

RECLAMATION

Managing Water in the West

FINDING OF NO SIGNIFICANT IMPACT

3-year Extension of the Mendota Pool Group Exchange Agreements

FONSI-14-033



U.S. Department of the Interior
Bureau of Reclamation

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.

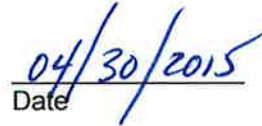
The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.


BUREAU OF RECLAMATION
South-Central California Area Office, Fresno, California

FONSI-14-033


**3-year Extension of the Mendota Pool
Group Exchange Agreements**


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Introduction

In accordance with section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the South-Central California Area Office of the Bureau of Reclamation (Reclamation), has determined that an environmental impact statement is not required for the issuance of temporary one-year exchange agreements with the Mendota Pool Group (MPG) and Peracchi over a 3-year period (2015-2018). This Findings of No Significant Impact (FONSI) is supported by Reclamation's Environmental Assessment (EA)-14-033, *3-year Extension of the Mendota Pool Group Exchange Agreements*, and is hereby incorporated by reference.

Reclamation provided the public with an opportunity to comment on the Draft FONSI and Draft EA between March 23, 2015 and April 6, 2015. Three comment letters were received. The comment letters and Reclamation's response to comments are included in Appendix C of EA-14-033.

Background

Reclamation currently executes annual exchange agreements with the Mendota Pool Group (MPG) and Donald J. Peracchi and affiliates (hereafter referred to as Peracchi). Members of the MPG and Peracchi own and/or operate farmland served from the San Luis Canal in Westlands Water District (Westlands), as well as in the vicinity of the Mendota Pool in Farmers Water District (Farmers WD) and surrounding areas (see Figures 1 and 2 in EA-14-033). The annual exchange agreements allow MPG farmers and Peracchi to cumulatively exchange up to 25,000 acre-feet (AF) of groundwater pumped into the Mendota Pool for Central Valley Project (CVP) irrigation water delivered to their lands in Westlands via the San Luis Canal.

The environmental documentation for the exchange agreements included the 2005 Environmental Impact Statement (EIS) for the 10-year MPG exchange program and a 2012 EA for the annual exchange agreements with Peracchi. Both documents evaluated the impacts to groundwater levels, groundwater quality, land subsidence, surface water quality and sediment quality in the Mendota Pool, biological resources, CVP operations, archaeological and cultural resources, Indian Trust Assets, land use, traffic, air quality, noise, environmental justice, and socioeconomics and are hereby incorporated by reference.

The 10 year MPG exchange program was anticipated to have less-than-significant effects on the majority of resource areas considered in the analysis. The primary adverse effect of the action was to increase the cumulative rate of groundwater

level degradation in wells west of the Mendota Pool, primarily MPG wells. Mitigation actions that addressed potential impacts of the exchange program were included in the EIS and incorporated into the exchange agreements. These mitigation actions include a baseline pumping program, design constraints, a monitoring program, and adaptive management. These measures were also included in the exchange program for Peracchi as groundwater exchanged with Mr. Peracchi was previously considered part of the MPG exchange program and is extracted from the same Farmers Water District wells analyzed in the MPG EIS.

Since the current exchange program for the MPG and Peracchi expires in February 2015, they have requested an extension of the exchange program for another 20 years (2015 through 2034). Reclamation and Westlands are preparing an EIS/Environmental Impact Report (EIR) pursuant to the National Environmental Policy Act and California Environmental Quality Act for the proposed 20-year extension. However, since the environmental review of the proposed 20-year extension is not likely to be completed before the expiration of the existing exchange program, the MPG and Peracchi have requested a temporary extension of the existing program.

Proposed Action

Reclamation proposes to execute a series of one-year exchange agreements with the MPG and Peracchi over a 3-year period (2015-2018) once the existing 10-year exchange program ends February 28, 2015. In the event the proposed 20-year exchange program is approved, the one-year exchange agreements under this Proposed Action would be superseded by new exchange agreements. Specific details of the exchange program are included in Section 2.2 of EA-14-033.

Environmental Commitments

The current pumping programs for the MPG exchange program are adaptively managed to minimize environmental impacts. The MPG pumping program is developed and reviewed on an annual basis to allow for year-to-year variations in hydrologic conditions which are defined in the spring, prior to the start of pumping. Annual pumping programs are based on consideration of several factors including the design constraints (e.g., water quality at the San Joaquin River Exchange Contractor's canal intakes or at the Mendota Wildlife Area), results of the previous year's monitoring program, the extent of groundwater level recovery, hydrologic conditions, and any Reclamation contractor's rescheduling of CVP deliveries from the previous water year. These would continue under the Proposed Action. Specific details of the design constraints and monitoring program are included in Section 2.2.1 of EA-14-033.

Findings

Reclamation's finding that implementation of the Proposed Action will result in no significant impact to the quality of the human environment is supported by the following findings:

Resources Eliminated from Detailed Analysis

As described in Table 1 of EA-14-033, Reclamation analyzed the affected environment and determined that the Proposed Action does not have the potential to cause direct, indirect, or cumulative adverse effects to the following resources: land use, cultural resources, Indian Sacred Sites, Indian Trust Assets, socioeconomic resources, environmental justice, air quality, global climate change, noise, or traffic.

Water Resources

Under the Proposed Action, Reclamation would temporarily continue annual exchange agreements with the MPG and Peracchi over the next three years pending completion of environmental review of their proposed 20-year extension. This would allow the MPG and Peracchi to continue to irrigate their historically farmed lands within Westlands. All of the monitoring and mitigation requirements for the exchange agreements would continue over the next three years as described in Section 2.2.1 of EA-14-033.

Due to the continued drought, it is likely that groundwater levels would continue to drop as groundwater pumping is increased within and outside the Proposed Action area to meet various landowner demands. In 2014, California enacted the Sustainable Groundwater Management Act. The Act requires the formation of local Groundwater Sustainability Agencies, who must develop Groundwater Sustainability Plans within the next five years for areas designated as medium or high priority. Under this system, the entire San Joaquin Valley is classified as high priority, which includes the Proposed Action area.

Although a Sustainability Plan for the Action area has not yet been developed and will likely not be developed fully within the next three years of the Proposed Action, as described in Section 2.2.1 of EA-14-033, groundwater level monitoring is required for all pumping around the Action area, not just those done by the MPG and Peracchi. In addition, specific design constraints are in place in order to minimize drawdowns during critical months. Previous years have shown recovery in the MPG wells due to groundwater recharge from Meyers Groundwater Bank and the San Joaquin River Restoration Program restoration flows in the San Joaquin River; however, this past year did not show the same recovery as the San Joaquin River Restoration Program did not release flows after February 2014 due to the current drought and the increase in groundwater pumping. Should restoration flows begin again, recharge and recovery of groundwater levels would likely be similar to what has occurred in the past.

Without the flows, groundwater level recovery is likely to be slow and dependent on hydrology.

Groundwater quality, surface water flow, surface water quality, sediment quality, and compaction would also continue to be monitored. Specific design constraints are in place that requires pumping to cease should specific thresholds be reached (see Section 2.2.1 of EA-14-033). These environmental commitments help to avoid and/or reduce potential adverse impacts.

The exchange would utilize existing facilities and would not require new infrastructure, new facilities, or ground disturbing activities. However, normal pumping and irrigation practices may require refurbishing or replacement of existing wells. Some wells may be taken out of service and replaced during this program due to water quality impacts, poor yield, and/or disrepair. The exchanged water would be used for existing agricultural purposes. No native or untilled land (fallow for three years or more) would be cultivated with water involved with these actions. In addition, CVP facilities would not be impacted as the exchanged water must be scheduled and approved by Reclamation in advance. No natural streams or water courses would be subject to new effects since no additional pumping or diversion from the Sacramento-San Joaquin River Delta would occur that would not have happened under the No Action Alternative.

Biological Resources

The Proposed Action would not involve the conversion of any land fallowed and untilled for three or more years. In addition, under either alternative, MPG and Peracchi lands would be farmed the same. The Proposed Action would continue to provide the additional water source that has been provided under the previously approved 10-year MPG exchange program. Pumping into the Mendota Pool would not change; the same wells that were addressed under the 10-year MPG exchange program would be used for the Proposed Action. Although MPG lands previously identified in the 10-year MPG EIS have changed over time, these lands were previously and continue to be used for agricultural purposes.

Since no natural stream courses or additional surface water pumping would occur, there would be no effects on listed fish species. No critical habitat occurs within the area affected by the Proposed Action and so none of the primary constituent elements of any critical habitat would be affected.

Potential effects to giant garter snakes would only be expected if the water quality parameters exceed concentrations or levels identified as toxic or of concern (4 µg/L and 2 µg/L, respectively). In 2004, Reclamation requested concurrence from the U.S. Fish and Wildlife Service that the MGP exchange program was not likely to adversely affect giant garter snake as Mendota Pool selenium levels available for review at that time had elevated concentrations of selenium (prior to 2002), and because of giant garter snakes potential sensitivity to water degradation, there was the potential, although unlikely, for impacts to the species.

As described in Section 3.1.1 of EA-14-033, MPG wells that have participated in the groundwater exchange program have not exceeded the 2.0 µg/L monthly mean for selenium from any of their wells. Further, selenium levels in the Mendota Pool did not exceed the water quality objective (≤ 2 µg/L monthly mean), except on a few occasions. In 2008, there were slight exceedances in one sample from the Delta-Mendota Canal terminus, Central California Irrigation District Main and Outside Canals, and Columbia Canal. There were also slight exceedances from Tranquillity Irrigation District and James Irrigation District in 2013. However, subsequent sampling found that these elevations in selenium levels were most likely the result of laboratory error. None of the increases in selenium are attributed to the MPG exchange program. With the continued restrictions incorporated into the Proposed Action, any potential impacts to giant garter snake would be avoided. The water quality monitoring program would continue to be implemented during the Proposed Action to manage and minimize any potential impairment to water quality. MPG and Peracchi would continue to comply with the environmental commitments and design constraints of the MPG exchange program, as described in Section 2.2.1 of EA-14-033.

With the implementation of environmental commitments listed in Section 2.2.1 of EA-14-033, and our understanding of the U.S. Fish and Wildlife Service's language regarding selenium levels of concern for listed species, Reclamation has determined that there would be No Effect to proposed or listed species or critical habitat under the Endangered Species Act, as amended (16 U.S.C. §1531 et seq.), and there would be no take of birds protected under the Migratory Bird Treaty Act (16 U.S.C. §703 et seq.).

Cumulative Impacts

Cumulative impacts result from incremental impacts of the Proposed Action or No Action alternative when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. To determine whether cumulatively significant impacts are anticipated from the Proposed Action or the No Action alternative, the incremental effect of both alternatives were examined together with impacts from past, present, and reasonably foreseeable future actions in the same geographic area.

Water Resources

Reclamation has reviewed existing or foreseeable projects in the same geographic area that could affect or could be affected by the Proposed Action as Reclamation and CVP contractors have been working on various drought-related projects, including this one, in order to manage limited water supplies due to current hydrologic conditions and regulatory requirements. This and similar projects would have a cumulative beneficial effect on water supply during this critically dry year.

As in the past, hydrological conditions and other factors are likely to result in fluctuating water supplies which drive requests for water service actions. Water districts provide water to their customers based on customers' demands and available water supplies and timing, while attempting to minimize costs. Farmers irrigate and grow crops based on these conditions and factors, and myriad water service actions are approved and executed each year to facilitate water needs. It is likely that during the drought, more districts will request exchanges, transfers, and Warren Act contracts (conveyance of non-CVP water in CVP facilities) due to hydrologic conditions. Each water service transaction involving Reclamation undergoes environmental review prior to approval.

The Proposed Action and other similar projects would not hinder the normal operations of the CVP and Reclamation's obligation to deliver water to its contractors or to local fish and wildlife habitat. Since the Proposed Action would not involve construction or modification of facilities, nor interfere with CVP operations, there would be no cumulative impacts to existing facilities or other contractors.

As described previously, the primary adverse effect of the 10-year exchange agreements analyzed in EIS-01-81 was the increase in the cumulative rate of groundwater degradation in wells west of the Mendota Pool, primarily MPG wells. This would likely continue during the three year period of the proposed exchange agreements; however, the temporary nature of the Proposed Action is not likely to increase these adverse impacts beyond what has occurred previously. Design constraints, monitoring, and mitigation as analyzed in EIS-01-81 would continue under the Proposed Action to address this cumulative effect.

Biological Resources

Conditions that may result in poorer water quality in the Mendota Pool area may increase the potential for adverse impacts to plant and wildlife resources. However, groundwater and surface water monitoring programs, like the MPG Exchange Program, provides a mechanism to predict and assess changes in water quality from both MPG and non-MPG wells that pump into the Pool. Also, with the approved increase in banked surface water at Meyers groundwater bank in 2013, there have been improvements in surface water in the Mendota Pool. As the Proposed Action would not result in any direct or indirect impacts to biological resources like giant garter snake, it would not contribute cumulatively to impacts on these resources.

RECLAMATION

Managing Water in the West

Final Environmental Assessment

3-year Extension of the Mendota Pool Group Exchange Agreements

EA-14-033



U.S. Department of the Interior
Bureau of Reclamation

April 2015

Mission Statements

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Section 1 Introduction

The Bureau of Reclamation (Reclamation) provided the public with an opportunity to comment on the Draft Finding of No Significant Impact (FONSI) and Draft Environmental Assessment (EA) between March 23, 2015 and April 6, 2015. Three comment letters were received. The comment letters and Reclamation's response to comments are included in Appendix C. Changes between this Final EA and the Draft EA, which are not minor editorial changes, are indicated by vertical lines in the left margin of this document.

1.1 Background

Reclamation previously executed annual exchange agreements with the Mendota Pool Group (MPG) and Donald J. Peracchi and affiliates (hereafter referred to as Peracchi) under a 10-year annual exchange program.

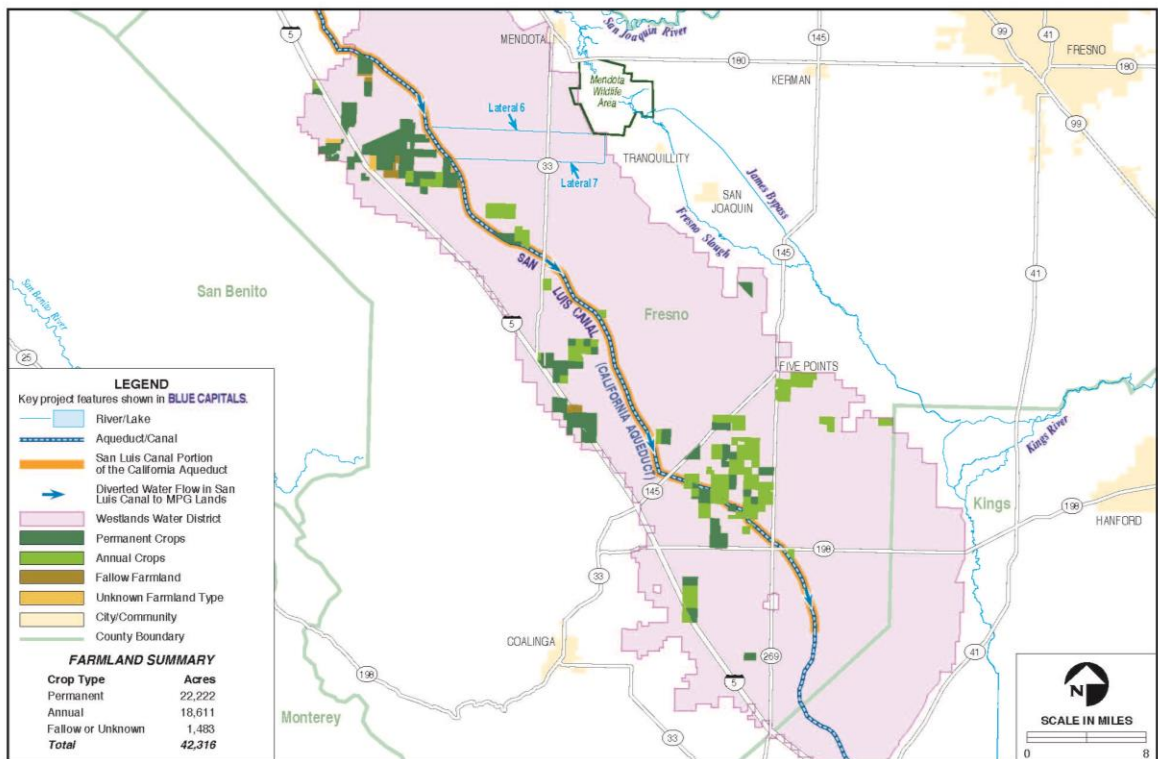
Members of the MPG and Peracchi own and/or operate farmland served from the San Luis Canal in Westlands Water District (Westlands), as well as in the vicinity of the Mendota Pool in Farmers Water District (Farmers WD) and surrounding areas (see Figures 1 and 2). The annual exchange agreements allow MPG farmers and Peracchi to cumulatively exchange up to 25,000 acre-feet (AF) of groundwater pumped into the Mendota Pool for Central Valley Project (CVP) irrigation water delivered to their lands in Westlands via the San Luis Canal.

The environmental documentation for the exchange agreements included an Environmental Impact Statement (EIS) for the 10-year MPG annual exchange program (Reclamation 2005) and an EA for the annual exchange agreements with Peracchi (Reclamation 2012). Both documents evaluated the impacts to groundwater levels, groundwater quality, land subsidence, surface water quality and sediment quality in the Mendota Pool, biological resources, CVP operations, archaeological and cultural resources, Indian Trust Assets, land use, traffic, air quality, noise, environmental justice, and socioeconomics and are hereby incorporated by reference.

The 10 year MPG annual exchange program was anticipated to have less-than-significant effects on the majority of resource areas considered in the analysis. The primary adverse effect of the action was to increase the cumulative rate of groundwater quality degradation in wells west of the Mendota Pool, primarily MPG wells. Mitigation actions that addressed potential impacts of the exchange program were included in the EIS and incorporated into the exchange agreements. These mitigation actions include a baseline pumping program, design constraints, a monitoring program, and adaptive management. These measures were also

included in the annual exchange program for Peracchi as groundwater exchanged with Peracchi was previously considered part of the MPG exchange program and is extracted from the same Farmers WD wells analyzed in the MPG EIS.

Since the current annual exchange program for the MPG and Peracchi expired in February 2015, they have requested an extension of the exchange program for another 20 years (2015 through 2034). Reclamation and Westlands are preparing an EIS/Environmental Impact Report (EIR) pursuant to the National Environmental Policy Act and California Environmental Quality Act for the proposed 20-year extension. However, as the environmental review of the proposed 20-year extension has not been completed, the MPG and Peracchi have requested a temporary extension of the 10-year program while the 20-year extension is being analyzed.



MPG Land in Westlands Water District

Figure 1 MPG and Peracchi Lands in Westlands Water District

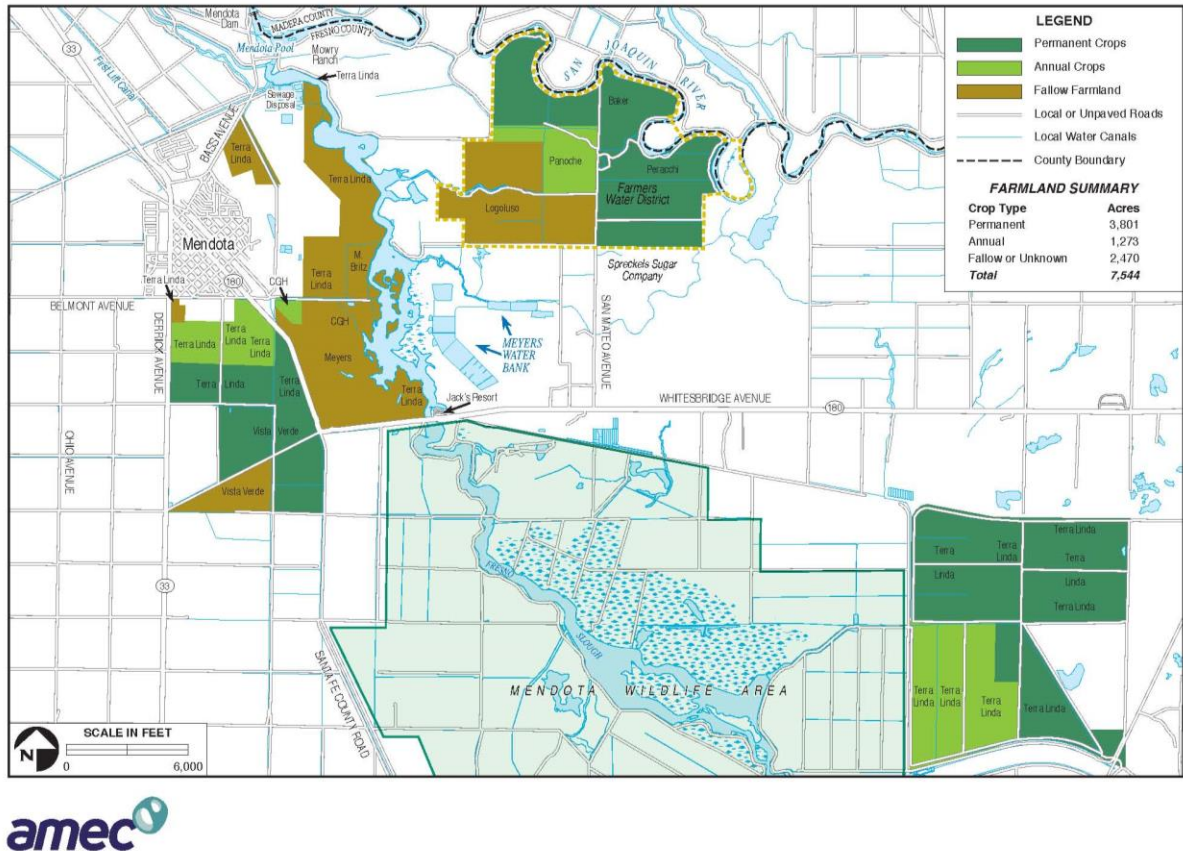


Figure 2 MPG and Peracchi Lands near Mendota Pool

1.2 Need for the Proposed Action

Due to legislative, regulatory, and environmental actions, the reliability of Westlands' CVP supply has been reduced substantially, and now averages 47 percent of contract amounts. Westlands has taken numerous steps to obtain additional sources of irrigation water and to ensure that comprehensive water conservation practices are being followed; however, water supplies are still inadequate to provide reliable and cost-effective irrigation water to historically irrigated lands within its service area. Landowners in Westlands need to supplement their water deliveries with affordable water in order to maintain production on historically irrigated lands.

The proposed three one-year extensions would allow the MPG and Peracchi to temporarily pump up to 26,316 AF per year (AFY) of groundwater of suitable quality into the Mendota Pool for exchange of up to 25,000 AFY CVP water while environmental review on the proposed 20-year extension is being prepared.

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Section 2 Alternatives Including the Proposed Action

This EA considers two possible actions: the No Action Alternative and the Proposed Action. The No Action Alternative reflects future conditions without the Proposed Action and serves as a basis of comparison for determining potential effects to the human environment.

2.1 No Action Alternative

Under the No Action Alternative, Reclamation would not execute one-year exchange agreements with the MPG and Peracchi over a three-year period (2015-2018). Additional water supplies would need to be acquired to meet the demands for the existing farmland in Westlands should CVP supplies be insufficient. Groundwater pumping by farmers around the Mendota Pool would continue to be used for irrigation of lands adjacent to the Pool as well as transfers or exchanges that do not involve Reclamation.

2.2 Proposed Action

Reclamation proposes to execute one-year exchange agreements with the MPG and Peracchi over a 3-year period (2015-2018) due to the expiration of the 10-year exchange program, which ended on February 28, 2015.

Under the proposed one-year exchange agreements, groundwater pumped annually into Mendota Pool, minus losses, would be used by Reclamation to offset existing water contract obligations at the Mendota Pool. Reclamation would then reduce CVP deliveries to the Mendota Pool by the quantity exchanged and make an equivalent amount of CVP water (up to 25,000 AFY) available via the San Luis Canal to be delivered to the MPG and Peracchi lands in Westlands for irrigation purposes.

Groundwater pumping would be conducted over a maximum of nine months each year, between March 1 and November 30, and would follow the same annual pumping program as the existing MPG pumping program. The MPG pumping program consists of three seasonal components: spring, summer, and fall. During the spring (March through May), both shallow (< 130 feet deep) and deep (>130 feet deep and above Corcoran Clay) wells may be pumped. During the summer (June through mid-September), only shallow wells may be pumped. However, during years when the program does not begin until after April 1, deep wells may

be pumped during the month of June. During the fall (mid-September through November), both shallow and deep wells may be pumped.

Specific conditions for the proposed execution of annual exchange agreements include the following:

- Reclamation's environmental analysis and the implementation of the required design constraints and monitoring as described in Section 2.2.1 is conditioned upon annual execution of an agreement between the MPG, Peracchi, and the San Joaquin River Exchange Contractors and Paramount Farming Company, and notification on or about March 15 of each year that the agreement is in effect. Reclamation may execute annual exchange agreements with the MPG or Peracchi once confirmation has been received from the San Joaquin River Exchange Contractors and Paramount Farming Company.
- In order to ensure that the effects of the annual pump-in program by the MPG and Peracchi are within the scope of analysis covered in this EA and that they are in compliance with any executed annual exchange agreement with Reclamation, the MPG and Peracchi are required to fully and promptly comply with the required annual agreement executed between the MPG, Peracchi, and the Exchange Contractors and Paramount Farming Company. If there are modifications to the design constraints and monitoring program that are outside the scope of the analysis covered in this EA or if unexpected impacts occur during a previous years pump-in that were not analyzed, additional environmental review and approval by Reclamation will be required before Reclamation executes further annual exchange agreements with the MPG or Peracchi.
- In the event the proposed 20-year exchange program is approved, the one-year exchange agreements under this Proposed Action would be superseded by new annual exchange agreements.
- No new infrastructure, new facilities, or ground disturbing activities would be needed for movement of this water. However, normal pumping and irrigation practices may require refurbishing or replacement of existing wells. Some wells may be taken out of service and replaced during this program due to water quality impacts, poor yield, and/or disrepair.
- No native or untilled land (fallow for three years or more) would be cultivated with water involved with these actions. In addition, the Proposed Action would be subject to the same environmental commitments and design constraints placed on the current MPG exchange program as described below.

2.2.1 MPG Exchange Program

The current pumping programs for the MPG exchange program are adaptively managed to minimize environmental impacts. MPG pumping is developed and reviewed on an annual basis to allow for year-to-year variations in hydrologic conditions which are defined in the spring, prior to the start of pumping. Annual pumping programs are based on consideration of several factors including the design constraints (e.g., water quality at the San Joaquin River Exchange Contractor's canal intakes or at the Mendota Wildlife Area), the results of the previous year's monitoring program, the extent of groundwater level recovery, hydrologic conditions, and any Reclamation contractor's rescheduling of CVP deliveries from the previous water year. These would continue under the Proposed Action.

Design Constraints

The existing 10-year MPG pumping program includes design constraints intended to minimize the potential environmental impacts of the pumping program. The constraints apply to the annual pumping programs and to triggers based on the results of the annual monitoring program. The constraints include the following measures:

- MPG wells along the Fresno Slough pump only when flow in the Fresno Slough is to the south. Wells in Farmers WD could pump irrespective of flow direction.
- MPG wells are shut off if electrical conductivity measurements at the San Joaquin River Exchange Contractors' canal intakes exceed that of the Delta-Mendota Canal flow into the Mendota Pool (as measured at Check 20) by 90 micromhos per centimeter ($\mu\text{mhos/cm}$) for a period of three days or more. If the MPG wells are shut off for this reason, they would not be turned back on until the electrical conductivity at the canal intakes returns to a level that is no more than 30 $\mu\text{mhos/cm}$ above the Delta-Mendota Canal inflow.
- Minimize deep zone drawdowns by reducing MPG deep zone transfer pumping during the summer months when the majority of non-MPG irrigation pumping occurs in the Mendota area.
- Limit total transfer pumping from the deep zone to 12,000 AFY to reduce subsidence, reduce water level impacts, and minimize the rate of groundwater quality degradation that would otherwise occur. Deep wells are defined as those with a perforated interval greater than 130 feet deep, while shallow wells are defined as those with a perforated interval less than 130 feet deep.
- Limit deep zone drawdowns throughout the pumping program to limit subsidence at the Yearout Ranch and Fordel extensometers caused by transfer pumping to less than an average of 0.005 foot per year over the 10-year period. Compaction data collected from the extensometers will be used along with model results to estimate the amount of subsidence caused by MPG pumping each year.

- Reduce transfer pumping if there is evidence that transfer pumping is causing long-term overdraft.
- Modify the pumping program based on the results of the surface water monitoring program to reduce overall surface water quality degradation, particularly with respect to salinity [total dissolved solids (TDS) or electrical conductivity]. This will ensure that the quality of water supplied to the Mendota Wildlife Area and other users in the southern portion of the Mendota Pool will meet applicable water quality criteria. Wells with TDS concentrations greater than 2,000 milligram per liter (mg/L) will not be pumped as part of the proposed action. During the fall pumping period, when there is reduced flow in the Mendota Pool and water quality at the Mendota Wildlife Area is most critical, wells with TDS higher than 1,200 mg/L will not be pumped for transfer.
- Shut off wells with selenium concentrations equal to or greater than the water quality criterion of 2 microgram per liter (µg/L).
- Minimize groundwater quality degradation by modifying the pumping program, based on the results of predictive modeling of the effects of the pumping program and the results of the groundwater monitoring program, and by minimizing drawdowns.

In addition to these measures, MPG financially compensates the other major groundwater pumpers in the Mendota area for increased power and other additional costs due to drawdowns estimated to have been caused by the MPG transfer pumping. The existing design constraints and financial compensation would continue under the Proposed Action.

Monitoring Program

The MPG, in cooperation with other interested parties, has designed a surface water, groundwater, and subsidence monitoring program to assess the impacts of this action. The current monitoring program was developed with input from the U.S. Fish and Wildlife Service (Service), the U.S. Geological Survey (USGS), and the California Department of Fish and Wildlife¹ (CDFW). The monitoring program was initiated in 1999 and was planned to last for the duration of the current 10-year exchange program. This monitoring program would continue under the Proposed Action. In 2001, the MPG implemented a sediment sampling program to assess accumulation of selenium, boron, arsenic, and molybdenum in Mendota Pool sediments. This would also continue under the Proposed Action. The monitoring program consists of the following components:

- Monitor pumpage of the MPG wells on at least a monthly basis
- Measure groundwater levels on a bimonthly basis throughout the year
- Conduct continuous monitoring at the Yearout Ranch and Fordel extensometers to estimate compaction and land subsidence
- Sample groundwater quality on an annual basis

¹ Formerly California Department of Fish and Game.

- Evaluate data from continuous electrical conductivity recorders located at the Delta-Mendota Canal, the Exchange Contractors' intakes, and the Mendota Wildlife Area at regular intervals
- Conduct surface water quality sampling during the pumping season
- Conduct sediment sampling at eight locations in the fall of each year

A quality assurance/quality control program is in place to verify accuracy of monitoring data. The monitoring data are provided to Reclamation to verify full implementation of the pumping and monitoring plan. In addition, monitoring data are provided to the Service, CDFW, Exchange Contractors, and Paramount Farming Company, as successor to The Newhall Land and Farming Company², among others. All of those procedures would continue under the Proposed Action.

Data collected by the MPG for the 10-year exchange program has been summarized in annual monitoring reports prepared jointly by the MPG, Exchange Contractors, and Paramount Farming Company, as successor to The Newhall Land and Farming Company at the conclusion of each pumping season. The results of the monitoring program are used in the design of the subsequent year's pumping program.

² The Newhall Land and Farming Company's New Columbia Ranch was purchased by Paramount Farming Company in 2005.

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Section 3 Affected Environment and Environmental Consequences

This section identifies the potentially affected environment and the environmental consequences involved with the Proposed Action and the No Action Alternative, in addition to environmental trends and conditions that currently exist.

3.1 Resources Eliminated from Further Analysis

Reclamation analyzed the affected environment and determined that the Proposed Action did not have the potential to cause direct, indirect, or cumulative adverse effects to the resources listed in Table 1.

Table 1 Resources Eliminated from Further Analysis

Resource	Reason Eliminated
Land Use	Under the Proposed Action, neither the MPG nor Peracchi would change historic land and water management practices. Groundwater would continue to be pumped from existing wells and delivered to the Mendota Pool as it has been done for the MPG pumpers in the past and by Peracchi since 2008. Pumped groundwater would be exchanged with Reclamation for a like amount, minus losses, of CVP water. Water delivered to their respective lands in Westlands would be done through existing facilities and would be used on existing crops. The water would not be used to place untillied or new lands into production, or to convert undeveloped land to other uses. Therefore, there would be no change to land use.
Cultural Resources	Reclamation has determined that the Proposed Action does not have the potential to cause effects to historic properties pursuant to 36 Code of Federal Regulations Part 800.3(a)(1). See Appendix A for Reclamation's determination.
Indian Sacred Sites	The Proposed Action would not limit access to or ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites.
Indian Trust Assets	The Proposed Action would not impact Indian Trust Assets as there are none in the Proposed Action area. See Appendix B for Reclamation's determination.
Socioeconomics	The Proposed Action would have beneficial impacts on socioeconomic resources as exchanged water would be used to help sustain existing permanent crops and maintain farming on MPG and Peracchi lands within Westlands.
Environmental Justice	The Proposed Action would not cause dislocation, changes in employment, or increase flood, drought, or disease nor would it disproportionately impact economically disadvantaged or minority populations.
Air Quality	Groundwater pumping by the MPG and Peracchi would occur with or without the Proposed Action and is therefore part of the existing conditions. No new construction or new facilities would be needed under the Proposed Action to deliver groundwater to the Mendota Pool. In addition, delivery of CVP water via the San Luis Canal to Westlands is water that would be delivered from existing facilities with or without the Proposed Action and is therefore part of the existing conditions. As there would be no change from existing conditions, a conformity analysis is not required and there would be no impact to air quality as a result of the Proposed Action.

Global Climate	No construction or new facilities is proposed. Some pumping would be required to move water under the Proposed Action, but power usage would be within the typical range for the facilities involved. No greenhouse gas emissions are anticipated outside normal operational fluctuations.
Noise	There would be no additional noise impacts under the Proposed Action as groundwater pumping into the Mendota Pool by MPG and Peracchi wells would occur with or without the Proposed Action and is therefore part of the existing conditions. In addition, there would be no physical changes to the environment or construction activities that could result in noise impacts.
Traffic	The Proposed Action would not change regional traffic circulation. In addition, no physical changes to the environment or construction activities would occur that could impact traffic in the Action area.

3.1 Water Resources

3.1.1 Affected Environment

Analysis of water resources in EIS-01-81 included the following: (1) groundwater levels and subsidence; (2) groundwater quality; (3) surface water delivery and distribution; (4) surface water quality; (5) sediment quality in the Mendota Pool; and (6) CVP operations. The primary adverse effect of the 10-year exchange agreements analyzed in EIS-01-81 was the increase in the cumulative rate of groundwater level degradation in wells west of the Mendota Pool, primarily MPG wells. Project planning, as described in EIS-01-81, included all practicable means of avoiding adverse environmental impacts. Where this was not possible, mitigation actions that addressed potential impacts of the exchange program were included in the EIS and incorporated into the exchange agreements. These mitigation actions include a baseline pumping program, design constraints, a monitoring program, and adaptive management (see Section 2.2.1). These are also included in the Proposed Action analyzed in this EA. Updates and changes to the previously analyzed water resources affected environment are discussed below.

Mendota Pool and Peracchi Exchange Program

As part of the original exchange program, MPG and Peracchi wells pump groundwater for exchange with Reclamation as well as for adjacent land use on their lands located near the Mendota Pool. Since completion of the ROD in 2005, the MPG has exchanged pumped groundwater with Reclamation six times (2007, 2008, 2009, 2010, 2012, and 2013); however, the MPG have been conducting transfer pumping (groundwater pumping that they transfer to other entities besides Reclamation) on and off since 1989 (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014). Table 2 summarizes pumping by the MPG and/or Peracchi over the last 10-years.

Table 2 Pumping by the MPG and Peracchi 2005-1013

Year	MPG pumping exchanged with Reclamation (AF)	Peracchi allocation exchanged (AF)	MPG pumping for adjacent use (AF)	Peracchi pumping for adjacent use (AF)
2013	19,234	3,215	10,461	1,624
2012	22,459	2,413	12,322	1,990
2011	0	0	6,431	2,133
2010	11,102	763	6,682	1,389
2009	23,811	2,981	8,903	1,184
2008	24,017	*	11,845	*
2007	22,556	-	15,463	-
2006	0	-	6,364	-
2005	0	-	10,009	-

Source: 2005-2014 MPG Annual Reports
 *Peracchi pumping was not broken out from those done by the MPG in the 2008 Annual Report.
 -Prior to 2008, pumping by Peracchi was done by previous landowners under the MPG exchange program.

As a requirement of the MPG and Peracchi exchange programs, the MPG implements data collection for the following resources: groundwater pumping, groundwater levels, groundwater quality, surface water flow, surface water quality, sediment quality, and compaction. The most recent MPG exchange and monitoring program is summarized in the 2013 annual report (available upon request).

Groundwater Pumping As described in the 2013 annual report, MPG and Peracchi pumping for exchange with Reclamation occurred between March 1 and November 12 and totaled 22,449 AF. This was 151 AF less than originally planned. Pumping for irrigation of overlying and adjacent lands in the Mendota Pool area occurred between January through December and totaled 12,085 AF, 216 AF less than planned. Non-MPG pumping in the affected area is also summarized in the 2013 annual report.

Groundwater Level Monitoring As a requirement of the MPG and Peracchi exchange program, the MPG conduct a groundwater level monitoring program as described in Section 2.2.1. The primary purpose of the groundwater level monitoring program is to generate the data necessary to evaluate the effects of MPG transfer pumping on groundwater levels. As described in the 2013 annual report, groundwater levels in the Proposed Action area have experienced large fluctuations in recent years likely due to recharge from the San Joaquin River Restoration Program and increased groundwater pumping due to the extensive drought. In 2013, seasonal drawdowns were greater than previous years and water levels in most wells did not recover after the irrigation season ended (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014).

Compaction As a requirement of the MPG and Peracchi exchange program, the MPG collect compaction data from the Fordel and Yearout Ranch extensometers to evaluate compliance with the established subsidence criteria for the program (an average 0.005 foot of subsidence per year over the 10 year program). The cumulative inelastic compaction caused by MPG transfer pumping since 2000 is

estimated to be 0.052 foot, which corresponds to an average annual inelastic compaction of 0.004 foot (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014). For 2013, the Fordel extensometer measured 0.009 foot of inelastic compaction above the Corcoran Clay with a cumulative inelastic compaction since March 2000 of 0.034 foot, averaging about 0.002 foot per year. For 2013, the Yearout Ranch extensometer measured 0.034 of inelastic compaction over the same period; however, this is a conservative value since the compaction data was incomplete. The cumulative inelastic compaction since March 2000 at the Yearout Ranch was 0.163, averaging about 0.012 of inelastic compaction.

Total land subsidence is monitored by the Plate Boundary Observatory using high-definition Global Positioning System equipment on the Meyers Farm property south of the City of Mendota. Since 2004, there has been approximately 0.42 foot of subsidence at this location, 15 times more than was measured at the Fordel extensometer during the same period (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014).

In addition, various entities, including Reclamation, USGS, California Department of Water Resources (DWR), San Luis and Delta-Mendota Water Authority, and the San Joaquin River Exchange Contractors have been monitoring subsidence trends within the Central Valley. In 2011, Reclamation established the San Joaquin River Restoration Program Geodetic Control Network to begin monitoring subsidence with the San Joaquin River Restoration Program Restoration Area. Subsidence in the San Joaquin River Restoration Program Restoration Area has been conducted biannually since 2011. In addition, due to significant subsidence rates along the flood control bypasses that parallel the San Joaquin River (some localized areas showing rates of more than 1 foot per year), DWR has collected levee survey data to help further refine the estimated annual subsidence rates along the levees of the flood bypasses (Reclamation 2014).

To visually compare subsidence rates and trends within the Restoration Area and surrounding areas, Reclamation developed an exhibit map (Figure 3) that combined data from various sources prior to the 2011 data collection effort, including Reclamation, U.S. Army Corps of Engineers, and RBF Consulting. Figure 3 shows annual subsidence rates ranging from less than 0.02 feet to more than 0.5 feet per year. However, Reclamation and DWR surveys from 2011 to 2013 indicate that the rates have either remained constant or have more than doubled in some areas (see Figure 4).

As shown in Figure 4, subsidence rates between December 2012 and December 2013 for the areas surrounding the Mendota Pool ranged between 0.15 and 0.3 feet.

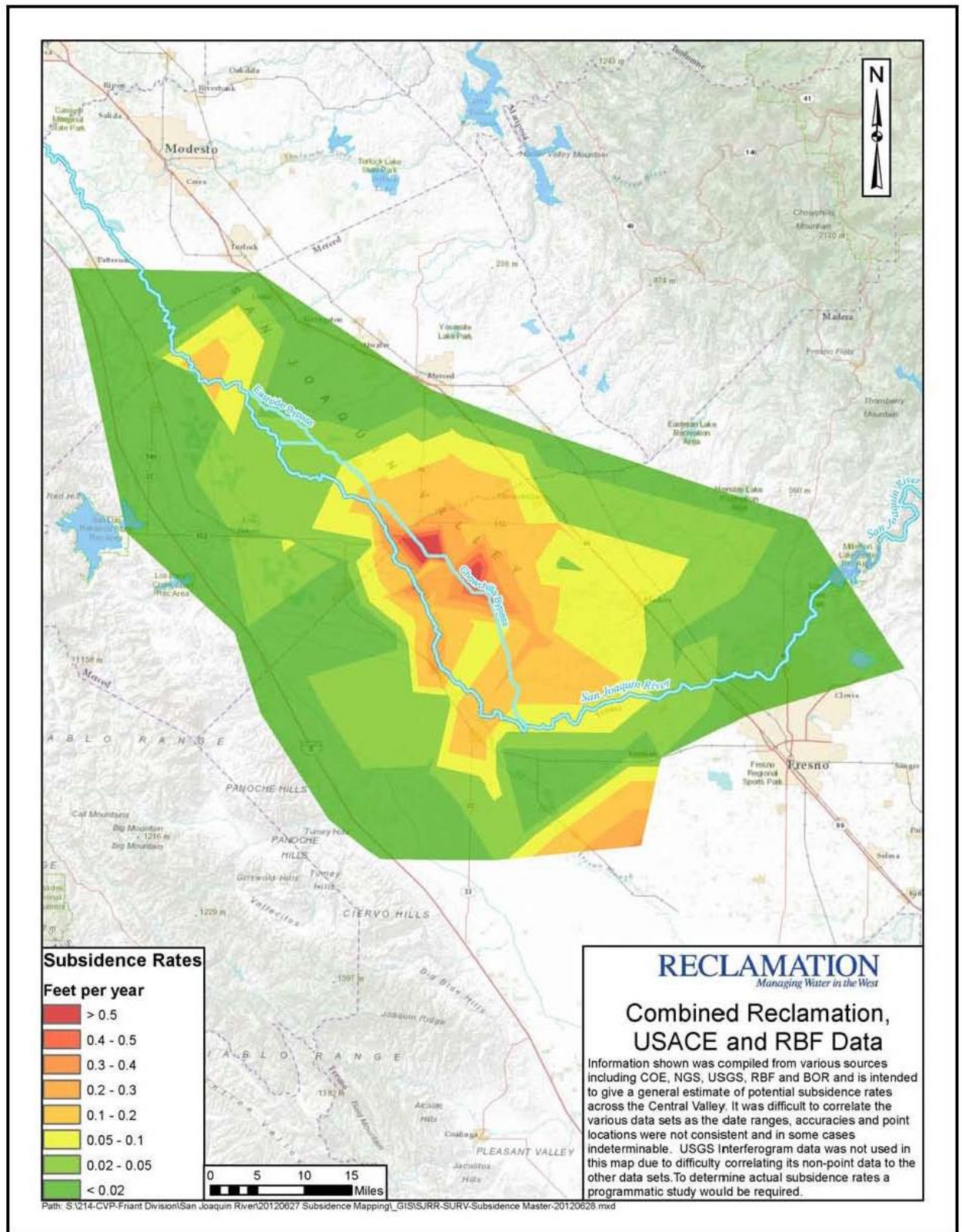


Figure 3 Subsidence Rates Prior to 2011 (combined calculated rates)

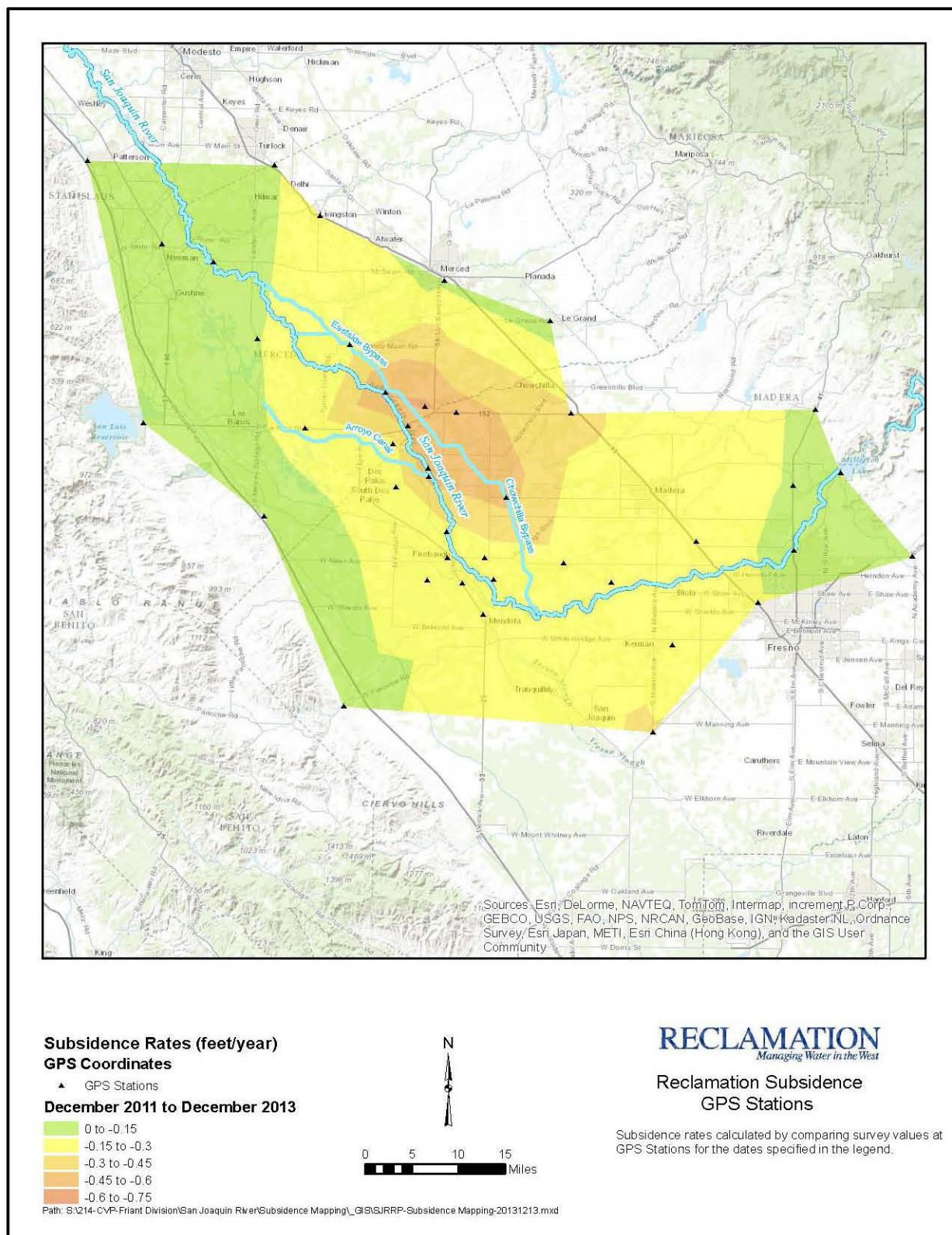


Figure 4 Calculated Annual Subsidence Rates from December 2011 to December 2013

Groundwater Quality Monitoring As a requirement of the MPG and Peracchi exchange program, the MPG conduct a groundwater quality monitoring program as described in Section 2.2.1. The purpose of the groundwater quality monitoring program is to generate the data necessary to evaluate changes in groundwater quality that may be caused by MPG and Peracchi transfer pumping and to forecast potential surface-water quality impacts in the Mendota Pool. Groundwater quality degradation has been occurring for decades in the Mendota Pool area and many wells have been taken out of service due to water quality impacts from the easterly movement of a saline front (Reclamation 2005). As described in the 2013 annual report, TDS concentrations vary widely around the Mendota Pool (less than 300 mg/L near the San Joaquin River to over 6,000 mg/L west of Fresno Slough). In addition, several Central California Irrigation District wells and MPG shallow and deep wells west of Fresno Slough continue to experience water quality degradation from movement of the saline front, which has increased due to MPG and Peracchi pumping; however, groundwater quality appears to be stable or improving at many of the northern and southern MPG wells along the Fresno Slough (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014). Improvements in the southern wells are largely attributed to the Meyers groundwater bank, which recharges groundwater east of Fresno Slough with lower salinity surface water from the Mendota Pool. Although the operation of the Meyers groundwater bank has resulted in substantial water quality improvements in the western portion of the Spreckels Sugar Company property, the shallow groundwater in the central portion remains degraded due to historical wastewater disposal practices and has migrated north toward the southernmost Farmers Water District wells; however, most of the their wells exhibit low salinity and stable groundwater quality due to recharge from the San Joaquin River and the Mendota Pool (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014).

Water quality at most wells in the Paramount Farming Company and Columbia Canal Company service areas have generally been stable and acceptable for irrigation, although many of their wells have experienced year-to-year salinity increases (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014).

Surface Water Monitoring As a requirement of the MPG and Peracchi exchange program, the MPG conducts a surface water quality monitoring program as described in Section 2.2.1. The primary purpose of this monitoring is to allow the MPG to detect any potential exceedances of water quality objectives in the Mendota Pool in order to adjust the pumping program as needed (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014). Surface water monitoring at the Pool includes eight trace elements and concentrations of four key elements (arsenic, molybdenum, boron, and selenium). MPG wells that have participated in the groundwater exchange program have not exceeded the 2.0 µg/L monthly mean from any of the wells (< 0.4 µg/L; n=130 in years 2007-2010, <1.3 µg/L; n=42 in 2012, and <2 µg/L; n=44 in 2013) (Luhdorff & Scalmanini and

Kenneth D. Schmidt & Associates 2005-2014). Also, selenium levels in the Mendota Pool did not exceed the water quality objective ($\leq 2 \mu\text{g/L}$ monthly mean), except on a few occasions (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2005-2014). In 2008, there were slight exceedances in one sample from the Delta-Mendota Canal terminus, Central California Irrigation District Main and Outside Canals, and Columbia Canal. There were also slight exceedances from Tranquillity Irrigation District and James Irrigation District in 2013. However, subsequent sampling found that these elevations in selenium levels were most likely the result of laboratory error (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014). None of the increases in selenium are attributed to the MPG exchange program.

Salinity measurements at the Columbia Canal and Central California Irrigation District main Canal intakes in the northern portion of the Mendota Pool was generally lower than the Delta-Mendota Canal due to San Joaquin River inflows from the San Joaquin River Restoration Program. Salinity measured within Central California Irrigation District's Outside Canal and Firebaugh Canal Water District's Intake Canal were more similar to the Delta-Mendota Canal over most of the year. There were several one to 16-day periods in January through March when electrical conductivity at the canal intakes exceeded that of the Delta-Mendota Canal by 90 $\mu\text{mhos/cm}$ or more. As the exceedances lasted for more than three days, the MPG was required to temporarily shut down groundwater pumping in March per the design constraints established for the program (see Section 2.2.1). Pumping resumed once electrical conductivity dropped below the threshold limit.

Sediment Monitoring The MPG initiated a sediment quality monitoring program in 2001 at the request of the CDFG (now CDFW). The purpose of this program is to provide baseline characterization of metal concentrations in the Mendota Pool sediments and to allow identification of temporal and spatial trends in sediment quality (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2011). In 2013, sediment sampling was conducted at eight locations in the Mendota Pool for the same trace elements analyzed in the surface water. Concentrations of arsenic, boron, molybdenum, and selenium were low at all sampling locations with one exception at the James Irrigation District Booster Plant where one result exceeded the EPA limit for arsenic (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2014).

3.1.2 Environmental Consequences

No Action

Under the No Action Alternative, Reclamation would no longer exchange pumped groundwater for CVP water with the MPG and Peracchi and neither would have supplemental water supplies for use on their lands within Westlands. Reclamation would continue to convey and deliver CVP water to Westlands and to CVP contractors at the Mendota Pool pursuant to their respective CVP contracts, as water is available. However, without the Proposed Action, MPG and

Peracchi's options to mitigate surface water supply deficits would be limited. They would need to either pump additional groundwater, for those lands that have available groundwater supplies in Westlands, or acquire other more costly surface water supplies in order to meet water supply demands. If other water supplies cannot be found, they may need to abandon permanent crops or fallow lands beyond what has been part of their historic practice.

Groundwater around the Mendota Pool would continue to be pumped by the MPG and Peracchi for adjacent land use and for transfer to other entities besides Reclamation as it has in the past. However, monitoring of groundwater pumping, groundwater levels, groundwater quality, surface water flow, surface water quality, sediment quality, and compaction would likely cease as they are costly and only required for the exchange agreements with Reclamation.

As water would no longer be exchanged with Reclamation for the lands in Westlands, it is likely that the amount of groundwater used for irrigation around the Mendota Pool would increase beyond what has been done in the last 10 years. This would provide some added recharge to groundwater in this area.

As groundwater pumping would continue, current subsidence trends would remain unchanged.

Proposed Action

Under the Proposed Action, Reclamation would temporarily continue annual exchange agreements with the MPG and Peracchi over the next three years pending completion of environmental review of their proposed 20-year extension. This would allow the MPG and Peracchi to continue to irrigate their historically farmed lands within Westlands. All of the monitoring and mitigation requirements for the exchange agreements would continue over the next three years as described in Section 2.2.1.

Due to the continued drought, it is likely that groundwater levels would continue to drop as groundwater pumping is increased within and outside the Proposed Action area to meet various landowner demands. In 2014, California enacted the Sustainable Groundwater Management Act. The Act requires the formation of local Groundwater Sustainability Agencies, who must develop Groundwater Sustainability Plans within the next five years for areas designated as medium or high priority. Under this system, the entire San Joaquin Valley is classified as high priority (DWR 2014), which includes the Proposed Action area.

Although a Sustainability Plan for the Action area has not yet been developed and will likely not be developed fully within the next three years of the Proposed Action, as described in Section 2.2.1, groundwater level monitoring is required for all pumping around the Action area, not just those done by the MPG and Peracchi. In addition, specific design constraints are in place in order to minimize drawdowns during critical months. Previous years have shown recovery in the MPG wells likely due to groundwater recharge from Meyers Bank and the San

Joaquin River Restoration Program restoration flows in the San Joaquin River (Luhdorff & Scalmanini and Kenneth D. Schmidt & Associates 2013); however, this past year did not show the same recovery as the San Joaquin River Restoration Program did not release flows after February 2014 due to the current drought and the increase in groundwater pumping. Should restoration flows begin again, recharge and recovery of groundwater levels would likely be similar to what has occurred in the past. Without the flows, groundwater level recovery is likely to be slow and dependent on hydrology.

Groundwater quality, surface water flow, surface water quality, sediment quality, and compaction would also continue to be monitored. Specific design constraints are in place that requires pumping to cease should specific thresholds be reached (see Section 2.2.1). These environmental commitments help to avoid and/or reduce potential adverse impacts.

The exchange would utilize existing facilities and would not require new infrastructure, new facilities, or ground disturbing activities. However, normal pumping and irrigation practices may require refurbishing or replacement of existing wells. Some wells may be taken out of service and replaced during this program due to water quality impacts, poor yield, and/or disrepair. The exchanged water would be used for existing agricultural purposes. No native or untilled land (fallow for three years or more) would be cultivated with water involved with these actions. In addition, CVP facilities would not be impacted as the exchanged water must be scheduled and approved by Reclamation in advance. No natural streams or water courses would be subject to new effects since no additional pumping or diversion from the Delta would occur that would not have happened under the No Action Alternative.

Cumulative Impacts

Cumulative impacts result from incremental impacts of the Proposed Action Alternative when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. To determine whether cumulatively significant impacts are anticipated from the Proposed Action or the No Action Alternative, the incremental effect of both alternatives were examined together with impacts from past, present, and reasonably foreseeable future actions in the same geographic area.

Reclamation has reviewed existing or foreseeable projects in the same geographic area that could affect or could be affected by the Proposed Action as Reclamation and CVP contractors have been working on various drought-related projects, including this one, in order to manage limited water supplies due to current hydrologic conditions and regulatory requirements. This and similar projects would have a cumulative beneficial effect on water supply during this critically dry year.

As in the past, hydrological conditions and other factors are likely to result in fluctuating water supplies which drive requests for water service actions. Water districts provide water to their customers based on customers' demands and available water supplies and timing, while attempting to minimize costs. Farmers irrigate and grow crops based on these conditions and factors, and myriad water service actions are approved and executed each year to facilitate water needs. It is likely that during the drought, more districts will request exchanges, transfers, and Warren Act contracts (conveyance of non-CVP water in CVP facilities) due to hydrologic conditions. Each water service transaction involving Reclamation undergoes environmental review prior to approval.

The Proposed Action and other similar projects would not hinder the normal operations of the CVP and Reclamation's obligation to deliver water to its contractors or to local fish and wildlife habitat. Since the Proposed Action would not involve construction of new facilities, nor interfere with CVP operations, there would be no cumulative impacts to existing facilities or other contractors.

As described previously, the primary adverse effect of the 10-year exchange agreements analyzed in EIS-01-81 was the increase in the cumulative rate of groundwater level degradation in wells west of the Mendota Pool, primarily MPG wells. This would likely continue during the three year period of the proposed exchange agreements; however, the temporary nature of the Proposed Action is not likely to increase these adverse impacts beyond what has occurred previously. Design constraints, monitoring, and mitigation as analyzed in EIS-01-81 would continue under the Proposed Action to address this cumulative effect.

3.2 Biological Resources

3.2.1 Affected Environment

The Proposed Action area includes the CVP service areas of MPG and Peracchi lands and the Mendota Pool area (waters from MPG, Peracchi, and non-MPG pumpers). Habitat types in the area are primarily cultivated agricultural lands which include field crops, vineyards, and orchards. These areas also include the irrigation water delivery systems and drainage canals.

Reclamation requested an official species list from the Service on January 29, 2015 via the Sacramento Field Office's website:

http://www.fws.gov/sacramento/ES_Species/Lists/es_species_lists-form.cfm.

The list includes species protected under Endangered Species Act (ESA), as identified from the USGS 7½ minute quadrangles that overlap the Proposed Action area (as shown in Figures 1 and 2) including: Huron, Gujarral Hills, La Cima, Burrel, Five Points, Westside, Harris Ranch, Calflax, Tres Pecos Farms, Lillis Ranch, Domengine Ranch, Jamesan, San Joaquin, Tranquillity, Coit Ranch, Levis, Chaney Ranch, Chounet Ranch, Tumey Hills, Monocline Ridge, and Mendota Dam. Reclamation further queried the CDFW's California Natural Diversity Database (CNDDB) for records of protected species within 10 miles of

the project location (CNDDDB 2015). The two lists, in addition to other information within Reclamation's files were combined to create the following list (Table 3).

Table 3 Special-status species that may occur within the Proposed Action Area

Species	Status ¹	Effects ²	Potential to occur and summary basis for ESA determination ³
AMPHIBIANS			
California red-legged frog (<i>Rana draytonii</i>)	T	NE	Absent. No CNDDDB-recorded occurrences in Proposed Action area and habitat absent.
California tiger salamander, central population (<i>Ambystoma californiense</i>)	T	NE	Absent. No CNDDDB-recorded occurrences in Proposed Action area and habitat absent. Agricultural activity precludes use by rodents whose burrows provide upland refugia.
BIRDS			
western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>)	T	NE	Possible. Riparian woodland habitats absent from Proposed Action area. However, still breeds along a portion of the Sacramento River, so birds might fly over the area when migrate to or from winter grounds in South America.
FISH			
Delta smelt (<i>Hypomesus transpacificus</i>)	T	NE	Absent. No natural waterways within the species' range would be affected by the Proposed Action.
Central Valley steelhead (<i>Oncorhynchus mykiss</i>)	T	NE	Absent. No natural waterways within the species' range would be affected by the Proposed Action.
INVERTEBRATES			
Valley elderberry longhorn beetle (<i>Desmocerus californicus dimorphus</i>)	T	NE	Possible. No records in area of effect. The host plant for this species could occur at Mendota Pool. No elderberry shrubs would be impacted by the Proposed Action.
Vernal pool fairy shrimp (<i>Branchinecta lynchi</i>)	T	NE	Absent. No CNDDDB-recorded occurrences in Proposed Action area and no vernal pools would be affected by the Proposed Action.
Vernal pool tadpole shrimp (<i>Lepidurus packardii</i>)	E	NE	Absent. No CNDDDB-recorded occurrences in Proposed Action area and no vernal pools would be affected by the Proposed Action.
MAMMALS			
Fresno kangaroo rat (<i>Dipodomys nigratoides exilis</i>)	E, X	NE	Absent. Managed agricultural lands are not expected to provide suitable habitat. Critical habitat absent. No land use changes would occur as a result of this action, no conversion of habitat, and no new facilities.
Giant kangaroo rat (<i>Dipodomys ingens</i>)	E	NE	Absent. No records in area of effect. This species cannot use actively farmed lands. No land use changes would occur as a result of this action, no conversion of habitat, and no new facilities.
San Joaquin kit fox (<i>Vulpes macrotis mutica</i>)	E	NE	Possible. Water would only be applied to existing converted lands. Kit foxes foraging may occur in some of the agricultural lands that would receive water as part of the Proposed Action, but

Species	Status ¹	Effects ²	Potential to occur and summary basis for ESA determination ³
			due to ongoing agricultural activities denning would be excluded.
Tipton kangaroo rat (<i>Dipodomys nitratoide</i> <i>nitratoide</i>)	E	NE	Absent. Managed agricultural lands are do not provide suitable habitat. No land use changes would occur as a result of this action, no conversion of habitat, and no new facilities.
PLANTS			
California jewelflower (<i>Caulanthus californicus</i>)	E	NE	Absent. No records in area of effect. Does not occupy aquatic areas such as Mendota Pool and can't grow in agricultural fields.
palmate-bracted bird's-beak (<i>Cordylanthus palmatus</i>)	E	NE	Absent. Does not occupy aquatic areas such as Mendota Pool and can't grow in agricultural fields.
San Joaquin woolly-threads (<i>Monolopia congdonii</i>)	E	NE	Absent. Does not occupy aquatic areas such as Mendota Pool and can't grow in agricultural fields.
REPTILES			
Blunt-nosed leopard lizard (<i>Gambelia sila</i>)	E	NE	Absent. Managed agricultural lands do not provide suitable habitat. No land use changes would occur as a result of this action, no conversion of habitat, and no new facilities.
Giant garter snake (<i>Thamnophis gigas</i>)	T	NE	Possible. Documented in the Mendota Pool vicinity (Hansen 2008). Species is sensitive to impaired water quality. No land use changes would occur as a result of this action, no conversion of habitat, and no new facilities. Proposed Action is subject to the same environmental commitments and design constraints to provide protection to the species as were followed during the MPG exchange program, see Section 2.2.1.
<p>1 Status = Listing of federally protected species protected under the Endangered Species Act E: Listed as Endangered T: Listed as Threatened X: Critical Habitat designated for this species in one or more quadrangles on the list</p> <p>2 Effects = Endangered Species Act Effect determination NE: No Effect anticipated from the Proposed Action to federally listed species or designated critical habitat</p> <p>3 Definitions of Occurrence Indicators: Possible: Species not observed in the study area, but could occur there from time to time Absent: Species not observed in the study area, and precluded from occurring there because habitat requirements not met</p>			

Special-Status Species

The MPG and Peracchi lands that would receive irrigation water are currently in agricultural production and as such, they have limited habitat value for federally listed species. As described in Table 3, most special-status species would not occur in the Proposed Action area. The few exceptions could include the western yellow-billed cuckoo, valley elderberry longhorn beetle, San Joaquin kit fox, and giant garter snake.

Selenium contamination and impaired water quality are identified as potential threats to the giant garter snake because of the bioaccumulative nature and long term persistence of selenium in aquatic sediments and food (Service and NMFS 2000, Service 2012). Over the life of a snake it is possible to accumulate contaminants that can impact the growth, survival, and reproduction of individuals. Based on limited information of selenium toxicosis for snakes, and even reptiles in general, the Service recommends giant garter snake toxicity threshold would be comparable with birds (Service and NMFS 2000). As a result, the Service believes that a selenium criterion of 2.0 µg/L or less should protect habitat in the area used by the species.

Reclamation determined that the Mendota Pool 10-Year Exchange Agreement was not likely to adversely affect the giant garter snake (Reclamation 2005). Relying largely on our commitment that pumps from MPG and Peracchi lands would only pump groundwater into the Mendota Pool whose selenium concentration level does not exceed 2.0 µg/L monthly mean, the Service concurred that the implementation of the MPG 10-Year Exchange Agreements was not likely to adversely affect giant garter snake (Service 2005; File Number: 1-1-04-I-1482).

3.2.2 Environmental Consequences

No Action

Under the No Action Alternative, farming activities would most likely continue on MPG and Peracchi lands. To meet existing water supply demands, additional groundwater would be pumped by farmers around the Mendota Pool for adjacent use as well as by transfers or exchanges. If these sources are not available, lands may become fallowed. During the 3-year period (2015-2018), San Joaquin kit fox could continue to access any agricultural lands in the area, and no new effects would occur to the western yellow-billed cuckoo, giant garter snake, or valley elderberry longhorn beetle as conditions would remain the same as existing conditions. The cuckoos would continue to not stopover in the area, and no elderberry shrubs would be affected by any ongoing farming activities or any pumping at Mendota Pool.

Proposed Action

The Proposed Action would not involve the conversion of any land fallowed and untilled for three or more years. In addition, under either alternative, MPG and Peracchi lands would be farmed the same. The Proposed Action would continue to provide the additional water source that has been provided under the previously approved 10-year MPG exchange program. Pumping into the Mendota Pool would not change; the same wells that were addressed under the 10-year MPG exchange program would be used for the Proposed Action. Although MPG lands previously identified in the 10-year MPG EIS have changed over time, these lands were previously and continue to be used for agricultural purposes.

Since no natural stream courses or additional surface water pumping would occur,

there would be no effects on listed fish species. No critical habitat occurs within the area affected by the Proposed Action and so none of the primary constituent elements of any critical habitat would be affected.

Potential effects to giant garter snakes would only be expected if the water quality parameters exceed concentrations or levels identified as toxic or of concern (4 µg/L and 2 µg/L, respectively). In 2004, Reclamation requested concurrence from the U.S. Fish and Wildlife Service that the MPG exchange program was not likely to adversely affect giant garter snake as Mendota Pool selenium levels available for review at that time had elevated concentrations of selenium (prior to 2002), and because of giant garter snakes potential sensitivity to water degradation, there was the potential, although unlikely, for impacts to the species.

As described in Section 3.1.1, MPG wells that have participated in the groundwater exchange program have not exceeded the 2.0 µg/L monthly mean for selenium from any of their wells. Further, selenium levels in the Mendota Pool did not exceed the water quality objective (≤ 2 µg/L monthly mean), except on a few occasions. In 2008, there were slight exceedances in one sample from the Delta-Mendota Canal terminus, Central California Irrigation District Main and Outside Canals, and Columbia Canal. There were also slight exceedances from Tranquillity Irrigation District and James Irrigation District in 2013. However, subsequent sampling found that these elevations in selenium levels were most likely the result of laboratory error. None of the increases in selenium are attributed to the MPG exchange program. With the continued restrictions incorporated into the Proposed Action, any potential impacts to giant garter snake would be avoided. The water quality monitoring program would continue to be implemented during the Proposed Action to manage and minimize any potential impairment to water quality. MPG and Peracchi would continue to comply with the environmental commitments and design constraints of the MPG exchange program, as described in Section 2.2.1.

With the implementation of environmental commitments listed in Section 2.2.1 and our understanding of the Service's language regarding selenium levels of concern for listed species, Reclamation has determined that there would be No Effect to proposed or listed species or critical habitat under the ESA, as amended (16 U.S.C. §1531 et seq.), and there would be no take of birds protected under the Migratory Bird Treaty Act (16 U.S.C. §703 et seq.).

Cumulative Impacts

Conditions that may result in poorer water quality in the Mendota Pool area may increase the potential for adverse impacts to plant and wildlife resources. However, groundwater and surface water monitoring programs, like the MPG Exchange Program, provides a mechanism to predict and assess changes in water quality from both MPG and non-MPG wells that pump into the Pool. Also, with the approved increase in banked surface water at Meyers groundwater bank in 2013, there have been improvements in surface water in the Mendota Pool (Reclamation 2013). As the Proposed Action would not result in any direct or

indirect impacts to biological resources like giant garter snake, it would not contribute cumulatively to impacts on these resources.

Section 4 Consultation and Coordination

4.1 Public Review Period

Reclamation provided the public with an opportunity to comment on the Draft FONSI and Draft EA between March 23, 2015 and April 6, 2015. Three comment letters were received. The comment letters and Reclamation's response to comments are included in Appendix C.

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Section 5 Preparers and Reviewers

Rain L. Emerson, M.S., Supervisory Natural Resources Specialist, SCCAO

Jennifer L. Lewis, PhD., Wildlife Biologist, SCCAO

Joanne Goodsell, Archaeologist, MP-153

Erma Leal, Repayment Specialist, SCCAO – reviewer

David E. Hyatt, Resources Management Division Chief – reviewer

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Section 6 References

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Appendix A

Reclamation's Cultural Resources Determination

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

MP-153 Tracking Number: 15-SCAO-057

Project Name: 3-Year Extension of the Mendota Pool Group Exchange Agreements

NEPA Document: EA-14-033

MP-153 Cultural Resources Reviewer: Joanne Goodsell



Date: January 9, 2015

Reclamation proposes to execute one-year exchange agreements with the Mendota Pool Group (MPG) and Mr. Donald J. Peracchi over a three-year period (2015-2018) to allow MPG and Mr. Peracchi to continue to cumulatively pump up to 26,240 acre-feet per year (AFY) of groundwater to the Mendota Pool in exchange for up to 25,000 AFY of Central Valley Project water delivered via the San Luis Canal. The proposed action would bridge any gap between the expiration of existing exchange agreements between Reclamation, MGP, and Mr. Peracchi that expire in February 2015 and the completion of a new EIS/EIR being prepared by the Westlands Water District and Reclamation that will fully analyze the environmental impacts of a proposed 20-year extension of these exchange agreements.

No new infrastructure, modifications to existing facilities, ground disturbing activities, or change in land use would be required for or result from the extension of these exchange agreements. As such, Reclamation has determined that the proposed action would have no impacts to cultural resources and is an undertaking that has no potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a)(1). At this time, Reclamation has no further obligations under Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101 *et seq.*) related to the proposed action.

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 would be required. Please retain a copy of this document with the administrative record for this action

Appendix B

Reclamation's Indian Trust Assets Determination



Emerson, Rain <remerson@usbr.gov>

ITA Determination

STEVENSON, RICHARD <rstevenson@usbr.gov>

Mon, Feb 2, 2015 at 3:08 PM

To: Rain Emerson <remerson@usbr.gov>

Rain,

I reviewed the proposed action to execute a series of three one-year exchange agreements with the MPG and Donald J. Peracchi through February 2018. Under the proposed exchange agreements, groundwater pumped annually into Mendota Pool, minus losses, would be used by Reclamation to offset existing water contract obligations at the Mendota Pool. Reclamation would then reduce Central Valley Project (CVP) deliveries to the Mendota Pool by the quantity exchanged and make an equivalent amount of CVP water (up to 25,000 acre-feet per year) available for irrigation purposes to the MPG and Donald J. Peracchi lands in Westlands Water District via the San Luis Canal.

No new infrastructure, modifications of facilities, or ground disturbing activities would be needed for movement of this water. No native or untitled land (fallow for three years or more) would be cultivated with water involved with these actions. In addition, the Proposed Action would be subject to the same environmental commitments and design constraints placed on the MPG exchange program.

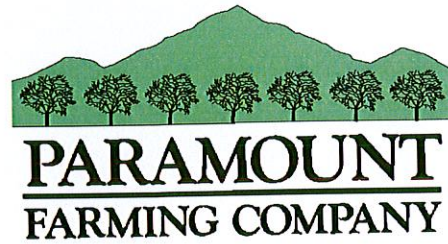
The proposed action does not have a potential to affect Indian Trust Assets. The nearest ITA is Santa Rosa Rancheria approximately 23 miles East of the project location.

Dick Stevenson

Richard M. Stevenson
Deputy Regional Resources Manager
2800 Cottage Way, MP-400
Sacramento, CA 95825-1898
(916) 978-5264
(916) 396-3380 iPhone
rstevenson@usbr.gov

Appendix C

Comment Letters and Reclamation's Response to Comments



April 3, 2015

Via email: remerson@usbr.gov

U.S. Bureau of Reclamation
Ms. Rain Emerson
1243 N. Street
Fresno, CA 93721

RE: ***Comments to Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI)***

Dear Ms. Emerson:

Thank you for the opportunity to comment on the subject draft EA and FONSI. The San Joaquin River Exchange Contractors Water Authority (Exchange Contractors) and Paramount Farming Company jointly submit the following comments and suggested change in the FONSI:

We believe that the Bureau of Reclamation (Reclamation) should alter its finding of approval of three (3) successive one (1) year periods, and instead provide a conditional and modified approval of a one year FONSI only to reflect a correct statement of the conditions and risks. The approval should state:

“1. The Bureau of Reclamation is informed that an extension of Agreement No. 2 of the MPG and the Exchange Contractors and Paramount Farming Company has not occurred at this time but may occur within a period after the Bureau of Reclamation’s proposed adoption of the FONSI. Because the Bureau of Reclamation is depending upon the monitoring, limitations, and controls of that extended agreement, the FONSI should be effective only if notice is provided by the Exchange Contractors and Paramount Farming and MPG and Perrachi parties that such a one year extension has been executed and agreed to.

U.S. Bureau of Reclamation, Ms. Rain Emerson

RE: ***Comments to Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI)***

April 3, 2015

Page 2

2. Because the impacts from the program of pumping of wells and transfer can be maintained at levels below significance as it relates to the specific areas of concern addressed in the Agreement between the Mendota Pool Group (MPG) and Mr. Perrachi and the Exchange Contractors and Paramount Farming Company (PFC), only if there is full and prompt compliance by the members of the MPG and Mr. Perrachi (a separate agreement holder) with the requirements of the Agreement between the Exchange Contractors and PFC with the Mendota Pool Group. If that Agreement is extended, and because Reclamation will not be monitoring or regulating the actions described, this finding of no significant environmental impact will be dependent in each of Year Two and Year Three upon the Exchange Contractors and Paramount Farming Company confirming in writing that full and prompt compliance occurred with the requirements of that Agreement in the prior year and that the Agreement No. 2 terms have been extended for first Year Two and then Year Three. There may be modifications of the terms in the extensions and, therefore, the FONSI findings, if proposed to be made applicable to Year 2 and Year 3, should be carefully restricted to apply and be applicable only if the requisite notifications regarding the Extension Agreements applicability and terms are received by the Bureau of Reclamation. If that confirmation is not received by February 15 of a water year, the NEPA process shall be re-opened and a supplemental report shall be required in regard to the potential significant arising from the events of the prior year alleged to have occurred and consideration of further mitigation measures to be employed shall be considered. If the potential significant impacts cannot be reliably avoided, then a supplemental environmental assessment shall be prepared and a determination made of whether a FONSI or EIS is required to properly consider the subsequent year program under NEPA.

3. Because the program outlined in the Project Description and the potential of significant impacts as it relates to the specific areas of concern addressed in the agreement between the MPG and Mr. Perrachi and the Exchange Contractors and PFC is dependent upon monitoring and enforcement of practices agreed to between the Mendota Pool Group and the Exchange Contractors/Paramount

EC & PFC-2

EC & PFC-3


U.S. Bureau of Reclamation, Ms. Rain Emerson

RE: ***Comments to Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI)***

April 3, 2015


Page 3

EC & PFC-3
cont.



Farming Company and adjusted during the water year by those parties, and because the Bureau of Reclamation will not be regulating the activities under the Program and will depend upon the parties monitoring, reporting and adjusting to avoid significant impacts, the conditional adoption of a FONSI determination for Year Two and Year Three is conditioned upon and shall not be effective unless each party affirms to the Bureau of Reclamation by February 15 of Year Two and/or of Year Three that the monitoring, enforcement and reporting is in accordance with the parties' agreements and the FONSI assumptions of no significant impacts.

EC & PFC-4



4. Because the MPG is in the process of preparing the studies and environmental documentation of the potential impacts and alternatives from continuation of the program made subject to the agreement of the MPG and the Exchange Contractors and PFC, the adoption of three (3) one-year separate FONSI approvals is appropriate only if the Mendota Pool Group and Mr. Perrachi (pursuant to his agreement with the MPG) proceeds with reasonable diligence to complete these studies, to fund the NEPA work by Reclamation and its consultants, and makes reasonable progress toward full NEPA compliance. It is anticipated that the mitigation and monitoring conditions required as a result of these more advanced and thorough studies may provide for new conditions, limitations and data gathering. If it is reported that funding and reasonable progress is not occurring in that process, the issuance and effectiveness of any FONSI for either subsequent one-year period will be suspended until Reclamation determines the issues of reasonable progress. If the NEPA and other regulatory processes are completed before the Year Two or Year Three FONSI term is complete, the new requirements or different requirements should be immediately implemented and the existence of this rather unusual approval of a FONSI should not be contended to delay the application of those more thorough studies and requirements. It is anticipated that the Exchange Contractors and Paramount Farming Company will have a substantial role through a new agreement with the MPG in attempting to apply those new conditions designed to eliminate or reduce significant environmental impacts."

U.S. Bureau of Reclamation, Ms. Rain Emerson

RE: ***Comments to Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI)***

April 3, 2015

Page 4

↑ Therefore, it would seem that the FONSI approval should specifically state that the approval will no longer be effective should Reclamation be informed that the NEPA and regulatory processes have been completed and new requirements are now applicable. If there is no new agreement with the Exchange Contractors and Paramount Farming Company at that time to provide monitoring and contractual diligence to the program, obviously Reclamation will have to determine under the terms of NEPA whether monitoring and mitigation are feasible and the FONSI proposed here will be ineffective in any case at that time as there will be an altered project description.

Discussion:

Each of the above conditions and qualifications should be included by Reclamation in its FONSI. Unless Reclamation proposes to organize a full inspection, monitoring and regulatory program and diligently performs those functions, the actions proposed can only have no significant environmental impact as it relates to the specific areas of concern addressed in the agreement between the MPG and Mr. Perrachi and the Exchange Contractors and PFC if the Exchange Contractors and Paramount Farming Company are able to affirm that the Mendota Pool Group and Mr. Peracchi's activities fully comply with the terms of the Agreement. This Agreement is currently being considered for an extension for 2015 and will be considered separately for Year Two and Year Three. There is no justification for or basis for adopting three separate one-year FONSI's without the preconditions and assumptions being confirmed in advance as to Year Two and Year Three in approximately the wording suggested above.

SAN JOAQUIN RIVER EXCHANGE CONTRACTORS
WATER AUTHORITY

By: 
Steve Chedester, Executive Director

PARAMOUNT FARMING COMPANY:

By: 
Roy Catania

Response to San Joaquin River Exchange Contractors Water Authority and Paramount Farming Company Joint Comment Letter, April 3, 2015

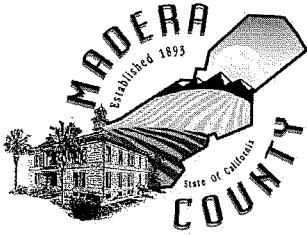
EC & PFC-1 Comment noted. Environmental Assessment (EA)-14-033 and its scope of analysis were developed consistent with National Environmental Policy Act (NEPA) regulations, guidance from the Council on Environmental Quality (CEQ), and the Department of the Interior's NEPA regulations. In accordance with NEPA, an EA is initially prepared to determine if there are significant impacts from carrying out the Proposed Action. An EA is defined by CEQ as a "concise public document" that "briefly provide[s] sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact" (40 CFR 1508.9). As described in Section 2.2 of EA-14-033 (page 5), the Proposed Action under consideration is the execution of one-year exchange agreements with the Mendota Pool Group (MPG) and Mr. Peracchi over a 3-year period (2015-2018). Further, as described in Section 1.1 (pages 1-2) and Section 2.2.1 (pages 6-8), the Proposed Action is a temporary continuation of the MPG's 10-year annual exchange program pending completion of environmental review of a 20-year extension and includes all environmental design constraints, monitoring, and mitigation required for execution of annual contracts by Reclamation with the MPG and Mr. Peracchi, including annual documentation from the San Joaquin River Exchange Contractors Water Authority stating that there are no objections to the MPG and Mr. Peracchi pumping non-Project water into the Mendota Pool. As an annual exchange contract will not be executed by Reclamation without this annual documentation, Reclamation believes the analysis within EA-14-033 fully supports the Finding of No Significant Impact for the Proposed Action. Additional language has been added to Section 2.2 of EA-14-033 to describe this (see page 6 of the Final EA).

EC & PFC-2 See Response to Comment EC & PFC-1.

EC & PFC-3 See Response to Comment EC & PFC-1.

EC & PFC-4 See Response to Comment EC & PFC-1.

EC & PFC-5 See Response to Comment EC & PFC-1.



Community and Economic Development Planning Division

Matthew Treber
Deputy Director

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- Suite 3100
- Madera, CA 93637
- (559) 675-7821
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April 3, 2015

Rain Emerson
Bureau of Reclamation
1243 N. Street
Fresno CA 93721

Regarding: Mendota Pool Group
Exchange Agreements FONSI-14-033

Dear Ms. Emerson:

The Madera County Planning Department has reviewed the proposed Draft Finding of No Significant Impact for a 3-year Extension of the Mendota Pool Group Exchange Agreement and would offer the following comments.

Madera County Code Title 13.100.050 states the following:

A. Except as otherwise provided in this chapter, no person shall engage in (1) the exportation of groundwater, (2) groundwater banking, (3) importation of foreign water, for purposes of groundwater banking, or (4) any combination of these activities, on or under land subject to this chapter without first obtaining a permit to do so pursuant to the terms and procedures of this chapter.

B. While engaging in their normal and/or historical operation of serving their constituents, local water agencies are specifically exempted from the requirements of subsection A of this section, with respect to such operations.

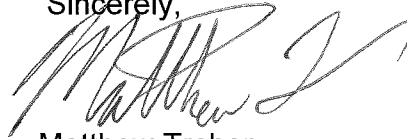
C. A single permit may be issued under this chapter for one or more of the activities listed in subsection A of this section, provided that the permit holder shall be authorized to engage only those activities or combination of activities specifically authorized by the permit. A permit that authorizes the importation of foreign water shall be limited to importation from the sources entitled and any importation from other sources is prohibited unless a new or amended permit granted for such importation.

The Department would respectfully request that the Bureau of Reclamation provide Madera County with a map clearly depicting the water agency's boundaries associated with this Exchange Agreement. At this time it is unclear with the documentation available whether the water agencies involved are a local water agency within Madera County where groundwater may be being pumped and exported outside of Madera County.

Madera-1

Madera-2 | If a non local water agency wishes to engage in activities listed in subsection A in Madera County then a permit in accordance with Madera County Code Title 13 is certainly required, and we would respectfully request that the Bureau of Reclamation cease the permitting of the Exchange Agreement and refer the appropriate agencies to Madera County Public Works to attain the necessary permit. Please feel free to contact me if I can provide further clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Treber", with a stylized flourish at the end.

Matthew Treber
Deputy Director

CC: Board of Supervisors
Eric Fleming, County Administrative Officer
Johannes Hoevertsz, Public Works Director
County Counsel Office

Response to Madera County Comment Letter, April 3, 2015

Madera-1 As shown in Figure 2 of EA-14-033, all lands with wells proposed to pump-in under the Proposed Action are located solely within Fresno County. Consequently, no groundwater would be exported out of Madera County.

Madera-2 See Response to Comment Madera-1.



April 6, 2015

Ms. Rain Emerson
Bureau of Reclamation, South-Central California Area Office
1243 N Street
Fresno, California 93721

Subject: Mendota Pool Group Exchange Agreements FONSI-14-033

Dear Ms. Emerson:

The Mendota Pool Group (MPG) has reviewed the proposed Draft Finding of No Significant Impact for a 3-year Extension of the Mendota Pool Group Exchange Agreements and would like to offer the following comment.

In Section 2.2, page 6, the document states:

"No new infrastructure, modifications of facilities, or ground disturbing activities would be needed for movement of this water."

During the course of this project, it may be necessary to repair or replace existing facilities (primarily wells). The MPG would like to have the above language replaced with the following, which is similar to the existing 10-year environmental impact statement:

"No new infrastructure, new facilities, or ground disturbing activities would be needed for movement of this water. However, normal pumping and irrigation practices may require refurbishing or replacement of existing wells. Some wells may be taken out of service during this program due to water quality impacts, poor yield, and/or disrepair. These wells may be replaced by others."

Thank you.

Sincerely yours,


William V. Pipes
Agent, Mendota Pool Group

cc: Mendota Pool Group
Erma Leal, U.S. Bureau of Reclamation

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Mendota Pool Group
1281 East Alluvial Avenue, Suite 101
Fresno, California 93720
Phone: (559) 264-2535
Fax: (559) 264-7431

MPG-1

Response to Mendota Pool Group Comment Letter, April 6, 2015

MPG-1 Comment noted. Section 2.2 (page 6) has been revised with the following language:

“No new infrastructure, new facilities, or ground disturbing activities would be needed for movement of this water. However, normal pumping and irrigation practices may require refurbishing or replacement of existing wells. Some wells may be taken out of service and replaced during this program due to water quality impacts, poor yield, and/or disrepair.”