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memorandum

date	July 29, 2022
to	Stephanie Anagnonson, Director of Water and Natural Resources, Madera County
cc	John Davids and Chad Tienken, Davids Engineering
from	Todd Gordon, ESA
subject	California Environmental Quality Act (CEQA) Notice of Exemption (NOE), for the Madera County Temporary Emergency Groundwater Recharge Project

Introduction

This memorandum was prepared by ESA to support a Categorical Exemption (CatEx) Under CEQA for the Madera County Temporary Emergency Groundwater Recharge Project (proposed Project).

The following presents information in support of filing a Class 3 Categorical Exemption per CEQA Guidelines section 15303 for New Construction or Conversion of Small Structures. Section 15303 Class 3 exempts from detailed environmental review the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel.

Included in this memorandum is a description of the proposed Project, and the information supporting how the proposed Project effects would not meet any of the applicable exceptions included in CEQA Guidelines section 15300.2.

Project Description

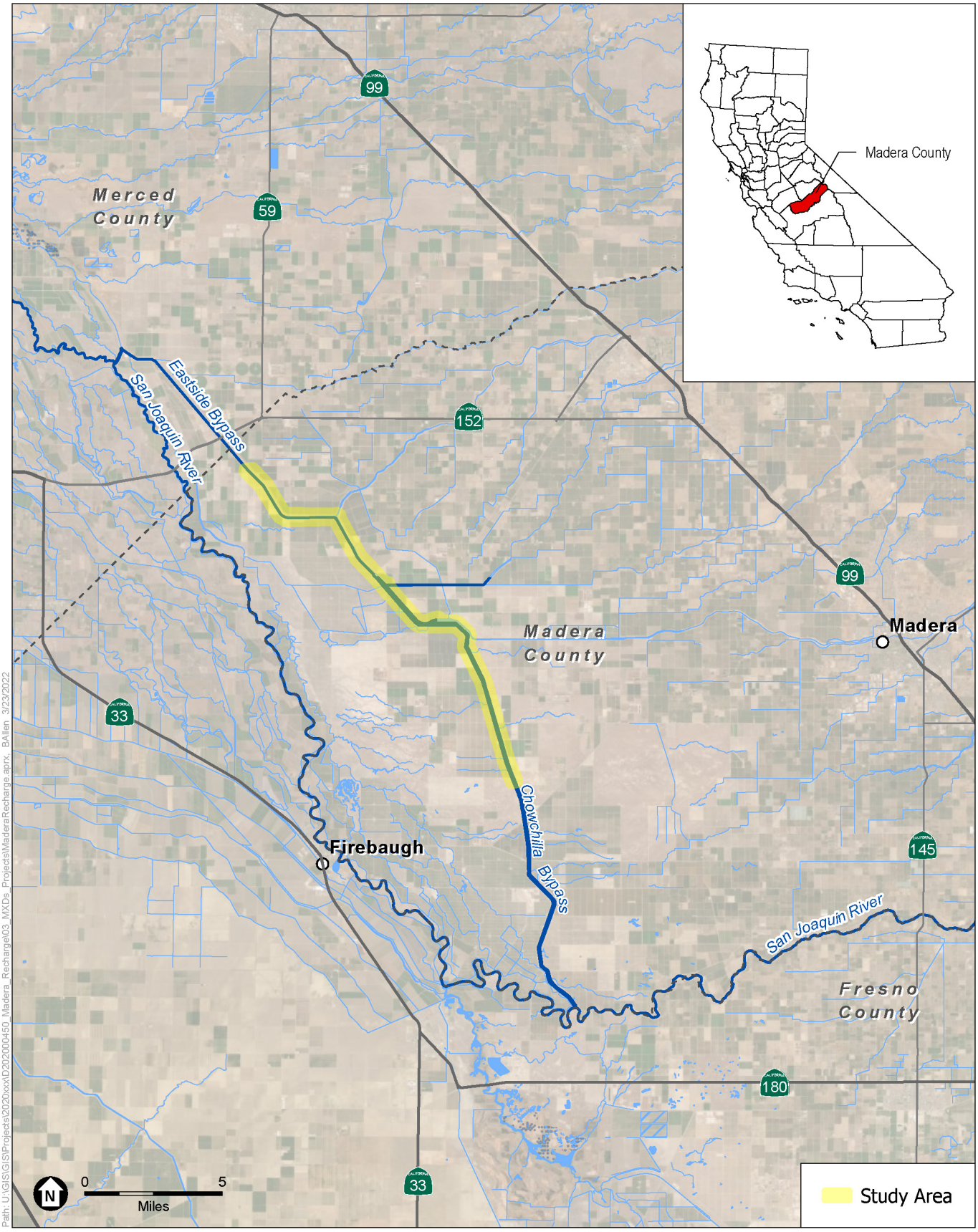
The objective of the proposed Project is to divert flood flows from the Chowchilla & Eastside Bypass (Bypass) for groundwater recharge using temporary pumping and conveyance systems. Diverting flood flows will also relieve pressure on the existing flood control system (Chowchilla and Eastside flood control facilities). The proposed Project is intended to be a temporary solution for groundwater recharge in the underlying critically overdrafted Chowchilla and Madera Subbasins until the County's and/or private longer-term strategic recharge project can be completed.

During years of above average precipitation, non-contracted water sourced from high flow events is released into the San Joaquin River (SJR). When the lower reaches of the SJR are at capacity, water is then diverted from those

lower reaches into the man-made Bypass, located in the unincorporated southwest portion of Madera County, via the bifurcation structure operated by the Lower San Joaquin Levee Control District (**Figure 1**). The Chowchilla Bypass flows northwesterly for approximately 15 miles before joining the Eastside Bypass which continues northwesterly for another 35 miles before flowing back into the San Joaquin River.

The proposed Project would divert unappropriated high flows using a total of up to 18 new points of diversion (PODs), to be temporarily placed along the banks of the Bypass, to divert flows from the Bypass during precipitation/flood events. The PODs would each consist of 4-5 trailer-mounted pump assemblies deployed outside of the Bypass levee banks and each connected to an intake line of PVC and metal pipes.. Using mobile trailer pumps and removable pipes will facilitate flexible and rapid deployment of the PODs in response to predicted precipitation/flood events. The POD intakes that would extend into the Bypass would consist of suction hoses with floating fish screens, each anchored in the channel with rock gabions. The intakes would be routed from the channel, up the Bypass levee slope, under a ramp (with non-slip surfaces, such as gravel or otherwise) placed across the Bypass levee crest, and down the outboard Bypass levee slope to the pumps that draw flows from the channel. Flows would then enter into a temporary network of conveyance pipelines placed in the uplands beyond.. The maximum rate of diversion for each POD pipeline is approximately 5 cubic feet per second (cfs), for a total instantaneous diversion rate of 360 cfs (18 PODs x 5 cfs/pipe x 4 pipes/POD). The conveyance pipeline network would convey the diverted flood flows to nearby recharge ponding areas and farm recharge areas within Madera County. The landowners will manage the water that ponds and infiltrates on their property.

Madera County, supported by a consulting team of engineers and environmental professionals, evaluated a total of approximately 40 potential POD locations for site suitability and operational considerations, maximal groundwater recharge benefit, and minimal environmental impact. The POD evaluation exercise was conducted in support of both a temporary emergency solution (the proposed Project) and the longer-term solution. Of the 40 potential PODs evaluated, a subset of 18 PODs are currently being proposed for temporary use under the proposed Project.



SOURCE: Maxar 2021; ESRI, 2012; ESA, 2022

Madera Recharge Study

Figure 1
Regional Location

Project Location and Surrounding Land Uses

The proposed Project is located within the unincorporated southwest portion of Madera County. The locations for each of the 18 temporary POD locations are shown on **Figure 2**.

Lands to the north, east, south, and west consist of agricultural uses (orchards, vineyards, and row crops). Cattle are grazed within the Bypass from adjacent stock pens.

The PODs would be located along the Bypass, which is a man-made, earthen canal generally about 800-feet wide and used to manage flows in the SJR from about 6 miles east of Mendota, in a northerly direction where diverted flows are received by the Eastside Bypass. The SJR is eventually tributary to the Pacific Ocean (via the Suisun and San Francisco bays). Aside from the Bypass, there are no other aquatic features - wetland or otherwise - within the vicinity of the PODs. The design channel capacity of the Chowchilla Bypass is approximately 12,000 cubic feet per second (cfs). The substrate soils within the Bypass are highly permeable. The Chowchilla Bifurcation Structure is a gated structure that controls the proportion of flood flows between the Chowchilla Bypass and the SJR, Reach 2B. The bifurcation structure has a drop (plunge pool) on the downstream side in both the San Joaquin River and Chowchilla Bypass, and has no fish passage facilities. The Chowchilla Bifurcation Structure is operated to keep flows in the SJR Reach 2B at a level less than 2,500 cfs because of SJR channel design capacity limitations.

Construction Methods and Equipment

Installation of the PODs and conveyance pipeline network would be conducted by field crews using hand-held tools, and driving light- or heavy-duty pickup trucks towing the pump trailers with pipe materials and equipment. Each POD assembly would consist of three fundamental elements: 1) the intake pipeline, 2) the 4-5 temporary trailer pumps, and 3) the conveyance pipeline. Crews would access the PODs by driving along existing levee access roads and would deploy, and later remove, each individual POD assembly one at a time (see Schedule section for a description of the typical deployment/removal episode timing). Assembly of the PODs would be done by hand and occur 'in the dry' along either the levee crests and their access roads or along the dry gently sloping canal banks above the wetted perimeter of the canal. No welding would be required and all pipe connections would be done using cam- or ring-lock connections for metal pipe, or PVC connectors for PVC pipes.

The intake pipelines would be manually moved to their locations adjacent and extending into the anticipated flood stage water line. Intake pipeline installation would occur within the active wet channel prior to bypass flows and include 2 rock gabion weight anchors at the pipe terminus and, if determined necessary, additional anchors at intervals of approximately 100-feet to help keep the intakes in position. Temporary metal stakes driven 36-inches deep could be used when necessary to help intake pipes stay in position. No permanently installed facilities would be placed within the active wet channel, and no dewatering or flow diversion would be required. The modified criteria for small fish screens where diversion flow is less than 40 cfs[1] would be employed on each intake pipe, as the maximum rate of diversion for each POD is approximately 20 cfs.

[1] National Marine Fisheries Service. 1997. Fish Screening Criteria for Anadromous Salmonids. Southwest Region. https://media.fisheries.noaa.gov/dam-migration/southwest_region_1997_fish_screen_design_criteria.pdf. Accessed via web on 6 March 2022.

SOURCE: Maxar, 2021; Esri, 2022; ESA, 2022

Madera Recharge Study

Figure 2
Point of Diversion Locations

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Each POD location would include 4-5 temporary trailer pumps that would be deployed in a single location outside of the Bypass and levee. Assembling the trailer pumps would require drive-and-crush from established dirt roads (generally the levee access roads) and otherwise be installed with limited, temporary soil crush disturbance resulting from crews walking and placing materials on the ground for the temporary trailers and pipes. Each temporary trailer pump would be fitted with secondary containment and fueling would be done at the temporary pump location, outside of the Bypass channel, using a truck-mounted fuel pump with a spill containment kit.

Installation of the conveyance pipeline network would involve crews in trucks driving along existing levee access roads, private agricultural roads, or public roads; the temporary conveyance pipeline network would be installed on the nearby agricultural lands, with temporary crush-type soil disturbance resulting from crews walking and placing materials on the agricultural lands to create the conveyance pipeline network.

POD Assembly and Conveyance Pipeline Network Components

Each POD assembly would primarily consist of the following materials described below.

Intake pipelines, which would extend from the intake within the active channel to the temporary trailer-mounted pumps outside of the Bypass, would each include the following materials:

- Fish screens (which comply with National Marine Fisheries Service's modified criteria for small fish screens where diversion flow is < 40 cfs);
- Suction hoses (12 inches diameter max); and
- Aluminum pipe ('ringlock style mainline' type; 12 inches diameter max.).
- 2 or more rock gabion anchors (approximately 3 feet cubes) placed along each intake pipeline.

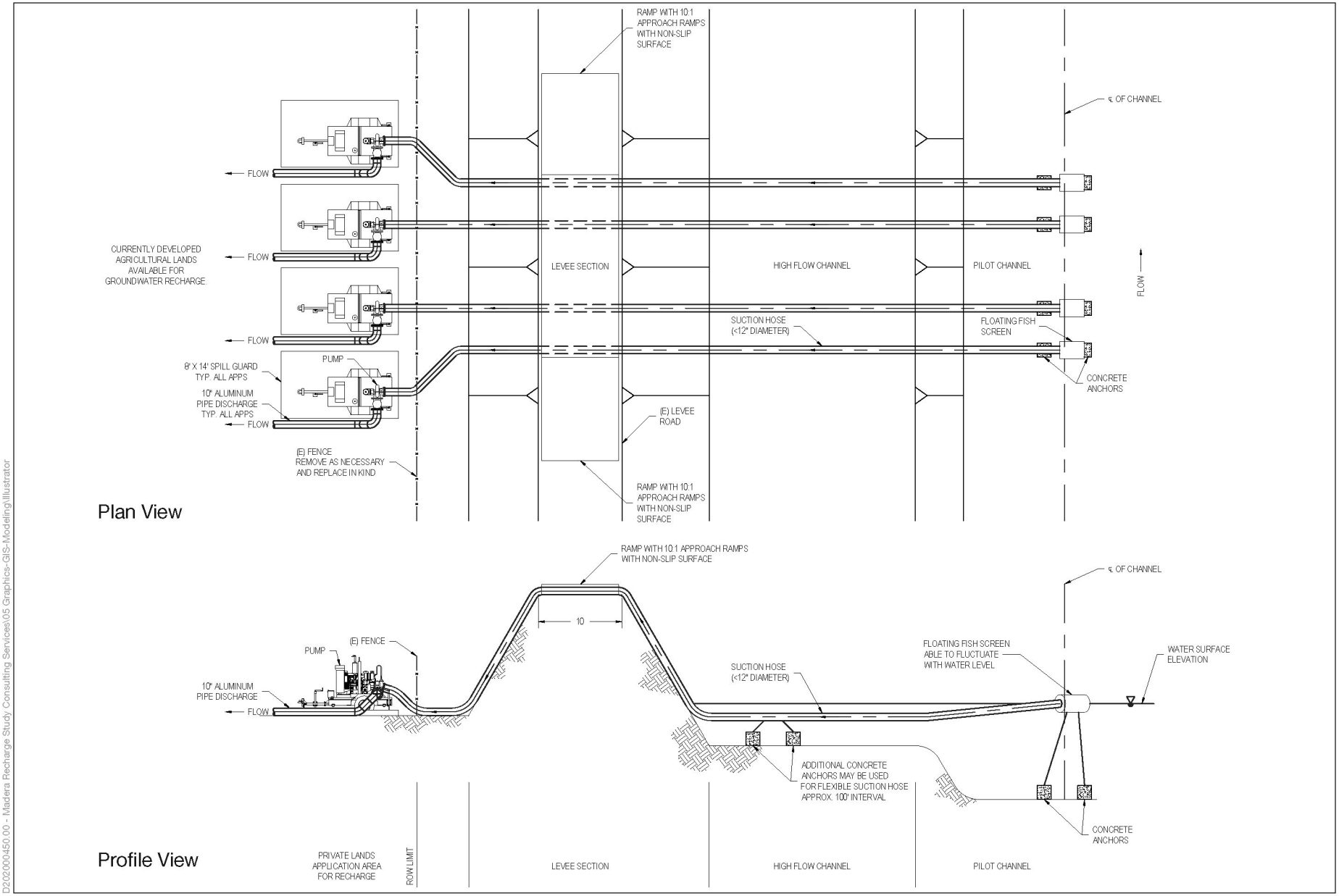
Trailer-mounted pumps, which would be deployed in 'uplands' outside of the Bypass and levee, would each include the following materials:

- Four to five trailer-mounted pumps ('DV150' or '6RB' type – one or both may be used; 15 feet x 7 feet, max. per larger 6RB type);
- Spillguard containment basin, positioned below each of the trailer-mounted pumps including trailer ('E-CONTAIN' type; 4 feet x 8 feet, max.);

The **conveyance pipeline network**, which would be installed in 'uplands' beyond the Bypass and extending inland from the pumps, would generally consist of the following components:

- Aluminum pipe ('ringlock style mainline' type; 12 inches diameter max.);
- Discharge hose(s);
- Gate Valves; and
- Flow Meters.

Figure 3 illustrates the anticipated POD assemblies in plan view and cross section.



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SOURCE: Davids Engineering, Inc., 2022

Madera Recharge Study

Figure 3
Temporary POD Design

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Operations and Maintenance:

Once assembled and placed on-site prior to the flood season the temporary POD pump systems will be maintained in approximately the same location for the duration of the diversion season. The pump systems may be slightly adjusted from their original specified location, if determined necessary, in order to avoid any erosion or unstable soil conditions, or to maximize pump efficacy in diverting flood flows. Any such adjustments would be done in coordination with the levee/Reclamation District, and in a manner that avoids disturbance to any known sensitive biological resources such as nesting birds or drainage channels/swales.

PODs would be manually operated (turned on and off just before/after each predicted flood event, which would be monitored via weather data and coordinated with the levee/Reclamation District) on-site, and would be inspected daily to ensure proper functioning and to refuel the PODs. Routine maintenance will occur every 400 hours of operation. If any POD assembly requires mechanical maintenance, it would be conducted off-site, in between deployment episodes. The temporary conveyance pipeline network would also be periodically inspected to ensure proper functioning. Other activities such as maintenance or replacement of pipe sections or connectors, if needed, would occur on-site.

Final removal of the temporary PODs and conveyance pipeline network would occur after the last precipitation/flood event of the season, and would be done by field crews generally in the same manner as installation (described in Construction Methods above).

Schedule

The proposed Project – including the installation and use of temporary PODs and the temporary conveyance pipeline network - could be implemented as soon as environmental permits and approvals are obtained, and as early as Summer 2022 if there are any flood flows diverted to the Bypass from a storm event.

The 18 temporary POD assemblies can each be compiled or broken down on-site in approximately 4 hours; a total of approximately 36 hours would be required to deploy or remove all 18 PODs. The conveyance pipeline network would require approximately 10 days to install, would remain in-place for the duration of the flood season (approximately October 1 to May 30, or approximately 8 months, of each year maximum), and would be capped (at open ends) when not connected to the PODs and actively being used to convey flows. The temporary PODs and the temporary conveyance pipeline network would be completely removed during the entire dry season.

Overall, the County expects to implement the proposed Project and operate the temporary PODs and conveyance pipeline network for emergency recharge during the wet season, for a total of up to approximately 1-3 years, starting as early as summer 2022 and likely in winter 2022-2023 and through winter 2025-2026, until the long-term strategy is approved, constructed, and implemented. Based on the above, and in order to maximize flexibility and efficacy of the temporary Plan to capture several ‘wet’ years (which are unpredictable and may not occur for several years in the future), the County is seeking a ‘Standard’ (i.e., 5-year, through 2027) CDFW Streambed Alteration Agreement (SAA).

Best Management Practices (BMPs)

The following BMPs shall be incorporated into the construction contract for the proposed Project to minimize potential releases of soils or sediments, hazardous materials spills, and minimize air quality emissions:

- All equipment and vehicles would be checked daily for the prevention of material leaks. Staging/storage areas for equipment, materials, fuels, and lubricants would be located as far away as possible from open water. A spill kit would be present on site in the event of fuel leaks or spills.
- All fueling of equipment would be done more than 50 feet away from open water and with a spill containment kit present.
- If the potential exists for loose sediment to runoff into nearby waterways, use straw waddles or other sediment control measure to prevent sediment runoff.
- All areas would be cleaned of any trash and debris and returned, as close as possible, to the condition prior to initiation of proposed Project activities.
- To minimize air quality impacts, shut off all equipment not in use. If idling is necessary construction or operation, plan operations to limit idling time as much as practicable.
- Limit equipment to 15 mph on site to reduce dust produced by equipment.

CEQA Exemption Discussion

Section 21084 of the Public Resources Code requires the CEQA Guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. A brief discussion of the applicable Class 3 exemption under Sections 15303 and CatEx exceptions per Section 15300.2 (Exceptions) of the CEQA Guidelines are discussed below.

CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

(a) One single-family residence, or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.

(b) A duplex or similar multi-family residential structure, totaling no more than four dwelling units. In urbanized areas, this exemption applies to apartments, duplexes and similar structures designed for not more than six dwelling units.

(c) A store, motel, office, restaurant or similar structure not involving the use of significant amounts of hazardous substances, and not exceeding 2500 square feet in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.

(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.

(e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

(f) An accessory steam sterilization unit for the treatment of medical waste at a facility occupied by a medical waste generator, provided that the unit is installed and operated in accordance with the Medical Waste Management Act (Section 117600, et seq., of the Health and Safety Code) and accepts no offsite waste.

Justification for Categorical Exemption

The proposed Project involves the temporary deployment of up to 18 PODs to divert water for infiltration and storage in the underlying subbasins. For these reasons, the proposed Project meets the conditions for a Class 3 Categorical Exemption because it involves the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures.

Exceptions to CatEx

CEQA Guidelines Section 15300.2 lists project types for which Categorical Exemptions may not apply. The following section discusses why the proposed Project is not subject to any of the exceptions, such that a CatEx is appropriate.

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located–a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

(a) Location

The Project area for the Proposed Project is located near potentially suitable habitat for State listed Swainson's hawks (*Buteo swainsoni*) and burrowing owl (*Athene cunicularia*) (see discussion of Biological Resources, below). However, the work activities associated with the proposed Project would be relatively small, temporary in nature, and include BMPs, as described in the BMPs section above. Therefore, impacts on sensitive environmental resources of hazardous or critical concern would not occur. Therefore, the Proposed Project is not subject to this exception.

(b) Cumulative Impacts

No known successive projects of the same type and place would occur concurrent with the proposed Project on the same sites. Therefore, no long-term or growth-inducing impacts would result, and all temporary construction impacts would be less than significant with incorporation of BMPs into the construction contract. The proposed Project would not have a cumulative contribution to similar, successive projects in the Project area. Therefore, the proposed Project is not subject to this exception.

(c) Significant Effect

The PODs are located within the unincorporated southwest portion of Madera County, specifically, the Chowchilla, Madera, and Delta-Mendota groundwater Subbasins. The PODs would be located along the Chowchilla and Eastside Bypass and the diverted water would be infiltrated on adjacent agricultural lands. No unusual circumstances have been identified in or around the proposed Project sites that would result in significant environmental impacts. Therefore, the proposed Project is not subject to this exception.

(d) Scenic Highways

The proposed Project is located within the unincorporated southwest portion of Madera County along the Chowchilla and Eastside Bypass and the diverted water would be infiltrated on adjacent agricultural lands, and not located near an officially designated scenic highway. Development of the proposed Project would not result in damage to scenic resources within a highway officially designated as a scenic highway. Therefore, the proposed Project is not subject to this exception.

(e) Hazardous Waste Sites

The PODs of the proposed Project are not located in an area where any known hazardous wastes are present and is not located on a site which is included on any list pursuant to Section 65962.5 of the Government Code. As such, the proposed Project presents no risk to human health or the environment. Therefore, the proposed Project is not subject to this exception.

(f) Historic Resource.

As discussed under the environmental analysis section, there are no architectural or structural resources on the POD sites that qualify as historical resources, as defined in CEQA Guidelines Section 15064.5. In addition, it was determined that no known archaeological resources or human remains are present within the POD sites. Therefore, the proposed Project would not impact a cultural and historical resource of critical concern, nor result significant effect to cultural or historical resources and the proposed Project is not subject to this exception.

Environmental Analysis

The nature of the proposed Project activities including the use of 18 PODs to divert water from the Chowchilla and Eastside Bypass during high flow events using temporary pumping and conveyance systems and infiltrate the diverted water on nearby recharge ponding areas and farm recharge areas within Madera County for storage in the underlying Chowchilla, Madera, and Delta-Mendota Subbasins.

The proposed Project would ultimately result in no change in land use, no increase in population, housing or economic changes would occur because the proposed Project would not induce new growth, no destruction of agricultural land would occur, and no increase in demand for public utilities or services such as police, fire, schools, parks, water, wastewater, or solid waste would result from the proposed Project.

Biological resources, cultural and historic resources, air quality and greenhouse gas emissions, and hydrology and water quality are relevant to the proposed Project and are discussed below.

Biological Resources

ESA queried the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Rare Plant Inventory, and U.S Fish and Wildlife Service (USFWS) Information for Planning and Consulting (IPaC). ESA also reviewed eBird data for the proposed Project site, the USFWS critical habitat for threatened and endangered species in the proposed Project vicinity, and current and historical Google Earth aerial imagery of the proposed Project site to assess the presence of suitable habitat for special-status species.

Site visits were performed on 6-7 December 2021 and on 21 March 2022 to document the biological resources and conditions of POD locations, and some of these POD locations were adjusted to avoid potentially sensitive resources (e.g., potential nest trees) or to accommodate design considerations. The Project site is surrounded by agricultural land use, the POD intake systems are within the Chowchilla and Eastside Bypass channel, while the pump and conveyance systems are located in the 'uplands' outside of the channel and levee. The reconnaissance surveys documented that the Bypass is characterized by a center channel largely devoid of vegetation resulting from scour, surrounded by ruderal vegetation on terraces between levees that are dominated by non-native grasses and forbs and are heavily disturbed by grazing. Vegetation was cropped low from grazing during the December and March reconnaissance surveys, making classification difficult. Occasional trees are found from PODs #18 to #21, where disused stick nests and one active raptor nest were observed in March 2022.

There is no suitable habitat within the proposed Project footprint for special-status plant species. Adult Spring-run Chinook salmon have the potential to be exposed to the proposed project and project changes during spring runs. Juvenile Spring-run Chinook salmon have the potential to be entrained into the Chowchilla and Eastside Bypass and could also be exposed to the proposed project or project changes. No suitable habitat for special-status amphibians is present in the vicinity of the proposed Project site, and patchy marginal habitats are present for some special-status mammals and reptiles. Occasional trees and bridges are present along Chowchilla Bypass as well; these features can provide cover, foraging, and nesting habitat for a variety of bird species. Burrowing owl (*Athene cunicularia*) is a CDFW SSC and the closest CNDDB occurrences are located approximately 1.8 miles to 2 miles southwest of the southern end of the Project area (POD #1) in 2006. Swainson's hawk (*Buteo swainsoni*) is a CDFW State Threatened and USFWS Bird of Conservation Concern. The closest record of nesting Swainson's hawk is from 2004, within 1.8 miles west of the Project area. Swainson's hawk breeds in California typically starting in March. There are cottonwood trees in a limited area between PODs #18 and #21, and during the March 2022 field visit, a red-tailed hawk was observed sitting in one nest tree location.

Cultural and Historical Resources

To determine the cultural resources sensitivity of the Plan PODs, ESA completed a cultural resources assessment that included background research and a surface survey. Background research included a records search at the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System on November 19, 2021 (File No. 21-454). The records search included the PODs and the immediate surrounding areas (500-foot radius). In addition, ESA reviewed historic topographic maps, aerial imagery, and geological and soils data. The purpose of the background research was to: (1) determine whether known cultural resources have been recorded within the vicinity of the proposed PODs; (2) assess the likelihood for unrecorded cultural resources to be present based on historical references and the distribution of nearby sites; and (3) develop

a context for the identification and preliminary evaluation of cultural resources. The records search consisted of an examination of the following documents:

- SSJVIC base maps (USGS Bliss Ranch, Poso Farm, and Firebaugh 7.5-minute topographic maps), to identify recorded archaeological sites and studies within and within 500-feet of the PODs.
- SSJVIC base maps (USGS Bliss Ranch, Poso Farm, and Firebaugh 7.5-minute topographic maps), to identify recorded historic-period resources of the built environment (building, structures, and objects) within and adjacent to the PODs.
- Resource Inventories: California Inventory of Historical Resources, California Historical Landmarks, Office of Historic Preservation's Built Environment Resources Directory

Records at the SSJVIC indicate that one pedestrian cultural resources survey has been completed that included the PODs and no cultural resources were identified. Three additional cultural resources surveys have been completed within a 500-foot radius. No cultural resources have been identified or recorded within the PODs or within a 500-foot radius.

ESA archaeologist Doug Alexander completed a pedestrian cultural resources survey of the PODs on December 7, 2021. No cultural resources were identified or recorded during the survey effort.

Based on the results of the background research and survey effort, no cultural resources are in the PODs and the proposed Project has a low potential to impact cultural resources. In addition, it was determined that no known archaeological resources or human remains are present within the PODs. Therefore, the proposed Project would not impact a cultural and historical resource of critical concern, and would have no effect on the environment related to cultural or historical resources.

Air Quality and Greenhouse Gases (GHG) Emissions

Implementation of the proposed Project would be temporary. The proposed Project would result in very limited vehicle trips to and from the Project area during Project activities. Because the proposed Project would not generate new regional vehicular trips and is temporary, no vehicle emissions would occur nor would long-term emissions or project-related stationary source emissions from energy consumption occur. Implementation of the proposed Project would not result in emissions of criteria air pollutants that would exceed the applicable San Joaquin Valley Air Pollution Control District (SJVAPCD) thresholds of significance. The proposed Project would not include operation of any of the types of odor-generating facilities identified by the SJVAPCD. Therefore, the proposed Project would not generate emissions of criteria air pollutants during either construction or operation that would exceed the applicable SJVAPCD thresholds of significance.

Given the short duration of the proposed Project and relatively minimal equipment being used, GHG Emissions would be substantially below the established thresholds of SJVAPCD and other agencies. Following construction, operation and maintenance of the proposed Project would occur occasionally as high flows allow for a total of up to approximately 1-3 years, starting as early as summer 2022 and likely in winter 2022-2023 and through winter 2024-2025, and the proposed Project would result in negligible increased operational emissions above baseline conditions.

Therefore, the proposed Project would have no effect on the environment related to air quality resources or GHG emissions.

Hydrology and Water Quality

The proposed Project would incorporate BMPs, as previously described, which would prevent erosion or siltation on- or off-site. Implementation of the proposed Project does not include groundwater withdrawal and the net gain of impervious surfaces would be zero. The proposed Project would result in groundwater recharge. The proposed Project would not change the existing draining patterns of the Study Area or vicinity, and, therefore would not result in erosion or siltation on site or off site, and would have no effect on the rate or amount of surface runoff and no effect on potential flooding on or off site. Implementation of BMPs would further ensure that the proposed Project would not violate any water quality or waste discharge requirements.

Therefore, the proposed Project would have a no effect on the environment related to hydrology or water quality.

Summary

The proposed Project involves the construction and operation of 18 PODs for use in emergency groundwater recharge of the underlying, critically overdrafted Chowchilla and Madera Subbasins. The Project, as proposed would have no significant environmental impact(s), and the proposed Project is categorically exempt under CEQA Guidelines Sections 15303 and would not meet any of the exceptions listed in Section 15300.2 of the CEQA Guidelines that would make the CatEx inapplicable.

Sincerely,

Todd Gordon