



November 30, 2021

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Nick Keller, Interim General Manager
Saucelito Irrigation District
130 North Garden Street
Visalia, CA 93277

**Subject: Initial Study/Mitigated Negative Declaration (IS/MND) for the Old Deer Creek Water Bank Project, Tulare County
SCH# 2021110003**

Dear Mr. Keller:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Saucelito Irrigation District (SID), acting as Lead Agency, has prepared and circulated an Initial Study/Mitigated Negative Declaration (IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The Project proposes to develop and operate up to 50 acres of recharge basins for banking water and associated facilities, which will be designed, constructed, operated, and monitored by Capinero. The Project site is currently walnut orchards and will be cleared and developed in three phases with a pipeline going north to south for a distance of approximately one mile, connecting to an existing SID mainline along Avenue 120. Please note the Project site is adjacent to the Teapot Dome Disposal Site (SWIS No. 54-AA-0004), located at 21063 Avenue 128, in Porterville, California.

The IS/MND states there is a concern that Project recharge water could perch on fine grained layers and that this perched water might migrate beneath the Teapot Dome Disposal Site. If Project monitoring indicates that unacceptable mounding is occurring, Capinero may elect to install dry wells within the Project recharge basins to drain perched water down to the upper unconfined aquifer.

Recharge Operations: It is anticipated that the Project will primarily bank Friant water. All phases of the Project will convey and bank water from the Friant-Kern Canal (FKC) through SID's turnout from the FKC through the existing pump station and be pumped

through the new (or improved) pipeline facility to the recharge basin site. In all cases, Capinero's ability to divert and convey water will be contingent on approval from SID to ensure that Capinero's operations do not impair SID operations and comply with SID policies, rules, and regulations.

Recovery Operations: The Project will not include construction of recovery wells. There will also be no recovered water returned to the FKC. All banked water recovery will take place through in-ground transfers.

Monitoring and Operational Constraint Plan (MOCP): The Project will be designed, operated, and monitored in a manner to ensure that the beneficial effects of the Project are maximized while preventing significant unacceptable impacts to the aquifer, groundwater levels, groundwater quality, the FKC, or adjacent landowners relative to conditions that would have occurred absent the Project. A Monitoring Committee will be formed to ensure that district interests, adjacent landowners and FKC interests are protected.

Ground Water Monitoring: Ground water monitoring will involve water level monitoring, baseline water quality sampling, monitoring of each phase of basin construction and operation, annual monitoring, and water accounting and monitoring.

COMMENTS

Since the Project site is located adjacent to the Teapot Dome Disposal Site, and perched water may migrate beneath the landfill, the Lead Agency should verify whether the adjacent landfill area is lined or unlined and should also consider the possibility that the landfill could potentially leach into the water recharge basins.

In addition, although the site is currently active, Postclosure Land Use pursuant to Title 27, California Code of Regulations (27 CCR), section 21190 may apply. Please see CalRecycle's Postclosure Land Use advisory for more information:

<https://www.calrecycle.ca.gov/lea/advisories/51>

Will any of the proposed pipelines or other parts of the Project be within the permitted boundary of the Teapot Dome Disposal Site? Will any modifications need to be made to the current landfill permitted boundary or disposal footprint, relocation or impacts (water intrusion) to any landfill gas monitoring wells, etc.? Please consider and analyze any and all impacts to the Teapot Dome Disposal Site.

Solid Waste Regulatory Oversight

The Tulare County Department of Health Services, Division of Environmental Health is the Local Enforcement Agency (LEA) for Tulare County and responsible for providing regulatory oversight of solid waste handling activities, including inspections, permitting,

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and postclosure land use. Please contact the LEA, Jessica Gocke at (559) 624-7400 to discuss any potential impacts to the Teapot Dome Disposal Site as described in the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the IS/MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent documents, Mitigation Monitoring and Reporting Program, Public Notices, and any Notices of Determination for this Project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at (916) 341-6772 or joy.isaacson@calrecycle.ca.gov.

Sincerely,



Joy Isaacson
Environmental Scientist
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

cc: Jessica Gocke, Tulare County LEA
Amy Wilson, Provost & Pritchard Consulting
Bill Hereth, CalRecycle Engineering & Support Branch
Kristen Gomes, Central Valley RWQCB