THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

October 1, 2020 **VIA ELECTRONIC MAIL**

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

Dear Mr. Vang:

Notice of Intent to Adopt a Negative Declaration for the
Westlands Water District Groundwater Pumping and Conveyance Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Intent (NOI) to adopt a Negative Declaration (ND) for the Westlands Water District (District) Groundwater Pumping and Conveyance Project (Project). The Initial Study (IS) and ND was prepared pursuant to the California Environmental Quality Act (CEQA) by the District as the Lead Agency. The proposed Project will include a five-year Warren Act Contract between the District and United States Bureau of Reclamation. The contract would allow the District to introduce up to 30,000 AFY, or up to 150,000 AF over the five-year life of the Project, of local acceptable-quality groundwater into the San Luis Canal (SLC). The Project would occur in 2020-2025, specifically, in years which the District'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 the SLC, ground subsidence monitoring, and water quality monitoring. This letter contains Metropolitan's response to the public notice as a potentially affected public agency.

BACKGROUND

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Metropolitan was formed in 1928 under an enabling Act of the California Legislature. Metropolitan provides supplemental water to the southern California coastal plain to augment local water supplies and supports water conservation and development projects within its service

area. Metropolitan receives water from the California State Water Project (SWP) and from the Colorado River via the Colorado River Aqueduct. This supplemental water is delivered to member agencies through a regional network of canals, pipelines, reservoirs, treatment plants, and appurtenant facilities.

As you are aware, Metropolitan is concerned about subsidence impacting infrastructure Metropolitan relies on to convey SWP water. On May 12, 2020, Metropolitan submitted a comment letter regarding the Westside Subbasin Groundwater Sustainability Plan (GSP). Some of the comments made in this letter regarding subsidence near and around the California Aqueduct/SLC are similar to the ones expressed in the GSP comment letter because the Project occurs in an area where subsidence is already an issue. Additionally, in July 2020, Metropolitan submitted comments to the California Department of Water Resources (DWR) regarding Reclamation's San Luis Canal Non-Project Water Pump-In Program 2020 Water Quality Monitoring Plan, which is referred to on this comment letter as "Reclamation, 2020" and is included on the IS/ND as Appendix B.

SWP WATER QUALITY IMPACTS

Water quality is important to Metropolitan because the 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. Metropolitan requests that this Project be consistent with the DWR Water Quality Policy and Implementation Process for Acceptance of Non-Project Water into the State Water Project. This policy was developed to safeguard the water quality in the SWP. In addition, the policy established the Facilitation Group, an advisory group that reviews pump-in proposals and provides recommendations to DWR.

Lateral 7 receives water from several wells and it appears that water quality data from each individual well that discharges into Lateral 7 will not be part of the monitoring plan. Without current water quality data from each well discharging into Lateral 7, Metropolitan is concerned about the quality and consistency of the water being discharged into the SLC. Also of concern are the Per- and Polyfluoroalkyl Substances (PFAS) levels in water introduced into the SLC from Lateral 7. The monitoring plan states that the Project will rely on a one-time screening of Lateral 7 but the plan does not define the acceptable PFAS level. Additionally, it is unclear from the plan if each source that discharges into Lateral 7 will be analyzed for PFAS. Without this information, it will not be possible to know which well(s) need to be turned off to lower PFAS levels in Lateral 7 (page 7 Reclamation 2020).

Metropolitan requests that Appendix A tables be revised to be consistent with Title 22 CCR, including adopting the recommended secondary MCLs for TDS, specific conductance, chloride, and sulfate. In addition, the MCLs should include the correct decimal place where applicable. For example, the MCL for arsenic is 0.010 mg/L but is currently listed as 0.01 mg/L (page A-1, Westlands 2020). The revisions outlined above also apply to Tables 5 and 6 on Appendix B.

Finally, the table on page A-2 is incomplete. The revisions outlined above also apply to Tables 5 and 6 on Appendix B.

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 (pages 9 and 11, Westlands 2020). This information is critical for Metropolitan and others to ensure the Project does not have adverse impacts on water quality for millions of Californians.

Metropolitan requests that Westlands:

1) Adhere to the DWR Water Quality Policy and Implementation Process for Acceptance of Non-Project Water into the State Water Project;
2) Provide the Facilitation Group with water quality data (Title 22 analytes and constituents of concern) from each well prior to the start of pumping for the year, including wells that are pumped into Lateral 7;
3) Provide the proposed sampling and analysis plan for PFAS monitoring;
4) Provide the Facilitation Group with daily models of flow and water quality impacts when pumping into the SLC; and
5) Consult with the Facilitation Group prior to pumping groundwater with water quality that could adversely impact the water quality in the SLC.

SUBSIDENCE IMPACTS TO THE CALIFORNIA AQUEDUCT

The Project's conveyance portion is the SLC, where groundwater pumping induced subsidence is a major concern (pages 16 and 49 and Figure 5, Westlands 2020). Historic groundwater pumping has negatively impacted the SLC, especially during years with low CVP allocations when groundwater pumping increased substantially (page 51, Westlands 2020). Subsidence not only causes infrastructure damage that must be repaired at significant capital cost, but also impedes water delivery operations and downstream water agencies incur an additional $25 million annually in operation, maintenance, and power costs (Section 7.2.1 and 7.2.2 DWR 2017).

The latest DWR report on subsidence stated that during normal to wet years, subsidence along the SLC was 0.1 inches per year, indicating that this was the residual "normal" subsidence rate during periods when groundwater extractions approximate sustainable groundwater pumping levels (Section 5.4 Table 5-2 and Section 6.3, DWR 2019). During dry to critical years, the subsidence rate rose to 1.2 inches per year, 10 times the residual rate, due to the increased groundwater withdrawals to replace imported surface water (Section 5.4 Table 5-2 and Section 6.3, DWR 2019). During the extreme drought of 2014-2017, some areas experienced a rate of 7.2 inches per year, and in certain areas, over 2 feet of subsidence which is non-recoverable (Section 5.4 Table 5-2 and Section 6.3 DWR 2019).

The Project relies on the GSP's measurable objective for land subsidence at 0.1 feet/year (page 52, Westlands 2020). The residual subsidence rate should be on the order of 0.1 inches per year and not 0.1 feet per year. For example, the residual subsidence rate of 0.1 feet per year coincides with the long-term average between 1967 and 2017 (Table 6-1 DWR 2019), which includes the most recent extreme drought. If groundwater pumping is allowed at a rate that causes subsidence at the rate of 0.1 feet per year it will lead to the SLC again having insufficient freeboard, continued impacts to delivery capacity, increased power costs and another expensive repair needed to ensure a reliable water delivery facility.

DWR has proposed several rehabilitation projects for the SLC to be completed in the next few years which will cost approximately $450 million. The timeframe for these rehabilitation projects coincides with the duration of the proposed Project (2020-2025). This investment in rehabilitation projects will be wasted if land subsidence around the SLC continues to occur at the rate of 0.1 feet/year. Implementation of this Project could contribute to ongoing subsidence along the SLC; therefore, Metropolitan disagrees with the conclusion that "no impact would occur" (page 58, Westlands 2020).

Relying on the GSP for monitoring and other subsidence thresholds is inadequate because the GSP will be implemented over 20 years with 5-year intervals to reassess the plan and make modifications. The proposed Project is for immediate implementation (2020-2025) and will be over prior to the first 5-year interval of the GSP. Metropolitan requests that Westlands:

1) work with the DWR Subsidence Program to incorporate monitoring and regular reporting of land surface elevations near critical water delivery facilities and;
2) limit subsidence near critical infrastructure to 0.1 inches per year to protect the SLC.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Jolene Ditmar at (213) 217-6184 or jditmar@mwdh2o.com.

Very truly yours,

Digitally signed by Jennifer Harriger
DN: cn=Jennifer Harriger, o, ou, email=jharriger@mwdh2o.com, c=US
Date: 2020.10.01 14:22:33 -07'00'

Jennifer Harriger
Unit Manager, Environmental Planning

Enclosures (Literature Cited)

JD:rdl
Sharepoint\Westlands Water District\ NOI ND Groundwater Pumping and Conveyance Project

Literature Cited

California Natural Resources Agency Department of Water Resources (DWR). 2017. California Aqueduct Subsidence Study. Available from: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Engineering-And-Construction/Files/Subsidence/Aqueduct_Subsidence_Study-Accessibility_Compatibility.pdf?la=en&hash=8B822EF535EACA58D36F2E65624AD5CF393E0BE7

California Natural Resources Agency Department of Water Resources (DWR). 2019. California Aqueduct Subsidence Study: Supplemental Report. Available from: https://water.ca.gov/Programs/Engineering-And-Construction/Subsidence

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Westlands Water District (Westlands). 2020. Draft Initial Study/Negative Declaration Westlands Water District Groundwater Pumping and Conveyance Project. September 2020. Available from: https://cs.westlandswater.org/resources/resources_files/misc/Environmental_Docs/202009/20200901-wwd-slc-pump-in-program-public-draft.pdf