

October 1, 2020

Mr. David Vang
Westlands Water District
3130 North Fresno Street
Fresno, California 93703-6056

Subject: Notice of Intent to Adopt a Negative Declaration for the Westlands Water District (WWD) Groundwater Pumping and Conveyance Project

Dear Mr. Vang:

The above public water agencies appreciate the opportunity to review and comment on the Notice of Intent to Adopt a Negative Declaration for the WWD's Groundwater Pumping and Conveyance Project (Project).

The Initial Study (IS) and Negative Declaration (ND) were prepared pursuant to the California Environmental Quality Act (CEQA) by the WWD as the Lead Agency. The proposed Project would include a five-year Warren Act Contract between the District and United States Bureau of Reclamation which would allow WWD to introduce up to 30,000 AFY, or up to 150,000 AF local of local groundwater into the San Luis Canal over the five-year life of the Project (2020-2025); specifically, years in which the WWD's Central Valley Water Project (CVP) allocation is 20 percent or less. The proposed Project would involve four main components: groundwater pumping, water conveyance in San Luis Canal (SLC), ground subsidence monitoring, and water quality monitoring. The State Water Contractors (SWC) has the following general comments:

SWP Water Quality Impacts

Surface water quality changes resulting due to this Project are important because proposed pump-ins in this Project would use the SLC for conveyance and SLC is a joint-use facility that conveys SWP water. As such, introducing water with a lower quality could alter the water quality in the SLC and adversely impact the SWP contractors. Historically, this pump-in program has been viewed as a mechanism to increase water supply by improving water quality of groundwater supplies that are sub-optimal for agricultural use through dilution. The SWC member agencies continue to have concern regarding the possible effects this Project could have on the quality of the SWP deliveries downstream. The potential to introduce water with significant TDS and arsenic can be particularly burdensome on our municipal water suppliers. In addition, the recent heightened concerns on PFOA and PFOS adds new constituents of concern for municipal water supplies throughout the State. One-time screening of wells, at the beginning of the program, is not sufficient. Rather, a routine testing and evaluation of the water quality needs to occur throughout this Project. We request that WWD, as part of its CEQA mitigation, commit to comply with the DWR Facilitation Group protocols and the DWR Water Quality Policy and Implementation Process for Acceptance of Non-Project Water into the SWP.

In addition, due to the close proximity and downstream position of a SWC member agency, the time available to quickly react to degrading water quality is minimal, which presents a real risk of delivering water exceeding State drinking water standards to individual homes. We note that conventional surface water treatment plants have no capacity to remove mineral constituents typically found in groundwater. Therefore, if unacceptable water quality is discovered at the water treatment plant, the plant would need to shut down and remain shut down while the considerable volume of impacted water within the California Aqueduct is purged resulting in a potentially significant water supply impact to the SWC members.

It is important to have frequent and regular water quality monitoring at individual wells and not just at the Laterals or integration facilities. Currently, it does not appear that water quality data from each individual wells that will be used in the pump-in program will be monitored according to the draft Water Quality Monitoring Plan included in the IS. It is concerning that the Water Quality Monitoring Plan is not finalized prior to the CEQA review of the proposed Project. The monitoring plan should include proposed sampling and analysis plan for emerging constituents of concerns (e.g. PFAS) and should be finalized and integrated into the project approvals, including the mitigation.

The Appendix A tables should be revised to be consistent with Title 22 CCR, including adopting the recommended secondary MCLs for TDS, specific conductance, chloride, and sulfate. Although, the Project lists 88 existing water integration locations along the SLC and approximately 117 operating groundwater wells, additional wells and water integration locations could be added to the list if they meet the criteria from Appendix A. It is concerning that the CEQA review was conducted without fully identifying all the participating wells in this Project. This information is critical for SWC members to ensure the Project does not have adverse impacts on water quality for SWP uses including drinking water for millions of Californians.

Structural and Operation Impacts to the SWP

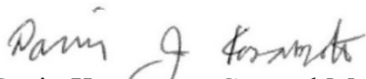
Since the last proposed WWD pump-in proposal, there has been a quantitative study on the location, extent, and causes of the San Luis Canal/California Aqueduct subsidence (Reference DWR's 2017 California Aqueduct Study and 2019 Supplemental Report). From these recent studies, it is clear that subsidence problems are most acute in sections of the San Luis Canal in the direct vicinity of this Project. In addition, subsidence rates greatly increase during times of drought – which is the intended pumping period for the proposed pump-in program. To date, subsidence has reduced the Canal/Aqueduct's carrying capacity by up to 20%. Continued and/or increased groundwater pumping in the vicinity of the San Luis canal as part of this pump-in program cannot do anything but exacerbate the subsidence issue.

DWR has also estimated that remediation of the subsidence issue (extensive construction) will cost hundreds of million in the near-term and potentially up to \$2B in the long-term. Faced with such a detrimental infrastructure and operational liability/impact, it is imperative that this Project does not cause additional subsidence damage to CVP/SWP facilities. Therefore, we request that no wells capable of influencing subsidence around or under the San Luis canal be used in this pump-in program.

A subsidence monitoring program will be a necessity for the proposed Project. The benchmark used to evaluate what is an "acceptable" level is critical as is the time period of the monitoring since subsidence effects from this Project may not occur until many years after this Project's conclusion (and termination of monitoring) and it would be too late to reduce/stop the progression. However, for the record, we currently cannot foresee an "acceptable" amount of additional subsidence caused by this Project.

WWD is facilitating the proposed pump-in program, conveying the water and responsible for monitoring. Therefore, WWD is responsible for the water supply, water quality and subsidence impacts associated with this Project, irrespective of ownership of the wells participating in this Project. We request that WWD accept and address our comments to avoid impacts to the SWP water supply, water quality and facilities due to this Project.

Sincerely,



Darin Kasamoto, General Manager
San Gabriel Valley Municipal Water District



Mark S. Krause, General Manager
Desert Water Agency



Roxanne Holmes, General Manager
Crestline-Lake Arrowhead Water Agency



Heather Dyer, General Manager
San Bernardino Valley MWD



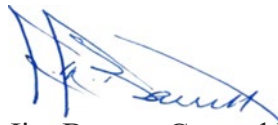
Roland Sanford, General Manager
Solano County Water Agency



Matthew Stone, General Manager
Santa Clarita Valley Water Agency



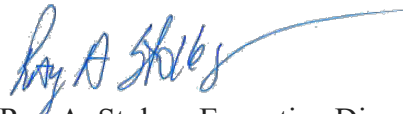
Jeff Kightlinger, General Manager
Metropolitan Water District



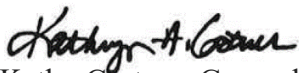
Jim Barrett, General Manager
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