

**2020 Temporary Groundwater Substitution Water Transfer  
Revised Initial Study / Negative Declaration**

**Appendix A**

**Comments and Responses List:**

- Email correspondence with United Auburn Indian Community
- Comment Letter from Buena Vista Rancheria of Miwok Indians
  - Response Letter to Buena Vista Rancheria of Miwok Indians
- Comment Letter from CA Department of Water Resources
  - Response Letter to CA Department of Water Resources
- Comment Letter from U.S. Bureau of Reclamation
  - Response Letter to U.S. Bureau of Reclamation
- Email Comments from CA Department of Fish and Wildlife
  - Response to CA Department of Fish and Wildlife

**From:** [Scott Johnson](#)  
**To:** [Anna Starkey](#)  
**Cc:** [Brett Ewart](#); [Rebecca Allen](#)  
**Subject:** RE: CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer  
**Date:** Friday, May 8, 2020 3:57:00 PM  
**Attachments:** [image001.png](#)

---

Hi Anna,

Thank you for your response, and yes, that is good point and we will revise that text.

I don't believe I have heard back on this project until this message; however, it was just a week ago, so is understandable.

Thanks again, and we'll make that change.

Scott Johnson  
City of Sacramento  
Community Development Department  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

---

**From:** Anna Starkey <astarkey@auburnrancheria.com>  
**Sent:** Friday, May 8, 2020 3:41 PM  
**To:** Scott Johnson <SRJohnson@cityofsacramento.org>  
**Cc:** Brett Ewart <BEwart@cityofsacramento.org>; Rebecca Allen <rallen@auburnrancheria.com>  
**Subject:** RE: CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer

Scott, thank you for providing the ND for review.

There is an issue in the tribal cultural resources chapter that I would like revised. The first sentence states "No Tribal Cultural Resources have been identified in the project area". I believe that this is misleading as UAIC was not provided with a project area map in which to check for the presence of TCRs. If you were to show all the areas where the water flows for this project (ex. American River), you would certainly find TCRs. I suggest stating that due to the nature of the project, the transfer of water using existing facilities, there would be no impacts to TCRs.

It also states that "At the time of preparation of this documentation, no tribes have

responded.” Correct me if I am mistaken but didn’t I respond on behalf of the tribe and requested additional information? Pardon me if I am incorrect as there are several of these water transfer projects happening right now. If UAIC did respond, this should be reflected in the ND. I will go back and check my records to be certain.

Please let me know if you have any questions regarding my comments.

Thank you and have a wonderful weekend,

Anna



**Anna M. Starkey, M.A., RPA**  
Cultural Regulatory Specialist  
Tribal Historic Preservation Department | UAIC  
10720 Indian Hill Road  
Auburn, CA 95603  
Direct line: (916) 251-1565 | Cell: (530) 863-6503  
[astarkey@auburnrancheria.com](mailto:astarkey@auburnrancheria.com) | [www.auburnrancheria.com](http://www.auburnrancheria.com)

---

**From:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>

**Sent:** Friday, May 8, 2020 2:36 PM

**To:** Scott Johnson <[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)>

**Cc:** Brett Ewart <[BEwart@cityofsacramento.org](mailto:BEwart@cityofsacramento.org)>

**Subject:** CEQA Notice of Availability / Intent to Adopt ND for 2020 Temporary Groundwater Substitution Water Transfer

The City of Sacramento, Community Development Department, Environmental Planning Services has completed preparation of a Draft Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer project and intends to present the document for adoption as part of project review. There is no physical development with this project.

The Notice of Availability / Intent to Adopt a Negative Declaration and the Negative Declaration are attached.

The document is now available for a 30-day public review and comment period. The comment period is from **May 8, 2020 to June 9, 2020**.

The Draft Negative Declaration is available online at:

[www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports](http://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports)

Written comments regarding the Draft Negative Declaration should be received by the Community Development Department, **NO LATER THAN 4:00 p.m. on Tuesday, June 9, 2020** when the public counter closes. Written comments should be submitted to:

Scott Johnson, Senior Planner  
Community Development Department  
300 Richards Boulevard  
Sacramento, CA 95811  
Email: [srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)  
Tel: (916) 808-5842

Thank you.

Scott Johnson  
City of Sacramento  
Community Development Department  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

---

Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.



May 12, 2020

City of Sacramento  
c/o Scott Johnson, Associate Planner  
Community Development Dept.  
300 Richards Blvd.  
Sacramento, Ca 95811  
srjohnson@cityofsacramento.org

Re: NOI and NEG DEC for the 2020 Temporary Groundwater Substitution Water Transfer

Dear Mr. Johnson

Buena Vista Rancheria of Me-Wuk Indians received your notification regarding the 2020 Temporary Groundwater Substitution Water Transfer project and would like to offer the following insights and underscore the importance of statements made in the Negative Declaration for this project.

Buena Vista Rancheria of Me-Wuk Indians (The Tribe) understands this project to be a surface water transfer of 2,500 acre-feet from Golden State Water Company (GSWC) local customers to identified "Buyers," and a water substitution where, instead of surface water from the American River, the GSWC will pump groundwater to maintain a supply to its local customers. It is unclear where the remaining 16,000 acre-feet will be coming from to provide the "Water Buyers" with a total of 18,500 acre-feet of water. Though it is alluded to that the City of Sacramento is working with five other regional water agencies to provide 18,500 acre-feet to the "buyers." The Tribe is curious to know who the other five agencies are and why there is not a joint CEQA analysis to analyze the cumulative effect of water resources. Buena Vista Rancheria has not seen any other CEQA documents from other agencies regarding this project. In order to understand the full impact of this project it is important to understand the cumulative effect all five agencies water transfers may have on water resources.

The Tribe believes in government transparency and accountability and would like to underscore the importance of the following statements made in the Neg. Dec. It is stated that this is a temporary transfer. Please clarify under what conditions the city of Sacramento sells water to "buyers" and where that water is typically sourced when transferring water to other municipalities, and the reason for the "substitution." Also, the Tribe suggest the City establish a timeline for the transfer and explicitly state the end date. In the interest of transparency, the Tribe suggests the GSWC's well pumping rates, well levels, and water quality data be made available to the public. We also suggest that the Regional Groundwater Monitoring, Reporting and Mitigation Plan be available online for the public.

Lastly, it is understood in the Neg. Dec. that the water transfer is not anticipated to contribute to population increases. This is a very important point and it should be underscored that this temporary water transfer is not a mechanism for enabling new development, industry, or population growth as that would cause a need for increased water in an already water scarce region. This water sale is to be understood only as a temporary mechanism to assist municipal and agricultural needs in 2020.

1418 20th Street, Ste. 200  
Sacramento, CA 95811  
Tel. 916.491.0011  Fax 916.491.0012  
[www.buenavistatribe.com](http://www.buenavistatribe.com)

The Central Sacramento County Groundwater Management Plan states that the long-term average annual sustainable yield of groundwater from the Central Basin is 273,000 acre-feet per year (AF/year), with current groundwater extractions estimated to be 250,000 AF/year. The GSWC must ensure that the water budget remains within sustainable bounds and that we do not set a precedent that Central Sacramento Groundwater will go into deficit in order to sell water to outside municipalities in other parts of the State.

Thank you for considering our suggestions,

Sincerely,

A handwritten signature in cursive script that reads "Emily Moloney". The signature is written in black ink and is positioned above the typed name and title.

Emily Moloney  
Water Program Coordinator  
Buena Vista Rancheria of Me-Wuk Indians  
emily@buenavistatribe.com

May 20, 2020

Emily Moloney  
Water Program Coordinator  
Buena Vista Rancheria of Me-Wuk Indians  
1418 20<sup>th</sup> Street, Suite 200  
Sacramento, CA 95811  
[emily@buenavistatribe.com](mailto:emily@buenavistatribe.com)

Re: Buena Vista Rancheria Letter of May 12, 2020

Dear Ms. Moloney,

Thank you for your letter on behalf of the Buena Vista Rancheria of Me-Wuk Indians (Buena Vista) dated May 12, 2020. We appreciate your interest in the proposed regional water transfer and the City's ongoing cooperative relationship with Buena Vista. We are providing this letter to answer questions posed by your inquiry and clarify the issues that you raised.

The City of Sacramento (City) is the regional coordinating agency among a number of urban water purveyors that are engaging in a groundwater substitution water transfer.. The participating agencies besides the City from the American River watershed region include: Carmichael Water District (Carmichael), Fair Oaks Water District, Golden State Water Company (GSWC), Sacramento County Water Agency, and Sacramento Suburban Water District. Together, these agencies will make as much as 18,500 acre-feet of surface water available to the drought-stricken areas in our state from July through November this year. Each water supply that each agency contributes to this transfer is subject to independent rules that must be followed in order to complete the transfer. GSWC's water rights require California Environmental Quality Act compliance in order for the transfer to commence while the other agencies' water rights that are contributing to the transfer, including the City's, are subject to an express CEQA exemption.<sup>1</sup>

As the regional coordinating agency for the transfer, the City agreed to prepare the CEQA documentation on behalf of GSWC. GSWC's 2,500 acre-foot contribution is exempt from other regulatory requirements that the other entities with surface water rights must complete. In this instance, the City and Carmichael have initiated a petition process with the State Water Resources Control Board where these entities must prove that the proposed transfer does not cause harm to other legal users of water or the environment. The City and Carmichael have prepared

---

<sup>1</sup> See Water Code section 1729.

extensive documentation on these items and, like the water transfers prepared in the past by these agencies, are engaging the State Board through a formal regulatory process.

In addition to the CEQA process and State Board process, the transferring agencies are also complying with the California Department of Water Resources and United States Bureau of Reclamation Guidelines for water transfers (Guidelines). These Guidelines provide specific rules related to water transfers and prevent actions that might otherwise cause harm to water users or the environment. For example, groundwater levels must be monitored at all times through identified and certified groundwater monitoring stations to determine if unforeseen harm might be incurred by a groundwater basin. Notably, the participants in this action have reduced groundwater extractions in recent years, which has led to increased storage in the basin. In addition, the surface water transfer volume is discounted by a significant percentage so that some of the water that would have been transferred, stays in the water system to percolate back into the groundwater basin. And last, the transferred water must augment flows already present in the river in order to be available for delivery downstream. All of these conditions are meant to prevent harm to other water users, maintain groundwater basin safe yield levels, and protect the environment.

Importantly, as you note in your letter, the transferred water will not contribute to population growth or urban sprawl in our state. The transferred water is being used by the Buyers to replace water supplies that are unavailable this year because of the drought conditions in California. Through this water transfer, the City and its regional partners have an opportunity to assist other areas in our state affected by drought conditions while still protecting the regional citizenry, other water users that depend on waters of the state, and environmental conditions in the American River and Sacramento River watersheds.

Please feel free to contact me directly if you have further questions or concerns.

Regards,

Scott Johnson  
City of Sacramento  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)  
(916) 808-5842

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791

**VIA EMAIL**

June 9, 2020

Mr. Scott Johnson, Senior Planner  
City of Sacramento  
Community Development Department  
300 Richards Boulevard  
Sacramento, CA 95811  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

Subject: SCH# 2020050212, the Draft Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer Project

Dear Mr. Johnson:

The Department of Water Resources (DWR) has reviewed the Draft Negative Declaration (Draft ND) for the 2020 Temporary Groundwater Substitution Water Transfer project (Project). The Golden State Water Company (Golden State) will temporarily transfer up to 2,500 acre-feet of its pre-1914 water rights water supplies as part of the regional water transfer project led by the City of Sacramento (City) to provide up to 18,500 acre-feet of water to buyers who also have contracted to receive water from the State Water Project (SWP). Golden State will forgo surface water supplies diverted from the American River and make the transfer water available by additional groundwater pumping. Then the transfer water will be conveyed to the buyers using the SWP facilities.

DWR appreciates that the Draft ND recognizes that a conveyance agreement will be necessary to move the transfer water through SWP facilities. The conveyance agreement will include provisions related to groundwater substitution transfers that are consistent with the December 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper). DWR recommends, to the extent not already done, that the Draft Water Transfer White Paper approval criteria related to groundwater substitution transfers be incorporated into this proposed Project.

In addition to its CEQA comments, DWR would also like to note that it will continue to work with Golden State to establish a suitable streamflow depletion factor (SFD) for this transfer year. DWR believes a 13 percent SFD factor is appropriate for this transfer. If another SFD factor is being suggested for this transfer, DWR requests Golden State to provide technical information to support the suggested SFD factor.

Please contact me at (916) 653-0190 or Janice Wu at (916) 653-9467 if you have any questions.

Mr. Scott Johnson  
June 9, 2020  
Page 2

Sincerely,

*Anna Fock*

Anna Fock, Supervising Engineer  
State Water Project Analysis Office  
Program Development and Water Supply and Transfers Branch

Copies

Lisa Holm  
Chief, Contracts and Water Rights Branch,  
Division of Resource Management,  
California-Great Basin Region,  
U.S. Department of the Interior, Bureau of Reclamation  
2800 Cottage Way  
Sacramento, CA 95825-1898  
[lholtm@usbr.gov](mailto:lholtm@usbr.gov)

Briana Seapy  
Water Program Supervisor,  
North Central Region,  
California Department of Fish & Wildlife  
[briana.seapy@wildlife.ca.gov](mailto:briana.seapy@wildlife.ca.gov)

June 12, 2020

**VIA E-MAIL**

Ms. Anna Fock  
Department of Water Resources  
State Water Project Analysis Office  
P.O. Box 942836  
Sacramento, CA 94236  
[Anna.Fock@water.ca.gov](mailto:Anna.Fock@water.ca.gov)

Re: SCGA 20200502, Draft Negative Declaration for the 2020 Temporary  
Groundwater Substitution Transfer

Dear Ms. Fock,

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on June 9, 2020 on behalf of the California Department of Water Resources (“DWR”). By this letter, the City of Sacramento (“City”) on behalf of Golden State Water Company (“GSWC”) is providing a response to DWR comment letter.

The City and GSWC reiterate their common understanding that GSWC will be entering into a conveyance agreement to facilitate the transfer of water. In the comment letter DWR suggests that DWR guidelines be incorporated the project. The City is adding the following language to the final Initial Study to meet DWR’s intent.

*“Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities.”*

The City and GSWC appreciate DWR’s commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority (“RWA”), which is helping coordinate technical aspects of the transfer, are working

cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans. GSWC proposes to utilize the streamflow depletion factor included in the Water Transfer White Paper of 13%. This in recognition that two of the GSWC wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

The City and GSWC appreciate DWR's cooperative engagement and anticipate finalizing the conveyance agreement in the coming weeks to the mutual satisfaction of all agencies.

The City appreciates the opportunity to provide this response to DWR's comment letter. Please contact me if you have any questions about this letter or would like further information regarding the American River Region's proposed 2020 groundwater substitution transfer.

Very truly yours,



Brett Ewart  
City of Sacramento

cc: (Via email)  
Paul Schubert, Golden State Water Company  
Scott Johnson, City of Sacramento  
Rob Swartz, RWA/SGA



## United States Department of the Interior



BUREAU OF RECLAMATION  
Interior Region 10  
Central California Area Office  
7794 Folsom Dam Road  
Folsom, California 95630-1799

IN REPLY REFER TO:

CC-400

2.2.4.22

Mr. Scott Johnson  
Associate Planner  
City of Sacramento  
Community Development Department  
300 Richards Boulevard  
Sacramento, California 95811

Subject: Notice of Intent to Adopt a Negative Declaration for A Temporary Water Transfer

Dear Mr. Johnson:

The Bureau of Reclamation is in receipt of the subject Notice of Intent (NOI) and the Initial Study/Negative Declaration (IS/ND) referred by the NOI from the City of Sacramento (City).

The City has prepared an Initial Study/Environmental Checklist for a transfer of 2,500 acre-feet of water from the Golden State Water Company (GSWC). According to the Initial Study, the City is participating in a water transfer project with five other regional water agencies to provide up to 18,500 acre-feet of water to various State Water Project (SWP) contractors. As part of a regional water transfer led by the City, GSWC will transfer up to 2,500 acre-feet of water based on its pre-1914 (pre-14) water rights. GSWC will meet the demands that would ordinarily be met by delivery of this surface water to its customers by increased groundwater pumping. The City states that this temporary pumping will occur within existing historical baselines and the parameters of an existing groundwater management plan administered by the Sacramento Central Groundwater Authority (SCGA).

The Initial Study states that water made available for transfer will be conveyed to the SWP contractors using SWP facilities during the summer and fall of 2020. This water may be stored in San Luis Reservoir for later delivery to an individual SWP contractor's service area. The SWP contractors and the regional water agencies, through the auspices of the Regional Water Authority, have entered into an agreement to undertake these transfers, including the GSWC transfer.

**INTERIOR REGION 10 • CALIFORNIA-GREAT BASIN**

CALIFORNIA\*, NEVADA\*, OREGON\*

\* PARTIAL

The Environmental Checklist for this transfer consists of 20 sections. Reclamation will focus its comments on Section X. (Hydrology and Water Quality). As noted above, the proposed transfer of 2,500-acre feet of GSWC's pre-14 water is part of a set of transfers totaling up to 18,500 acre-feet. All of these transfers are groundwater substitution transfers. However, Section X. only discusses the potential impacts of the GSWC transfer and makes no mention of the other transfers that are part of the overall project.

Reclamation recommends that the City consider and assess the potential effects on streamflow caused by increased groundwater pumping (known as the streamflow depletion factor). In petitions filed with the State Water Resources Control Board by the City and Carmichael Water District for other transfers that are part of the regional water transfer project, an eight percent (%) streamflow depletion factor was used. Reclamation stated in its comment letters on these petitions:

An eight % streamflow depletion factor was used to support a transfer of 8,200 acre-feet by the City in 2018. The proposed transfer of 14,000 acre-feet is almost twice the amount transferred by the City in 2018; the combined total of 18,500 acre-feet to be transferred is over 60% greater than the combined total for transfers from the lower American River for 2018. Due to this significant increase in the amount of water to be transferred, Reclamation requests that the City provide additional information (including recent modeling data) to support the continued use of an eight % streamflow depletion factor.

Reclamation requests that Section X. of the Environmental Checklist include a discussion of streamflow depletion for this and all other current regional transfers, and that this discussion include up-to-date information (including the most recent modeling data).

Reclamation appreciates the opportunity to comment on the NOI and IS/ND for this transfer. Please contact Brad Hubbard, Chief, Resources Management Division at [bhubbard@usbr.gov](mailto:bhubbard@usbr.gov), or (916) 537-7041, if you have any questions.

Sincerely,

Drew Lessard  
Area Manager

**INTERIOR REGION 10 • CALIFORNIA-GREAT BASIN**

CALIFORNIA\*, NEVADA\*, OREGON\*

\* PARTIAL

June 12, 2020

**VIA E-MAIL**

Mr. Drew Lessard  
United States Bureau of Reclamation  
Central California Area Office  
7794 Folsom Dam Road  
Folsom, CA 95630  
[DLessard@usbr.gov](mailto:DLessard@usbr.gov)

Re: SCH 20200502, Draft Negative Declaration for the 2020 Temporary  
Groundwater Substitution Transfer

Dear Mr. Lessard,

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on June 9, 2020 on behalf of the United States Bureau of Reclamation (“USBR”). By this letter, the City of Sacramento (“City”) on behalf of Golden State Water Company (“GSWC”) is providing a response to the USBR comment letter.

The City understands that the primary inquiry in the comment letter relates to proposed streamflow depletion factors. This inquiry is consistent with USBR comments on other regional petitions to the State Water Resources Control Board which proposed an alternate streamflow depletion factor of 8% rather than DWR’s default factor of 13%.

The City and GSWC appreciate DWR’s commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority (“RWA”), which is helping coordinate technical aspects of the transfer, are working cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans. GSWC proposes to utilize the streamflow depletion factor included in DWR’s 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper) of 13%. This in recognition that two of the GSWC

wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

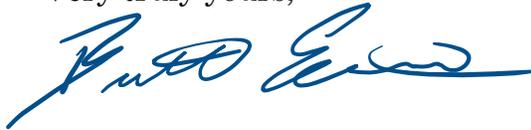
The City is adding the following language to the final Initial Study to reflect both the Draft Water Transfer White Paper and to meet USBR's request.

*“Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities.”*

The City appreciates USBR's cooperative engagement and hopes to coordinate with USBR to provide optimized release patterns of water that would have otherwise been subject to GSWC diversion rate in the Lower American River.

The City and GSWC appreciate the opportunity to provide this response to USBR's comment letter. Please contact me if you have any questions about this letter or would like further information regarding the American River Regions proposed 2020 groundwater substitution transfer.

Very truly yours,



Brett Ewart  
City of Sacramento

cc: (Via email)  
Paul Schubert, Golden State Water Company  
Scott Johnson, City of Sacramento  
Rob Swartz, RWA/SGA

**From:** [Wood, Dylan@Wildlife](mailto:Wood,Dylan@Wildlife)  
**To:** [Scott Johnson](mailto:Scott.Johnson)  
**Cc:** [Wildlife R2 CEQA](#); [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov); [cathy@carmichaelwd.org](mailto:cathy@carmichaelwd.org); [Brett Ewart](#); [Meza, Michael@Waterboards](#); [Drongesen, Jeff@Wildlife](mailto:Drongesen,Jeff@Wildlife); [McDougall, Lillian@Wildlife](mailto:McDougall,Lillian@Wildlife); [Fock, Anna@DWR](mailto:Fock,Anna@DWR); [Seapy, Briana@Wildlife](mailto:Seapy,Briana@Wildlife)  
**Subject:** Comments on the Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer (SCH: 2020050212)  
**Date:** Tuesday, June 9, 2020 4:41:54 PM  
**Attachments:** [image001.png](#)

---

Dear Mr. Johnson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Negative Declaration (ND) from the City of Sacramento for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. <sup>[1]</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of 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; 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. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, 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.

It is the mission and responsibility of the Department to manage viable populations of fish and wildlife resources throughout the State. Watershed and aquifer protection, fishery access to headwater reaches, and adequate instream flows for all life stages of fishery resources are focal points of the Department's efforts to manage native populations of fish and wildlife.

## **Project Description:**

The City of Sacramento prepared a Draft Negative Declaration on behalf of Golden State Water Company (GSWC) for a 2020 temporary water transfer wherein GSWC will temporarily transfer up to 2,500 acre feet (af) of its pre-1914 water rights water supplies, made available by groundwater substitution, during the summer and fall of 2020. The proposed transfer is a component of a regional 18,500 af groundwater substitution transfer. Transfer water will be exported by DWR using existing State Water Project (SWP) facilities during the summer and fall of 2020. However, the transfer water may be temporarily stored in San Luis Reservoir for later delivery to an individual Buyer's service area.

**Comments:**

The GSWC Negative Declaration is submitted in concert with an additional 16,000 af of proposed groundwater substitution water transfers from the City of Sacramento and Carmichael Water District for a cumulative regional transfer of 18,500 af.

*Surface Water*

This proposed 18,500 af regional transfer is among several other proposed transfers that may impact the Folsom cold water pool in terms of timing and volume of releases to meet downstream diversions. The Department has concerns over the potential cumulative adverse impacts on the sensitive anadromous and/or resident fisheries within the Lower American River (LAR) from water transfer changes to the quantity, timing, and duration of flow. The LAR is considered temperature impaired (U.S. EPA 2003) and water temperatures frequently exceed optimal conditions for summer rearing of juvenile steelhead and for fall-run Chinook salmon (*Oncorhynchus tshawytscha*) spawning in October and November. Folsom Reservoir operations directly influence conditions in LAR. Releases out of Folsom to meet contracted LAR water diversions or 2020 water transfer needs can substantially influence conditions, including temperature, in the LAR. Water transfer releases from Folsom Reservoir can have both positive and negative effects on habitat quality and quantity in the river. Increasing reservoir releases in spring may encourage emigration of juvenile salmonids and improve survival whereas a high-volume transfer completed in summer or fall may cause rearing steelhead to redistribute to less desirable habitat (Snider 2001). The Department recommends close coordination with U.S. Bureau of Reclamation (USBR) and regulatory agencies on the release timing of transfer water out of Folsom to minimize cold-water pool loss associated with a water transfer.

In recognition that Folsom Reservoir summer releases affect LAR habitat quantity and quality and that warming associated with water residence time in Lake Natoma can be minimized at specific reservoir releases, the Department further recommends working closely with USBR on adaptively accounting for transfer water. As opposed to block releases of transfer water that can result in substantial flow fluctuations and a large usage of cold-water pool, the Department recommends optimizing releases to provide stable flows across summer and fall months at targeted release rates which minimize warming in Lake Natoma. Targeting a stable, optimized flow within which transfer water can be accounted for will better maintain rearing habitat for steelhead.

*Groundwater*

The Department is also concerned with potential cumulative impacts associated with proposed and future groundwater substitution water transfers within or adjacent to the Sacramento Valley - North and South American Subbasins (subbasin numbers: 5-021.64 and 5-21.65) that have the potential to impact groundwater dependent ecosystems. On September 16, 2014, Governor Brown signed into law a three-bill legislative package collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires Groundwater Sustainability Agencies (GSAs) to develop and implement Groundwater Sustainability Plans (GSPs) that will ensure long term groundwater sustainability in the state's medium and high priority groundwater basins, including the North and South American Subbasins.

Ecological communities or species that depend on groundwater emerging from aquifers or

on groundwater occurring near the ground surface are collectively known as groundwater dependent ecosystems (GDEs) (23 Cal. Code Regs. § 351(m)). These GDEs include seeps and springs; wetlands and lakes; rivers, streams, and estuaries; and terrestrial vegetation. Water transfers made available by groundwater substitution have the potential to affect groundwater hydrology due to increased groundwater extraction and reduced groundwater recharge. Correlating effects could be temporary and/or long-term declines in groundwater levels, reduction of groundwater storage, depletions of interconnected surface water, land subsidence, and degraded water quality. These effects have the potential to adversely impact GDEs in basins where water transfers are made available by groundwater substitution.

According to the Natural Communities Commonly Associated with Groundwater Dataset (DWR 2018), there are potential vegetated and aquatic GDEs overlying or adjacent to the project locations. SGMA requires GSAs to identify and consider impacts to beneficial uses and users of groundwater, including GDEs, during the development and implementation of GSPs (23 Cal. Code Regs. § 354.16 (g) and Water Code § 10727.4(l)). Therefore, Department staff believe it is essential for the City of Sacramento to ensure water transfer activities are considered in the development of the North and South American Subbasin GSPs to avoid long-term undesirable results to beneficial uses and users of groundwater. The City of Sacramento has the opportunity to provide information on how water transfer activities in the basin may impact GDEs and interconnected surface waters, thereby supporting the development of sustainability goals, minimum thresholds, and measurable objectives within the North and South American Subbasin GSPs.

As outlined in the DWR's 2015 Draft Technical Information for Preparing Water Transfer Proposals and acknowledged in the petition, the City of Sacramento must demonstrate that the proposed groundwater substitution water transfers are consistent with local requirements (DWR 2019). For groundwater substitution transfers, DWR also requires groundwater monitoring and a mitigation plan designed to alleviate possible injury to other legal users of water including environmental users. The Department respectfully requests the City of Sacramento provide groundwater monitoring plans, mitigation plans, documentation demonstrating the North and South American Subbasin GSAs have been notified of the proposed transfer, and details on how the proposed groundwater substitutions will be consistent with local requirements. Effective, comprehensive monitoring will help understand both hydrologic patterns and corresponding habitat/GDE trends to inform both project operations and GSP development. Accordingly, groundwater monitoring should be accompanied by habitat monitoring and designed and deployed to capture seasonal and operational variability and follow accepted technical procedures and best practices established by the USGS (Cunningham 2011) and DWR (DWR 2016) respectively. Monitoring plans and data should be made publicly accessible.

The Department appreciates your consideration of these comments when reviewing the water transfer petitions. If you have questions regarding these comments, please contact Briana Seapy, Water Program Supervisor, at (916) 508-3345 or [Briana.Seapy@wildlife.ca.gov](mailto:Briana.Seapy@wildlife.ca.gov) or Dylan Wood, Environmental Scientist, at 916-358-2384 or [dylan.a.wood@wildlife.ca.gov](mailto:dylan.a.wood@wildlife.ca.gov).

Sincerely,

**Dylan Wood**

California Department of Fish and Wildlife  
Environmental Scientist

(916) 358-2384



## REFERENCES

Cunningham, W. L., and C. W. Schalk. 2011. Groundwater Technical Procedures of the U.S. Geological Survey

Department of Water Resources. 2016. Best Management Practices for Sustainable Management of Groundwater.

Department of Water Resources. 2018. Natural Communities Commonly Associated with Groundwater Dataset.

Department of Water Resources. 2019. Draft Technical Information for Preparing Water Transfer Proposals.

Snider, B. 2001. Evaluation of effects of flow fluctuations on the anadromous fish populations in the lower American River. California Department of Fish and Game, Habitat Conservation Division. Stream Evaluation Program. Tech. Reports No. 1 and 2 with appendices 1-3.

U.S. Environmental Protection Agency. 2003. EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards. EPA 910-B-03-002.

---

<sup>[1]</sup> 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.

June 12, 2020

**BY EMAIL ONLY**

Mr. Dylan Wood  
California Department of Fish and Wildlife  
Dylan.wood@wildlife.ca.gov

Re: Comments on the Negative Declaration for the 2020 Temporary Groundwater Substitution Water Transfer (SCH: 2020050212)

Dear Mr. Wood:

We have reviewed the comments regarding the above-referenced Notice of Intent to Adopt a Negative Declaration submitted on behalf of the California Department of Fish and Wildlife (“CDFW”). By this letter, the City of Sacramento (“City”) on behalf of Golden State Water Company (“GSWC”) is providing a response to CDFW’s comment letter dated June 9, 2020.

CDFW’s letter makes comments on two general subject areas related to GSWC’s role in the proposed 2020 American River water transfer program. The transfer will be accomplished through groundwater substitution, which is an approved transfer method under the *Technical Information for Preparing Water Transfer Proposals (Water Transfer White Paper)* prepared by the Department of Water Resources (“DWR”) and U.S. Bureau of Reclamation (“USBR”) in December 2019. The first set of CDFW comments relate to matters concerning surface water resources. The second set involve groundwater resources. We address each of these subject areas in turn.

**1. CDFW Comments on Surface Water.**

CDFW’s comments regarding potential impacts on surface water resources generally concern potential changes in flows released from Folsom Reservoir into the Lower American River (“LAR”) to effectuate the 2020 regional water transfer and related potential impacts to the Folsom cold water pool and the LAR fishery. The City responds as follows:

The proposed regional water transfer will not affect storage levels or the cold water pool in Folsom Reservoir, due to the fact that the transfer does not change the amount of water released from the reservoir. Absent the transfer, the same amount of water would have been delivered from the reservoir to the GSWC point of diversion downstream. Below the GSWC point of diversion, and other diversion points for parties that are concurrently petitioning the

SWRCB for similar transfer—Carmichael Water District (CWD) and the City (the lowest diversion point that would be used without transfer)—, there will be a small increase in flow on the LAR, when compared to the without-transfer scenario, of approximately 70 cfs for the July 1 to September 30 period and approximately 40 cfs in October and November. This marginal flow compares to average flows in the American River for the 2015-2019 period of 4,091 cfs in July, 3,183 cfs in August, 2,266 cfs in September, 1,729 cfs in October, and 1,659 in November. The addition of 40 to 70 cfs to these flows would represent an increase over the five-year average flows of between 1.7% and 3.1% during the transfer period. Thus, these flow increases associated with the proposed transfer represent insignificant increases compared to without-transfer conditions.

In addition, these additional flows may provide minor temperature benefits to the LAR because they will maintain additional colder water in the river, which will mitigate the impact of heat transfer from ambient air.

Another aspect of this proposed transfer is that the groundwater deliveries and surface water supplies made available for transfer will be provided on a relatively regular pattern, rather than in block releases. As noted in the CDFW comment, a steady release rate from Folsom Reservoir is preferable to large variations. In fact, a steady-state release pattern is the release profile proposed for this transfer. GSWC, City, and CWD will be coordinating with USBR on release rates from the reservoir in order to minimize any temperature- and flow-related impacts on the LAR and meet CDFW's request for a stable, optimized flow. CDFW also requests an accounting of the transfer water. A template for accounting methods will be included in the required DWR conveyance agreement.

In separate CDFW comment letters sent to the State Water Resources Control Board, CDFW inquired about the region's proposed use of an 8% streamflow depletion factor for this transfer. In response, City and CWD have noted that the 13% factor stated in the DWR/USBR Water Transfer White Paper is based on general modeling that is not site-specific to the American River, and is addressing the unique technical aspects through those petitions. The City and GSWC appreciate DWR's commitment to work cooperatively on streamflow depletion factors. Staff from the Regional Water Authority ("RWA"), which is helping coordinate technical aspects of the transfer, are working cooperatively with DWR to finalize the conveyance agreement and associate monitoring plans.

GSWC proposes to utilize the streamflow depletion factor included in DWR's 2019 Draft Technical Information for Preparing Water Transfer Proposals (Draft Water Transfer White Paper) of 13%. This in recognition that two of the GSWC wells in the transfer are very close to the American River and have fairly shallow depths in their initial perforated intervals.

All petitioners continue to work collaboratively with DWR technical staff to ensure adequacy of streamflow factors that will be ultimately be included in DWR's required conveyance agreement. Relevant technical information is being uploaded onto the state-sponsored Water

Transfer Information Management System (WTIMS), and interested parties are invited to review that content.

The City is adding the following language to the final Initial Study to reflect DWR's Draft Water Transfer White Paper.

*"Identification of the approved wells, in addition to baseline groundwater pumping conditions, and appropriate stream flow depletion factors, will be included in a DWR Conveyance agreement that will govern GSWC transfer activities."*

## **2. CDFW Comments on Groundwater.**

With respect to groundwater, CDFW expressed concerns with potential cumulative impacts on groundwater resources associated with the proposed transfer and future transfers related to Sustainable Groundwater Management Act ("SGMA") requirements to incorporate protection of groundwater dependent ecosystems ("GDEs") into groundwater sustainability plans ("GSPs"). CDFW comments that City should ensure that water transfers are considered in the development of GSPs for the North American and South American Subbasins currently under development by the respective Groundwater Sustainability Agencies ("GSAs"), SGA for the North American Subbasin and the Sacramento Central Groundwater Authority ("SCGA") for the South American Subbasin.

City's response to CDFW's concerns about groundwater resources is as follows. Groundwater to replace the transferred surface water will be pumped from existing municipal wells that have been constructed to meet all required state and local standards. All wells will be operated within historical baseline pumping amounts and the basins' respective safe yield amounts in accordance with the SGA's and the SCGA's existing AB 3030 groundwater management plans. The wells used in the transfer will be certified and approved by DWR staff, and all pumping will be in accordance with the mitigation, monitoring, and reporting plans that City, CWD, and GSWC will be required to comply with as a condition of the water conveyance agreements that each transferor will enter into the DWR.

In addition, there is an established water accounting framework administered by SGA in the North American Subbasin that accounts for the significant conjunctive use activities engaged in by City, CWD, and the other agencies participating in the 2020 water transfer. The participating agencies include SSWD, which alone has banked over 200,000 acre-feet of water in the North American Subbasin through in-lieu banking. City and CWD also have positive accounts in the SGA water accounting framework resulting from their conjunctive use activities. Most importantly, regional conjunctive use efforts in the past two decades have resulted in increasing groundwater levels, and continuing conjunctive use activities will ensure that groundwater levels return to their previous elevations quickly after a water transfer.

The most recent results were supplied to the SGA Board on April 9, 2020 and are attached to the end of this correspondence. The Water Accounting Framework program can be accessed on the SGA website as follows: <https://www.sgah2o.org/programs/groundwater-management-program/water-accounting-framework/>.

GSWC activities are exclusively occurring within the South American Subbasin over which SCGA is the exclusive GSA. SCGA does not maintain an accounting framework that matches SGA but does compile records and estimates of surface and groundwater usage within the service area. SCGA has been preparing and submitting basin reports consistent with SGMA, most recently submitted in 2019. These reports are publicly available on the SCGA website and demonstrate increased recharge of groundwater over recent years far in excess of proposed transfer amounts. This increase storage is due, in part to increased deliveries of surface water by transfer participants to allow for in-lieu recharge of groundwater resources.

As an example, the report and executive summary of the 2018 SGMA Annual Report includes the following data showing the cumulative change in storage.

2018 SCGA SGMA Annual report, Table 4

*Table 4. Annual and Cumulative Changes in Storage*

| Year | Change in Storage (Ac-Ft) | Cumulative Change in Storage 2005 to 2018 (Ac-Ft) | Cumulative Change in Storage 2015 to 2018 (Ac-Ft) |
|------|---------------------------|---|---|
| 2005 | baseline                  | 0   |   |
| 2009 | 42,766                    | 42,766  |   |
| 2010 | (16,046)                  | 26,720  |   |
| 2011 | 46,705                    | 73,425  |   |
| 2012 | 40,416                    | 113,841   |   |
| 2013 | (16,458)                  | 97,384  |   |
| 2014 | (111,930)                 | (14,546)  |   |
| 2015 | (58,717)                  | (73,263)  | 0   |
| 2016 | 28,833                    | (44,430)  | 28,833  |
| 2017 | 189,306                   | 144,876   | 218,139   |
| 2018 | 70,480                    | 215,356   | 288,619   |

Separately, Figure 8 in the Executive Summary compares extraction history to the presently understood sustainable yield.

2018 SCGA SGMA Annual report, Table 4

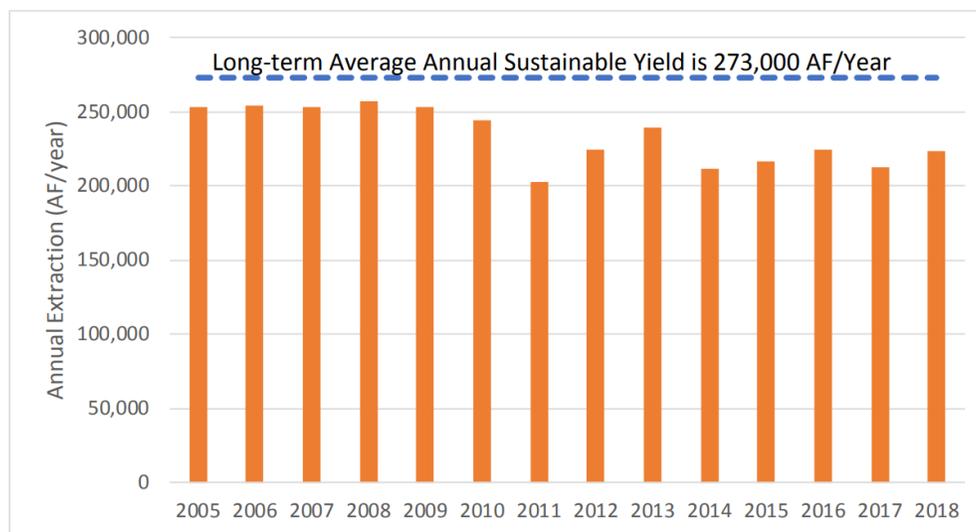


Figure 8. Verification of Annual Sustainability Goal

This 2018 SCGA SGMA report can be reviewed by interested parties at the following location: [https://scgah2o.saccounty.net/Documents/2018%20SCGA%20Annual%20Report%20South%20American%20Subbasin%205-021.65\\_20180329.pdf](https://scgah2o.saccounty.net/Documents/2018%20SCGA%20Annual%20Report%20South%20American%20Subbasin%205-021.65_20180329.pdf).

As noted, all groundwater pumped and used from both the North and South American Subbasins to make surface water available for transfer will be within the safe yield figures for each subbasin as both established in the existing AB 3030 groundwater management plans and as currently forecasted in the GSPs under development for each subbasin. All transfer parties have notified the GSAs of the transfer as required, and neither GSA has objected to the proposed transfers. Thus, City, GSWC, and other parties outside of this ISND have coordinated the proposed transfer with the GSAs to ensure that they avoid any impacts on the basin. Consistent with the County Code, permits for the proposed transfer have been issued by Sacramento County to project participants. Per request by CDFW, accompanying this email is a copy of the GSA notification letter to SCGA and a copy of the board agenda when the letter was provided to the SCGA Directors. Other requested technical documents are being uploaded to the State Water Transfer Information Management System operated by DWR, which is intended to provide a common source of supporting data.

City and GSWC appreciate the opportunity to provide this response to CDFW's June 9, 2020 letter. Please contact me if you have any questions about this letter or would like further information regarding the American River proposed 2020 groundwater substitution transfer.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Brett Ewart". The signature is fluid and cursive, with the first name "Brett" being more prominent than the last name "Ewart".

Brett Ewart  
City of Sacramento

cc: (Via email)  
Paul Schubert, Golden State Water Company  
Scott Johnson, City of Sacramento  
Rob Swartz, RWA/SGA

## Water Accounting Framework, Phase III

| Basin Sustainability Goal |              |                |                  |                        |                     |                              | Exchangeable Water |                               |                     |                  |                            |
|---------------------------|--------------|----------------|------------------|------------------------|---------------------|------------------------------|--------------------|-------------------------------|---------------------|------------------|----------------------------|
| Water District            | Total Demand | Target Pumping | Actual GW Pumped | Target minus Actual GW | Transfer of Credits | Basin Sustainability Balance | Surface Water Use  | Water Transfer (out of basin) | Credits transferred | Net Banked Water | Exchangeable Water Balance |
|                           |              | 6,646          |                  |                        |                     |                              |                    |                               |                     |                  | 40,049                     |
| 2012                      | 9,895        |                | 1,580            | 5,066                  | 0                   | 5,066                        | 8,315              | 0                             | 0                   | 5,066            | 45,115                     |
| 2013                      | 10,400       |                | 2,031            | 4,615                  | 0                   | 9,681                        | 8,369              | 0                             | 0                   | 4,615            | 49,730                     |
| 2014                      | 8,517        |                | 3,575            | 3,071                  | 0                   | 12,752                       | 4,942              | 0                             | 0                   | 3,071            | 52,801                     |
| 2015                      | 7,353        |                | 2,755            | 3,891                  | 0                   | 16,643                       | 4,598              | 0                             | 0                   | 3,891            | 56,692                     |
| 2016                      | 7,696        |                | 1,419            | 5,227                  | 0                   | 21,870                       | 6,277              | 0                             | 0                   | 5,227            | 61,919                     |
| 2017                      | 8,495        |                | 2,597            | 4,049                  | 0                   | 25,919                       | 5,898              | 0                             | 0                   | 4,049            | 65,968                     |
| 2018                      | 8,614        |                | 2,947            | 3,699                  | 0                   | 29,618                       | 5,667              | 408                           | 0                   | 3,291            | 69,259                     |
| 2019                      | 8,219        |                | 2,166            | 4,480                  | 0                   | 34,098                       | 6,053              | 0                             | 0                   | 4,480            | 73,739                     |
|                           |              | 20,591         |                  |                        |                     |                              |                    |                               |                     |                  | 36,568                     |
| 2012                      | 38,084       |                | 13,554           | 7,037                  | 0                   | 7,037                        | 24,530             | 0                             | 0                   | 7,037            | 43,605                     |
| 2013                      | 39,068       |                | 11,732           | 8,859                  | 0                   | 15,896                       | 27,336             | 0                             | 0                   | 8,859            | 52,464                     |
| 2014                      | 31,724       |                | 13,602           | 6,989                  | 0                   | 22,885                       | 18,122             | 0                             | 0                   | 6,989            | 59,453                     |
| 2015                      | 27,878       |                | 12,682           | 7,909                  | 0                   | 30,794                       | 15,196             | 0                             | 0                   | 7,909            | 67,362                     |
| 2016                      | 28,962       |                | 17,151           | 3,440                  | 0                   | 34,234                       | 11,811             | 0                             | 0                   | 3,440            | 70,802                     |
| 2017                      | 30,110       |                | 23,728           | -3,137                 | 0                   | 31,097                       | 6,382              | 0                             | 0                   | 0                | 70,802                     |
| 2018                      | 30,221       |                | 23,495           | -2,904                 | 0                   | 28,193                       | 6,726              | 2641                          | 0                   | -2,641           | 68,161                     |
| 2019                      | 28,774       |                | 19,401           | 1,190                  | 0                   | 29,383                       | 9,373              | 0                             | 0                   | 1,190            | 69,351                     |
|                           |              | 17,995         |                  |                        |                     |                              |                    |                               |                     |                  | 7,115                      |
| 2012                      | 14,186       |                | 13,595           | 4,400                  | 0                   | 4,400                        | 591                | 0                             | 0                   | 591              | 7,706                      |
| 2013                      | 14,110       |                | 14,110           | 3,885                  | 0                   | 8,285                        | 0                  | 0                             | 0                   | 0                | 7,706                      |
| 2014                      | 11,260       |                | 11,260           | 6,735                  | 0                   | 15,020                       | 0                  | 0                             | 0                   | 0                | 7,706                      |
| 2015                      | 9,581        |                | 9,581            | 8,414                  | 0                   | 23,434                       | 0                  | 0                             | 0                   | 0                | 7,706                      |
| 2016                      | 10,319       |                | 10,102           | 7,893                  | 0                   | 31,327                       | 217                | 0                             | 0                   | 217              | 7,923                      |
| 2017                      | 11,220       |                | 9,203            | 8,792                  | 0                   | 40,119                       | 2,017              | 0                             | 0                   | 2,017            | 9,940                      |
| 2018                      | 11,065       |                | 9,609            | 8,386                  | 0                   | 48,505                       | 1,456              | 0                             | 0                   | 1,456            | 11,396                     |
| 2019                      | 10,724       |                | 9,241            | 8,754                  | 0                   | 57,259                       | 1,483              | 0                             | 0                   | 1,483            | 12,879                     |
|                           |              | 1,465          |                  |                        |                     |                              |                    |                               |                     |                  | 0                          |
| 2012                      | 1,499        |                | 1,499            | -34                    | 0                   | -34                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2013                      | 1,571        |                | 1,571            | -106                   | 0                   | -140                         | 0                  | 0                             | 0                   | 0                | 0                          |
| 2014                      | 1,246        |                | 1,246            | 219                    | 0                   | 79                           | 0                  | 0                             | 0                   | 0                | 0                          |
| 2015                      | 1,052        |                | 1,052            | 413                    | 0                   | 492                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2016                      | 1,128        |                | 1,128            | 337                    | 0                   | 829                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2017                      | 1,239        |                | 1,239            | 226                    | 0                   | 1,055                        | 0                  | 0                             | 0                   | 0                | 0                          |
| 2018                      | 1,226        |                | 1,226            | 239                    | 0                   | 1,294                        | 0                  | 0                             | 0                   | 0                | 0                          |
| 2019                      | 1,158        |                | 1,158            | 307                    | 0                   | 1,601                        | 0                  | 0                             | 0                   | 0                | 0                          |
|                           |              | 1,098          |                  |                        |                     |                              |                    |                               |                     |                  | 0                          |
| 2012                      | 1,119        |                | 1,119            | -21                    | 0                   | -21                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2013                      | 1,184        |                | 1,184            | -86                    | 0                   | -107                         | 0                  | 0                             | 0                   | 0                | 0                          |
| 2014                      | 896          |                | 896              | 202                    | 0                   | 95                           | 0                  | 0                             | 0                   | 0                | 0                          |
| 2015                      | 778          |                | 778              | 320                    | 0                   | 415                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2016                      | 793          |                | 793              | 305                    | 0                   | 720                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2017                      | 854          |                | 854              | 244                    | 0                   | 964                          | 0                  | 0                             | 0                   | 0                | 0                          |
| 2018                      | 836          |                | 836              | 262                    | 0                   | 1,226                        | 0                  | 0                             | 0                   | 0                | 0                          |
| 2019                      | 840          |                | 840              | 258                    | 0                   | 1,484                        | 0                  | 0                             | 0                   | 0                | 0                          |

2019 Results

## Water Accounting Framework, Phase III

| Basin Sustainability Goal                 |                     |                       |                         |                               |                            |                                     | Exchangeable Water       |                                      |                            |                         |                                   |
|---|---------------------|-----------------------|-------------------------|-------------------------------|----------------------------|-------------------------------------|--------------------------|--------------------------------------|----------------------------|-------------------------|-----------------------------------|
| Rio Linda / Elverta CSD                   | Total Demand        | Target Pumping        | Actual GW Pumped        | Target minus Actual GW        | Transfer of Credits        | Basin Sustainability Balance        | Surface Water Use        | Water Transfer (out of basin)        | Credits transferred        | Net Banked Water        | Exchangeable Water Balance        |
|   |                     | 2,882                 |                         |                               |                            |                                     |                          |                                      |                            |                         | 109                               |
| 2012                                      | 2,882               |                       | 2,857                   | 25                            | 0                          | 25                                  | 25                       | 0                                    | 0                          | 25                      | 134                               |
| 2013                                      | 3,052               |                       | 3,052                   | -170                          | 0                          | -145                                | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2014                                      | 2,249               |                       | 2,449                   | 433                           | 0                          | 288                                 | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2015                                      | 2,109               |                       | 2,109                   | 773                           | 0                          | 1,061                               | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2016                                      | 2,236               |                       | 2,236                   | 646                           | 0                          | 1,707                               | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2017                                      | 2,458               |                       | 2,458                   | 424                           | 0                          | 2,131                               | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2018                                      | 2,506               |                       | 2,506                   | 376                           | 0                          | 2,507                               | 0                        | 0                                    | 0                          | 0                       | 134                               |
| 2019                                      | 2,429               |                       | 2,439                   | 443                           | 0                          | 2,950                               | 0                        | 0                                    | 0                          | 0                       | 134                               |
| <b>Sacramento County WA</b>               | <b>Total Demand</b> | <b>Target Pumping</b> | <b>Actual GW Pumped</b> | <b>Target minus Actual GW</b> | <b>Transfer of Credits</b> | <b>Basin Sustainability Balance</b> | <b>Surface Water Use</b> | <b>Water Transfer (out of basin)</b> | <b>Credits transferred</b> | <b>Net Banked Water</b> | <b>Exchangeable Water Balance</b> |
|   |                     | 4,288                 |                         |                               |                            |                                     |                          |                                      |                            |                         | 0                                 |
| 2012                                      | 5,211               |                       | 5,211                   | -923                          | 0                          | -923                                | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2013                                      | 5,316               |                       | 5,316                   | -1,028                        | 0                          | -1,951                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2014                                      | 4,559               |                       | 4,559                   | -271                          | 0                          | -2,222                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2015                                      | 3,887               |                       | 3,887                   | 401                           | 0                          | -1,821                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2016                                      | 4,064               |                       | 4,064                   | 224                           | 0                          | -1,597                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2017                                      | 4,756               |                       | 4,756                   | -468                          | 0                          | -2,065                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2018                                      | 4,817               |                       | 4,817                   | -529                          | 0                          | -2,594                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| 2019                                      | 4,582               |                       | 4,582                   | -294                          | 0                          | -2,888                              | 0                        | 0                                    | 0                          | 0                       | 0                                 |
| <b>Sacramento Suburban Water District</b> | <b>Total Demand</b> | <b>Target Pumping</b> | <b>Actual GW Pumped</b> | <b>Target minus Actual GW</b> | <b>Transfer of Credits</b> | <b>Basin Sustainability Balance</b> | <b>Surface Water Use</b> | <b>Water Transfer (out of basin)</b> | <b>Credits transferred</b> | <b>Net Banked Water</b> | <b>Exchangeable Water Balance</b> |
|   |                     | 35,035                |                         |                               |                            |                                     |                          |                                      |                            |                         | 183,034                           |
| 2012                                      | 38,089              |                       | 27,530                  | 7,505                         | 0                          | 7,505                               | 10,559                   | 0                                    | 0                          | 7,505                   | 190,539                           |
| 2013                                      | 38,554              |                       | 38,145                  | -3,110                        | 0                          | 4,395                               | 409                      | 3,068                                | 0                          | -2,659                  | 187,880                           |
| 2014                                      | 32,561              |                       | 32,561                  | 2,474                         | 0                          | 6,869                               | 0                        | 0                                    | 0                          | 0                       | 187,880                           |
| 2015                                      | 27,502              |                       | 27,422                  | 7,613                         | 0                          | 14,482                              | 80                       | 0                                    | 0                          | 80                      | 187,960                           |
| 2016                                      | 29,311              |                       | 17,863                  | 17,172                        | 0                          | 31,654                              | 11,448                   | 0                                    | 0                          | 11,448                  | 199,408                           |
| 2017                                      | 31,253              |                       | 19,791                  | 15,244                        | 0                          | 46,898                              | 11,462                   | 0                                    | 0                          | 11,462                  | 210,870                           |
| 2018                                      | 30,873              |                       | 20,423                  | 14,612                        | 0                          | 61,510                              | 10,450                   | 5,253                                | 0                          | 5,197                   | 216,067                           |
| 2019                                      | 30,610              |                       | 13,363                  | 21,672                        | 0                          | 83,182                              | 17,247                   | 0                                    | 0                          | 17,247                  | 233,314                           |
| <b>Central Area Total</b>                 | <b>Total Demand</b> | <b>Target Pumping</b> | <b>Actual GW Pumped</b> | <b>Target minus Actual GW</b> | <b>Transfer of Credits</b> | <b>Basin Sustainability Balance</b> | <b>Surface Water Use</b> | <b>Water Transfer (out of basin)</b> | <b>Credits transferred</b> | <b>Net Banked Water</b> | <b>Exchangeable Water Balance</b> |
|   |                     | 90,000                |                         |                               |                            |                                     |                          |                                      |                            |                         | 266,875                           |
| 2012                                      | 110,965             |                       | 66,945                  | 23,055                        | 0                          | 23,055                              | 44,020                   | 0                                    | 0                          | 20,224                  | 287,099                           |
| 2013                                      | 113,255             |                       | 77,141                  | 12,859                        | 0                          | 35,914                              | 36,114                   | 3,068                                | 0                          | 10,815                  | 297,914                           |
| 2014                                      | 93,012              |                       | 70,148                  | 19,852                        | 0                          | 55,766                              | 23,064                   | 0                                    | 0                          | 10,060                  | 307,974                           |
| 2015                                      | 80,140              |                       | 60,266                  | 29,734                        | 0                          | 85,500                              | 19,874                   | 0                                    | 0                          | 11,880                  | 319,854                           |
| 2016                                      | 84,509              |                       | 54,756                  | 35,244                        | 0                          | 120,744                             | 29,753                   | 0                                    | 0                          | 20,332                  | 340,186                           |
| 2017                                      | 90,385              |                       | 64,626                  | 25,374                        | 0                          | 146,118                             | 25,759                   | 0                                    | 0                          | 17,528                  | 357,714                           |
| 2018                                      | 90,158              |                       | 65,859                  | 24,141                        | 0                          | 170,259                             | 24,299                   | 8,302                                | 0                          | 7,303                   | 365,017                           |
| 2019                                      | 87,336              |                       | 53,190                  | 36,810                        | 0                          | 207,069                             | 34,156                   | 0                                    | 0                          | 24,400                  | 389,417                           |



April 28, 2020  
Mr. Darrell K. Eck  
Executive Director  
Sacramento Central Groundwater Authority  
827 7th St., Rm 301 Sacramento, CA 95814

Transmitted via email.

RE: 2020 Water Transfer Notification

Dear Mr. Eck.

The City of Sacramento (COS), the Sacramento County Water Agency (SCWA), and Golden State Water Company (GSWC) have identified an opportunity to participate in a regional groundwater substitution transfer over the period of July 1<sup>st</sup>, 2020 to November 30<sup>th</sup>, 2020. In preparing the transfer document, the regional partners are following DWR's draft 2019 guidebook. See link below:

[https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/Water-Transfers/Files/Draft\\_WTWhitePaper\\_20191203.pdf?la=en&hash=F0ACE02168387A77EDDDB844545E7F7A4642A05F](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/Water-Transfers/Files/Draft_WTWhitePaper_20191203.pdf?la=en&hash=F0ACE02168387A77EDDDB844545E7F7A4642A05F)

We draw your attention to page 27, which identifies the expected components of a submittal. The last bullet reads:

*"Demonstration that the transfer is consistent with the local requirements and applicable GSP(s) of the groundwater basins where the additional groundwater pumping would occur under the transfer proposal; or written notification to the relevant Groundwater Sustainability Agency/Agencies (GSA(s)) if a GSP has not been implemented at the time the transfer is being proposed."*

Pursuant to DWR's latest draft guidebook for preparing water transfer proposals, this letter is designed to serve as notification of intent to participate by the COS, SCWA, and GSWC. Participation will be achieved in the following fashion:

- Sacramento County Water Agency will deliver approximately 1500 ACFT of groundwater to the City of Sacramento through the Franklin Intertie, thereby allowing the City to reduce surface water diversions.
- Golden State will preferentially utilize approximately 2500 ACFT of groundwater for its retail demands rather than rely on its own surface water entitlements.

The proposed extractions from Sacramento County Water Agency and Golden State Water are within historic extractions that have been reduced in recent years by a combination of reduced customer demand and/or reliance on surface water. The surface water remaining in the system will be conveyed to interested buyers in 2020. In near term future years, COS will fully return an identical quantity of surface water to SCWA thereby allowing recharge to occur when wells extractions are reduced. Similarly, GSWC will return to greater reliance on surface water diversions when hydrologic conditions are appropriate. The net impact on the basin will be neutral.

The guidebook also identifies a process by which a GSA can supply a "concurrence letter" when a Groundwater Sustainability Plan (GSP) is in place. At present, until the GSP is developed, we are submitting this notification letter to meet the intent of the guidebook. If SCGA, as the GSA for the affected portion of the South American Subbasin, has any questions about this notification or the transfer, we would be happy to address them.

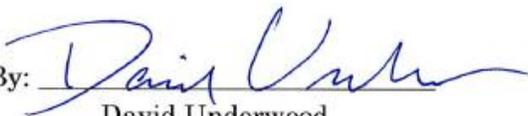
Please note that other parties in the North American Subbasin, including the City of Sacramento, Sacramento Suburban Water District, Carmichael Water District, and Fair Oaks Water District are all considering participation in the Regional Transfer. The transfer volumes included in this notification letter would occur exclusively in the South American Subbasin.

In closing, we wish to highlight a key component of the planned water transfer; All additional groundwater extracted as part of the 2020 Water Transfer, will be returned in the form of greater reliance on surface water during appropriate hydrologic conditions.

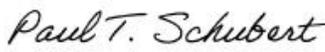
City of Sacramento:

By:   
Brett Ewart  
Senior Engineer

Sacramento County Water Agency:

By:   
David Underwood  
Principal Engineer

Golden State Water Company:

By:   
Paul Schubert  
General Manager

**Application to Permit the Export of Groundwater or Surface Water out of Sacramento County  
(SCWA Code, Title 3, Section 3.40.090 Groundwater and Surface Water Export)**

---

**Name and Address  
of Applicant:**

Golden State Water Company  
c/o Paul Schubert, General Manager  
3005 Gold Canal Drive  
Rancho Cordova, CA 95670

**Owner of Source:**

Same

**Owner of Place  
of Use:**

Same

**Consulting Engineer:  
(Plan and Design  
of Work)**

Tully & Young, Inc.  
965 University Avenue, Ste 222  
Sacramento, CA 95825

**Description of  
proposed action:**

Attached Transfer Proposal

**Location of source(s):**

American River

**Point(s) of use:**

Golden State Water Company American River point of diversion  
Golden State Water Company Service Area as the place of use

**Justification for  
proposed action:**

Attached Transfer Proposal

\_\_\_\_\_ **To Be Completed by the Sacramento County Water Agency** \_\_\_\_\_

Is proposal is in conformance with County water planning policies adopted and revised from time to time by the County and the Sacramento County Water Agency?

Yes  No Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Will proposal impose liability on the County or the Water Agency?

Yes  No Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Does proposal cause adverse impacts on the source, the area of use, or the environment?

Yes  No Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is this proposal consistent with the general plan of the County of Sacramento, the water plan of the Sacramento County Water Agency?

Yes  No Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is this proposal consistent with a specific plan of the County or Water Agency which may be affected by the work or activity?

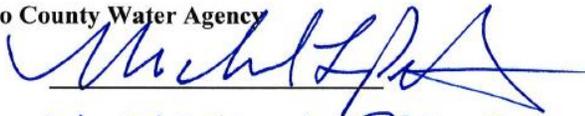
Yes  No Comment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Pursuant to the findings contained herein, this Application is  Approved  Denied

Permit No: 2020-2

Sacramento County Water Agency

Signature:



Name:

MICHAEL L. PETERSON

Title:

DIRECTOR / AGENCY ENGINEER

Date:

5-19-20