

**CA Save Our Streams Council**



January 21, 2020

Westlands Water District Board of Directors  
Westlands Distribution District #1 & #2  
Westlands District's Fresno Office  
3130 N. Fresno Street,  
Fresno, CA 93703

**Re: Objection to Adoption of Westlands Water District Board of Directors Distribution District #1 & #2 Resolution Nos. 101-20, 102-20, 103-20 and 104-20 Because of:**

- (1) Insufficient Public Notice and Inadequate Project Description and**
- (2) Failure to Comply with the California Environmental Policy Act (CEQA), the Central Valley Project Improvement Act (CVPIA), and state and federal Endangered Species Acts.**

Via email [[jgutierrez@wwd.ca.gov](mailto:jgutierrez@wwd.ca.gov)] & [[bormonde@westlandswater.org](mailto:bormonde@westlandswater.org)] and fax 559-241-6286

The Center for Biological Diversity, Planning Conservation League and other signatory organizations to this letter object to the proposed adoption of Westlands Water District's Distribution Districts #1 & #2 (Westlands) Board of Directors Resolution Nos. 101-20, 102-20, 103-20 and 104-20. These Resolutions, if approved, would adopt Notices of Statutory Exemption (NOE) and Categorical Exemption (CE) under the California Environmental Quality Act for four federal Central Valley Project (CVP) contracts for Westlands Distribution District #1 and one CVP contract for Westlands Distribution District #2:

The Westland's Board of Directors Agenda Item #4 for a Meeting on January 21, 2020 note the following for Distribution District #1: *“Consider Recommendation that the Board of Directors Adopt Resolution Nos. 101-20, 102-20, 103-20 and 104-20, Authorizing the Filing of Notices of Statutory Exemption and Categorical Exemption from the California Environmental Quality Act for Approval of and Authorization to Execute the Contracts Between the United States and Westlands Water District Distribution District No. 1 Providing for Project Water Service and Facilities Repayment, Authorizing Approval and Execution of the Contracts Between the United States and Westlands Water District Distribution District No. 1 Providing for Project Water Service and Facilities Repayment, and Authorizing Actions In Furtherance Thereof”*<sup>1</sup>

And Agenda Item #4 for Distribution District #2: *“Consider Recommendation that the Board of Directors Adopt Resolution Nos. 101-20, Authorizing the Filing of Notices of Statutory Exemption and Categorical Exemption from the California Environmental Quality Act for Approval of and Authorization to Execute the Contract Between the United States and Westlands Water District Distribution District No. 2 Providing for Project Water Service and Facilities Repayment, Authorizing Approval and Execution of the Contract Between the United States and Westlands Water District Distribution District No. 2 Providing for Project Water Service and Facilities Repayment, and Authorizing Actions In Furtherance Thereof”*<sup>2</sup>

#### **Insufficient Public Notice and Inadequate Project Description.**

The above Notices are agenda items for the Westlands' January 21, 2020 Board Meeting, but no further information is provided on these contracts. The public does not have an adequate description of the project, the NOEs, the CEs, or the actual Board Resolutions. It is unclear whether these Board Resolutions apply to CVP Interim Contract Renewals (which were publicly noticed on December 20, 2019 on <https://ceqanet.opr.ca.gov>) or if these Notices pertain to proposed conversions of CVP contracts to repayment contracts pursuant to section 4011 of the Water Infrastructure Improvements for the Nation Act (“WIIN Act”). Further, there is no information provided that justifies the Exemptions under CEQA. We can only conclude that Westlands' proposed Board Resolutions are procedurally flawed and substantively mistaken.

For much of the last decade the undersigned have commented on Westlands' two-year interim contracts, seeking disclosure of the environmental impacts, including threats to endangered species and water pollution, and yet none of the undersigned or their representatives received notice of the "public negotiations" for the permanent repayment contract or this proposed Westlands' action. Our most recent comments addressed the numerous problems with Westlands CVP contract renewals, including submission of comments on Westlands Interim Contracts dated December 14, 2019<sup>3</sup> and comments on the proposed Westlands conversion of contract to a repayment contract dated January 6, 2020<sup>4</sup>. As these

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<sup>1</sup> <https://wwd.ca.gov/wwd-agenda/distribution-district-no-1/>

<sup>2</sup> <https://wwd.ca.gov/wwd-agenda/distribution-district-no-2/>

<sup>3</sup> <http://calsport.org/news/wp-content/uploads/PCL-et.-al.-Cmts-Re-WWD-Interim-Contract-12-14-19.pdf>

<sup>4</sup> <http://calsport.org/news/wp-content/uploads/PCL-et.-al.-Comments-on-WWD-Permanent-Contract-Conversion-Jan-6-2020.pdf>

comments are relevant to the Westlands proposed Board Resolutions, we incorporate these comments by reference and are included in the links provided in the footnotes below.

### **Failure to Comply with CEQA, CVPIA, and state and federal Endangered Species Acts.**

Public Resources Code Section 21151, which provides that EIRs are required for certain projects, notes that a Categorical Exclusion is not allowed when:

1. The project site is environmentally sensitive as defined by the project's location. A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.
2. The project and successive projects of the same type in the same place will result in cumulative impacts;
3. There are "unusual circumstances" creating the reasonable possibility of significant effects.

As emphasized in our comments on Westlands' CVP Interim Contracts and Westlands' CVP Repayment contract conversions for Westlands, areas within the project site and downstream habitats are known to be habitats for endangered species that are sensitive to selenium contamination and salt sterilization and will likely be adversely affected by these water contract deliveries. Specifically, impacts may occur to the California Least Tern, giant garter snake (*Thamnophis gigas*), blunt-nosed leopard lizard (*Gambelia sila*), San Joaquin kit fox (*Vulpes macrotis mutica*), and San Joaquin woolly-threads (*Monolopia congdonii*). These concerns were previously raised in regard to the issuance of two-year interim contracts.<sup>5</sup> These previously identified impacts will now be further compounded by a permanent contract and yet no compliance with the California Endangered Species Act or Federal Endangered Species Act have been provided.

Previous comments also describe significant groundwater contamination and downstream cumulative impacts. The toxic runoff, drainage, and effects of drainage treatment and disposal, including but not limited to, fish, wildlife, air emissions, transportation and other impacts, have not been disclosed. Without a proven drainage solution, water quality impacts from irrigation of toxic soils in Westlands have far reaching impacts outside of the district and in downstream waters.<sup>6</sup> Therefore, there clearly are significant effects to the environment associated with the issuance of permanent water contracts considered in these Board Resolutions and, therefore, a full EIR under CEQA needs to be completed along with compliance with federal and state endangered species laws.

If indeed the proposed resolutions sanction the exemption from environmental review for the conversion of these contracts<sup>7</sup> to long term permanent contracts, the Board of Directors of Westlands will have failed

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<sup>5</sup> See Environmental Advocate Comment Letter Re Interim Contract Renewal WWD Santa Clara.pdf John Buse, Center for Biological Diversity February 6, 2018.

<sup>6</sup> The Department of Interior's Inspector General issued a report in November 2019 that finalized their investigation on the Demo-Plant. The Inspector General found that the Demo-Plant did not provide the agricultural drainage service that is required by statute and it did not consistently meet operational performance criteria. In addition, the USBR was found to not have provided effective oversight of the cooperative agreement for operation and maintenance of the Demo-Plant. As a result, USBR spent a reported \$67.8 million for a project that does not meet its legal obligation and that had not consistently met operation performance goals.[see <https://www.doi.gov/reports/bureau-reclamation-did-not-effectively-manage-san-luis-demonstration-treatment-plant>]

<sup>7</sup> The notice to the public did not include a description of the project that is the subject of the CEQA exemption.

to comply with the Central Valley Project Improvement Act, which requires full environmental review of any long term contract.<sup>8</sup> Further any full EIR for long term contracts should include information on the relationships between irrigation in the San Luis Unit (including Westlands) and groundwater movement downslope, in terms of flow and water quality. EPA has noted previously that such an environmental review should provide information on the San Luis Unit's role in groundwater accretions and discharges of pollutants into wetland channels and the San Joaquin River and identify impacts to wetlands and wildlife. Absent this information, the public and decision makers are left in the dark as to significant impacts and required mitigation measures, such as "*changes in amounts and location of water applied, which will reduce drainage production and selenium mobilization.*" The effects of toxic pollution from Westlands caused by irrigation enabled by the proposed permanent water contracts are significant and complex and must be addressed in a comprehensive EIR.

Finally, consideration and analysis of a full range of project alternatives is needed to prevent significant impacts. We have raised these issues in the past, and they are even more pertinent today. They include first the failure to study "the alternative of a reduction in maximum interim contract water quantities. By failing to study this alternative, the Westlands EA defies the *PCFFA* Court's instruction that Reclamation must "give full and meaningful consideration to the alternative of a reduction in maximum interim contract water quantities." *PCFFA*, 655 Fed.Appx. at 599. Second, the CEQA exemption fails to disclose – let alone analyze as required – the massive environmental impacts of diverting this water from the Delta and applying to contaminated soils. Third, an accurate map of the land uses that will be receiving water under these contracts is needed to determine the impacts of converting these agricultural areas to other uses, including utilities.<sup>9</sup> And, fourth, there needs to be an assessment of the ability of existing agricultural users to pay the significant amounts of debt required under the contract conversion process. This required debt load predictably will change land uses and the likely shift to industrial uses must be disclosed and analyzed. Lastly, no information is provided as to how this debt will be repaid and the

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<sup>8</sup> Section 3404(c) of the CVPIA requires that an EIS be completed before Reclamation can renew any long-term repayment or water service contract for a period of 25 years. Reclamation defines "long term contract" as a "contract with a term of more than 10 years." See <https://www.usbr.gov/recman/pec/pec-p05.pdf> By these definitions any contract term longer than 10 years is by Reclamation's own definition 'a long-term contract.' A conversion to a permanent contract fits the definition of a long-term contract. Thus, federal law requires a full EIS before entering into permanent repayment contracts. No such analysis has been prepared and by the same rules a full EIR is also required. Congress determined that long-term contracts would have a significant effect on the environment such that an EIS is required. As Senator Feinstein noted with the passage of the WIIN Act, .." the bill's savings clause that prevents the legislation from violating state or federal environmental laws including the *Endangered Species Act* and biological opinions..."see <https://www.feinstein.senate.gov/public/index.cfm/press-releases?ID=FF5C94EB-667A-4DEC-A0A4-296AB5027BE4>. Westlands' cannot evade this duty by claiming a CEQA exemption.

<sup>9</sup> See WWD 2008 Bond Debt Statement: 30,065,000 Westlands Water District adjustable Rate Refunding Revenue Certificates Of Participation, Series 2008a \_ Westlands Water District Notes To Financial Statements Years Ended FEBRUARY 28, 2007 AND 2006 @ page 31: "*In February and March 2005, the District acquired approximately 8,750 acres of land within the Broadview Water District, which is substantially all of Broadview's irrigable acreage. In conjunction with the acquisition, the District initiated the process to annex all of Broadview's lands and will seek a permanent assignment of Broadview's Central Valley Project Water Contract totaling 27,000 acre-feet to the District from the Bureau of Reclamation. Of this water supply, the District plans to annually make available 6,000 acre-feet of entitlement to the Naval Air Station – Lemoore pursuant to the Supplemental Water Allocation Agreement between the District and NASL.*" See this 2016 overview of transmission lines, towers and land conversion maps for Westlands WD: [http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI02/TN210903\\_20160330T140735\\_Daniel\\_Kim\\_Comments\\_WSP\\_comments\\_to\\_RETI\\_20\\_plenary\\_group\\_meeti.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI02/TN210903_20160330T140735_Daniel_Kim_Comments_WSP_comments_to_RETI_20_plenary_group_meeti.pdf) & <http://web.energyacuity.com/REProject.aspx?id=16887>

impacts on existing agricultural and industrial operations, especially during severe prolonged droughts and climate change, will be managed. These critical shortcomings leave decision-makers and the public in the dark.

In short, procedurally and substantively Westlands' adoption of the CEQA exemption for these contracts would not comply with state and federal laws. We urge Westlands to withdraw these Board Resolutions, and complete a full EIR analysis of these contracts as required. Under this contract conversion process, the public has been given a puzzle of dizzying complexity without the puzzle picture. Westlands' proposed contract conversion must be withdrawn and restarted with full consideration of all similar contract conversions and their cumulative effects. The water contract conversion process must start with outreach to the 17-20 parties of interest that have thus far been excluded or contracted out under the proposal. Furthermore, all of these invisible draft contracts must be publicly disclosed and the critical exhibits must be provided to the public and those areas of origin that are most impacted by the water that is being taken and exported to Westlands.

Thank you for considering these comments. Please make sure the undersigned are included in any future Westlands actions with regard to CVP contract renewals and/or conversion of CVP contracts pursuant to Section 4011 of the WIIN Act. If you have any questions please contact John Buse, Senior Counsel Senior Attorney, Center for Biological Diversity, 1411 K St. NW, Washington, D.C. 20005 [jbuse@biologicaldiversity.org](mailto:jbuse@biologicaldiversity.org).



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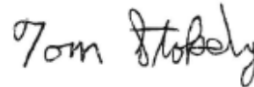
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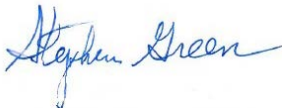
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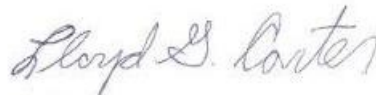
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**Documents Adopted By Reference: Public Interest & Comments Incorporated by Reference [All Documents can be found in the record of earlier contract renewals, earlier NEPA processes and in some cases on the BOR website.]**

- 1. 1-29-10 “ Draft Environmental Assessment and Finding of No Significant Impact for the San Luis Unit Water Service Interim Renewal Contracts” To Rain Healer from Joseph Membrino for Hoopa Valley Tribe.**
- 2. 1-29-10 “Comments of The Bay Institute and NRDC on Draft Environmental Assessment (EA) and Draft Findings of No Significant Impact (FONSI) for the San Luis Unit interim renewal contracts (Central Valley Project, California)” To Rain Healer from Hamilton Candee**
- 3. 2-18-2010 “Comments Re Two Year Interim Renewal Central Valley Project Water**

**Service Contracts: Westlands Water District [WWD] Contracts 14-06-200-8237AIR13; 14-06-200-8238A-IR13; WWD DD1-Broadview 14-06-200-8092-IR12; WWD DD1 Centinella 7-07-20-W0055-IR12-B; WWD1 Widren 14-06-200-8018-IR12-B; WWD DD2 Mercy Springs 14-06-200-3365A-IR12-C. To Karen Hall, USBR, from 11 Conservation, Fishery and Community Organizations.**

- 4. 3-2-2010 “Final Scoping Comments for Westlands Water District [Westlands] Proposed “Conveyance of Nonproject Groundwater from the Canal side project using the California Aqueduct”. The project proposes to discharge up to 100,000 acre feet of groundwater into the State Water Project California Aqueduct, a Drinking Water Supply for Approximately 20 Million People”. To Russ Freeman from 14 Conservation, Fishery and Community Organizations.**
- 5. 5-19-10 Letter to Donald Glaser, USBR From David Ortmann, Pacific Coast Management Council**
- 6. 7-30-2010 “San Joaquin River Central Valley Selenium Basin Plan Waiver, 303 (d) Delisting of San Joaquin River for Selenium and the California Toxics Rule” To Jared Blumenfeld, EPA from 16 Conservation, Fishery and Community Organizations.**
- 7. 9-22-2010 USFWS “Comment Letter – San Joaquin River Selenium Control Plan Basin Plan Amendment” To: Ms. Jeanine Townsend, Clerk to the Board from Susan K. Moore.**
- 8. 11-16-2010 “Letter to Senator Feinstein on Long Term Solution to Westlands Drainage Problem” To Commissioner Connor from Environmental Working Group.**
- 9. 12-13-2010 Comments on the Draft Finding of No Significant Impact [FONSI] San Luis Water District’s [SLD] and Panoche Water District’s [PWD] Water Service Interim Renewal Contracts 2011-2013 FONSI-10-070. To Rain Healer, USBR, From 8 Conservation, Fishery and Community Organizations.**
- 10. 2-28-2011 “Scoping Comments Proposed Ten Year North to South Water Transfer of CVP and Non CVP Water Using State Water Project (SWP) and Central Valley Water Project (CVP) Facilities” To Brad Hubbard, USBR et. al from 10 Conservation, Fishery and Community Organizations.**
- 11. 5-5-11 “Request for Revised Notice of Intent for the Bay Delta Conservation Plan (BDCP) that Recognizes Water Supply Realities” To Deputy Interior Secretary Hayes from 16 Conservation, Fishery and Community Organizations.**
- 12. 8-11-2011 “Opposition to the Proposal to Curtail Monitoring at the Grassland Bypass Project.” To Michael C. S. Eacock (Chris), Donald R. Glaser, USBR and Ren Lohofener USFWS et. al from 7 Conservation, Fishery and Community Organizations.**
- 13. 10-17-2011 “Comments on Draft EA/FONSI (DEA) for the San Luis Drainage Feature Reevaluation Demonstration Treatment Facility at Panoche Drainage District’s San Joaquin River Improvement Project (SJRIP) FONSI-10-030” To Rain Healer, USBR from 8 Conservation, Fishery and Community Organizations.**

14. 11-15-2011 “Full Environmental Impact Statement Needed for San Luis Drainage Feature Reevaluation Demonstration Treatment Facility at Panoche Drainage District [FONSI-10-030]” To Donald Glaser from 13 Conservation, Fishery and Community Organizations.
15. 11-16-2011 Notice Inviting Public Comment on BDCP MOA to Hon. Kenneth Salazar, Secretary John Laird, Secretary from 190 Conservation, Fishery and Community Organizations.
16. 1-5-2012 “Comments on Draft EA/FONSI for Three Delta Division and Five San Luis Unit Water Service interim Renewal Contracts 2012-2014” To Rain Healer from Stephen Volker on behalf of 4 Tribal, Conservation, Fishery and Community Groups.
17. 1-18-2012 “Comments on Draft EA/FONSI for Oro Loma Water District Partial Assignment of Central Valley Project Water to Westlands Water District FONSI-11-092” To Rain Healer, USBR from 12 Conservation, Fishery and Community Organizations.
18. 1-20-2012 “Delta Division, San Luis Unite and Cross Valley CVP Interim renewal contracts—Comments of the Hoopa Valley Tribe on draft EA-11-049 and EA-11011 and FONSI 11-049 and FONSI 11-011” To Rain Healer, USBR from Leonard E. Masten Jr. Chariman.
19. 3-26-2012 “Comments on CVP Interim Renewal Contracts for three Delta Division and five San Luis Unit interim water service renewal contracts for: Pajaro Valley Water Management Agency, Santa Clara Valley Water District, and Westlands Water District (five contracts) 2012 to 2014 and Environmental Documents.” To Hon. David J. Hayes, Donald R. Glaser, Michael L. Connor, Hilary Tompkins and Michael Jackson from PCFFA et. al [13 Conservation, Fishery and Community Organizations.]
20. November 1, 2013 EWC et. al to Karen Hall Bureau of Reclamation Central Valley Project Interim Contract Renewals: Pajaro Valley Water Management Agency, Westlands Water District Distribution District No. 1, and Santa Clara Valley Water District 14-06-200-3365A-IR14-B Tracy, City of (The West Side) 7-07-20-W0045-IR14-B Tracy, City of (Banta-Carbona) 14-06-200-4305A-IR14-B Westlands Water District Distribution District 1 (Widren) 14-06-200-8018-IR14-B Westlands Water District Distribution District 1 (Centinella) 7-07-20-W0055-IR14-B Westlands Water District Distribution District 1 (Broadview) 14-06-200-8092-IR14 Westlands Water District Distribution District 2 (Mercy Springs) 14-06-200-3365A-IR14-C Westlands Water District 14-06-200-495A-IR4 Tracy, City of 14-06-200-7858A-IR1
21. March 29, 2014, "Subject: Final Record of Decision and Environmental Assessment [EA] for Westlands Water District et. al. Central Valley Project Interim 6 Contract Renewals for Approximately 1.2 MAF of water. Rain Emerson Bureau of Reclamation.
22. January 9, 2014, "The EA for Westlands Water District Central Valley Project Interim Contract Renewals listed below & the Finding of No Significant Impact (FONSI) is



supported by Reclamation's Environmental Assessment (EA) Number EA-13-023, *Central Valley Project Interim Renewal Contracts for Westlands Water District, Santa Clara Valley Water District, and Pajaro Valley Water Management Agency 2014 – 2016*. Rain Emerson Bureau of Reclamation."

23. January 13, 2014, "The Environmental Assessment [EA] for Westlands Water District et. al. Central Valley Project Interim Contract Renewals" Rain Emerson. Bureau of Reclamation.
24. February 13, 2014 "Coalition Of Environmental, Environmental Justice, Tribal and Fishing Organizations' Comments In Opposition To The Grassland Drainer Proposal To Discharge Selenium And Other Pollutants To Broadview Water District Lands—Another Kesterson In The Making". EWC letter to Sally Jewell, Secretary of Interior; Rod McInnis NMFS Regional Administrator & Jared Blumenfeld, Regional IX Administrator
25. April 2, 2014, PCL et. al. Subject: "Final Record of Decision and Final Environmental Assessment [FEA] for Westlands Water District et. al. Central Valley Project Interim 6 Contract Renewals for Approximately 1.2 MAF of water" Rain Emerson Bureau of Reclamation
26. June 4, 2014, Institute for Fisheries Resources (IFR COALITION) Comments on Proposed CVP Cost Allocation Methodology: A recipe for continuing deficits and failure to repay taxpayers, Brooke Miller-Levy Project Manager, Bureau of Reclamation.
27. February 6, 2017, Environmental Advocates et. al. Re: Comments EA-17-021, FONSI-15-023A & Renewal of Six Interim Contracts for Westlands, Santa Clara et. al. Brenda Burman Commissioner of Reclamation David Murillo Mid-Pacific Regional Director Michael Jackson, Area Manager, SCC-100 South-Central California Area Office, Paul Souza Pacific Southwest Region Regional Director USFWS.
28. January 12, 2018, PCL et. al. Re: Interim Renewal Contract for Central Valley Project Water Contracts for Westlands Water District (EA17-021& FONSI-15-023A1 )--An abuse of discretion and failure to comply with federal law. Brenda Burman, Commissioner Bureau of Reclamation; Quentin Branch, Kate Connor Bureau of Reclamation, David Murillo, Regional Director Mid-Pacific Regional Office.
29. January 16, 2018, Steve Volker, "Comments of PCFFA, SFCBOA, IFR and NCRA on 16 Central Valley Project Interim Renewal Contracts for Cross Valley Canal, Delta Division and American River Division" Brenda Burman, Commissioner Bureau of Reclamation; Quentin Branch, Kate Connor Bureau of Reclamation, David Murillo, Regional Director Mid-Pacific Regional Office

