

DEPARTMENT OF WATER RESOURCES

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VIA-EMAIL

May 19, 2025

Pablo Arroyave
San Luis & Delta-Mendota Water Authority
P.O. Box 2157
Los Banos, California 93635
pablo.arroyave@sldmwa.org

Subject: Draft Initial Study and Draft Addendum to the Final Long-Term Water Transfers EIR for Evaluation of 2026-2027 North to South Water Transfers

Dear Mr. Arroyave,

The California Department of Water Resources (Department) has reviewed the Draft 2026-2027 North to South Water Transfers Environmental Assessment/Initial Study (EA/IS) jointly prepared by U.S. Bureau of Reclamation (Reclamation) and the San Luis & Delta-Mendota Water Authority and the Draft Addendum to the Final Long-Term Water Transfers EIR (Addendum) for the potential transfer of water made available through groundwater substitution and/or stored reservoir release actions in 2026 and 2027.

Please find attached a copy of the Department's comment letter to Reclamation regarding the EA/IS for your consideration as the issues addressed remain directly relevant to the Addendum.

The Department appreciates the opportunity to provide this comment letter. If you have any questions or need additional information, please contact me at SWPWaterTransfers@water.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Andy Chu".

Andy Chu
Supervising Engineer, Water Resources
Non-SWP Agreements Section
Division of Operations and Maintenance

Mr. Arroyave

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CA Department of Water Resources

Attachment:

Attachment A: The Department's Comment Letter to Reclamation on Draft Environmental Assessment/Initial Study for the 2026-2027 North-to-South Water Transfers

cc:

Melissa Vignau
Bureau of Reclamation
mvignau@usbr.gov

Melissa Dekar
Bureau of Reclamation
mdekar@usbr.gov

Mr. Arroyave

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ATTACHMENT A

The Department's Comment Letter to Reclamation on Draft Environmental Assessment/Initial Study for the 2026-2027 North-to-South Water Transfers

DEPARTMENT OF WATER RESOURCES

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**VIA-EMAIL**

May 19, 2025

Melissa Dekar
United States Department of the Interior
Bureau of Reclamation
Sacramento, California
mdekar@usbr.gov

Subject: Draft 2026-2027 North to South Water Transfers Environmental Assessment /Initial Study (CGB-ED-2024-025)

Dear Ms. Dekar,

The California Department of Water Resources (Department) has reviewed the Draft 2026-2027 North to South Water Transfers Environmental Assessment/Initial Study (EA/IS) for the potential transfer of water made available through groundwater substitution and/or stored reservoir release actions in 2026 and 2027. The Department values its ongoing collaboration with U.S. Bureau of Reclamation (Reclamation) and, with that in mind, provides the following comments and recommendations.

Project Description

This joint EA/IS document was prepared by Reclamation and the San Luis & Delta-Mendota Water Authority (SLDMWA) for SLDMWA's obligations under the California Environmental Quality Act statute and guidelines and Reclamation's requirements of the National Environmental Policy Act. This EA/IS document describes the potential direct, indirect, and cumulative effects of transferring water in contract years 2026 and 2027 from willing Sellers to the SLDMWA, its member agencies, Contra Costa Water District, and East Bay Municipal Utility District (collectively referred to as the Buyers). The proposed action includes a range of potential transfers of up to 250,000 acre-feet annually from Sellers to Buyers. The methods by which water may be made available for transfer include groundwater substitution and reservoir releases. The proposed transfer program is needed by Buyers that are at risk of experiencing water shortages and who require these supplemental water supplies to meet the level of anticipated annual existing demands.

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Continue Close Coordination

The Department seeks to continue and maintain close coordination with Reclamation in the review and approval to convey and facilitate proposed water transfers in 2026 and 2027. That includes, but not limited to, the following items.

1. Continue utilizing the Water Transfers Information Management System (WTIMS; <https://info.water.ca.gov/wtims/>) as the platform for water transfer proposal submittal and review. The Department and Reclamation (collectively referred to as Project Agencies) have been utilizing WTIMS online database to facilitate and track transfer proposal submittal and review since 2018. The use of WTIMS has improved coordination among Project Agencies, Sellers, Buyers, public, and other agencies to ensure the latest information is available in a timely manner and provide accurate communication. The Department works ceaselessly to improve WTIMS to enhance user experience and provide trust in this transfer process.
2. The Project Agencies continue to coordinate the review, implementation, and monitoring of all transfers by using the best available data, information, guidance, and regulations. In particular, the Department notes that:
 - a. Groundwater Sustainability Plans (GSP) and the corresponding annual reports developed by Groundwater Sustainability Agencies pursuant to the 2014 Sustainable Groundwater Management Act have superseded the references to Basin Management Objectives and Groundwater Management Plans. While GSPs serve as the primary regulatory tools for all Seller groundwater basins and subbasins, the Project Agencies' review is still needed to understand and assess impacts from groundwater pumping associated with groundwater substitution transfers through a higher spatial resolution.
 - b. Historical land subsidence records are important to understand how certain transfers cause or affect elastic and inelastic subsidence. This understanding is needed if elastic and inelastic subsidence is to be avoided.
 - c. To ensure that sufficient information is developed to demonstrate transfers will result in no injury to other users of water and no unreasonable impacts to the environment, the Project Agencies will continue to rely on the 2019 DRAFT Technical Information for Preparing Water Transfer Proposals and update it as necessary, and applicable local, state, and federal laws.
 - d. The Project Agencies will work with Sellers to ensure that recent and adequate reservoir data and information is provided to establish baseline

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conditions and support the development of the proposed transfer release pattern.

3. The Project Agencies work together to ensure proper implementation of mitigation measures to minimize any potential impacts from transfer, including but not limited to the following:
 - a. Streamflow Depletion Factor (SDF) and other equivalent measures through Sacramento Valley-wide coordination and cooperation: an appropriate SDF is essential to mitigate potential water supply impacts to the State Water Project and Central Valley Project (collectively referred to as Projects) operations resulting from increased groundwater pumping associated with groundwater substitution transfers. Reclamation and the Department have been coordinating regularly to evaluate and determine an appropriate SDF, in coordination with Buyers and Sellers, using the best available technical data and tool at the time.
 - b. Carriage water: when the Projects export transfer water that third parties make available to the south of the Delta, it could result in incremental impacts on Delta water quality due to increased disruption to natural flow patterns. Since the Projects must manage export operations in compliance with applicable regulatory requirements, including Delta salinity standards, proper application of carriage water is necessary to address the potential increases in Delta salinity.
 - c. Reservoir refill agreement development, execution, implementation, and coordination: refilling the space vacated by additional reservoir releases to make water available for transfers may impact the Projects operations. Therefore, any transfer involving a reservoir release must include in its approval process an executed refill agreement that signed by both the Department and Reclamation. The refill agreement shall include conditions, criteria, and procedures to account for and avoid injuries to Projects operations due to refill at a seller's reservoir following the release of the transfer water.

Technical Comments on the EA/IS

In addition to the above, the Department has included some comments and recommendations in Attachment 1.

The Department appreciates the opportunity to provide this comment letter and looks forward to working closely with Reclamation to facilitate water transfers, which are

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critically important to California's water supply reliability. If you have any questions or need additional information, please contact me at SWPWaterTransfers@water.ca.gov.

Sincerely,



Andy Chu
Supervising Engineer, Water Resources
Non-SWP Agreements Section
Division of Operations and Maintenance
CA Department of Water Resources

Attachment:

Attachment 1: Technical Comments

cc:

Melissa Vignau
Bureau of Reclamation
mvignau@usbr.gov

Pablo Arroyave
San Luis & Delta-Mendota Water Authority
pablo.arroyave@sldmwa.org

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ATTACHMENT 1

Technical Comments

3.3 Groundwater Resources

3.3.1 Affected Environment/Environmental Setting

The groundwater levels discussion under Seller Service Area, Sacramento Valley Groundwater Basin claims: “Past groundwater measurements suggest groundwater levels decline moderately during extended droughts and recover to pre-drought levels after subsequent wet periods (DWR 2021).” This statement does not fully capture the findings of the cited reference as there are areas in the Sacramento Valley Groundwater Basin that are not experiencing the same level of recovery. The Department recommends that the areas in the Sacramento Valley Groundwater Basin that are experiencing less recovery and may even be experiencing continued decline be noted and more accurately described.

The groundwater quality discussion in this section provides a broad, generalized overview of groundwater quality across the entire Sacramento Valley Groundwater Basin. This section would benefit from clearly linking this information to the groundwater quality criteria for the proposed project. Groundwater quality is highly site-specific and varies significantly by well location and depth. General summaries at the basin scale would not provide the level of detail needed to assess potential water quality impacts from groundwater substitution transfers at specific transfer wells.

3.3.3 Environmental Commitments/Mitigation Measures

The Department noted that Mitigation Measure GW-1: Monitoring Program and Mitigation Plan (Plan) would benefit from additional clarity regarding the approach to monitor land subsidence in transfer proposals. The Plan should clearly identify the monitoring locations and methods to enable monitoring land subsidence using quantitative metrics. In the Plan, groundwater level triggers and thresholds are described as the primary tools to prevent irreversible land subsidence. While this is an important component, the section may oversimplify the issue by suggesting that irreversible subsidence only occurs when groundwater levels fall below historic lows, which does not fully reflect the findings from USGS (2018). It is recommended that the Plan includes additional methods to measure subsidence, such as through InSAR, extensometers, CGPS, or other appropriate tools, and not solely rely on groundwater levels as a proxy. Also, the use of inelastic land subsidence measurements may not always be a practical metric to manage, measure, or mitigate the impacts of short-term water transfers. It is recommended to eliminate the use of the term ‘inelastic’ when defining metrics to manage, measure, or mitigate land subsidence impacts.

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The groundwater quality mitigation under Mitigation Measure GW-1 is intended to prevent potential impacts from the migration of reduced-quality groundwater during transfer pumping. To support this objective more effectively, it may be helpful to include additional details, such as sample locations, well depths, construction information, and their proximity to Sellers' transfer wells, that would allow reviewers to better assess whether groundwater pumping at individual sites could degrade water quality locally or regionally. Presenting this information in both map and table formats, with an explanation of how the data supports the project analysis, would strengthen the evaluation. Groundwater quality testing has been a requirement in past transfer programs, as outlined in the 2019 DRAFT Technical Information for Preparing Water Transfer Proposals. To enhance the evaluation, the following recommendations are provided: (1) The Sellers should demonstrate that previous groundwater substitution transfers did not result in the migration of degraded groundwater quality; (2) Including groundwater quality sampling results in the final summary reports, in addition to the other evaluation metrics listed on under Evaluation and Reporting, would provide a more complete understanding; and (3) Including well-specific groundwater quality data and proper analysis would enable a thorough evaluation of any potential impact on groundwater quality.

Additional Recommendations for 3.3 Groundwater Resources

- The EA/IS refers to various types of wells. It would be helpful to clearly define and describe the different well types used in the water transfer program, including its specific purpose. The recommended definitions are as follows: Transfer Well: A production well used to pump groundwater as part of a groundwater substitution transfer.
- Suitable Monitoring Well: A monitoring well used to assess the effects of pumping from a designated Transfer Well.
- Other Monitoring Well: A designated well used to measure groundwater levels before, during, and after the transfer period, but not necessarily linked to a specific Transfer Well.
- SGMA Representative Monitoring Site (RMS): A well identified in a Groundwater Sustainability Plan (GSP) under Sustainable Groundwater Management Act (SGMA) for monitoring the sustainability indicator chronic lowering of groundwater levels. RMS wells include defined quantitative thresholds: Minimum Threshold (MT) and Measurable Objective (MO).

It is noted that SGMA GSP sustainability indicators are not designed to assess impact resulting from short-term water transfers, although GSPs can inform the development of groundwater level triggers and mitigation actions.

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It is recommended that the process of incorporating SGMA RMS wells be revised. Identifying only the nearest RMS well to a Transfer Well may be impractical or unreliable. Instead, all RMS wells within the Seller's service area and within a two-mile radius of the service area boundary should be identified. An RMS well should be used as a Monitoring Well and included in the transfer monitoring well network, or as a Suitable Monitoring Well if they meet the suitable monitoring well requirements.