

DEPARTMENT OF WATER RESOURCES

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



Governor's Office of Planning & Research

Jul 17 2020**STATE CLEARINGHOUSE**

July 16, 2020

Mr. Tim Ashlock
Buena Vista Water Storage District
P.O. Box 756
Buttonwillow, California 93206

SCH# 2020060315, Notice of Preparation and Initial Study for the Palms Groundwater Recovery Project EIR

Dear Mr. Ashlock:

The California Department of Water Resources (DWR) State Water Project Analysis Office (SWPAO) and Division of Operations and Maintenance (O&M) have reviewed the Buena Vista Water Storage District's Notice of Preparation and Initial Study for the proposed Palms Groundwater Recovery Project (Recovery Project) and have the following comments. DWR is providing these comments pursuant to DWR's regulatory responsibilities under Cal. Code Regs. Tit. 23, § 600 et seq. and Cal. Code Regs. Tit. 14, § 15096.

Project Description

The Buena Vista Water Storage District (BVWSD) has a conjunctive management which includes groundwater recharge and groundwater water banking. The Recovery Project would extract water banked within the District, including but not limited to water recharged in District canals and the Palms Groundwater Banking Project (Palms Project). The extracted water would be distributed to BVWSD water users, exchanged with other water districts or sold to industrial or municipal users. The Recovery Project may discharge water into the California Aqueduct.

The Recovery Project would construct nine new wells, replace five existing wells and construct conveyance pipes. The new and replacement wells would be drilled to a depth of up to 500-feet and include an 18-inch casing. Approximately 11.9 miles of conveyance pipe would be installed to connect the new and replacement wells to the BVWSD's existing turnout at the California Aqueduct at BV8.

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Specific Comments

1.4.2 Project Facilities and Construction

Section 1.4.2 states, “[t]he water pipelines will connect to the District’s existing turnout at the California Aqueduct at BV8. BV8 can be used to either input water to the Aqueduct or to withdraw water from the Aqueduct.”

According to DWR records, the BV-8 turnout is not currently a turn-in, therefore it is not able to input water. The EIR needs to provide supporting evidence that the current BV-8 turnout is a turn-in/turnout. If the Recovery Project needs to modify BV-8 to a turn-in/turnout, that action needs to be added to the Project Facilities and Construction section. In addition, BVWSD will need permission from DWR to make any such modifications.

1.5 AGENCY REVIEW AND APPROVALS

The Recovery Project may require multiple approvals from DWR. If a modification at turnout at the California Aqueduct at BV8, BVWSD will need permission from DWR to make the modification. In addition, as the NOP/IS indicates, DWR approval is required to pump into the California Aqueduct. This is accomplished through a turnout agreement which must be executed prior to connecting the proposed wells to the SWP.

2.7 Geology and Soils and 2.71 Environmental Setting

The NOP/IS states that subsidence which impacts infrastructure in the Recovery Project area has not been observed. The Recovery Project is within Basin 5-022 and the Buena Vista Groundwater Sustainability Agency (BVGSA) jurisdiction. The Sustainable Groundwater Management Act (SGMA) classifies Basin 5-022 as critically over drafted.

The NOP/IS subsidence analysis focuses on the extraction wells, explaining that because the BVGSA discourages groundwater extraction from beneath E-clay, recovery wells constructed as part of the Recovery Project will not be constructed below the E-clay. The analysis concludes, “[g]iven that the range of groundwater elevations expected during implementation of the Recovery Project will be within the range of elevations that has been experienced in the past, the risk of subsidence which result in damage to infrastructure is less-than-significant and these topics will not be evaluated further in the EIR.”

DWR finds the subsidence evaluation in the NOP/IS inadequate for our responsible agency purposes. DWR requests the EIR include a Geology and Soils section which includes the reports and analysis which are the basis for the conclusion that, due to the project design feature where recovery wells would not be constructed below the E-clay, the risk of subsidence in Basin 5-022 is less than significant.

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Please provide DWR with a copy of any subsequent project environmental or other documentation when it becomes available for public review by sending the document to:

Pedro Villalobos, Chief
State Water Project Analysis Office
Department of Water Resources
1416 Ninth Street, Suite 1620
Sacramento, California 95814

and

Donald Walker, Chief
Project Management
Operations and Maintenance Division
Department of Water Resources
1416 Ninth Street, Room 641-3
Sacramento, California 95814

Thank you for the opportunity to comment on the project. If you have any questions, please contact Pedro Villalobos at (916) 653-4313 or Pedro.Villalobos@water.ca.gov.

Sincerely,

nancy finch

Nancy Finch
Senior Attorney
Office of the Chief Counsel
Department of Water Resources
1416 Ninth Street, Room 1118
Sacramento, California 95814
Phone (916) 653-6840
Fax (916) 653-0952
Nancy.Finch@water.ca.gov

bcc: Lincoln King
Terri Ely
Shannon McDaniel
Scott Williams
Tamee Yokota
Casey Pancaro