

# RECLAMATION

*Managing Water in the West*

## Finding of No Significant Impact

### Amendatory Contract between the United States and Conaway Preservation Group, LLC and Sacramento River Settlement Contract between the United States and the Woodland-Davis Clean Water Agency

#### FONSI 13-17-MP

Recommended by:



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## Background

In accordance with Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA), as amended, the Bureau of Reclamation (Reclamation) has prepared an Environmental Assessment (EA) for the execution of an amendatory Sacramento River Settlement Contract (Settlement Contract) between the United States and the Conaway Preservation Group, LLC (CPG), and the execution of a Settlement Contract between the United States and the Woodland-Davis Clean Water Agency (CWA). These contracts recognize the water rights changes approved by the State Water Resources Control Board (SWRCB) in 2012 authorizing the conveyance to CWA by CPG of CPG's interest in 10,000 acre feet (af) of Sacramento River water made available under CPG's state water rights licenses. The EA is dated September, 2013, and is attached and incorporated by reference.

The CWA is converting its water supply from groundwater to surface water through implementation of the Davis Woodland Water Supply Project (DWWSP). The DWWSP is intended to address issues associated with providing water for municipal and industrial (M&I) needs, including aging water systems, more stringent water quality standards and regulations, and increasing water demands within these jurisdictions. In March 2011, as a component to implement the DWWSP, the SWRCB approved a surface water right for the CWA for diversions of up to 45,000 af from the Sacramento River during January through December. The CWA permit contains standard permit Term 91, which prevents the CWA from diverting water under its permit during certain conditions when notified by the SWRCB. As a result of the Term 91 limitation, the CWA permit contains a condition providing that no water may be diverted under the permit until the CWA obtains a long-term water supply covering the Term 91 period when water is not available for diversion under the permit.

To fulfill this condition, CPG and the CWA entered into an agreement for the permanent assignment to the CWA of 10,000 af of CPG's water diverted under CPG's state water rights Licenses 904 and 5487, which is a portion of CPG's Base Supply under its Settlement Contract. The agreement assigns CPG's right to divert up to 10,000 af during the months of June, July, August and September, which are the periods in which Term 91 restrictions would normally limit the CWA's ability to divert under its own surface water permit. The agreement provides that CPG will make up for the assigned water by substituting up to 10,000 af of groundwater. When Term 91 conditions are not present, the CWA would divert under its Sacramento River water right; and pursuant to the agreement between the CWA and CPG, through the year 2039, CPG may divert any of the 10,000 af of surface water not used by the CWA.

To implement the agreement, by letter dated January 19, 2011, CPG requested that the Bureau of Reclamation (Reclamation), acting on behalf of the United States, amend CPG's existing Settlement Contract to, among other things, assign 10,000 af of Base Supply to the CWA. Also, on March 17, 2011, CPG filed Petitions for Change with the SWRCB. In the petitions, CPG asked to split its water rights License 904 into 904A and 904B and License 5487 into 5487A and 5487B and assign Licenses 904A and 5487A to the CWA. The petitions identified that the total quantity of water assigned to Licenses 904A and 5487A shall not exceed 10,000 af per year (afy) from a point of diversion located a few hundred feet downstream of CPG's currently authorized point of diversion. The place of use for Licenses 904A and

5487A would be expanded to include the CWA's service area, currently 23,950 acres, in addition to CPG's authorized places of use. The petitions also proposed that the purpose of use for Licenses 904A and 5487A would include (in addition to irrigation), municipal, industrial, fish and wildlife enhancement, and fisheries and aquaculture research. The changes would authorize diversions from the Sacramento River under Licenses 904A and 5487A for use within the CWA and CPG, in accordance with the agreement.

## **Alternatives Including Proposed Action**

### No Action Alternative

Under the No Action Alternative, Reclamation would not amend CPG's Settlement Contract and would not execute a Settlement Contract with the CWA. As a result, in order to exercise its right to divert surface water under Permit 20281, the CWA would have to secure an alternate source of long-term water supply covering those periods when water is not available for diversion under the permit, such as another water right assignment or transfer (Condition 25, Permit 20281). Demands within the CWA would continue to be met primarily by groundwater pumping within the CWA. Reclamation would continue to implement the existing Settlement Contract with CPG consistent with its existing provisions, and CPG would have no need to increase groundwater pumping to replace the permanently assigned surface water.

### Proposed Action

The Proposed Action is the execution of an amendatory Settlement Contract between the United States and CPG and the execution of a Settlement Contract between the United States and the CWA that recognize the water rights changes approved by the State Water Resources Control Board in 2012 authorizing the conveyance to CWA by CPG of CPG's interest in 10,000 af of Sacramento River water made available under CPG's state water rights licenses. CPG would not reduce its demand for water, and would pump 10,000 af of groundwater to replace the surface water during Term 91 conditions on the Sacramento River.

Table 2-1 included in the EA identifies the maximum monthly quantities of Base Supply available for diversion by the CWA pursuant to the proposed Settlement Contract with the CWA. The Settlement Contract with the CWA would contain similar terms and conditions as CPG's existing Settlement Contract with a termination date of March 31, 2045. The "service area" for CWA's Settlement Contract includes the cities of Davis and Woodland, and UC Davis, in addition to CPG, and the "purpose of use" would include M&I uses in addition to agricultural uses. CPG's amendatory Contract would retain the quantities and conditions listed in its existing Settlement Contract, less the quantities assigned to the CWA, and would add M&I uses for the purpose of fish and wildlife enhancement. Further, no crop idling or land fallowing would occur at Conaway Ranch as a result of this action.



## Public Review of the EA

The EA was released for a 30-day public review period beginning July 29, 2013 and no public comments were received.

## Findings

In accordance with NEPA, Reclamation has found that execution of an amendatory Sacramento River Settlement Contract (Settlement Contract) between the United States and the Conaway Preservation Group, LLC, and the execution of a Settlement Contract between the United States and the Woodland-Davis Clean Water Agency is not a major federal action that would significantly affect the quality of the human environment, and an Environmental Impact Statement is not required. This determination is supported by the following factors:

1. **Environmental Commitments:** The environmental commitments outlined below are adopted as part of Reclamation's final decision on the Proposed Action. An Environmental Commitments Plan will be developed and adopted prior to CPG's initiation of any ground water pumping to replace the 10,000 af of surface water assigned to CWA.

*In the event CPG (Licensee) chooses to use groundwater as a substitute for the 10,000 acre-feet of surface water assigned to Licenses 904A and 5487A, the quantity of groundwater pumped as a result of substitution for the diversions made under Licenses 904A and 5487A shall be in accordance with the following conditions. These conditions are considered to be a functional equivalent to Mitigation Measure 3.3-3 at page ES-12 in the "Davis-Woodland Water Supply Project Final Environmental Impact Report", dated October 1, 2007.*

- a. *Licensee shall, on an annual basis, identify the wells that it will use for the purpose of substituting all or a portion of the 10,000 acre-feet of surface water assigned to Licenses 904A and 5487A. The wells shall be separately metered and the meters maintained in good working condition at all times. Any well may only be used to provide substitute water at times that its well meter is working properly. Use of the wells is subject to conditions (b) through (e) below. In no case shall Licensee use the so-called "O'Connor" wells located North of Interstate 5 and between the Sacramento River and Tule Canal, as identified on the map attached as Exhibit A to the December 20, 2011 U.S. Bureau of Reclamation letter to the Division of Water Rights, for the purpose of substituting all or a portion of the 10,000 acre-feet of surface water assigned to Licenses 904A and 5487A.*
- b. *The quantity of groundwater pumped to replace the 10,000 acre-feet of surface water assigned to Licenses 904A and 5487A shall, if necessary, be adjusted by a streamflow depletion factor to be based on the results of the analysis provided for in condition (c) below to account for any additional streamflow depletion due to the additional groundwater pumping. The quantity of substitute groundwater pumped monthly by Licensee shall be reported to the State Water Board annually in the Report of Licensee, shall be separately accounted for under Licenses 904B and 5487B (no aggregate quantities shall be reported), and shall not be claimed as groundwater substitution credits under Water Code section 1011 et seq. The quantity of substitute groundwater pumped monthly by Licensee shall be reported to the U.S.*

Bureau of Reclamation (Reclamation) and Department of Water Resources (DWR) by the 30th day of the month following the month in which this groundwater is pumped.

- c. *Within one year of issuance of this amended license, and prior to pumping any groundwater to replace the 10,000 acre-feet of water assigned to Licenses 904A and 5487A, Licensee shall provide Reclamation and DWR an analysis of the change in streamflow depletion that will result from the proposed additional groundwater pumping associated with the replacement of the 10,000 acre-feet of surface water assigned to Licenses 904A and 5487A. This analysis shall be undertaken with an integrated groundwater/surface water model that can estimate the impacts of groundwater pumping on streamflow. The model shall be agreed upon by Licensee, Reclamation and DWR prior to undertaking the analysis. Licensee will make all information from its past, current, and future well construction and geologic exploration activities available to Reclamation, DWR and the State Water Board to assist in the evaluation of the model's suitability for this analysis.*
- d. *Licensee shall, within one year of issuance of this amended license, and prior to pumping any groundwater to replace the 10,000 acre-feet of water assigned to Licenses 904A and 5487A, (1) develop a monitoring program to observe, document, and report the effects on Reclamation and DWR, if any, of Licensee's proposed in lieu groundwater pumping; and (2) develop a mitigation plan that describes Licensee's approach to address potential adverse impacts to Reclamation and DWR, if any, resulting from additional groundwater pumping undertaken by Licensee to replace water as a result of the subject assignment of Licenses 904A and 5487A. This monitoring program and mitigation plan shall be agreed upon by Licensee, Reclamation and DWR and approved by the Deputy Director for Water Rights. The plan shall, at a minimum, document compliance with the diversion limits of Licenses 904B and 5487B by documenting the quantities of diversion that Licensee will forego under each separate license to offset the adverse effect, if any, resulting from in lieu groundwater diversions. The plan shall also establish a reporting requirement for all diversions, including groundwater and surface water diversions. Licensee shall continue to monitor and collect data from the groundwater substitution wells in all years, irrespective of whether groundwater substitution is occurring. In the event the results of the modeling provided for in condition (c) above, or the ongoing monitoring provided for in this condition (d), results in a determination that the in lieu groundwater pumping has a depletion factor equal to or greater than the value previously determined by Reclamation and DWR in consultation with Licensee, then Licensee shall mitigate for those impacts as provided for in the plan required by this condition (d).*
- e. *In the event of a dispute among Licensee, Reclamation and DWR over the results of the modeling effort, the monitoring program, the mitigation plan, or the calculated depletion factor, they shall jointly agree upon and retain a neutral third party expert in groundwater/surface water modeling. In the event that Licensee, Reclamation and DWR are unable to resolve the dispute with the assistance of the neutral third party, any of the parties may refer the matter to the State Water Board for resolution. All disputes must be resolved within one year of issuance of this amended license, or the dispute shall be referred to the Deputy Director for Water Rights for a determination.*

*Licensee shall only use groundwater pumped in accordance with the terms and conditions of this License, or surface water transferred to Licensee pursuant to a separate Order of the State Water*

*Board or obtained otherwise from others in a manner consistent with the requirements of state law, to replace the water diverted under Licenses 904A and 5487A or to offset the adverse effect, if any, resulting from in lieu groundwater pumping. Licensee shall not divert surface water under any other existing right, whether riparian, appropriative, or other, to substitute for reductions in diversions under Licenses 904B and 5487B or to offset any adverse effect, if any from in lieu groundwater pumping.*

- 2. Surface Water Resources:** The Proposed Action would not result in any change in the amount or timing of diversion from the Sacramento River during Term 91 periods. The point of diversion would move from its current location to the CWA point of diversion approximately ¼ mile downstream. This change in the point of diversion is to accommodate construction of a fish screen, and not to increase the total diversion capacity for the CWA or CPG. The Proposed Action would not adversely affect surface water resources.
- 3. Groundwater Resources:** CPG has an existing network of groundwater wells plus two new wells that would be installed as part of its planned operation that could be used to pump replacement groundwater. Five wells closer to the Sacramento River, known as the O'Connor wells, have been specifically excluded from use for the replacement groundwater pumping under the Proposed Action. CPG must implement specific conditions to mitigate impacts to Sacramento River streamflow caused by pumping replacement groundwater, as described in its amended water right licenses. Implementation of these conditions would be equivalent to mitigation measure 3.3-3 of the 2007 DWWSP EIR, and were designed to effectively eliminate any negative impacts to Sacramento River streamflow from replacement pumping. As required in the license conditions, Reclamation and DWR will need to agree to the exact amount of streamflow depletion that will be required to mitigate any impacts that may occur as a result of additional groundwater pumping. CPG shall mitigate for streamflow depletion impacts in accordance with the Reclamation/DWR approved mitigation plan prior to initiation of the groundwater pumping described in the Proposed Action and throughout the entire duration of the Proposed Action. Therefore, the Proposed Action will not have a significant adverse impact on groundwater resources.
- 4. Subsidence:** The Proposed Action could potentially result in localized decreased groundwater levels (increasing area drawdown rates) as a result of increased groundwater pumping (up to 10,000 af) over a relatively short period (i.e., primarily June through September). Basin-wide groundwater levels are anticipated to remain mostly unaffected by the Proposed Action because the CWA member agencies would eliminate a commensurate amount of groundwater pumping from the same groundwater basin. As mentioned above, the Conaway Ranch site is near an area that is experiencing relatively high levels of subsidence. However, onsite extensometer data reveal that subsidence at Conaway Ranch is much lower than the surrounding areas (i.e., UC Davis, Woodland, and Zamora).

During June through September, substantially greater groundwater pumping is occurring within the project area and within the overall groundwater basin because it is the prime growing season for crops. Total historical groundwater pumping by CPG during this time period averages approximately 10,000 afy. Therefore, the amount of groundwater pumping by CPG could double. As was concluded in the 2007 DWWSP EIR (City of Davis 2007, p. 3.3-30), additional groundwater pumping by CPG



would result in the short-term drawdown of groundwater levels by 16 to 26 feet, but groundwater levels would return to pre-pumping conditions following one or more normal to above normal precipitation cycles. Further, these drawdown levels are within the historical range of groundwater level fluctuations. However, potential short-term groundwater drawdown rates during multiple dry years would increase groundwater drawdown level by 31 to 50 feet and could result in increased subsidence in the immediate vicinity of Conaway Ranch (City of Davis 2007, p. 3.3-30).

Because the primary factor contributing to the subsidence issue is groundwater extraction, an increase in local groundwater pumping could increase subsidence rates in the immediate vicinity of Conaway Ranch, which could increase potential for damage to various infrastructure including local flood control facilities, especially levees surrounding onsite canals.

CPG shall prepare a groundwater monitoring plan that includes the following components to minimize impacts to geology and soils: *groundwater pumping measurements, groundwater levels, coordination with other monitoring efforts, a response strategy and conservation measures.*

The monitoring program shall include a response strategy, consistent with the Yolo County Flood Control and Water Conservation District (YCFCWCD) Basin Management Objective (BMO) for Groundwater Quantity (YCFCWCD 2006, p. 12) because this strategy provides regionally consistent trigger points and response actions for groundwater impacts and increases coordination between regional stakeholders. Further, the YCFCWCD's BMO is also generally consistent with City of Davis and UC Davis Groundwater Management Plan BMO (City of Davis 2006, p. 3-10). The response strategy shall be triggered when  $\frac{3}{4}$  of CPG's monitoring wells reach within 25 percent of the lowest water level recorded for those wells. (If the well is new, or data is otherwise limited, groundwater levels at similar wells during the multiple drought years 1976-1977 will be used; if such data is not available, data shall be collected during multiple drought years in the future to establish a benchmark. Until that time, data shall be inferred from the 1976-1977 drought years). The response strategy shall indicate that when the trigger point is reached, a letter shall be immediately sent to DWR and Reclamation, as well as local water providers and agencies, including RD 2035, YCFCWCD, Yolo County, and the cities of Davis and Woodland. The letter shall indicate that groundwater levels are approaching historically low levels at Conaway Ranch. The letter shall request that stakeholders immediately implement adopted conservation measures from applicable groundwater management plans, if such strategies have not already commenced.

The response strategy shall include a suite of conservation measures which shall be implemented by CPG during critical months if and when the trigger point is reached. As part of the preparation of the response strategy, CPG shall coordinate with DWR, Reclamation, and other local water resource agencies regarding additional feasible conservation strategies that could potentially be incorporated. Implementation of these conservation measures shall either result in stabilization of groundwater levels, or shall result in modified groundwater pumping. These conservation measures may include (but are not limited to):

**Increased Monitoring Frequency:** Frequency of groundwater level monitoring shall increase to once per week after commencement of replacement pumping.

**Coordinated Well Pumping:** A qualified hydrogeologist shall analyze the most current groundwater level monitoring data and work with CPG to identify a strategic well operating schedule, which shall include reduced operating time of wells in areas experiencing the highest levels of groundwater decline, especially for such wells within 0.25-mile of an operational offsite production well, and increase operating time of wells in areas experiencing less decline. The well operating schedule shall also be based on well depth and will allocate pump operation time according to depths that result in the lowest rate of groundwater drawdown. The well operating schedule shall be updated weekly (if necessary) based on the weekly monitoring data.

With implementation of the Monitoring and Mitigation Measures, which provide for subsidence monitoring and, if needed, groundwater pumping limitations the Proposed Action would not have an adverse impact related to subsidence.

- 5. Vegetation and Wildlife Resources:** The Proposed Action would not affect riparian habitat, elderberry shrubs, or other terrestrial habitat for wildlife. There would be no effect to Valley elderberry longhorn beetle, western snowy plover, least Bell's vireo, or palmate bird's beak.

The rice fields and associated irrigation ditches, wetlands, and streams on Conaway Ranch may provide habitat for giant garter snake. As part of the agreement between CPG and CWA, CPG would not fallow any croplands as a result of the water assignment. The acreage of land currently farmed as rice by CPG would continue to be farmed as rice with implementation of the Proposed Action. As part of normal CPG operations there may be localized spatial shifting of rice fields, but no net loss of total rice field acreage. Giant garter snake may be susceptible to changes to water quality because they are dependent on aquatic habitats during their active season; however, no specific water quality thresholds have been developed for giant garter snake. The selenium level in the aquatic habitat at Conaway as a result of the use of additional ground water is expected to be  $<1.0 \mu\text{g/L}$ , which is within the "No Effect" range of ecological risk. Similarly, the levels of arsenic and mercury in the irrigation wells were below the level of detection and are not expected to result in any toxicological effects on giant garter snake.

Based on the Salt Balance Mixing Model results (only considering water/salt balance and not soil, pH, or other chemical processes), with the use of groundwater instead of surface water, boron concentrations could range from 5.3 to 10.0 mg/L in the summer months, which is an increase of up to 4 mg/L from existing levels. In September and October, boron concentrations could increase by about 6-10 mg/L for a total concentration of 13.0 mg/L in October. However, because rice is sensitive to boron concentrations above 2.5 to 5 mg/L, Conaway Ranch management activities, including irrigation water blending, would be expected to reduce boron concentrations to well below 13 mg/L, even for short periods.

No data is available pertaining to giant garter snake boron exposure toxicity, but as described previously, the vast majority of species studies show no adverse effects in exposure to concentrations



below 20 mg/L. Boron toxicity in amphibians, for example has been correlated to concentrations between 47 and 145 mg/L (Davis 2000), and greater than 200 mg/L (USDOI 1998, p. 30). The potential increase in boron would occur later in the year after giant garter snake have given birth, and with the highest modeled levels of boron in the irrigation water when giant garter snake are leaving aquatic habitat for upland hibernation sites. Because the concentration of boron would not be expected to reach levels toxic to giant garter snakes and the snakes would have limited exposure to aquatic habitats with slightly higher boron concentrations than under existing conditions, no effects are expected to giant garter snake.

6. **Cultural Resources:** No soil disturbance, demolition, construction, or other earthmoving activities would occur as a result of implementation of the Proposed Action. Further, there are no structures that would be affected by the Proposed Action. Finally, the Proposed Action would not alter the flows or water levels of the Sacramento River or upstream storage reservoirs such that cultural resources may be exposed or otherwise altered. Reclamation concludes that this action does not have the potential to cause effects to historic properties, assuming such historic properties were present, pursuant to the regulations that implement the NHPA at 36 CFR Part 800.3(a)(1).
7. **Indian Trust Assets:** The nearest ITA to Conaway Ranch is the Rumsey Rancheria, and Conaway Ranch is located greater than 30 miles from these ITA. Therefore, there would be no impact to ITA as a result of the Proposed Action.
8. **Environmental Justice:** Normal agricultural practices and employment would continue on Conaway Ranch, and implementation of the project would not result in economic and quality of life effects on any individual or groups of people. Therefore, minority and low-income people would not be disproportionately affected.
9. **Cumulative Impacts:**

#### *Surface Water Resources*

The Proposed Action would not result in any direct changes to surface water flows and no changes in diversions along the Sacramento River. Further, the project would not result in any changes to the timing or quantity of water released from upstream water storage reservoirs. The Proposed Action would result in the same volume of water diverted from the Sacramento River during periods when Term 91 curtails diversions under the CWA's Permit 20281, and variations would be similar to normal monthly and yearly historical variations. While other cumulative water transfer programs could create changes in the timing and quantity of water released from upstream reservoirs, altering river flows, the Proposed Action would not contribute to this cumulative impact.

## **Groundwater Resources**

**Groundwater Drawdown:** Multi-year groundwater pumping increases under cumulative programs operating in similar areas of the Sacramento Valley could reduce groundwater levels. Groundwater levels may not fully recover following a transfer and may experience a substantial net decline in groundwater levels over several years. Under the Proposed Action, CPG would increase its pumping of groundwater to replace water assigned to the CWA and meet its agricultural irrigation demands. During periods when Term 91 is in effect, the CWA would divert water that is provided by CPG and other transferring senior water right holders. Some of these holders would also implement a groundwater substitution program by pumping groundwater in lieu of using their surface water supplies during certain months, thereby freeing up surface water for transfer to the CWA during these months. At this time, it is estimated that the CWA may acquire a potential average annual quantity of approximately 15 TAF/yr from senior water rights holders that would implement a groundwater substitution program, about 40% of which would be supplied through the Proposed Action on an average annual basis.

Implementation of the Proposed Action would result in fluctuations of groundwater levels consistent with historical subbasin-wide groundwater fluctuations, even during multiple dry years. Because mitigation would be implemented to ensure that short-term drawdown would not occur during multiple dry years as a result of increased groundwater pumping, the Proposed Action would not contribute to long-term, basin-wide drawdown of groundwater levels.

**Streamflow Depletion:** As discussed above, CPG's reliance on increased groundwater pumping includes the commitment that there will be no net change to streamflow in the Sacramento River. Reclamation would also use the water rights process and any federal discretionary actions (such as changes to other Sacramento River Settlement Contracts) to minimize cumulative streamflow depletion during the Term 91 period. Therefore, the Proposed Action would not result in or contribute cumulatively to streamflow depletion during the Term 91 period.

## **Subsidence**

Conaway Ranch is in the middle of an area that is experiencing relatively high levels of subsidence. Because the primary factor contributing to the subsidence issue is groundwater extraction, the proposed increase in local groundwater pumping by CPG could increase subsidence rates within the area, which could increase potential for damage to various infrastructure, including well casings, and could even potentially compromise the integrity of local flood control facilities. Rates of subsidence in this area of Yolo County are being closely monitored by the Yolo County Subsidence Monitoring Network. With implementation of monitoring and mitigation measures, which provide for subsidence monitoring and, if needed, groundwater pumping limitations, the Proposed Action would not have an adverse impact related to subsidence. While other potential cumulative projects could result in increased groundwater pumping that could result in adverse subsidence impacts, the Proposed Action, with implementation of minimization measures identified in the EA, would not result in a substantial cumulative contribution to subsidence in the area.

### **Biological Resources**

Vegetation and Wildlife: Under the Proposed Action, the only potential environmental effect relates to increases in selenium and boron during the critical months (July through September) when the project site is more reliant on groundwater than under current operating conditions. However, levels of selenium in the groundwater and in the overall mix of irrigation water that would be used at the site will be below the EPA threshold under which adverse effects to biota would occur. Similarly for boron, there are no adverse effects expected from boron concentrations reaching 13 mg/L during the fall months, and the project is not anticipated to contribute to any cumulative impacts to vegetation and wildlife.

Special-Status Species: As described under Vegetation and Wildlife above, no effects to vegetation and wildlife are expected under the Proposed Action. Therefore, the project would not contribute to any cumulative impacts on special-status species in the region.