

RECLAMATION

Managing Water in the West

Finding of No Significant Impact

West Kern Water District Water Use Efficiency Project

14-26-MP

Prepared by:

Andrea Meier

Date: 4/3/2015

Andrea Meier
Natural Resources Specialist
Mid-Pacific Regional Office

Reviewed by:

David T. White

Date: 04/03/15

David White
Social Scientist
Mid-Pacific Regional Office

Approved by:

Richard Woodley

Date: 4/6/2015

Richard Woodley
Regional Resources Manager
Mid-Pacific Regional Office



U.S. Department of the Interior
Bureau of Reclamation
Mid Pacific Region

April 2015

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) to analyze impacts of providing a CALFED Water Use Efficiency (program) grant to the West Kern Water District (water district) for its Water Use Efficiency Project (project).

The EA, dated April 2015, is attached and incorporated by reference.

Alternatives Including Proposed Action

No Action Alternative

Under the No Action Alternative, Reclamation would not provide financial assistance to the water district for the project. The water district may find other sources of money, may proceed with part of the project, or may not proceed at all. The no action alternative Reclamation analyzed assumes the district would not proceed with the project absent Reclamation funding.

Proposed Action

Reclamation would contribute \$300,000 to the water district's project through a program grant. The water district would contribute \$351,288 to the project and would receive \$351,288 from non-federal sources. The West Kern Water District Water Use Efficiency Project would increase rebates offered on new clothes washers with WaterSense Specification designations and would install new water meters with Automated Water Meter Reading (AMR) in the water district. Automatic Meter Information (AMI) Management Technology used with the AMR on industrial businesses within the water district's service area would improve leak detection and repair programs. A projected 1,456 AFY water savings of water would result from increasing the WaterSense rebate and implementing the AMR and AMI technologies in the water district.

Findings

In accordance with NEPA, the Mid-Pacific Regional Office of Reclamation has found that the approval of the proposed action is not a major federal action that will significantly affect the quality of the human environment. Consequently, an environmental impact statement is not required.

The following are the reasons why the impacts from the proposed action are not significant:

- Implementing the proposed action will not disproportionately affect minorities or low-income populations and communities (EO 12898). See section 4.2.4 of the Environmental Assessment.
- The proposed action would have a beneficial effect on water supply for the water district. See section 4.2.5 of the Environmental Assessment.
- The proposed action will not adversely affect air quality. See section 4.2.6 of the Environmental Assessment.
- The proposed action is not likely to adversely affect San Joaquin kit fox (*Vulpes macrotis mutica*) (40 CFR 1508.27(b)(9)). Reclamation received a memorandum concurring with our determination from the U.S. Fish and Wildlife Service on March 31, 2015. See Appendix A of the Environmental Assessment.
- The proposed action will not have significant cumulative effects on the human environment with other actions, past, present, or future actions (40 CFR 1508.27(b)(7)). See section 4.2.8 of the Environmental Assessment.
- There are no Indian Trust Assets in or near the proposed work area, therefore none will be effected (512 DM 2, Policy Memorandum dated December 15, 1993). Reclamation made this determination September 4, 2014. See Appendix B of the Environmental Assessment.
- Reclamation determined that the proposed action has no potential to cause effects on historic properties (40 CFR 1508.27(b)(8)). This determination was made March 5, 2015, Cultural Resources Compliance memorandum 14-MPRO-220. See Appendix C of the Environmental Assessment.
- The proposed action will not limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007 and 512 DM 3). Reclamation made this determination on March 5, 2015, Cultural Resources Compliance memorandum 14-MPRO-220.
- The proposed action will not violate Federal, state, tribal or local law or requirements imposed for the protection of the environment (40 CFR 1508.27(b)(10)).
- The proposed action will not have possible effects on the human environment that are highly uncertain or involve unique or unknown risks (40 CFR 1508.27(b)(5)).

- The proposed action will neither establish a precedent for future actions with significant effects nor represent a decision in principle about a future consideration (40 CFR 1508.27(b)(6)).
- There is no potential for the effects to be considered highly controversial (40 CFR 1508.27(b)(4)).

RECLAMATION

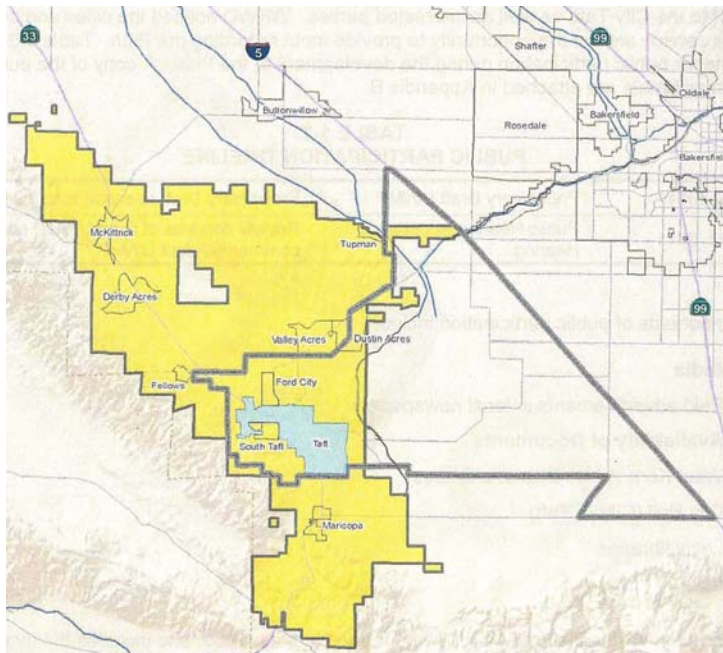
Managing Water in the West

Environmental Assessment

West Kern Water District Water Use Efficiency Project

Kern County, California

14-26-MP



U.S. Department of the Interior
Bureau of Reclamation
Mid Pacific Region

April 2015

Mission Statements

The mission of the Department of the Interior is to protect and manage the Nation's natural resources and cultural heritage; provide scientific and other information about those resources; and honor its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Appendices

- A Endangered Species Act consultation
- B Indian Trust Assets coordination
- C Cultural Resources coordination

Acronyms and Abbreviations

AF	acre-feet
AFY	acre-feet per year
APE	area of potential effect
CALFED	California Bay-Delta Program
CalFIRE	California Department of Forestry and Fire Prevention
CNDDB	California Natural Diversity Database
CVP	Central Valley Project
EA	Environmental Assessment
EPA	Environmental Protection Agency
FONSI	Finding of No Significant Impact
kWh/y	Kilowatt-hour per year
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
Program	CALFED Water Use Efficiency Program
Project	West Kern Water District Water Use Efficiency Project
Reclamation	Bureau of Reclamation
SHPO	State Historic Preservation Officer
SWP	State Water Project
USFWS	U.S. Fish and Wildlife Service
Water district	West Kern Water District
WKWD	West Kern Water District
WRCC	Western Regional Climate Center

Section 1 Introduction

Reclamation manages the CALFED Water Use Efficiency Grant Program. The program was established to accelerate the implementation of cost-effective actions that provide state-wide benefits of water conservation. Water conservation and water use efficiency are critical elements of any plan to address Bay-Delta water concerns. Applicants can apply for grant assistance through the program.

The West Kern Water District applied for a program grant to expand rebates on water-efficient appliances and to install automated water meters in their service area. Since the action of providing financial assistance to the water district through the program is not categorically excluded from the procedural requirements of NEPA, this EA has been prepared to examine the potential direct, indirect, and cumulative impacts to the affected environment from the proposed action.

1.1 Proposed action

Reclamation's action would be to provide financial assistance to the water district for their Water Use Efficiency Project through a program grant.

1.2 Project location

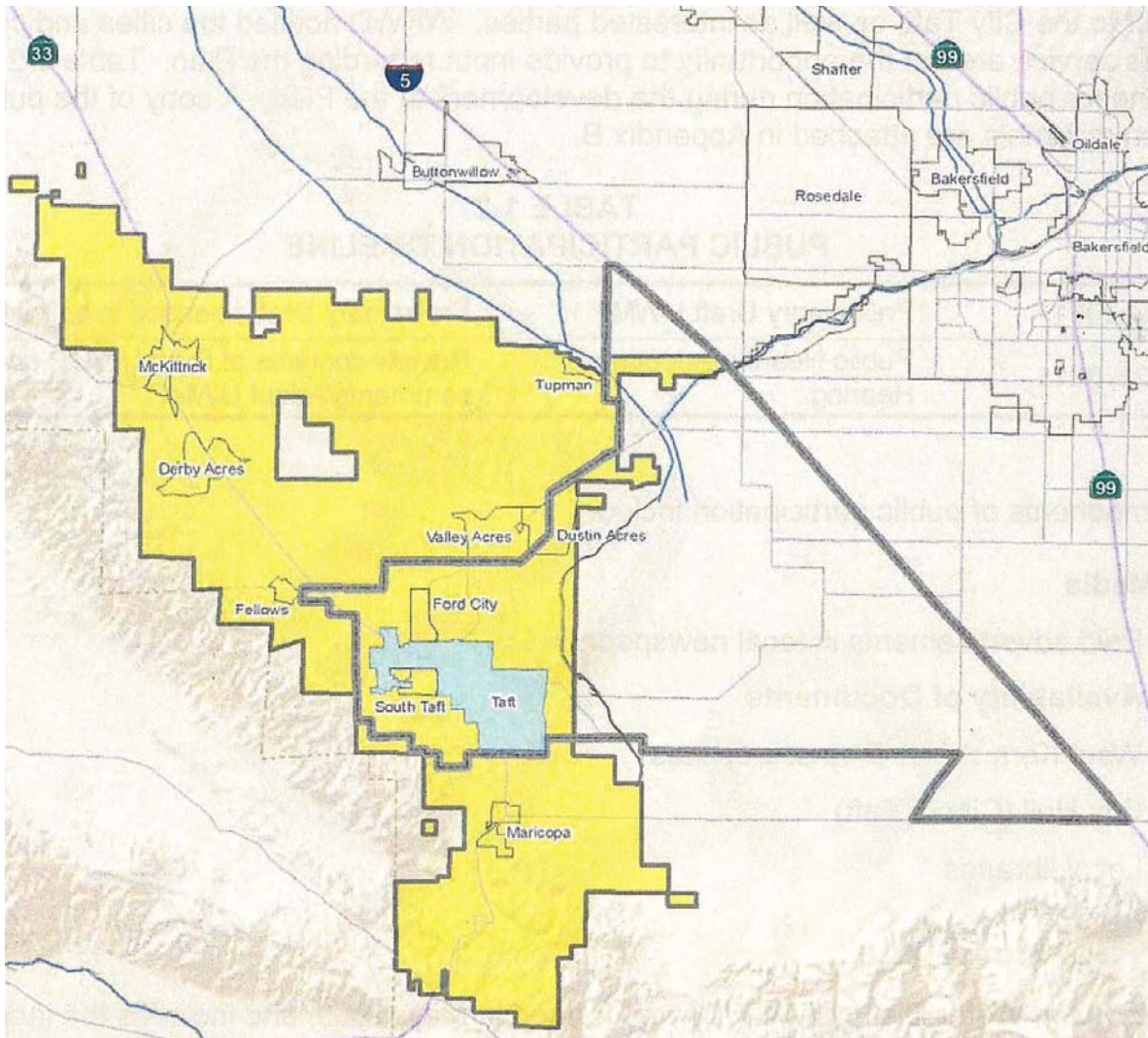
The water district is located in Kern County, California. It is about 30 miles west of Bakersfield and 100 miles north of Los Angeles, and covers about 300 square miles, including the incorporated cities of Taft and Maricopa, together with the communities of Taft Heights, South Taft, Ford City, Tupman, Dustin Acres, Valley Acres, Derby Acres, Fellows, and McKittrick (Figure 1).

Section 2 Proposed Action and alternatives

2.1 No Action Alternative

Under the No Action Alternative, Reclamation would not provide funding through a program grant for the project. The water district may find other sources of money to continue with the project as described, may proceed with only part of the project, or may not proceed with project. The no action alternative assumes the district would not proceed with the project absent Reclamation funding.

Figure 1. West Kern Water District boundaries



2.2 Proposed action

Reclamation would contribute \$300,000 to the water district's project through a program grant. The water district would contribute \$351,288 to the project and would receive \$351,288 from non-federal sources. The West Kern Water District Water Use Efficiency Project would increase rebates offered on new clothes washers with WaterSense Specification designations and would install new water meters with Automated Water Meter Reading (AMR) in the water district. Automatic Meter Information (AMI) Management Technology used with the AMR on industrial businesses within the water district's service area would improve leak detection and focus repair efforts. A projected 1,456 AFY water savings of water would result from increasing the WaterSense rebate and implementing the AMR and AMI technologies in the water district. Indirect benefits of the Water Use Efficiency Project include reducing energy consumption used to pump water for use in the water district by 815,360 kWh/yr and 25,578 Therms per year.

respectively, a reduction in greenhouse gases from reduced pumping, and increased flexibility in water and energy resources management in the district due to these savings.

Work to install water meters would be within previously disturbed and maintained roadways and shoulders and all water meters would be installed above ground.

The water district would begin work on expanding the rebate program and installing water meters in July 2015.

Section 3 Affected Environment

The water district lies against the Temblor Range of the Sierra Madre Mountains and has an elevation varying from 300 to 1,700 feet above sea level. This area is within the rain shadow of the Coastal Range. It is arid with an annual average rainfall of 5.4 inches per year (WRCC, 2012), which is equivalent to precipitation received in the Mojave Desert and Imperial Valley of California (UCSD, 2013). The water district relies heavily on groundwater and surface water purchased from the state, federal, other water districts, and private entities. The water district's annual water supplies averaged 26,560 AF in recent years with approximately 1,500 AFY banked underground in the Kern Fan area for future recovery. Water use is projected to increase in the water district to 27,373 AFY by 2035.

The water district's pipeline water delivery system covers the largest area of any retail municipal and industrial water provider in California. State Water Project water is delivered from a turnout from the California Aqueduct and pump station with pipeline to a tank. The water district's well field supplies all other customers with water. The distribution system is expansive, and involves many natural gas and electric booster pump stations to lift and pressurize water for delivery. The area covered and length of the pipe distribution system is approximately 170 miles, considered large among municipal and industrial water districts, which presents a challenge of timely meter reading, leak detection, and leak repair. The distribution system losses have been estimated at 270 AFY.

Section 4 Environmental Consequences

4.1 No Action Alternative

The No Action Alternative would consist of Reclamation not providing financial assistance to the water district for the project. Under the No Action Alternative, there would be no change to existing conditions and current trends of the affected environment for those resource areas evaluated in section 4.2.

4.2 Proposed Action

4.2.1 Cultural Resources

The term “cultural resources” broadly refers to prehistoric and historic sites, buildings and other structures or objects, and traditional cultural properties. The National Historic Preservation Act (NHPA) of 1966 is the primary Federal legislation that outlines the Federal Government’s responsibility to cultural resources. Section 106 of the NHPA requires the Federal Government to take into consideration the effects of its actions or undertakings on cultural resources listed on or eligible for inclusion in the National Register of Historic Places (NRHP). Those resources that are listed on, or determined eligible for inclusion on, the NRHP are referred to as historic properties. Historic properties, and effects on such properties, are identified through the Section 106 process outlined in Federal regulation at 36 CFR Part 800.

The proposed action involves providing financial assistance to be used for rebates and the replacement of existing industrial water meters with new meters utilizing automated reading technology. Pursuant to 36 CFR § 800.3(a)(1), Reclamation has determined that the proposed action has no potential to cause effects on historic properties. Neither activity proposed for funding through the program grant would significantly affect any cultural resources eligible for NRHP inclusion.

4.2.2 Indian Trust Assets

There are no Indian Trust Assets in the water district boundaries. Therefore, the proposed action does not have the potential to affect Indian Trust Assets.

4.2.3 Indian Sacred Sites

Executive Order 13007 defines an Indian sacred site as “a specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual...as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion.” Executive Order 13007 requires that federal agencies provide access to and use of Indian Sacred Sites to Indian Tribes and individuals on federal land. The proposed action does not involve Federal land and therefore would have no effect on access to Indian sacred sites.

4.2.4 Environmental Justice

Low income communities

The federal per capita poverty threshold is \$11,600 per person and in Kern County, 22.5% of their population live below that threshold (Healthy Communities Institute, 2014). Since the only

physical changes from the project is water meter installation, and installations will only affect disturbed industrial areas and roadways, there would be negligible effects to any population, including low-income households and places of work.

The West Kern Water District Urban Water Management Plan (plan) states that its programs and activities under the plan, including the proposed project, conform to California Senate Bill (SB) 1087. SB 1087 requires water and sewer providers to reserve water and sewer capacity for lower-income housing. The water district states in their plan that they will not deny or condition approval of water services, or reduce the amount of services applied for by a proposed development that includes housing units affordable to lower income households. The proposed project is a water conservation project that would provide flexibility in the system to meet the demands of all water users in the district, including low-income communities. Therefore the proposed project would not have a disproportionate effect on low-income communities.

Minority communities

Demographic characteristics of the West Kern area were evaluated to determine the population mix that would be expected in the water district service area boundaries. The population in the water district is predominantly white at 78.3% of the total persons living in the West Kern area (Kern Economic Development Corporation, 2012). As a whole, the population served by the water district would not meet the definition of a minority community. Therefore the proposed project would not have a disproportionate effect on minority communities.

4.2.5 Water resources

A projected 1,456 AFY water savings of water would result from increasing the WaterSense rebate and implementing the AMR and AMI technologies in the water district. The conserved water would allow more flexibility in meeting water demands and could be banked for future recovery. Therefore the project would have a long-term, moderately beneficial effect on water resources available to the water district.

4.2.6 Air quality

WaterSense labeled appliances are also likely to be labeled as Energy Star. Energy Star appliances use less electricity and natural gas than non-Energy Star appliances in their size range. Replacing old appliances with those labeled WaterSense and Energy Star appliances reduces greenhouse gas (carbon dioxide) emissions (EPA, 2014). Therefore the WaterSense rebates would result in long-term, minor reductions in greenhouse gas emissions from appliances in the water district service area.

Water conserved by the project would reduce the amount of natural gas and electricity used by groundwater pumps and pressurization systems in the water district by identifying leaks in the

system, thus providing minor reductions in emissions from these systems including a reduction in greenhouse gas emissions (WKWD, 2014). Automated meter reading will also reduce the need for the water district staff to travel as frequently around the service area, thereby reducing emissions from vehicle trips. Therefore the AMR and AMI water meter technologies would result in long-term, minor emission reductions from water pumping and travel in the water district service area.

4.2.7 Federally-listed threatened and endangered species

A list of federal endangered and threatened species was obtained for Kern County in September 2014, from the U.S. Fish and Wildlife Service's website. Since no vernal pool habitat, riparian habitat, oak woodland habitat, drainages, scrub, or grassland habitat are present in the areas affected, the proposed project would have no effect on most species on the list. However, federally-listed endangered San Joaquin kit fox may be present near where water meters would be installed. Multiple known occurrences and suitable habitat for the San Joaquin kit fox (*Vulpes macrotis mutica*) are present in the water district. Kit foxes frequently use small road culverts, pipes, landscaped zones, spaces under shipping containers, and crawl spaces under buildings as denning sites which are common features in industrial areas and along road shoulders (Bjurlin, Cypher, Wingert, & Van Horn Job, 2005). Reclamation assumes that the kit fox are present throughout the water district service area and may be present where water meter installation would occur.

All work to replace the water meters with automated systems would be done above ground, not require any digging, and would be conducted during daylight hours. The process would take approximately two hours for each meter and require one or two Water District staff members. Access to each meter site will be from a vehicle and by foot. San Joaquin kit fox (*Vulpes macrotis mutica*) are known to occur throughout its service area and may be exposed to disturbances related to meter replacement activities.

On February 2, 2015, Reclamation met over the phone with West Kern Water District and the U.S. Fish and Wildlife Service to discuss measures to avoid and minimize impacts to San Joaquin kit fox from implementing the Water District's Water Use Efficiency Project. Based on the Service's recommendation, the West Kern Water District has agreed to modify their meter replacement schedule to span two seasons, each between July and December, in order to avoid work during the kit fox natal season. By implementing this measure, Reclamation has determined that this action to award the grant to the Water District may affect, but is not likely to adversely affect, San Joaquin kit fox.

4.2.8 Cumulative effects

According to CEQ regulations for implementing the procedural provisions of NEPA, a cumulative impact is defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

Temporary, minor adverse effects to San Joaquin kit fox habitat may occur as a result of this action. With the implementation of the measure to avoid work during the kit fox natal season (see section 4.2.7 and Appendix A), effects to kit fox will be discountable and will not contribute to significant cumulative adverse impacts to the species.

Section 5 Consultation and coordination

Reclamation consulted with the U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office, San Joaquin Division and coordinated with the West Kern Water District and Reclamation's Native American Affairs Coordinator in the preparation of this EA.

Reclamation's Native American Affairs Coordinator made the determination that the action would have no effect on Indian Trust Assets on September 8, 2014 (Appendix B).

The USFWS concurred with Reclamation's determination on March 31, 2015, that the action is not likely to adversely affect San Joaquin kit fox pursuant to Section 7 of the Endangered Species Act (16 U.S.C. §1536). In order to receive this concurrence, the water district agreed to implement the minimization measures in section 4.2.7., as a part of the proposed project (Appendix A).

Section 6 References

- Bjurlin, C.D., Cypher, B.L., Wingert, C.M., Van Horn Job, C.L. (2005). *Urban Roads and the Endangered San Joaquin Kit Fox*. Accessed September 15, 2014.
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- USFWS. (2011). *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance*. Retrieved September 15, 2014, from
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- WKWD. (2010). *Urban Water Management Plan*. Retrieved Sept. 11, 2014, from
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Appendix A: Endangered Species Act consultation



United States Department of the Interior



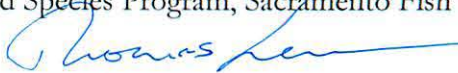
In Reply Refer to:
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2015-I-0121

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Suite W-2605
Sacramento, California 95825-1846

MAR 31 2015

Memorandum

To: Anastasia T. Leigh, Regional Environmental Officer, Mid-Pacific Regional Office,
Bureau of Reclamation, Sacramento, California

From: Chief, San Joaquin Valley Division, Endangered Species Program, Sacramento Fish
and Wildlife Office, Sacramento, California 

Subject: Concurrence on the Proposed West Kern Water District Water Use Efficiency
Project, Kern County, California

This is in response to your December 29, 2014 and February 25, 2015 memoranda requesting concurrence that the Proposed West Kern Water District (Water District) Water Use Efficiency Project (Proposed Action) may affect, but is not likely to adversely affect (NLAA), the federally-listed as endangered San Joaquin kit fox (*Vulpes macrotis mutica*). The Bureau of Reclamation (Reclamation) is providing CALFED Water Use Efficiency Grant funding to the Water District to replace 484 water meters with automated water meters within its service area. Reclamation is consulting with the Service on behalf of the Water District for the Proposed Action. This response has been prepared pursuant to section 7 of the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), and in accordance with the regulations governing interagency consultations (50 CFR §402).

This consultation is based on information provided in your December 29, 2014 and February 25, 2015 memoranda and a February 2, 2015 telephone conversation with Reclamation, Service and Water District staff. All work to replace the water meters would be done above ground (meters to be replaced on existing structures above ground), not require any digging below ground, and would be conducted during daylight hours only. The meters being replaced are within already disturbed industrial/petroleum fields and disturbed/maintained roadways and shoulders. The process of replacing each meter will take approximately two hours and require one or two staff members who will access meters by vehicle and foot, similar to current maintenance activities. Equipment required would be limited to hand tools and portable welding units and would not generate excessive noise or ground vibration. The immediate area surrounding each meter installation site is highly disturbed, generally consisting of operational pipes, valves and gravel surfaces associated with industrial operations. These sites are accessed on a regular basis by District staff for ongoing maintenance activities.

The meter replacement schedule will span two seasons, each between July and December, in order to avoid work during the kit fox natal season. Reclamation has also coordinated with the Water District to educate and train field personnel about kit fox and a qualified biologist would be notified if kit fox activity or den were observed near the meter installation sites. If potentially active dens are identified at a work site, the qualified biologist would visit the site and determine the appropriate measures to be taken to avoid impacting kit fox or dens, following the *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (January 2011).

Based on a review of the Proposed Action and the above information specific to this Proposed Action, we concur that replacing 484 water meters with automated water meters is NLAA San Joaquin kit fox. We believe that any effects to San Joaquin kit fox would be discountable because:

- 1) the disturbance of each meter will be for a very short duration and will affect a very small area;
- 2) the nature of the disturbance is consistent with other activities in the industrial/petroleum fields;
- 3) work will be performed outside the natal period (January 1 through May 31 in the action area);
- 4) the likelihood of dens being present and physically disturbed by the work is very low; and
- 5) crews will be trained to recognize potential dens and to report them to the qualified biologist.

This concludes the Service's review of Reclamation's action to provide grant funding to the District for replacing their existing water meters and the Service's consideration of the Proposed Action's effects on San Joaquin kit fox. No further coordination with the Service under the Act is necessary at this time, unless new information reveals effects of the Proposed Action on listed species in a manner or to an extent not considered. Note that take of listed species is not exempted from the prohibitions described under section 9 of the Act. If conditions change so that the project may adversely affect listed species, initiation of formal consultation, as provided in 50 CFR § 402.14, is required. If you have any questions about this memorandum, please contact Thomas Leeman at (916) 414-6600.

Appendix B: Indian Trust Assets coordination



Meier, Andrea <ameier@usbr.gov>

Re: ITA records search request for the West Kern Water District Water Use Efficiency Project

1 message

RIVERA, PATRICIA <privera@usbr.gov>

Mon, Sep 8, 2014 at 12:22 PM

To: "Meier, Andrea" <ameier@usbr.gov>

Cc: Kristi Seabrook <kseabrook@usbr.gov>, "Mary (Diane) Williams" <marywilliams@usbr.gov>

Andrea,

I reviewed the proposed action to provide \$300,000 of federal funding to the West Kern Water District's \$651,288 Water Use Efficiency Project. The water district would contribute \$351,288 to the project and would receive \$351,288 from non-federal sources. The West Kern Water District Water Use Efficiency Project would increase rebates offered on new clothes washers with WaterSense Specification designations and would install new water meters with Automated Water Meter Reading (AMR) in the water district. Automatic Meter Information (AMI) Management Technology used with the AMR on industrial businesses within the water district's service area would improve leak detection and repair programs.

A projected 1,456 AFY water savings of water would result from increasing the WaterSense rebate and implementing the AMR and AMI technologies in the water district where the annual water use has been approximately 26,000 AFY. Indirect benefits of the Water
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Use Efficiency Project include reducing energy consumption used to pump water for use in the water district by 815,360 kWh/yr and 25,578 Therms per year respectively, a reduction in greenhouse gases from reduced pumping, and increased flexibility in water and energy resources management in the district due to these savings.

All work would be within previously disturbed and maintained roadways and shoulders and all water meters would be installed above ground.

The proposed action does not have a potential to impact Indian Trust Assets.

Patricia Rivera
Native American Affairs Program Manager
US Bureau of Reclamation
Mid-Pacific Region
2800 Sacramento, California 95825
(916) 978-5194

Kristi only need is to enter into database. thanks

Appendix C: Cultural Resources coordination

CULTURAL RESOURCES COMPLIANCE
Mid-Pacific Region
Division of Environmental Affairs
Cultural Resources Branch

MP-153 Tracking Number: 14-MPRO-220

Project Name: West Kern Water District Water Use Efficiency Project

NEPA Document: EA-14-26-MP

MP-153 Cultural Resources Reviewer: Joanne Goodsell



Date: March 5, 2015

Reclamation proposes to provide a program grant to the West Kern Water District for use in a water efficiency project involving providing rebates to customers who purchase new clothes washers with WaterSense Specification designations and replacing industrial water meters with new meters utilizing Automated Water Meter Reading (AMR) and Automatic Meter Information (AMI) Management technologies to improve the detection of leaks in the system. A projected 1,456 acre-feet per year water savings would result from the rebate and meter replacement program.

The proposed action is limited to providing financial assistance for the project. Neither activity proposed for funding through the program grant would significantly affect any cultural resources eligible for inclusion in the National Register of Historic Places. As such, and pursuant to 36 CFR § 800.3(a)(1), Reclamation has determined that the proposed action has no potential to cause effects on historic properties. Reclamation has no further obligations under Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 *et seq.*) related to this undertaking.

This document communicates the completion of the NHPA Section 106 review process for this undertaking. If there are any changes to the proposed action prior to implementation, additional Section 106 review will be required. Please retain a copy of this document with the administrative record for this action