act for Westlands Water District Environmental Assessment and Finding of No Significant Impact (CGB-EA-2020-032 and CGB-FONSI-2020-032, respectively) to authorize execution of Warren Act Contracts, which is effective through 2025. Annual Warren Act Contracts would be coordinated with USBR to implement the Project as excess capacity is available.





PROJECT SUMMARY

General Description of the Project

The Project would allow the District to introduce up to 30,000 acre-feet per year (AFY) of acceptable-quality groundwater into the SLC over the next 5 years, in years which the District's Central Valley Project allocation is 20 percent or less. The period of introduction would be between April 1 and August 31 of a given year. The Project would involve four main components: (1) groundwater pumping, (2) water conveyance, (3) ground subsidence monitoring, and (4) water quality monitoring.

The source of the groundwater would be pumped from wells within the District. The groundwater would be pumped into the SLC via existing licensed water integration (introduction) facilities located on either side of the SLC. The amount of water from each source would vary, but the total quantity introduced under the Project would not exceed 30,000 AF in a given year.

Because of water quality criteria and anticipated pumping restrictions, actual annual Project volume may be less than the maximum value. The Project would utilize an estimated 26 existing, permanent separate water integration locations with associated wells, however, additional wells and water integration locations may participate if they meet the Water Quality Monitoring Plan requirements, which are based off the applicable Title 22 California Drinking Water Standards. Wells that participate in and volume pumped under the Project would be limited by the following factors:

- USBR contract allocation levels to water users;
- water quality and capacity limitations in the SLC;
- conveyance capacities of the District distribution system;
- seasonal limitations on groundwater pumping related to groundwater overdraft and potential subsidence; and
- Groundwater Sustainability Plan management actions, including non-structural programs or policies that are intended to incentivize reductions in groundwater pumping.

Prior to introduction of groundwater into the SLC, all wells would be tested to demonstrate compliance with USBR's SLC Non-Project Water Pump-in Program – 2020 Water Quality Monitoring Plan (Water Quality Monitoring Plan) standards (based off Title 22 water quality standards). Only groundwater wells that meet these water quality standards would be used for integration into the SLC. Water sourced from the Mendota Pool Inlet Canal would be tested at laterals discharging to the SLC.

Groundwater introduced into the SLC would either be directly delivered to agricultural users located downstream of discharge points, or operationally exchanged with USBR for an in-kind amount, minus conveyance losses, of the District's available water supplies in the San Luis Reservoir. Exchanged water would either be delivered to agricultural users located upstream of introduction points in the District or stored in the San Luis Reservoir as exchanged non-CVP water for later delivery to the District via the SLC. Introduction of the District's groundwater and storage of the exchanged water would be annually scheduled with USBR and would be subject to excess capacity, operational constraints, and CEQA requirements, as applicable. The District intends to use the water in the same year in which it is introduced into federal facilities. However, if the District is unable to make use of water introduced into the facilities within the designated window, it may be necessary to carry the water over through storage in the San Luis Reservoir until it can be put to use.

Under the Project, no new facilities or modifications to the SLC would be authorized. Given the Project proposes to utilize existing facilities for pumping of groundwater and introduction of supplies into the SLC, no ground disturbance or construction/installation of new facilities is proposed under this Project. All water delivered would be subject to existing water banking, place of use, water allocation and credit provisions. Groundwater pumping will occur within existing historical baselines and the requirements of an existing groundwater management plan administered by the District as the Groundwater Sustainability Agency of

the Westside Subbasin. Due to the proposed limitations on pumpage and the established historic use of the wells, it is not anticipated that overall groundwater extractions would increase under this Project.

Water Conveyance

Water conveyance would be accomplished either directly into the SLC via pipelines or through District laterals. Water for delivery into the SLC would be conveyed through existing pipelines ranging from a few hundred feet to more than ten miles in length. At the SLC right-of-way, the buried pipelines pass through the SLC bank and are capable of discharging water directly into the SLC below the water line. Flows into the SLC would be metered by the District and verified by the Department of Water Resources (DWR). When direct conveyance into the SLC is impractical, qualified groundwater may be conveyed from a participating well into a District lateral, with the flow reversed through the lateral to the SLC. Such water must pass through a reverse-flow meter before participation in the Project is permitted. Because of this limitation, it is anticipated that most water delivered under this Project would be conveyed via facilities directly into the SLC.

The qualified groundwater pumped into the SLC in this manner would be subject to a 5 percent reduction assessed by USBR for transportation and other losses. The groundwater would either be directly delivered to agricultural users in the District, exchanged for CVP water for agricultural users located upstream of the points of introduction, or stored in the San Luis Reservoir for later delivery to the District via the SLC. The Project participants either take delivery of an equal amount of water through District laterals or receive a credit for an equivalent amount of water for later delivery, subject to the following options and limitations:

- At an additional cost, water can be exchanged for credit in San Luis Reservoir when adequate storage space exists in the USBR portion of storage space in the Reservoir and when adequate space is available in the SLC to receive participating water.
- Banked groundwater is among the first water to be spilled (lost) when storage space is no longer available in San Luis Reservoir for CVP water.

Groundwater Subsidence and Monitoring

There are two subsidence prone areas located within the District along the SLC identified in the Westside Subbasin Groundwater Sustainability Plan (GSP) (see Figure 3). These two areas experienced increased rates of subsidence, which may threaten lands and infrastructure within their vicinity, namely the SLC. Within these areas, wells would be subject to more restrictive minimum thresholds to protect critical head levels, and extraction from the Lower Aquifer (deep aquifer below the Corcoran Clay layer) would be limited in all years to minimize or avoid subsidence in susceptible Lower Aquifer.

Limits on groundwater extraction from these areas would be identified as part of detailed groundwater modeling conducted as part of GSP implementation and subject to final approval by the District's Board of Directors. These limitations are expected to be more restrictive than baseline pumping conditions identified in the Westside Subbasin GSP, which identified a restriction of up to 50 percent of their allocated pumping amount. These wells are also subject to limitations established in the Water Quality Monitoring Plan, which requires an individual well be shut off when its depth to groundwater (DTGW) reaches 75 percent of the difference between the Fall/Winter Median Groundwater Level and the Max DTGW. Monitoring for subsidence would continue to be conducted by the District as part of the existing robust subsidence monitoring network, which includes data collection by the District, DWR, USBR, and UNAVCO from field/survey Global Positioning System (GPS) locations, extensometers, and satellite imagery.

Water Quality Monitoring and Protection

Groundwater in some areas of the District has generally high salinity content. Salinity is typically measured using EC, often stated as Total Dissolved Solids (TDS). To confirm that the groundwater from the participating wells meets the Water Quality Monitoring Plan, the Project participants' groundwater would be tested before the water is transferred via the SLC. No drainage water would be permitted for conveyance under this program.

Key constituents for testing include TDS, metals, organic chemicals, and other potential pollutants. Each well operator must provide sufficient information about each well to confirm that the pumped groundwater would be consistent, predictable, and acceptable in quality. The water would continue to be tested at periodic intervals during pumping to ensure no water quality exceedances occur. The wells within the District must meet the Title 22 California Drinking Water Standards to participate in the proposed Project.

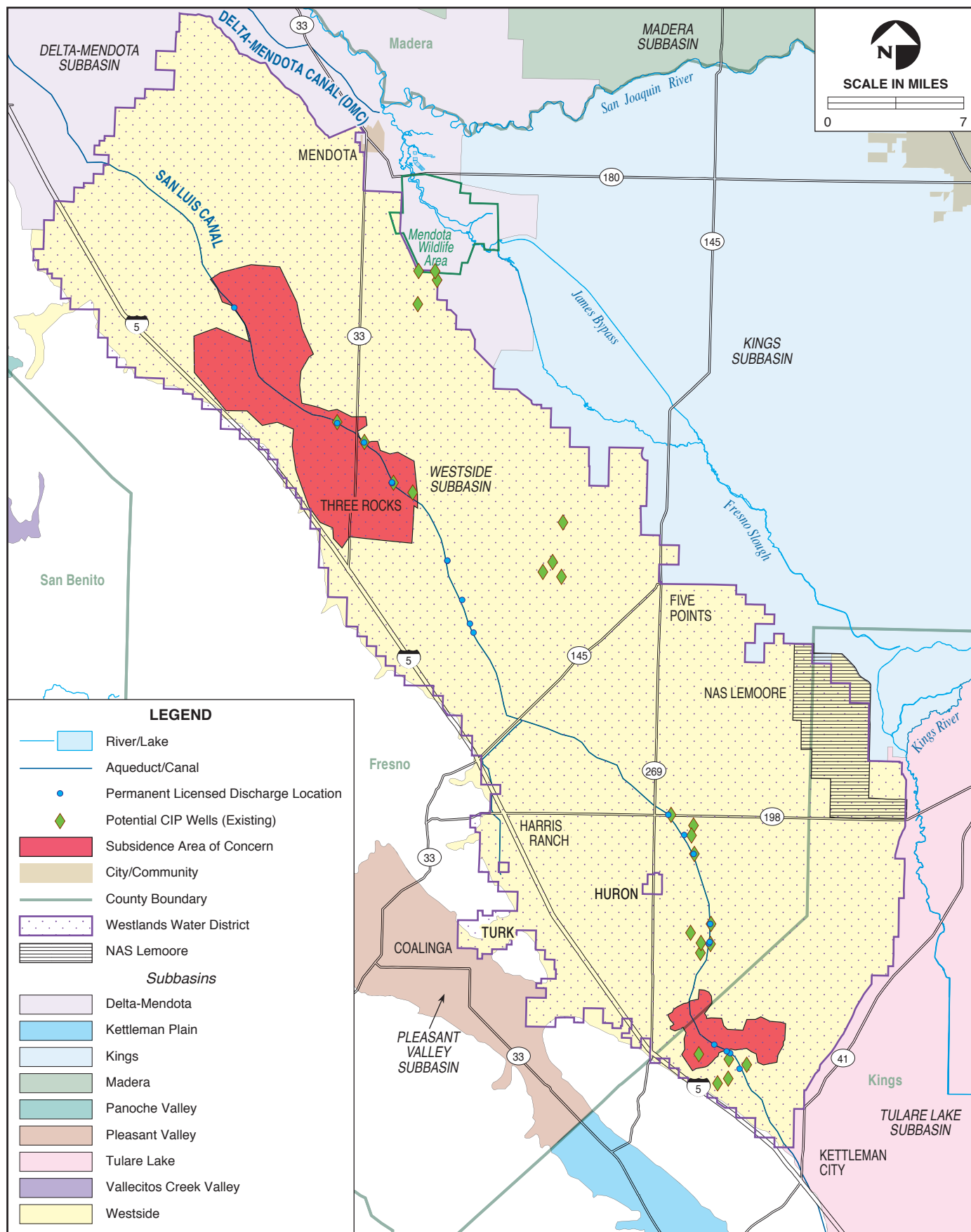
Mean daily salinity and EC would be assessed with the sensors located along the SLC that report real-time data to the California Data Exchange Center. The mean daily salinity and EC data would be downloaded by the District to monitor daily changes along the SLC. Additionally, the District would use mass balance models to estimate the contribution of salinity to the SLC from actively pumping wells. Based on monitoring data, USBR and the District have the authority to shut off inflows of the District distribution system or SLC if the quality or quantity of the inflow is unacceptable.

Water Storage

The SLC is used jointly by USBR and DWR and is divided into federal and state shares. While the SLC is not physically divided into two, it establishes limits for the amount and ownership of the water conveyed. Because the Project's water, when integrated to the SLC, would mix with state and federal water, the pumped water could be used in the District and downstream in lieu of releases from San Luis Reservoir of stored CVP water. The release from San Luis Reservoir could be reduced by the amount of pumped groundwater integrated to the SLC. This practice, known as water storage, allows an exchange of CVP water with water stored in San Luis Reservoir, providing the participant a credit for an equivalent amount of water in storage in San Luis Reservoir.

Water Allocation and Credit System

Under the District's credit system, groundwater delivered to the SLC would be credited to Project participants. Credit for water delivered into the SLC is reduced by 5 percent of the amount delivered to account for losses from evaporation and seepage in the SLC. Given the maximum groundwater delivery of 30,000 AFY under the proposed program, the 5 percent conveyance loss equates to a maximum of 1,500 AFY. The District takes delivery of this net amount of water through other laterals along the SLC in the same month it is introduced, the water is not stored.



Place of Use of Project Water

Water generated by this Project would be used on historically irrigated lands in the District. The water would be used to make up for reductions in surface water supplies available to the District from the CVP. The District also has a set of policies in place that encourage the trading of water among farmers with landholdings in the District. No water from this Project would be sold, transferred, or exchanged either directly or indirectly for use outside the District, unless authorized by the Board through separate action. Consequently, even though a Project participant receives a credit for pumping groundwater into the SLC, that credit, generated by the proposed Project, can result in the delivery of water to almost any parcel of land within the District.

The delivery of water within the District is subject to the following limits:

- Water would not be delivered to lands ineligible for water under the federal USBR laws and District rules and regulations; and,
- Water would not be delivered to lands that have not been historically irrigated.

DISCRETIONARY APPROVALS

In addition to certification of the EIR and approval of the Project by the District, discretionary approvals required for Project implementation include: USBR approval of future Warren Act Contract(s), Department of Water Resources review and approval of Drinking Water Source Assessment and Protection Program documentation, and amendment to any existing operating permit for the water distribution system.

POTENTIAL PROJECT IMPACTS

In accordance with Section 15126 of the CEQA Guidelines, the EIR will assess the physical changes to the environment that would likely result from implementation of the Project, including direct, indirect and cumulative impacts. The EIR will identify mitigation measures if necessary and feasible to avoid or substantially reduce Project impacts. The EIR also will consider alternatives to the Project, including the "No Project" alternative.

The scope of the EIR for the Project will be based in part on comments received in response to this NOP and public input received during the public scoping meeting. At a minimum, the following environmental issues will be analyzed in the EIR:

- Biological Resources
- Geology/Soils (Subsidence)
- Hydrology and Water Quality (Groundwater Quality, Groundwater Levels, Surface Water Quality)