Final

WDCWA LONG-TERM WATER TRANSFER PROJECT

Supplemental Environmental Impact Report

Prepared for
Woodland–Davis Clean Water Agency

October 2026

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A. Comment Letters Received on the Draft SEIR

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CHAPTER 1
Introduction

1.1 Purpose of this Document

This document includes all agency and public written comments received on the Draft Supplemental Environmental Impact Report (Draft SEIR, SCH #2006042175) for the Woodland–Davis Clean Water Agency (WDCWA) Long-Term Water Transfer Project (proposed Project). Also included are changes in the text of the Draft EIR either in response to written comments or initiated by staff.

The Draft SEIR identified and evaluated the potential environmental impacts associated with implementation of the proposed Project and identified applicable mitigation measures. The statutes and Guidelines of the California Environmental Quality Act (CEQA) require the Lead Agency, WDCWA, to consult with public agencies having jurisdiction over a proposed project, and to provide the public and other interested parties with an opportunity to comment on the Draft SEIR.

Written comments were received by WDCWA during the public comment period from August 10, 2026, through September 28, 2026. This document includes written responses to each comment received on the Draft SEIR. This document has been prepared in accordance with CEQA and, together with the Draft SEIR, constitutes the Final SEIR. CEQA Guidelines (Section 15132) specify that a final environmental impact report shall consist of:

- The Draft EIR or a revision of the draft;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process;
- Any other information added by the Lead Agency.

1.2 Summary of the Proposed Project

The Draft SEIR is a supplement to the Davis Woodland Water Supply Project (DWWSP) Final Environmental Impact Report (EIR) (SCH # 2006042175), which was certified by the City of Davis in November 2007, adopted by the City of Woodland in December 2007, amended by the Woodland–Davis Clean Water Agency (WDCWA or Agency) through several addenda. The DWWSP Final EIR identified the joint use by the WDCWA and Reclamation District 2035 of a replacement surface water intake as the preferred alternative for diversions of water from the Sacramento River. The DWWSP, which is currently in operation, provides surface water supplies to the cities of Woodland and Davis, and the UC Davis.

The WDCWA would implement the proposed Project to obtain, divert, and deliver additional water supplies from the Sacramento River through long-term water transfers from the South Sutter Water District (SSWD), Te Velde Farms, The Nature Conservancy, and/or a Sacramento River Settlement Contractor (SRSC) (collectively Sellers and individually a Seller) to meet water demands during dry-year conditions, Term 91 curtailment periods, and Shasta Critical Year conditions, including under a DPP 50-percent reduction scenario. The LTWT would allow WDCWA to purchase transfer water supplies on an as-needed basis using one-year contracts with upstream Sellers. Consistent with existing practice for such short-term transfers, Sellers would perform any additional California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA.

Refer to Chapter 2, *Project Description,* of the Draft SEIR for a detailed description of the proposed Project. Note that no changes to the proposed Project, its objectives, or its location have been made following publication of the Draft SEIR. Clarifications have been made to the Project Description regarding implementation of individual water transfers under the LTWT and the additional environmental review that may be required for such transfers. These clarifications are identified in Chapter 3 of this Final SEIR.

1.3 CEQA Process

The following sections summarize the CEQA process for the proposed Project.

1.3.1 Draft SEIR

WDCWA made the Draft SEIR available to local, state, and federal agencies and to interested organizations and individuals for review and comment. Notice of the availability of the Draft SEIR was distributed to agency and organization representatives and individuals on WDCWA's mailing list. Notices regarding the availability of the Draft SEIR were also published in the Woodland Daily Democrat (August 9, 2026) and the Davis Enterprise (August 9, 2026). The Draft SEIR was made available electronically on WDCWA’s website throughout the entire circulation period. Hardcopies were also available for public review at the City of Woodland Public Library and the Mary L. Stephens Davis Branch Public Library throughout the circulation period. The 45-day public review period for the Draft SEIR was from August 10, 2026, through 5:00 p.m. on September 28, 2026.

1.3.2 Completion of the CEQA Process

The Final SEIR will be made available to the public for review prior to certification. In order to complete the CEQA process, WDCWA’s board will formally review and consider this Final SEIR, pursuant to the requirements of Section 15090 of the CEQA Guidelines. After considering the anticipated and potential environmental impacts of the Project, as identified in the Draft SEIR, the WDCWA board will then choose whether or not to (1) certify the Final SEIR and (2) approve the Project. Where a significant impact is identified, typically the certifying agency would be required to make one or more findings for each significant effect, and then adopt a statement of overriding conditions. However, the Draft SEIR did not identify any significant effects of Project implementation; all potential impacts were less than significant or mitigable to less than significant levels with incorporation of applicable mitigation measures. Therefore, the WDCWA board would *not* be required to make findings or adopt a statement of overriding conditions, should the board choose to certify the Final SEIR and approve the proposed Project. Section 15097 of the

CEQA Guidelines also require that the Lead Agency adopt a program for monitoring and reporting the mitigation measures and project revisions it has imposed. All adopted mitigation measures have been included in the mitigation monitoring and reporting program (MMRP) (see to verify compliance. The MMRP is provided in Chapter 4 of this Final SEIR.

After certifying the Final SEIR and approving the proposed Project, WDCWA would file a Notice of Determination (NOD) with both the Yolo County Clerk's Office and the State Clearinghouse. Other responsible agencies making decisions to approve or implement the proposed Project may file NODs at the times their respective actions are taken. Once certified and approved, then WDCWA may proceed with proposed Project implementation.

1.3.3 Seller Environmental Review

As described in Chapter 2 of the Draft SEIR, individual water transfers under the LTWT would be implemented on an as-needed basis using one-year contracts. Consistent with existing practice for such short-term transfers, Sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA. Individual transfers would also remain subject to applicable regulatory approvals.

1.4 List of Commenters

Agencies that provided comments on the Draft SEIR are listed in Table ES-1. For each party that commented, the table identifies the assigned letter number, and the number of individual comments contained in the letter. Excerpted comments are provided following the table below. Reproductions of comment letters are provided in **Appendix A**.

TABLE ES-1
LIST OF DRAFT SEIR COMMENTING PARTIES

Commenter	Contact	Comment Letter	Number of Comments
California Department of Fish and Wildlife (CDFW)	Alyssa Obester, Senior Environmental Scientist	1	3
California Department of Water Resources (DWR)	Andy Chu, Supervising Engineer Transfer and Real Water Section California	2	3

1.5 Final SEIR Organization

This Final SEIR is organized as follows:

Chapter 1, Introduction. Chapter 1 summarizes the proposed Project, describes the CEQA process completed to date and procedures to be followed for the completion of CEQA, reviews potential need for additional environmental review, and summarizes Final SEIR organization.

Chapter 2, Comments Received and Responses. Chapter 2 presents all comments received on the Draft SEIR, and provides responses to all comments, as warranted.

Chapter 3, Changes, Clarifications, or Modifications to the Draft SEIR. Chapter 3 presents changes, clarifications, and modifications incorporated into the Draft SEIR, in response to comments received during the public circulation period.

Chapter 4, Mitigation Monitoring and Reporting Program. Chapter 4 presents the mitigation monitoring and reporting program (MMRP) for the proposed Project.

Appendix A provides copies of the comment letters received on the Draft SEIR.

CHAPTER 2
Project Description

2.1 Summary of Commenting Parties

Table 2-1 presents the list of agencies that provided comments on the Draft SEIR. For each party that commented, the table identifies the assigned letter number, and the number of individual comments contained in the letter. Reproductions of comment letters are provided in **Appendix A**.

TABLE 2-1
LIST OF DRAFT SEIR COMMENTING PARTIES

Commenter	Contact	Comment Letter	Number of Comments
California Department of Fish and Wildlife (CDFW)	Alyssa Obester, Senior Environmental Scientist	1	3
California Department of Water Resources (DWR)	Andy Chu, Supervising Engineer Transfer and Real Water Section California	2	3

2.2 Comments and Responses

The following discussion presents individual comments excerpted from letters submitted by each commenter. and the comments were numbered sequentially as they appear in the letter. A response to each comment is provided. Reproductions of comment letters received are provided in Appendix A.

2.2.1 California Department of Fish and Wildlife (Letter 1)

Comment 1-1

CDFW supports a long-term transfer solution to WDCWA's current and anticipated water supply deficiencies and is primarily concerned with the lack of impacts analysis in the DSEIR with respect to the "Sellers" side of the transfer. While the DSEIR identifies potential transfer opportunities, it only generally describes the transfer timing, duration, and volume and does not characterize any potential impacts to the originating water source for the long-term transfers. The SEIR also does not identify the specific transfer mechanism, rather signals that water may be transferred by any of multiple mechanisms including reservoir reoperation, groundwater substitution, water conservation, and water supply source diversification. Without knowing the when, where, and how of the seller side of the transfer, CDFW cannot meaningfully evaluate the potential effects on fish and wildlife; including impacts to flow-dependent migration, spawning and rearing habitat, entrainment risk, and temperature conditions for sensitive fish species; and the DSEIR does not meet the level of detail required under CEQA to fully disclose potential impacts.

Response to Comment 1-1

The Draft SEIR is a supplement to the 2007 DWWSP EIR and should be considered together with the analysis contained in that document. The 2007 DWWSP EIR evaluated the acquisition of supplemental water supplies from senior water right holders within the Sacramento River watershed, including the environmental effects associated with transfers made available through groundwater substitution and water conservation.

The Draft SEIR further establishes defined parameters for the LTWT, including maximum transfer quantities, seasonal timing, potential sellers, and potential transfer mechanisms. The Draft SEIR provides for up to 2,000 acre-feet of winter transfers between November 1 and March 31 and up to 9,000 acre-feet of summer transfers between April 1 and October 31. It also identifies reservoir reoperation, groundwater substitution, water conservation, and water supply source diversification as potential mechanisms through which water may be made available for transfer.

WDCWA anticipates that SSWD would most likely be the source of winter transfer water. A winter transfer would occur only if Term 91 is in effect during the winter transfer period and supplemental water is needed by WDCWA. The specific seller or sellers and transfer mechanisms for summer transfers would be more variable and would depend on hydrologic conditions, available water supplies, and willing sellers.

The Final SEIR has been revised to clarify that WDCWA would purchase transfer water supplies on an as-needed basis using one-year contracts. Consistent with existing practice for such short-term transfers, sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA. Individual transfers would also remain subject to applicable regulatory approvals.

These revisions clarify the relationship between the LTWT evaluated in the SEIR and the seller-specific actions associated with individual future transfers. No changes to the impact conclusions of the Draft SEIR are required in response to this comment.

Comment 1-2

CDFW recommends that the SEIR be revised to include a biological resources impacts analysis based on the "Sellers" side of the proposed long-term water transfers that evaluates long-term transfer water sources, timing, mechanisms, and conveyance and operations decisions that affect in-stream flow volume, rate of change, timing, and temperature.

Response to Comment 1-2

As discussed in Response to Comment 1-1, the Draft SEIR supplements the 2007 DWWSP EIR, which evaluated the environmental effects associated with obtaining supplemental water supplies from upstream water right holders in the Sacramento River watershed, including transfers made available through groundwater substitution and water conservation. The Draft SEIR evaluates the LTWT within the maximum volumes, seasonal periods, and operational parameters identified in Chapter 2, *Project Description*, of the Draft SEIR.

The Final SEIR has been revised to clarify that individual transfers would occur on an as-needed basis using one-year contracts. The specific seller and transfer mechanism for an individual transfer would depend on the circumstances existing at the time of the transfer. Consistent with existing practice for such short-term transfers, sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA.

Accordingly, the Final SEIR has been clarified as described above; however, no additional biological resources analysis is required in response to this comment.

Comment 1-3

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the DSEIR for the Woodland-Davis Clean Water Agency Long-Term Water Transfer Project to assist WDCWA in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Alyssa Obester, Senior Environmental Scientist, at Alyssa.Obester@wildlife.ca.gov.

Response to Comment 1-3

The comment is acknowledged. WDCWA will provide CDFW with notification of proposed actions and pending decisions regarding the proposed Project consistent with applicable CEQA requirements.

2.2.2 California Department of Water Resources (Letter 2)

Comment 2-1

The Draft SEIR evaluated the potential environmental impacts of the proposed LTWT including hydrology, water quality and aquatic biological resources. The Draft SEIR concluded that the LTWT will not result in any significant and unavoidable impacts. However, in its current form, the Draft SEIR does not provide sufficient information to reach this conclusion. To evaluate these potential impacts, the SEIR must provide clear and thorough description of the proposed transfer actions, including but not limited to:

- A clear and comprehensive description of potential seller agencies involved and their water rights, such as water rights permit/licenses, and the points of diversion required to move water between the seller and buyer.
- A clear description of the transfer type, maximum allowable transfer water 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.
- 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.

Response to Comment 2-1

The Draft SEIR supplements the 2007 DWWSP EIR and should be considered together with the analysis contained in that document. The 2007 DWWSP EIR evaluated the acquisition of supplemental water supplies from senior water right holders within the Sacramento River watershed and identified and analyzed potential environmental effects associated with transferring water from upstream sellers, including transfers made available through groundwater substitution and water conservation. The 2007 DWWSP EIR also evaluated potential effects on Sacramento River and Delta hydrology, groundwater resources within potential seller service areas, and biological resources.

The Draft SEIR further establishes defined parameters for the LTWT, including maximum transfer quantities, seasonal timing, potential sellers, and potential transfer mechanisms. The Draft SEIR provides for up to 2,000 acre-feet of winter transfers between November 1 and March 31 and up to 9,000 acre-feet of summer transfers between April 1 and October 31. It identifies reservoir reoperation, groundwater substitution, water conservation, and water supply source diversification as potential mechanisms through which water may be made available for transfer.

WDCWA anticipates that SSWD would most likely be the source of winter transfer water. A winter transfer would occur only if Term 91 is in effect during the winter transfer period and supplemental water is needed by WDCWA. The specific seller or sellers and transfer mechanisms for summer transfers would be more variable and would depend on hydrologic conditions, available water supplies, and willing sellers.

The Final SEIR has been revised to clarify that WDCWA would purchase transfer water supplies on an as-needed basis using one-year contracts. Because the specific circumstances of future individual transfers cannot be known in advance, the precise seller, transfer mechanism, water right, point of diversion, and seller-specific operations are not presently defined for every transfer that could occur in the 25-year term of the LTWT. Consistent with existing practice for such short-term transfers, sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA. Individual transfers would also remain subject to applicable regulatory approvals.

These revisions clarify the relationship between the LTWT evaluated in the SEIR and the seller-specific actions associated with individual future transfers. No changes to the impact conclusions of the Draft SEIR are required in response to this comment.

Comment 2-2

Failure to provide the information necessary for the public, decisionmakers, and other governmental agencies to be informed of all potential environmental impacts means the Draft SEIR fails to comply with CEQA requirements. The absence of this information means the Draft SEIR is inadequate, incomplete, and lacks full disclosure.

Due to the failure to provide the information necessary to properly analyze all potential environmental impacts, the Draft SEIR must be updated with the relevant information and recirculated for another public review period.

Response to Comment 2-2

As discussed in Response to Comment 2-1, the Draft SEIR supplements the analysis contained in the 2007 DWWSP EIR and evaluates the LTWT within defined maximum transfer quantities, seasonal periods, potential transfer mechanisms, and operational parameters. The Final SEIR has been revised to clarify that WDCWA would purchase transfer water supplies on an as-needed basis using one-year contracts and that sellers would perform any additional CEQA and/or NEPA analysis required for the specific sale and conveyance of water to WDCWA.

The revisions to the Final SEIR clarify the implementation of future individual transfers and do not change the proposed Project, result in a new significant environmental impact, or substantially increase the severity of an environmental impact identified in the Draft SEIR. No significant new information has been added and therefore, recirculation of the Draft SEIR is not required.

Comment 2-3

For further information regarding the details needed to assess water transfer impacts, the Department suggests referencing the Draft Technical Information for Preparing Water Transfer Proposals, and/or the 2026-2027 North to South Water Transfers Environmental Assessment/Initial Study.

Response to Comment 2-3

DWR's *Draft Technical Information for Preparing Water Transfer Proposals* (Water Transfer White Paper) is not regulatory, but rather guidance intended primarily to provide technical information for

transfers conveyed across the Delta using State Water Project (SWP) or Central Valley Project (CVP) facilities. Transfers to WDCWA would occur entirely upstream of the legal Delta, with transferred water ultimately conveyed to WDCWA's existing Joint Intake Facility on the Sacramento River. Accordingly, the proposed Project differs from the cross-Delta transfers that are the primary focus of the non-regulatory guidance in the Water Transfer White Paper.

Under the proposed Project, an individual transfer to WDCWA might involve CVP facilities (generally water regulated through Shasta Dam and Reservoir). It is not contemplated that any SWP water supplies or facilities would be used in the program. Any such transfer would remain subject to any applicable regulatory approvals and, as stated in Response to Comment 2-1, sellers would perform any additional CEQA and/or NEPA review required for the specific sale and conveyance of water to WDCWA.

CHAPTER 3

Changes, Clarifications, or Modifications to the Draft SEIR

3.1 Summary

Revisions and clarifications have been made to the Draft SEIR in response to comments received during the public review period. These revisions clarify the implementation of individual water transfers under the LTWT and the additional environmental review that may be required for such transfers. The revisions do not change the proposed Project or the impact conclusions presented in the Draft SEIR. The revisions to the Draft SEIR are presented below. Text deleted from the Draft SEIR is shown in ~~strikeout~~, and new text is shown in double underline.

3.2 Clarification Regarding Individual Water Transfers

Executive Summary

ES.3 Project Description

Section ES.3, Project Description, on page ES-2 of the Draft SEIR is revised as follows:

> WDCWA proposes to implement the LTWT to obtain, divert, and deliver additional water supplies from the Sacramento River through long-term water transfers from the SSWD, Te Velde Farms, The Nature Conservancy, and/or a SRSC to meet water demand during dry-year conditions, periods of Term 91 curtailment, and Shasta Critical Year conditions, including a DPP 50-percent reduction scenario. The LTWT would allow WDCWA to purchase transfer water supplies on an as-needed basis using one-year contracts with upstream Sellers. Consistent with existing practice for such short-term transfers, Sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA.

Chapter 1, Introduction

Section 1.1, Introduction

Section 1.1, Introduction, on page 2-1 of the Draft SEIR is revised as follows:

> This supplemental environmental impact report (SEIR) was prepared pursuant to the California Environmental Quality Act (CEQA) as a supplement to the Davis Woodland Water Supply Project (DWWSP) Final Environmental Impact Report (SCH # 2006042175), which was certified by the City of Davis in November 2007, adopted by the City of Woodland in December 2007,

and amended by the Woodland–Davis Clean Water Agency (WDCWA) through several addenda. The DWWSP EIR identified the joint use by the WDCWA and Reclamation District (RD) 2035 of a replacement surface water intake as the preferred alternative for diversions of water from the Sacramento River. The DWWSP provides surface water supplies to the cities of Woodland and Davis and the University of California, Davis (UC Davis). To increase the reliability of its surface water supplies, the WDCWA is proposing the Long-Term Water Transfer Project (LTWT or proposed Project). The proposed LTWT would obtain, divert, and deliver additional water supplies from the Sacramento River through long-term water transfers from the South Sutter Water District, Te Velde Farms, The Nature Conservancy, and/or a Sacramento River Settlement Contractor (collectively Sellers and individually a Seller) to help meet water demands during dry-year conditions, periods of Term 91 curtailment, and Shasta Critical Year conditions, including a 50-percent reduction scenario when the State Water Resources Control Board's Standard Permit Term 91 (Term 91) curtailment is in effect. The LTWT would allow WDCWA to purchase transfer water supplies on an as-needed basis using one-year contracts with upstream Sellers. Consistent with existing practice for such short-term transfers, Sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA. The proposed long-term water transfers are described in Chapter 2, *Project Description*.

Chapter 2, Project Description

Section 2.1, Introduction

Section 2.1, Introduction, on page 2-1 of the Draft SEIR is revised as follows:

WDCWA proposes to implement the proposed Project to obtain, divert, and deliver additional water supplies from the Sacramento River through long-term water transfers from the South Sutter Water District, Te Velde Farms, The Nature Conservancy, and/or a Sacramento River Settlement Contractor (SRSC) (collectively Sellers and individually a Seller) to help meet water demands during dry-year conditions, periods of Term 91 curtailment, and Shasta Critical Year conditions, including a DPP 50-percent reduction scenario. The LTWT would allow WDCWA to purchase transfer water supplies on an as-needed basis using one-year contracts with upstream Sellers. Consistent with existing practice for such short-term transfers, sellers would perform any additional CEQA and/or NEPA analysis required to analyze the impacts of the specific sale and conveyance of water to WDCWA.

Section 2.2.3, Schedule and Timing

Section 2.2.3, Schedule and Timing, on page 2-7 of the Draft SEIR is revised as follows:

WDCWA is proposing to implement the conditions under the LTWT for 25 years, with the option for renewal subject to additional CEQA review. Once implemented, the LTWT would allow WDCWA to purchase transfer water supplies on an as-needed basis using one-year contracts during Term 91 curtailment and/or Shasta Critical Years from upstream Sellers. The LTWT would be implemented through water agreements for each transfer as required, subject to available water supplies and willing Sellers. Consistent with existing practice for such short-term transfers, sellers would perform any additional CEQA and/or NEPA analysis required to analyze

the impacts of the specific sale and conveyance of the water to WDCWA. Any additional ~~Additional~~ permits or approvals are not anticipated to be required as part of Project implementation, except for approvals of in-basin transfers by Reclamation under a Settlement Contract and the State Water Board if a Seller holds a state-granted water right.

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CHAPTER 4
Mitigation Monitoring and Reporting Program

4.1 Introduction

Section 15097 of the CEQA Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. The intent of the MMRP is to track and successfully implement the mitigation measures identified within the SEIR. The SEIR includes the Draft SEIR, as revised in the Final SEIR. The mitigation measures are taken from the proposed Project SEIR and are assigned the same number as in the SEIR. The MMRP, provided in **Table 4-1**, consists of the adopted mitigation measures, the entity responsible monitoring and reporting, and the impact being mitigated. Note that the mitigation measures presented in the DWWSP EIR refer to the "Applicant" which in the case of this SEIR is the WDCWA and/or Seller(s).

TABLE 4-1
WDCWA LONG-TERM WATER TRANSFER PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Responsibility Monitoring and Reporting	Impacts Being Mitigated
Cultural Resources		
Mitigation: Mitigation Measure 3.3-1: Implement DWWSP EIR Mitigation Measure 3.14-1. **DWWSP EIR Mitigation Measure 3.14-1:** The following tasks shall be conducted, where appropriate, by the Applicant. The tasks described satisfy not only CEQA, but federal rules and regulations as well (in particular, Section 106 of the National Historic Preservation Act and its implementing regulations). Collectively, these tasks represent a cultural resource management approach designed to ensure compliance with applicable General Plans, CEQA, and federal rules and regulations. ***Task I. Site-Specific Historic Properties Identification*** A. Upon selection of a preferred diversion/intake pipeline option, the Applicant, where appropriate, shall complete the identification process per 36 CFR Part 800.4 (which includes, among other identification efforts, a Class I literature search and a Class III field survey) in the area of potential effect (APE) for a specific undertaking. A Class III pedestrian survey will not be required when: a. The California Historical Information System and SHPO agree that previous cultural resources surveys have already adequately identified historic properties, or b. The California Historical Information System and SHPO agree that previous disturbance has eliminated the possibility of identifying historic properties. B. An undertaking shall be considered to exist, and an APE shall be defined, when the Applicant, directly or through the issuance of appropriate permits, undertake construction of the facilities identified in project development and construction plans. The APE will be the land area affected by construction of new facilities, from the point of diversion at the Sacramento River, along pipelines, and at water treatment and storage facilities; C. Where the Applicant conduct an intensive (Class III) inventory, required consultation with California SHPO shall be undertaken and coordinated by the lead federal agency with approval authority over Project features. ***Task II. Assessing Effects*** A. The lead agency, in consultation with SHPO, will assess the effects of the undertaking on properties that are eligible for inclusion in the NRHP. If the Applicant, and federal lead agency, determine that construction and operation of the project would result in unavoidable effects, or an adverse effect, to historic properties within the APE, in accordance with 36 CFR Part 800.5, then the lead agency, other interested parties, the Applicant, and SHPO will consult to resolve the adverse effect (see Task III below). ***Task III. Treating Effects*** A. The Applicant shall implement one or more of the following measures for treating effects to historic properties: a. Avoid effects through redesign of the project; b. Avoid effects by not executing the proposed contract;	WDCWA and/or Seller(s)	**Impact 3.3-1:** Implementation of the proposed Project could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

Mitigation Measure	Responsibility Monitoring and Reporting	Impacts Being Mitigated
c. If avoidance is not feasible, mitigate effects through measures such as data recovery or archival documentation (for example, the Historic American Buildings Survey/ Historic American Engineering Record). The Applicant, in consultation with the lead federal agency, SHPO, the Advisory Council, and other interested agencies, shall work together to find measures to mitigate the effects of a particular undertaking on historic properties. The Applicant shall develop plans to implement the agreed upon mitigating measures and shall submit such plans, in the form of a Memorandum of Agreement, to the SHPO, the Advisory Council, and interested agencies for review and comment. B. The Applicant shall ensure that any mitigating measures agreed on during consultation will be included as a specification in Project development. Mitigation measures will be completed before the start of ground disturbing activities that would affect the physical integrity of an historic resource. Mitigating measures for visual, audible, or atmospheric effects will be completed before completion of Project construction. ***Task IV. Properties Discovered During Implementation of an Undertaking*** A. If a previously undiscovered historic property is inadvertently encountered during construction, all work in the immediate vicinity of the property except that necessary to secure and protect the property will cease until the Applicant can secure assistance from a professional archaeologist who evaluate and, if necessary, mitigate effects to the discovery. Evaluation and mitigation will be carried out in consultation with the federal lead agency and SHPO pursuant to 36 CFR Part 800.11(b)(2)(ii). B. If human remains are discovered during archaeological survey, any archaeological testing or data recovery or any construction activities, work in the immediate vicinity of the discovery will cease except to secure and protect the remains. The Applicant or their consulting archaeologist will immediately notify the County Coroner, per State law. As well, the Applicant shall ensure that any human remains and grave-associated artifacts discovered are also managed in accordance with California Statutes, their chapters and sections, which include but are not necessarily limited to: Chapter 1492, Statutes of 1982, Section 7050.5 of the Health and Safety Code, and Sections 5097.94, 5097.98, and 5097.99 of the Public Resources Code.		
Mitigation: Mitigation Measure 3.4-2: Implement DWWSP EIR Mitigation Measure 3.14-1.	WDCWA and/or Seller(s)	**Impact 3.3-2:** Implementation of the proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
Mitigation: Mitigation Measure 3.4-3: Implement DWWSP EIR Mitigation Measure 3.14-1.	WDCWA and/or Seller(s)	**Impact 3.3-3:** Implementation of the proposed Project could disturb human remains, including those interred outside of dedicated cemeteries.

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Appendix A

Comment Letters Received on the Draft SEIR

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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
R2CEQA@wildlife.ca.gov
(916) 358-2900
wildlife.ca.gov

9/1/2026

Tim Busch
General Manager
Woodland-Davis Clean Water Agency
855 County Road 102
Woodland, CA 95776
Tim.Busch@cityofwoodland.gov

Subject: WOODLAND-DAVIS CLEAN WATER AGENCY LONG-TERM WATER TRANSFER PROJECT
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)
SCH No. 2006042175

Dear Tim Busch:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DSEIR from Woodland-Davis Clean Water Agency (WDCWA) for the WDCWA Long-Term Water Transfer Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise 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;

[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.

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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. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, 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.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

WDCWA proposes to secure additional water supplies from the Sacramento River through long-term transfers from South Sutter Water District, Te Velde Farms, The Nature Conservancy, and/or Sacramento River Settlement Contractors (collectively, the "Sellers"). The transferred water would help WDCWA's water demands during dry-year conditions, Term 91 curtailments, Shasta Critical Year conditions, and potential Drought Preparedness Plan scenarios involving a 50 percent reduction in available supplies. Transfer water would be diverted at WDCDWA's existing Sacramento River intake facility, known as the Joint Intake Facility, and conveyed through the existing raw water pipeline to the Regional Water Treatment Facility.

COMMENTS AND RECOMMENDATIONS

CDFW supports a long-term transfer solution to WDCWA's current and anticipated water supply deficiencies and is primarily concerned with the lack of impacts analysis in the DSEIR with respect to the "Sellers" side of the transfer. While the DSEIR identifies potential transfer opportunities, it only generally describes the transfer timing, duration, and volume and does not characterize any potential impacts to the originating water source for the long-term transfers. The SEIR also does not identify the specific transfer mechanism, rather signals that water may be transferred by any of multiple mechanisms including reservoir reoperation, groundwater substitution, water conservation, and water supply source diversification. Without knowing the when, where, and how of the seller side of the transfer, CDFW cannot meaningfully evaluate the potential effects on fish and wildlife; including impacts to flow-dependent migration, spawning and rearing habitat, entrainment risk, and temperature conditions for sensitive fish species; and the DSEIR does not meet the level of detail required under CEQA to fully disclose potential impacts. 01-1

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CDFW recommends that the SEIR be revised to include a biological resources impacts analysis based on the "Sellers" side of the proposed long-term water transfers that evaluates long-term transfer water sources, timing, mechanisms, and conveyance and operations decisions that affect in-stream flow volume, rate of change, timing, and temperature. 01-2

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov. 01-3

CDFW appreciates the opportunity to comment on the DSEIR for the Woodland-Davis Clean Water Agency Long-Term Water Transfer Project to assist WDCWA in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Alyssa Obester, Senior Environmental Scientist, at Alyssa.Obester@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Morgan Kilgour
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Morgan Kilgour, PhD
Regional Manager

ec: Briana Seapy, Senior Environmental Scientist (Supervisory)
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California Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

DEPARTMENT OF WATER RESOURCES
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VIA EMAIL

September 25, 2026

Tim Busch
Woodland-Davis Clean Water Agency
855 County Road 102
Woodland, CA 95776
Tim.Busch@cityofwoodland.gov

Subject: State Clearinghouse #2006042175, Woodland-Davis Clean Water Agency Long-Term Water Transfer Project Supplemental Environmental Impact Report

Dear Mr. Busch,

The Department of Water Resources (Department) has reviewed the Draft Supplemental Environmental Impact Report (Draft SEIR) prepared by the Woodland-Davis Clean Water Agency (WDCWA) in September of 2026 and has the following comments.

Project Description

The WDCWA prepared a Draft SEIR to the 2007 Davis-Woodland Water Supply Project Final Environmental Impact Report (FEIR). The FEIR evaluated potential environmental impacts of constructing and operating a treated surface water supply project proposed by the City of Davis, the City of Woodland, and University of California Davis. The Draft SEIR is evaluating potential environmental consequences/impacts of Long-Term Water Transfer Project (LTWT) to increase the reliability of water supplies from the Sacramento River through long-term transfer agreements with the South Sutter Water District, Te Velde Farms, The Nature Conservancy, and/or a Sacramento River Settlement Contractor (SRSC) to help meet water demands of the cities of Woodland and Davis and the University of California, Davis during dry-year conditions, periods of Term 91 curtailments, Shasta Critical Year conditions, and other scenarios.

The proposed transfer water would be available through an individual Seller's water rights or an SRSC's existing entitlement under its settlement contract with the U.S. Bureau of Reclamation. Under the LTWT for an initial term of 25 years, transferred surface water would be diverted at WDCWA's existing Sacramento River intake facility, known as the Joint Intake Facility, and conveyed through the existing raw water pipeline to the Regional Water Treatment Facility treatment and distribution to the cities of Woodland and Davis and UC Davis for municipal and irrigation uses.

General Comments

The Draft SEIR evaluated the potential environmental impacts of the proposed LTWT including hydrology, water quality and aquatic biological resources. The Draft SEIR concluded that the LTWT will not result in any significant and unavoidable impacts. However, in its current form, the Draft SEIR does not provide sufficient information to reach this conclusion. To evaluate these potential impacts, the SEIR must provide clear and thorough description of the proposed transfer actions, including but not limited to:

- A clear and comprehensive description of potential seller agencies involved and their water rights, such as water rights permit/licenses, and the points of diversion required to move water between the seller and buyer.
- A clear description of the transfer type, maximum allowable transfer water 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.
- 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.

02-1

Failure to provide the information necessary for the public, decisionmakers, and other governmental agencies to be informed of all potential environmental impacts means the Draft SEIR fails to comply with CEQA requirements. The absence of this information means the Draft SEIR is inadequate, incomplete, and lacks full disclosure.

Due to the failure to provide the information necessary to properly analyze all potential environmental impacts, the Draft SEIR must be updated with the relevant information and recirculated for another public review period.

02-2

For further information regarding the details needed to assess water transfer impacts, the Department suggests referencing the Draft Technical Information for Preparing Water Transfer Proposals[1], and/or the 2026-2027 North to South Water Transfers Environmental Assessment/Initial Study[2].

02-3

[1] Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/Water-Transfers/Files/Draft_2019WTWhitePaper-012324.pdf
[2] Available at: https://www.usbr.gov/mp/nepa/nepa_project_details.php?Project_ID=56209

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
Transfer and Real Water Section
California Department of Water Resources
Andy.Chu@water.ca.gov

cc:

Casey Pancaro
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State Clearinghouse
State.Clearinghouse@lci.ca.gov