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STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY **GAVIN NEWSOM,** *Governor*

DEPARTMENT OF WATER RESOURCES
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VIA EMAIL

August 24, 2026

Pablo Arroyave
San Luis & Delta-Mendota Water Authority
842 6th Street
Los Banos, CA 93635
Pablo.Arroyave@sldmwa.org

Subject: State Clearinghouse #2011011010, North-to-South Water Transfers Subsequent Environmental Impact Report to the 2019 Long-Term Water Transfers Final Environmental Impact Report

Dear Mr. Arroyave,

The Department of Water Resources (Department) has reviewed the Subsequent Environmental Impact Report (SEIR) Notice of Preparation prepared by the San Luis & Delta-Mendota Water Authority (Authority) in July of 2026 and has the following comments.

Project Description

The Authority is preparing an SEIR to the 2019 Long-Term Water Transfers Final Environmental Impact Report (LTWT EIR), which evaluated water transfers conducted by contractors located south of the Sacramento–San Joaquin River Delta (Delta) or in the San Francisco Bay Area. The SEIR "*will consider a revised list of participating sellers and transfer quantities*" and "*…evaluate the potential environmental effects of the project as revised and ensure that any new or substantially more severe environmental impacts are addressed through the CEQA process…*" Furthermore, "*the SEIR will include a detailed hydrologic analysis and will focus on potential environmental impacts of the proposed project and alternatives…*" including water quality, surface water supply, groundwater, and other potential impacts. Transfer water would be made available by groundwater substitution, cropland idling/shifting, and reservoir release actions.

General Comments

The proposed project will involve the continuation of large volumes of transfer water being made available by Sellers for export through the Delta by State Water Project (SWP) and Central Valley Project facilities. The proposed transfers may potentially cause impacts in the Central Valley and Delta environments, and to SWP water operations. To evaluate these potential impacts from the proposed project, the SEIR

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must provide clear and thorough description of the proposed transfer actions, including but not limited to:

- A clear and comprehensive delineation of the facilities and agencies involved, such as potential sellers, buyers, and the points of diversion required to move water between them.

- A clear description of the maximum allowable transfer volume to be made available by each seller and how that volume was determined. Maximum transfer volumes for each seller should describe how much is allowed under each transfer type, and what time frame the action would approximately take place.

- An Environmental Setting that includes and evaluates the project at the hydrologic region and groundwater basin scale, in addition to the seller service area. We recommend using an organizational approach similar to the LTWT EIR (Section 3.3).

- The use of the best available data and best management practices to estimate and address challenges related to transfer impacts, such as streamflow depletion, land subsidence, Delta water quality, and wildlife habitat.

- A clear description of the intended term of the proposed SEIR.

Analysis Comments

To evaluate the potential impacts from the proposed project, the SEIR must also provide a clear and thorough analysis of the proposed transfer actions, including:

- An analysis involving carriage water values that reflects the range of historically observed values of carriage water.

- A complete documentation of assumptions and results using an Integrated Water Flow Model for the Sacramento Valley to assess the impacts of groundwater substitution transfers. The assessment should include:

    - A sufficiently long simulation period that captures the entire amount of streamflow depletion caused by groundwater substitution pumping. Such depletion can take decades to complete and is not ‘reset’ by wet hydrology.

    - The locations and pumping volumes of each proposed pumping well used in the above analysis.

    - Figures showing the change in simulated groundwater elevations after the proposed groundwater substitution transfers occur.

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- Groundwater pumping monitoring and mitigation plans that are functionally sufficient for stand-alone transfer projects, and do not overly rely on other regulatory frameworks such as the Sustainable Groundwater Management Act.

- Documentation of any modeling tools beyond publicly available tools like CalSim and SVSim, including descriptions of inputs, outputs, and methodology.

The Department appreciates the opportunity to comment on the proposed project. If you have any questions or need additional information, please contact SWP staff at SWPWaterTransfers@water.ca.gov.

Sincerely,

Andy Chu, Supervising Engineer
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cc:

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