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memorandum

date	October 1, 2026
to	Mike Tietze, General Manager, East Turlock Subbasin Groundwater Sustainability Agency
cc	Chris Heppner, EKI Environment & Water, Inc.
from	Raynisha Fields, Emily Kline, and Kelley Sterle, Environmental Science Associates
subject	Memo to File for the CEQA Notice of Determination of the Burroughs Family Farm Orchard Swale Rewilding Project

Within the Turlock Subbasin, land repurposing projects on previously irrigated lands such as extended fallowing and orchard swale rewilding provide opportunities to decrease groundwater demand while promoting groundwater recharge, flood attenuation, water quality, habitat for beneficial insects, and/or native vegetation. The Turlock Subbasin Groundwater Sustainability Plan (GSP) Program Environmental Impact Report (PEIR) evaluates implementation of projects and management actions (P&MAs) described in the GSP at the program-level. The types of P&MA's and impact mechanisms analyzed in the Turlock Subbasin GSP PEIR are consistent with extended fallowing and orchard swale rewilding land purposing projects.

The Naraghi Orchard Swale Rewilding and Extended Multibenefit Fallowing Project (proposed Project) would fallow and replant 31 acres of previously irrigated land and rewild 12 acres of orchard swale within a fallowed orchard. The land would be replanted with beneficial cover crops intended to improve water penetration and retention, provide pollinator-friendly and bee-friendly habitat, and reduce groundwater demand through reduced irrigated acreage. Native hedgerows would be established along field boundaries to provide habitat for birds and beneficial insects, and livestock grazing would occur periodically throughout the year to support vegetation management. No excavation or tilling is proposed as part of the Project.

The ETSGSA is the CEQA lead agency and determined that implementation of the proposed project would not result in new significant or substantially more severe impact(s) compared to the Turlock Subbasin GSP PEIR. Therefore, the proposed project is covered under the existing Turlock Subbasin GSP PEIR (CEQA Guidelines Section 15168).