



GEORGETOWN DIVIDE
Public Utility District
P.O. BOX 4240
GEORGETOWN, CALIFORNIA 95634-4240
PHONE (530) 333-4356
FAX (530) 333-9442
gd-pud.org

June 25, 2026

Tracking No: 9570 1148 7231 6176 3335 91

Erik Ekdahl, Chief Deputy Director
State Water Resources Control Board
Division of Water Rights
1001 I Street, 14th Floor
Sacramento, CA 95814
erik.ekdahl@waterboards.ca.gov
WaterRightPetitions@waterboards.ca.gov

Subject: Georgetown Divide Public Utility District Petition for Change Involving a
Temporary Water Transfer under Permit 012827 (Application A005644)

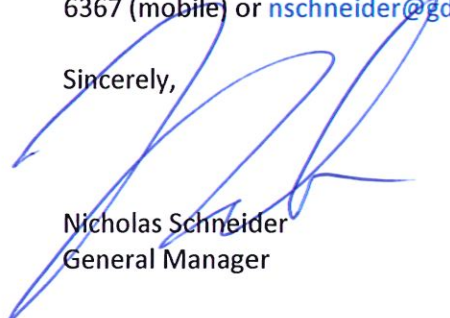
Dear Mr. Ekdahl:

Please find enclosed with this letter a Petition for Change Involving Water Transfer, made pursuant to Water Code section §1725, for a temporary transfer from Georgetown Divide Public Utility District (GDPUD) to Westlands Water District (WWD). Also attached to this letter is an Environmental Information for Petitions form, along with supporting documentation to assist in your review of this petition.

Finally, please find enclosed checks for the appropriate Division of Water Rights and Department of Fish and Wildlife fees. On January 14, 2026, GDPUD filed an intent to transfer under Permit 012827 with the State Water Resources Control Board to qualify for the streamlined noticing provided in Water Code Section § 1727. Interested Parties requesting notification of this petition are courtesy copied on this transmittal.

GDPUD respectfully requests your prompt consideration of this petition. Should you have any questions or wish to speak with GDPUD, please feel free to contact me directly at (530) 333-4356 (office) or (760) 217-6367 (mobile) or nschneider@gd-pud.org.

Sincerely,



Nicholas Schneider
General Manager

Enclosures:

1. Petition for Change Involving Water Transfer
2. Attachment 1 GDPUD_2026 (for Petition to Change)
3. Environmental Information for Petitions
4. Attachment A for Environmental Information for Petition

Cc via email:

Arvin Chi, Division of Water Rights (Arvin.Chi@waterboards.ca.gov)
Patricia Fernandez, Division of Water Rights (Patricia.Fernandez@waterboards.ca.gov)
Anna Fock, DWR SWPAO (Anna.fock@water.ca.gov)
Michelle Snapp, CVRWQCB (Michelle.Snapp@waterboards.ca.gov)
Morgan Kilgour, CDFW Region 2 (Morgan.Kilgour@wildlife.ca.gov)
Briana Seapy, CDFW Region 2 (Briana.Seapy@wildlife.ca.gov)
Bridget Gibbons, CDFW Region 2 (Bridget.Gibbons@wildlife.ca.gov)
California Department of Fish and Wildlife (R2water@wildlife.ca.gov)
Lisa Holm, U.S. Bureau of Reclamation (lhholm@usbr.gov)
Clerk to the Board, El Dorado County (edc.cob@edcgov.us)
Clerk to the Board, Sacramento County (boardclerk@sacounty.gov)
Clerk to the Board, San Joaquin County (rdebord@sigov.org)
Clerk to the Board, Fresno County (clerkbos@fresnocountyca.gov)
Clerk to the Board, Kings County (catherine.venturella@co.kings.ca.us)
Chris Shutes, California Sportfishing Protection Alliance (blancapaloma@msn.com)
Jose Rangel, Westlands Water District (jrangel@wwd.ca.gov)
Peter Maraccini, Westlands Water District (pmaraccini@wwd.ca.gov)
Shelly Ruiz, Westlands Water District (sruiz@wwd.ca.gov)

Invoice Date	Invoice Number	Amount Paid	Description
06/24/26	AP 0000165	3,620.00	Water Transfer

PRINTED IN U.S.A.

A

PRODUCT SSLB135 USE WITH 91534 ENVELOPE

Deluxe Corporation 1-800-328-0304 or www.deluxe.com/shop

Georgetown Divide Public Utility District

P.O. BOX 4240
GEORGETOWN, CALIFORNIA 95634
(530) 333-4356

RiverCityBank

2480 NATOMAS PARK DRIVE STE 150
SACRAMENTO, CALIF. 95833
1-800-564-7144

90-3341/1211

3011

DATE

AMOUNT



06/24/26

*****3,620.00

PAY THREE THOUSAND SIX HUNDRED TWENTY- DOLLARS AND NO
CENTS

TO THE
ORDER
OF:

STATE WATER RESRCS CNTRL BOAR
P.O. BOX 1888
SACRAMENTO CA 95812-1888

D




AUTHORIZED SIGNATURE

Security features. Details on back.

⑈003011⑈ 121133416⑈ 3979934126⑈

Invoice Date	Invoice Number	Amount Paid	Description
06/24/26	AP 0000161	850.00	Water Right Application/Petition Fee

PRINTED IN U.S.A.

A

PRODUCT SSLB135

USE WITH 91534 ENVELOPE

Deluxe Corporation 1-800-328-0304 or www.deluxe.com/shop

Georgetown Divide Public Utility District

P.O. BOX 4240
GEORGETOWN, CALIFORNIA 95634
(530) 333-4356

RiverCityBank

2480 NATOMAS PARK DRIVE STE 150
SACRAMENTO, CALIF, 95833
1-800-864-7144

90-3341/1211

DATE

AMOUNT



06/24/26

*****850.00

PAY EIGHT HUNDRED FIFTY- DOLLARS AND NO CENTS

TO THE
ORDER
OF:

CALIF DEPT OF FISH & WILDLIFE
ACCOUNT SERVICES BRANCH
PO BOX 944209
SACRAMENTO CA 94244-2090




AUTHORIZED SIGNATURE

Security features. Details on back.

⑈002984⑈ ⑆121133416⑆ 3979934126⑈

Please indicate County where
your project is located here:

El Dorado County

MAIL FORM AND ATTACHMENTS TO:
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P.O. Box 2000, Sacramento, CA 95812-2000
Tel: (916) 341-5300 Fax: (916) 341-5400
<http://www.waterboards.ca.gov/waterrights>

PETITION FOR CHANGE INVOLVING WATER TRANSFERS

Separate petitions are required for each water right. Mark all areas that apply to your proposed change(s). Incomplete forms may not be accepted. Location and area information must be provided on maps in accordance with established requirements. (Cal. Code Regs., tit. 23, § 715 et seq.) Provide attachments if necessary.

- | | | | |
|---|--|---|---|
| ☐ Point of Diversion
Wat. Code, § 1701 | ☒ Point of Rediversion
Wat. Code, § 1701 | ☒ Place of Use
Wat. Code, § 1701 | ☐ Purpose of Use
Wat. Code, § 1701 |
| ☐ Temporary Urgency
Wat. Code, § 1435 | ☒ Temporary Change
Wat. Code, § 1725 | ☐ Long-term Transfer
Wat. Code, §§ 382, 1735 | ☐ Instream Flow Dedication
Wat. Code, § 1707 |

Application A005644

Permit 12827

License

Statement

I (we) hereby petition for change(s) noted above and described as follows:

Point of Diversion or Rediversion – Provide source name and identify points using both Public Land Survey System descriptions to ¼-¼ level and California Coordinate System (NAD 83).

Present: See Attachment 1

Proposed: See Attachment 1

Place of Use – Identify area using Public Land Survey System descriptions to ¼-¼ level; for irrigation, list number of acres irrigated.

Present: See Attachment 1

Proposed: See Attachment 1

Purpose of Use

Present: See Attachment 1

Proposed: See Attachment 1

Instream Flow Dedication – Provide source name and identify points using both Public Land Survey System descriptions to ¼-¼ level and California Coordinate System (NAD 83).

Upstream Location: Not Applicable

Downstream Location: Not Applicable

List the quantities dedicated to instream flow in either: ☐ cubic feet per second or ☐ gallons per day:

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

Will the dedicated flow be diverted for consumptive use at a downstream location? ☐ Yes ☐ No

If yes, provide the source name, location coordinates, and the quantities of flow that will be diverted from the stream.

Proposed New User(s)

Provide the names, addresses, and phone numbers for all proposed new user(s) of the water right.

Westlands Water District: Post Office Box 6056, 3130 N. Fresno Street, Fresno, CA 93703-6056

Phone Number: (559) 224-1523

Amount of Water to be Transferred

3,250.00 acre-feet will be transferred. If the basis of right is direct diversion, the average rate of diversion for the maximum 30-day period of use is _____ cubic feet per second or million gallons per day.

General Information – Provide the following information, if applicable to your proposed change(s).

Have you attached an analysis which documents that the amount of water to be transferred or exchanged would have been consumptively used or stored in the absence of the proposed temporary change or long-term transfer? ☒ Yes ☐ No

Have you attached an analysis of any changes to streamflow, water quality, timing of diversion or use, return flows, or effects on legal users from the proposed temporary change or long-term transfer? ☒ Yes ☐ No

Have you attached an analysis that shows the proposed temporary change or long-term transfer will not unreasonably affect fish, wildlife, or other instream beneficial uses? ☒ Yes ☐ No

I (we) have access to the proposed point of diversion or control the proposed place of use by virtue of:
☐ ownership ☐ lease ☐ verbal agreement ☒ written agreement

If by lease or agreement, state name and address of person(s) from whom access has been obtained.

Georgetown Divide Public Utility District has entered into an agreement for the temporary transfer of water from Stumpy Meadows Reservoir to Westlands Water District:
Russ Freeman, Deputy General Counsel
Westlands Water District: Post Office Box 6056, 3130 N. Fresno Street, Fresno, CA 93703-6056

Give name and address of any person(s) taking water from the stream between the present point of diversion or redirection and the proposed point of diversion or redirection, as well as any other person(s) known to you who may be affected by the proposed change.

See Attachment 1

All Right Holders Must Sign Below: I (we) declare under penalty of perjury that this involves only the amount of water which would have been consumptively used or stored in the absence of the proposed temporary change, and that the above is true and correct to the best of my (our) knowledge and belief.

Dated _____

at _____

Right Holder or Authorized Agent Signature

Right Holder or Authorized Agent Signature

NOTE: All petitions must be accompanied by:

- (1) the form Environmental Information for Petitions, available at:
http://www.waterboards.ca.gov/waterrights/publications_forms/forms/docs/pet_info.pdf
- (2) Division of Water Rights fee, per the Water Rights Fee Schedule, available at:
http://www.waterboards.ca.gov/waterrights/water_issues/programs/fees/
- (3) Department of Fish and Wildlife fee of \$850 (Pub. Resources Code, § 10005)

ATTACHMENT 1
Petition for Change Involving Transfer and Environmental Information for Petitions
Georgetown Divide Public Utility District
Permit 012827

Introduction

This Attachment provides details, analyses, maps, and graphics in support of a proposed water transfer of up to 3,250 acre-feet of water from Georgetown Divide Public Utility District (“GDPUD”) to Westlands Water District (“WWD”). This information is provided in accordance with the State Water Resources Control Board (“Water Board”) Petition for Change Involving Transfer (“Petition”) and the related Environmental Information for Petitions (“Environmental Information”). This transfer repeats a successful transfer of 2,000 acre-feet that occurred in 2020 between these same parties.

Overview of Transfer Parties

The proposed transfer is between GDPUD and WWD for delivery of water beginning on August 1, 2026 and lasting for approximately 4 to 5 weeks or until the total transfer quantity is delivered to the Point of Delivery, defined in the agreement between GDPUD and WWD to be Folsom Reservoir.

Georgetown Divide Public Utility District

The Georgetown Divide Public Utility District was formed in 1946 under the California Public Utility District Act (Public Utilities Code §15500 *et seq.*) to serve residents of the Georgetown Divide area, which had historically been served by a succession of private water companies since 1852. The Georgetown Divide is located in the northwest portion of El Dorado County, roughly bounded by the Middle and South Forks of the American River.

The GDPUD service area encompasses approximately 76,000 acres; the sphere of influence covers about 113,000 acres, primarily to the east and south of the District’s boundary. GDPUD’s water originates in the Sierra Nevada Mountains, drains into Stumpy Meadows Reservoir, and is transported through a canal system and pipes to the Walton Lake and Auburn Lake Trails Water Treatment Plants. The Walton Lake Plant serves the communities of Georgetown, Garden Valley, Kelsey and Greenwood. The Auburn Lake Trails Plant serves Auburn Lake Trails, Cool and Pilot Hill. The estimated population of GDPUD’s service area is approximately 10,000 residents.

GDPUD provides treated water to about 3,800 customers and untreated water to 370 customers for irrigation. The District’s primary water supply source is the Stumpy Meadows Project, which includes a 20,000 acre-foot impoundment reservoir on Pilot Creek, at the eastern edge of the District. Raw water from this source of supply is conveyed through 75 miles of open ditch and pipeline to the Walton Lake Water Treatment Plant in Georgetown and then further on to the Auburn Lake Trails Water Treatment Plant in Cool.

Westlands Water District

Westlands Water District was formed in 1952 and encompasses more than 600,000 acres of farmland in western Fresno and Kings Counties. WWD serves approximately 600 family owned farms that average 900 acres in size.

Water is delivered to WWD through the Central Valley Project ("CVP"), a federal water project that stores water in large reservoirs in Northern California for use by cities and farms throughout California. After it is released from CVP reservoirs, the water is typically pumped from the Sacramento-San Joaquin Delta ("Delta") via U.S. Department of the Interior, Bureau of Reclamation's ("Reclamation's") Bill Jones Pumping Plant ("Jones") and delivered 70 miles through the Delta-Mendota Canal to San Luis Reservoir. During spring and summer, the water is released from San Luis Reservoir and delivered to WWD farmers through the San Luis Canal and the Coalinga Canal. Once it leaves the CVP canals, water is delivered to farmers through 1,034 miles of underground pipe and more than 3,300 water meters.

WWD farmers produce more than 60 commercial food and fiber crops sold for the fresh, dry, canned, and frozen food markets, both domestic and export. More than 50,000 people live and work in the communities dependent on the WWD's agricultural economy. The communities in and near the WWD's boundaries include Mendota, Huron, Tranquility, Firebaugh, Three Rocks, Cantua Creek, Helm, San Joaquin, Kerman, Lemoore, and Coalinga.

WWD is interested in augmenting its water supply through this transfer based on reoperation of Stumpy Meadows Reservoir.

Summary of Requested Change to Permit 012827 including Present and Proposed Point of Diversion or Rediversion, Place of Use, and Purpose of Use

GDPUD proposes to transfer up to 3,250 acre-feet (AF) of water during August 2026 and into September 2026 as may be needed, to WWD through reoperation of GDPUD's Stumpy Meadows Reservoir. GDPUD would release up to 3,250 AF from Stumpy Meadows Reservoir, which stores water pursuant to Water Right Permit 012827. The proposal requires approval of a Petition for Change Involving Water Transfer from the State Water Resources Control Board ("SWRCB") to temporarily add a Place of Use and Point of Rediversion under Permit 012827. The requested change is exempt from CEQA under California Water Code section 1725 and CEQA Guidelines 15282(u) as long as the transfer would not injure any legal user of the water or unreasonably affect fish, wildlife, or other instream beneficial uses. Information regarding potential effects of the reoperation of Stumpy Meadows reservoir is further discussed below.

To accomplish the transfer associated with the Water Right Permit 012827, GDPUD seeks the following temporary (one year or less) changes in the Place of Use and Point of Rediversion, consistent with California Water Code §1725-§1732, to Water Right Permit 012827:

1. The temporary addition of the State Water Project's Harvey O. Banks Pumping Plant (Banks) intake facility as a Point of Rediversion.
2. The temporary addition of the United States Department of the Interior Bureau of Reclamation (Reclamation) Central Valley Project (CVP) Bill Jones Pumping Plant (Jones) intake facility as a Point of Rediversion;
3. The temporary addition of San Luis Reservoir (SLR), a Reclamation CVP facility, as a Point of Rediversion; and
4. The temporary addition of the WWD service area to Water Right Permit 012827 Place of Use.

Maps demonstrating the locations of GDPUD's water sources, existing Point of Diversion and Place of Use under Water Right Permit 012827, the proposed flow paths to Folsom Reservoir and from Folsom Reservoir to WWD, and the requested Points of Rediversions and Place of Use are attached hereto.

Stumpy Meadows Reservoir Reoperation

For the proposed transfer, GDPUD would reoperate Stumpy Meadows Reservoir to draw it down under a schedule approved by Reclamation and deliver this water to Folsom Reservoir for transfer to WWD. GDPUD would release approximately 3,250 AF from Stumpy Meadows Reservoir starting on or around August 1st and ending by mid-September. GDPUD will enter into a refill agreement with Reclamation to protect Folsom Reservoir storage in 2026. WWD is responsible for obtaining any additional agreements as warranted, which may include a Warren Act Contract, as well as a conveyance agreement with Reclamation and the Department of Water Resources to allow the delivered transfer water to be collected at Folsom Reservoir and conveyed to WWD in August and September.

Folsom Reservoir would be the Point of Delivery (POD) from GDPUD to WWD. Reclamation would provide the transfer water from the Point of Delivery to WWD on a schedule that is mutually agreeable and/or beneficial to Reclamation, DWR, WWD, and the environment such that it will not disrupt normal CVP or State Water Project (SWP) operations and will adhere to all current flow standards for the lower American River (LAR) from Lake Natoma to the confluence with the Sacramento River, as well as the most up-to-date requirements for the Delta as directed by the SWRCB.

WWD would divert the transfer water at the Bill Jones Pumping Plant (Jones) intake facility or Harvey O. Banks Pumping Plant (Banks) intake facility (see map in Attachment B) and have it conveyed south for approximately 70 miles via the Delta Mendota Canal or California Aqueduct to San Luis Reservoir. WWD would temporarily store transferred water in San Luis Reservoir, a Point of Rediversion sought under this petition, and then deliver the water within its service area via the San Luis Canal, thence the Coalinga Canal (see map in Attachment B).

WWD will coordinate with Reclamation's Central Valley Operations (CVO) staff to determine

the timing and flow rate of transfer water releases from the POD in Folsom Reservoir for rediversion at the Jones or Banks intake facility. On average, GDPUD will delivery about 100 acre-feet (50 cfs) daily to Folsom Reservoir. The delivery out of Folsom will occur in a manner where each daily inflow to Folsom is released within 30 days of the inflow, if not sooner, such that the entire transferred quantity is expected to be delivered by mid-September.

Requested Changes to the Point of Diversion and Place of Use for Stumpy Meadows Reservoir

Current Point of Diversion for Water Right Permit 012827

Point of Diversion: North 64° 45' East 7260.8 feet from the SW corner of Section 10, T12N, R12E, MDB&M, being within the (1) SE 1/4 of NW 1/4; (2) SE 1/4 of NW 1/4 of Section (1) 4, T12N, R12E; (2) 11, T12N, R12E, MDB&M. See Appendix C.

Proposed Point(s) of Rediversion for Water Right Permit 012827

Bill Jones Pumping Plant - This CVP Point of Rediversion is located 37°47'47.22"N/ 121°35'8.06"W, California Coordinate System, Zone 3, NAD 83, being within the SW 1/4 of Section 35, T1 S, R3E, MDB&M . See Appendix D.

Harvey O. Banks Pumping Plant - This SWP Point of Rediversion is located 37°48'02.90"N/ 121°37'15.22"W, California Coordinate System, Zone 3, NAD 83, being within the NW 1/4 of NE ¼ of Section 24, T1 S, R3E, MDB&M . See Appendix D.

San Luis Reservoir - This CVP/SWP Point of Rediversion is located 37° 4'27 .36"N/121° 0'54.55"W California Coordinate System, Zone 3, NAD 83, being within the SE V4 of Section 7, T1 OS, R9E, MDB&M. See Appendix D

Current Place of Use for Water Right Permit 012827

The total irrigated area of 14,140 acres within the District's boundaries of 66,500 acres as shown on maps on file with the State Water Resources Control Board and include the following power plants:

Tunnel Power Plant within Section 26, T13N, R11E, MDB&M

Buckeye Power Plant within Section 1, T12N, R10E, MDB&M

See Appendix B.

Proposed Place of Use for Water Right Permit 012827

GDPUD proposes to add the service area of WWD as an additional Place of Use for Water Right Permit 012827 in order to facilitate the temporary water transfer to WWD. See Appendix E

Current Purpose of Use for Water Right Permit 012827

The current purposes of use for Water Right Permit 012827 are: (1) irrigation, (2) domestic, (3) Stockwatering and (4) Incidental Power.

Proposed Purpose of Use for Water Right Permit 012827

The petition requests no change to the existing purposes of use. WWD would use the transfer water predominately for irrigation use in its service area.

Demonstrating Compliance with Water Code section 1727

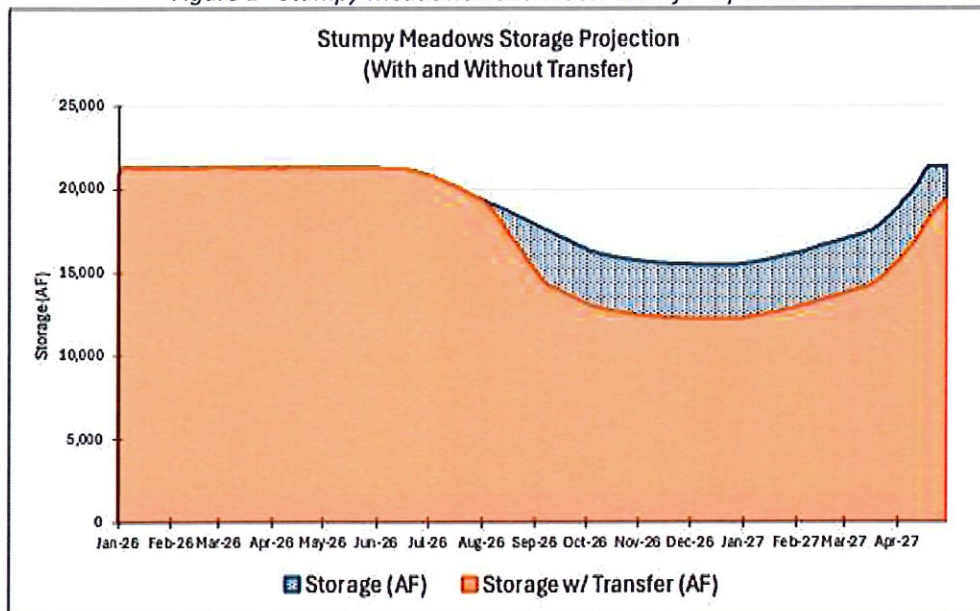
The following information is provided to facilitate the SWRCB review and findings required under Water Code section 1727, specifically:

- Section 1727(b)(1): The proposed temporary change would not injure any legal user of the water, during any potential hydrologic condition that the board determines is likely to occur during the proposed change, through significant changes in water quantity, water quality, timing of diversion or use, consumptive use of the water, or reduction in return flows.
- Section 1727(b)(2): The proposed temporary change would not unreasonably affect fish, wildlife, or other instream beneficial uses.

Information to Support Finding of No-Injury from Proposed Changes to Stumpy Meadows Reservoir Re-operation

Figure 1 shows the forecast drawdown schedule for Stumpy Meadows reservoir operations, both with and without a water transfer. This storage level allows for storage withdrawals to meet GDPUD demands and instream fishery flow requirements throughout the recreation season.

Figure 1 - Stumpy Meadows 2026 Water Transfer Operations



Ramping up to the targeted transfer rate will begin on August 1 at approximately 10 cfs above the without transfer release rate and increase by 5 cfs each day until reaching nearly 50 cfs by August 9, then maintain an average of about 48 cfs through August. Releases will then gradually decline in early September, dropping by about 5 cfs daily until the target transfer amount is reached on or around September 10. Using this schedule, the total transfer volume is approximately 3,250 AF. Figure 1 illustrates a comparison between the normal operations (without transfer) and the transfer operations. The orange area shows the forecasted Stumpy Meadows storage assuming the 3,250 AF transfer occurs.

The blue area represents the storage difference between the without-transfer operations and the with-transfer operations. Once the transfer is complete, the difference in storage is approximately 3,250 AF. The top of the blue area is the without-transfer storage and the bottom of the blue area is the resulting with-transfer storage. On August 1st, the proposed transfer releases begin. As the transfer begins, the storage deviates from the without-transfer operations. The orange area shows a decrease in storage until the transfer is complete on or about September 10. The resulting transfer storage is approximately 3,250 AF below the without-transfer storage and reaches a low-point of around 12,000 acre-feet in storage around mid-December (based on historic average inflow hydrology). This low-point occurs at the same time as would be anticipated under a without-transfer condition. Figures 2 shows the daily plan for flow releases above without-transfer operations during the transfer period, a calendar view of the planned transfer

Figure 2 –Anticipated Transfer Flows during Transfer Period

AUGUST						
M	T	W	T	F	S	S
27	28	29	30	31	1	2
					10 cfs	15 cfs
3	4	5	6	7	8	9
20 cfs	25 cfs	30 cfs	35 cfs	40 cfs	45 cfs	50 cfs
10	11	12	13	14	15	16
50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs
17	18	19	20	21	22	23
50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs
24	25	26	27	28	29	30
50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs	50 cfs
31	1	2	3	4	5	6
50 cfs						

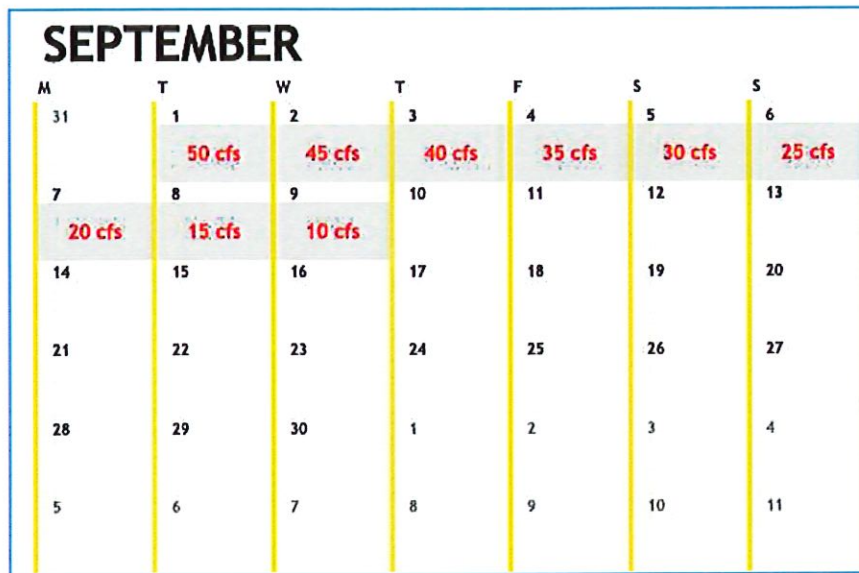


Table 1 summarizes the proposed 2026 transfer release schedule described above. Transfer releases begin on August 1, 2026, gradually increasing during the first week up to 50 cfs (above without-transfer releases), remaining relatively stable through the remainder of August, and decreasing by about 5 cfs per day beginning on September 2 until the transfer quantity is reached by September 9. Actual daily operations may have minor variations from this schedule as necessitated by GDPUD customer needs and other operational considerations. However, the intended quantity of 3,250 acre-feet should be achieved prior to mid-September at the latest.

Table 1: 2026 Proposed Transfer Release Schedule

Transfer Schedule	Transfer Release
8/1 - 8/9	Gradual increase from 10 cfs to 50 cfs
8/10 - 8/31	Steady release of 50 cfs
9/1 - 9/9	Gradual decrease from 50 cfs to 10 cfs
9/10	Approximate end of transfer

The water proposed for transfer consists of water previously stored in Stumpy Meadows Reservoir pursuant to Water Right Permit 012827. In the absence of the proposed transfer, the water would remain in storage for future use by GDPUD and would not be available to other water users. There will be no change in return flows for GDPUD's service area. The releases from storage to support the water transfer will not reduce the available supply to any other legal user of water downstream of Stumpy Meadows Reservoir. Refill of the storage vacated for the transfer will only occur during periods when such actions will not affect the amount of water that would otherwise have been available to other legal users downstream of Stumpy Meadows Reservoir, as such will be dictated in a refill agreement with Reclamation.

Reclamation would manage release of the transfer water from the POD of Folsom Reservoir to Banks or Jones on a schedule that is mutually agreeable and/or beneficial to Reclamation, WWD, and the environment such that it would not disrupt normal CVP or SWP operations and would adhere to all current flow standards for the LAR from Lake Natoma to the confluence with the Sacramento River, as well as the most up-to-date requirements for the Delta as directed by the SWRCB, the CVP Biological Opinion and other applicable standards.

The diversion of Transfer Water at the Jones intake facility would also comply with current standards and all state and federal regulations and permits that apply to the proposed Point of Rediversions. The proposed transfer of up to 3,250 AF, is currently in storage in accordance with GDPUD's water rights and, with or without this proposed transfer, would not be available to any other legal user of water. The Water Transfer would not affect GDPUD's ability to meet future obligations.

In addition, as part of the proposed project, GDPUD and Reclamation would enter into a refill agreement for Stumpy Meadows Reservoir with conditions acceptable to both parties. One such condition is that CVP water system operations would not be adversely affected during the 2027 refill period by the transfer of previously stored water in 2026.

Information to Support Finding of No Unreasonable Effects on the Environment from Stumpy Meadows Reservoir Re-operation

An analysis of effects from GDPUD's proposed Water Transfer on fish and aquatic wildlife in Stumpy Meadows Reservoir, Pilot Creek, and downstream watercourses indicates that less-than-significant effects (*no unreasonable effects*) on those resources would likely occur.

Below the Pilot Creek and Rubicon River confluence, the timing of the proposed transfer will likely have a positive effect on summer minimum instream flows and water quality in the affected Upper American River tributaries. Delivery of transfer water to Folsom Reservoir in mid- to late summer will augment the cold-water pool.

All water diverted at Banks or Jones is done in accordance with the criteria contained in D-1641 and the Biological Opinions (BOs). DWR and Reclamation will continue to meet the objectives specified in D-1641 or any subsequent orders in effect at the time of the export. The quantity of transfer water to be conveyed through the Delta, including other currently planned transfers, is well within the quantities analyzed in current BOs and environmental documentation on the coordinated operations of the State Water Project and Central Valley Project and relevant BOs.

Figure 3 illustrates the 1920 - 2015 natural inflow to Stumpy Meadows Reservoir plotted on a water year and compared to the proposed transfer ramping rates and magnitude, shown in red during the August – September period. The Y-axis scale has been capped at 1,000 cfs so that the proposed transfer schedule can be seen. The proposed transfer will occur at a time when natural inflow is usually very low. During the wet season inflow can exceed 3,500 cfs – significantly more than the up to 50 cfs transfer flow rate.

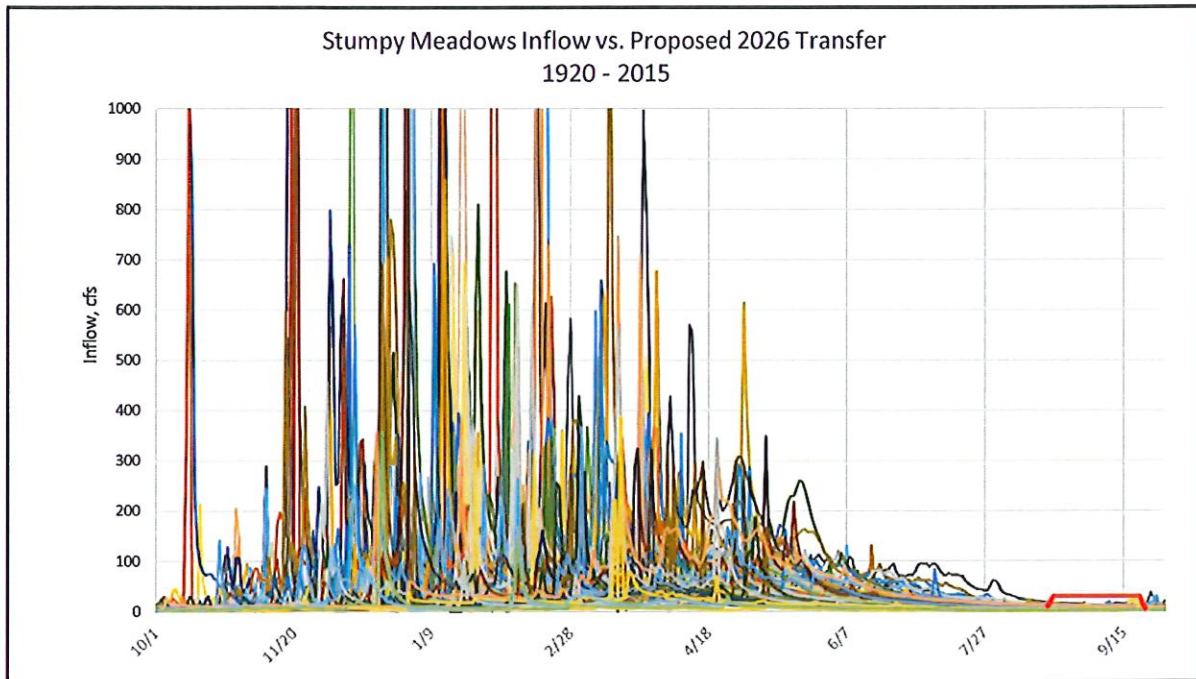


Figure 3 - Pilot Creek Inflow to Stumpy Meadows vs Proposed Transfer

Other Relevant Information

In addition to Reclamation and SWRCB, GDPUD and WWD are coordinating with appropriate local, state and federal agencies to obtain all necessary approvals, consultations or noticing for the proposed transfer including:

1. California Department of Fish and Wildlife
2. Regional Water Quality Control Board
3. Intent to Transfer Notification

California Department of Fish and Wildlife

Consistent with Water Code § 1726, a copy of this Petition will be sent prior to the CDFW Region 2 water rights staff and CDFW North Central Region Sierra District Regional Manager Morgan Kilgour at 1701 Nimbus Road, Rancho Cordova, CA 95670 Phone: (916) 358-2909.

GDPUD expects CDFW to indicate that the transfer will not unreasonably affect fish or wildlife resources because very similar transfers from other purveyors within the American River watershed have occurred in the past with no adverse impacts identified by CDFW.

Regional Water Quality Control Board

GDPUD has not formally contacted the Regional Board staff, but intends to send a copy of this Petition prior to the posting of the Public Notice and opening of the comment period. The water proposed for transfer is very high-quality runoff derived predominantly from snowmelt and rains

falling in largely undeveloped higher elevation portions of El Dorado County in the Pilot Creek watershed.

Specifically, the proposed transfer would not violate any water quality standards or waste discharge requirements. The proposed transfer would use existing reservoirs, streams, and rivers operating within all applicable requirements. Given the relatively small amount of transfer water released, there would not be any existing water quality standards or waste discharge requirements that would not be met. The small amount of the transfer (approximately 3,250 AF) being added to Folsom Reservoir would not violate water quality standards or waste discharge requirements. Agricultural activities in the WWD service area would not change as a result of the proposed project, and no new violations in water quality standards or waste discharge requirements would occur. No impact would occur.

Intent to Transfer Notification

Pursuant to California Water Code Section 1727, GDPUD submitted an expedited notice to the State Water Resources Control Board regarding a potential temporary water transfer. The required information, including the applicable water right, the method by which water would be made available for transfer, and a contact email for interested parties and Board inquiries was submitted and accepted by the SWRCB. This notice allows the proposed transfer to be processed under the expedited review procedures established in Water Code Section 1727 and reduces GDPUD's noticing requirements.

State of California
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P.O. Box 2000, Sacramento, CA 95812-2000
Tel: (916) 341-5300 Fax: (916) 341-5400
<http://www.waterboards.ca.gov/waterrights>

ENVIRONMENTAL INFORMATION FOR PETITIONS

This form is required for all petitions.

Before the State Water Resources Control Board (State Water Board) can approve a petition, the State Water Board must consider the information contained in an environmental document prepared in compliance with the California Environmental Quality Act (CEQA). This form is not a CEQA document. If a CEQA document has not yet been prepared, a determination must be made of who is responsible for its preparation. As the petitioner, you are responsible for all costs associated with the environmental evaluation and preparation of the required CEQA documents. Please answer the following questions to the best of your ability and submit any studies that have been conducted regarding the environmental evaluation of your project. If you need more space to completely answer the questions, please number and attach additional sheets.

DESCRIPTION OF PROPOSED CHANGES OR WORK REMAINING TO BE COMPLETED

For a petition for change, provide a description of the proposed changes to your project including, but not limited to, type of construction activity, structures existing or to be built, area to be graded or excavated, increase in water diversion and use (up to the amount authorized by the permit), changes in land use, and project operational changes, including changes in how the water will be used. For a petition for extension of time, provide a description of what work has been completed and what remains to be done. Include in your description any of the above elements that will occur during the requested extension period.

See Attachment A

Insert the attachment number here, if applicable: A

Coordination with Regional Water Quality Control Board

For change petitions only, you must request consultation with the Regional Water Quality Control Board regarding the potential effects of your proposed change on water quality and other instream beneficial uses. (Cal. Code Regs., tit. 23, § 794.) In order to determine the appropriate office for consultation, see: http://www.waterboards.ca.gov/waterboards_map.shtml. Provide the date you submitted your request for consultation here, then provide the following information.

Date of Request

Will your project, during construction or operation, (1) generate waste or wastewater containing such things as sewage, industrial chemicals, metals, or agricultural chemicals, or (2) cause erosion, turbidity or sedimentation?

☐ Yes ☒ No

Will a waste discharge permit be required for the project?

☐ Yes ☒ No

If necessary, provide additional information below:

See Attachment A

Insert the attachment number here, if applicable: A

Local Permits

For temporary transfers only, you must contact the board of supervisors for the county(ies) both for where you currently store or use water and where you propose to transfer the water. (Wat. Code § 1726.) Provide the date you submitted your request for consultation here.

Date of Contact
see Attachment A

For change petitions only, you should contact your local planning or public works department and provide the information below.

Person Contacted: N/A

Date of Contact:

Department:

Phone Number:

County Zoning Designation:

Are any county permits required for your project? If yes, indicate type below.

☐ Yes ☒ No

Grading Permit

Use Permit

Watercourse

Obstruction Permit

Change of Zoning

General Plan Change

Other (explain below)

If applicable, have you obtained any of the permits listed above? If yes, provide copies.

☐ Yes ☒ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Federal and State Permits

Check any additional agencies that may require permits or other approvals for your project:

- ☐ Regional Water Quality Control Board ☐ Department of Fish and Game
- ☐ Dept of Water Resources, Division of Safety of Dams ☐ California Coastal Commission
- ☐ State Reclamation Board ☐ U.S. Army Corps of Engineers ☐ U.S. Forest Service
- ☐ Bureau of Land Management ☐ Federal Energy Regulatory Commission
- ☐ Natural Resources Conservation Service

Have you obtained any of the permits listed above? If yes, provide copies. ☐ Yes ☒ No

For each agency from which a permit is required, provide the following information:

Agency	Permit Type	Person(s) Contacted	Contact Date	Phone Number
N/A				

If necessary, provide additional information below:

See Attachment A

Insert the attachment number here, if applicable: A

Construction or Grading Activity

Does the project involve any construction or grading-related activity that has significantly altered or would significantly alter the bed, bank or riparian habitat of any stream or lake? ☐ Yes ☒ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Archeology

Has an archeological report been prepared for this project? If yes, provide a copy. ☐ Yes ☒ No

Will another public agency be preparing an archeological report? ☐ Yes ☒ No

Do you know of any archeological or historic sites in the area? If yes, explain below. ☐ Yes ☒ No

If necessary, provide additional information below:

Insert the attachment number here, if applicable:

Photographs

For all petitions other than time extensions, attach complete sets of color photographs, clearly dated and labeled, showing the vegetation that exists at the following three locations:

- ☐ Along the stream channel immediately downstream from each point of diversion
- ☐ Along the stream channel immediately upstream from each point of diversion
- ☐ At the place where water subject to this water right will be used

Maps

For all petitions other than time extensions, attach maps labeled in accordance with the regulations showing all applicable features, both present and proposed, including but not limited to: point of diversion, point of redirection, distribution of storage reservoirs, point of discharge of treated wastewater, place of use, and location of instream flow dedication reach. (Cal. Code Regs., tit. 23, §§ 715 et seq., 794.)

Pursuant to California Code of Regulations, title 23, section 794, petitions for change submitted without maps may not be accepted.

All Water Right Holders Must Sign This Form:

I (we) hereby certify that the statements I (we) have furnished above and in the attachments are complete to the best of my (our) ability and that the facts, statements, and information presented are true and correct to the best of my (our) knowledge. Dated _____ at _____.

Water Right Holder or Authorized Agent Signature

Water Right Holder or Authorized Agent Signature

NOTE:

- Petitions for Change may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game. (Cal. Code Regs., tit. 23, § 794.)
- Petitions for Temporary Transfer may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game and the board of supervisors for the county(ies) where you currently store or use water and the county(ies) where you propose to transfer the water. (Wat. Code § 1726.)

Attachment A

Project Description and Environmental Information for 2026 Georgetown Divide Public Utility District Temporary Water Transfer to Westlands Water District

1.0 INTRODUCTION

This attachment provides supplemental descriptions, graphics, and analysis in support of a proposed 2026 water transfer for up to 3,250 acre-feet (AF) less 5% conveyance losses of non-Project water supplied by the Georgetown Divide Public Utility District's (GDPUD) Stumpy Meadows Reservoir on Pilot Creek to Westlands Water District (WWD). The information contained herein is intended to facilitate review and approval of the proposed transfer by the State Water Resources Control Board (SWRCB).

2.0 ORGANIZATION

The remainder of this Attachment is organized as follows:

1. Overview of Transfer Parties —a brief introduction to both GDPUD and WWD, with relevant information regarding the basis for the transfer.
2. Summary of the Proposed Transfer — a summary of the proposed transfer, including sources of water, method to make water available, and requested changes to a water right license for a portion of the transfer.
3. Transfer Details —information regarding the proposed timing of releases, flow rates and other relevant details, including graphs, maps and tables and proposed monitoring and compliance procedures.
4. Demonstrating Compliance with Water Code Statutes - information regarding no injury to other legal users or to fish and wildlife, as required under Water Code Section 1727.
5. Other relevant information.

3.0 OVERVIEW OF TRANSFER PARTIES

The proposed transfer is between GDPUD and the buyer: WWD. Water transferred under the proposed agreement would be delivered in the summer of 2026. The following provides an overview of each of the parties participating in the proposed transfer.

3.1.1 *Georgetown Divide Public Utility District*

The Georgetown Divide Public Utility District (GDPUD) was formed under the authority of California Public Utility District Act, Government Code Sections 15501, et seq. The District was formed on June 4, 1946; however, the origins of District facilities can be directly traced back to 1852 and the El Dorado, Pilot and Rock Creek Canal Companies, one of the first established water purveyors in the State of California – a not inconsequential result of James Marshall's discovery of gold in nearby Coloma. Following the decline in gold production, agriculture and lumbering became the staple industries on the Divide for many years.

The focus of the District water supply system is the Stumpy Meadows Reservoir, a 20,000 acre – foot impoundment on Pilot Creek, at the eastern edge of the District. The Georgetown Divide is located

between the Middle and South Forks of the American River, nestled in the heart of the Sierra Nevada Foothills and Northern California's Gold Country. Access is through Highway 50 and Highway 80, making it in close proximity to either metropolitan cities or recreational activities of Lake Tahoe. The community is a haven for those who enjoy boating, hiking, fishing and hunting, and is well known for its fine wine grapes and specialty agriculture (GDPUD 2020).

Water Right Permit 12827

Permit 12827 authorizes GDPUD to directly divert up to 100 cubic feet per second (cfs). In addition, the District may divert to storage up to 20,000 acre-feet (AF) annually. The season of diversion for both is August 1 to November 1. Total authorized diversion and use is 74,347.9 AF annually (54,347.9 AF for direct diversion and 20,000 AF for diversion to storage. Between August 1 and November 1, the District relies on re-diversion of Stumpy Meadows storage to meet consumptive demands. The permit requires compliance with Exhibit 15 of Decision 893 by the State Water Rights Board for the preservation of fish and wildlife in Pilot Creek, which includes minimum release requirements:

Minimum Release Requirements

- Following a prediction that the unimpaired runoff of the American River at Fair Oaks will be 1,500,000 acre-feet or more for the current water year: 4 cfs, or the natural flow whichever is less, for natural flows between 2 and 4 cfs.
- Following a prediction that the unimpaired runoff of the American River at Fair Oaks will be less than 1,500,000 acre-feet for the current water year and until a prediction to the contrary: not less than 2 cfs.
- The minimum release of water shall never be less than 2 cfs, irrespective of the natural flow.
- Natural flow is defined for this purpose as the natural flow of Pilot Creek measured immediately about the confluence of Pilot Creek and the inflow from the proposed diversion from Onion Creek.
- The flows are to be measure in the natural stream bed of Pilot Creek at USGS Gage Station No. 1143040 located downstream from Pilot Creek Diversion Dam near Mutton Canyon.
- *Predictions of unimpaired runoff of the American River at Fair Oaks will be based upon reports and predictions of the State Department of Water Resources and the United States Weather Bureau. The specific methods of calculating these predictions for the purposes of these conditions will be determined mutually by the applicant and the Department of Fish and Game and will be presented to the SWRCB at the earliest possible date.* The italicized text is in Decision 893. In actual practice, the District and the Department of Fish and Wildlife have agreed to use the Bulletin 120 forecast for the unimpaired runoff for the American River below Folsom Lake.

Minimum Pool Requirements

- At no time can the District maintain a minimum pool less than 1,200 AF of water. 1,200 AF is the dead pool at Stumpy Meadows Reservoir.

3.1.2 Westlands Water District

The following information is from the State of California's Westland Water District website.

Before Westlands began receiving CVP water, growers on the west side of the San Joaquin Valley relied on groundwater pumping. The dependence on groundwater led to severe overdrafts, widespread land subsidence and other environmental damage. Growers primarily grew a limited variety of crops, focusing on cereal grain crops such as wheat and barley. California's first legislature recognized a need for developing year-round irrigation water supplies for the fertile San Joaquin Valley as early as 1850, but planning was limited to the east side. It was to be another 87 years before the CVP would become the main source of water for the Valley and an additional 26 years before San Luis Act facilities would bring surface water to the Westlands area.

4.0 SUMMARY OF PROPOSED TRANSFER

GDPUD proposes to convey up to 3,250 AF, less 5% conveyance losses to WWD. Under the proposed transfer, GDPUD would release the 3,250 AF of transfer water from its Stumpy Meadows Reservoir into Pilot Creek which subsequently flows into the Rubicon River, Ralston Afterbay, Oxbow Powerhouse, Middle Fork American River, North Fork American River, Folsom Reservoir, Lake Natoma, and Sacramento River. Transfer water would be stored and later released in the 2026/2027 water year for conveyance through the Lower American River and Sacramento River to the Jones or Banks Pumping Plant, which would convey the GDPUD water to the Delta-Mendota Canal or California Aqueduct and pumped into O'Neill Forebay where it would be diverted either for immediate WWD use or for storage in the federal share of San Luis Reservoir for later release to the federal side of the San Luis Canal for conveyance to WWD and the Coalinga Canal for use. If the Banks Pumping Plant is used instead of Jones Pumping Plant, water would be conveyed through the California Aqueduct to the O'Neill Forebay where it would be diverted either for immediate WWD use or for storage in the federal share of San Luis Reservoir for later release to the federal side of the San Luis Canal for conveyance to WWD and the Coalinga Canal for use. The transferred water is subject to 5% conveyance loss for use of the Delta-Mendota and San Luis Canal.

GDPUD will enter into a refill agreement with Reclamation to refill Stumpy Meadows Reservoir while protecting downstream vested water rights holders following the transfer. The proposed transfer would not involve construction or modification of any facilities. Only existing facilities would be utilized to divert, release, convey, and redivert water. Land uses within the GDPUD and WWD service areas would not change as a result of the transfer.

Execution of the transfer may require the execution of a Warren Act Contract between GDPUD and WWD. The Contract would authorize use of the federally owned Folsom Reservoir for storage and conveyance of the GDPUD transfer water. Federal facilities potentially involved in the storage and conveyance include Folsom Reservoir, Jones Pumping Plant, the Delta-Mendota and the San Luis Canals and the San Luis Reservoir. If no additional capacity is available at the Jones Pumping Plant, the State-owned Harvey O. Banks Pumping Plant and the California Aqueduct would be utilized to convey the water to O'Neill Forebay.

The proposed transfer is subject to approval by The State Water Resources Control Board (SWRCB) for issuance of a Temporary Change Order (Order) to GDPUD approving temporary changes in the Stumpy Meadows water right permit's place of use and points of redirection prior to the execution of the transfer.

5.0 TRANSFER DETAILS

5.1 Operations

The operations plan for transferring 3,250 AF of water from GDPUD to WWD would be to release 3,250 AF of stored water from GDPUD's Stumpy Meadows Reservoir into Pilot Creek, which flows into the Rubicon River, Ralston Afterbay, Oxbow Powerhouse, then to the Middle Fork American River and North Fork American River, and subsequently into Folsom Reservoir between August 2026 and September 2026. The transfer water would be released from Folsom Reservoir into Lake Natoma, which is impounded by Nimbus Dam and serves as the re-regulating afterbay for Folsom Reservoir. Transfer operations from Folsom Reservoir would be coordinated by WWD in accordance with applicable Warren Act contract requirements. Each daily transfer volume delivered to Folsom Reservoir would be released within 30 days of delivery, such that no transferred water would remain in Folsom Reservoir for longer than 30 days. Water would then be released through Nimbus Dam into the Lower American River, and subsequently would flow into the Sacramento River and the Delta. The transfer water would be conveyed from the Jones or Banks Pumping Plant in the southern portion of the Delta into their respective conveyance channels, and either stored in the federal share of the San Luis Reservoir or conveyed to WWD via the San Luis and Coalinga Canals for immediate use.

For 2026, the District anticipates a 3,250 AF late season transfer to Westlands Water District located south of the Sacramento-San Joaquin Delta. In anticipation of a late season transfer, the District has prepared a transfer schedule that includes a ramp up from the minimum flow requirement to the calculated transfer flow rate of about 30 cfs, then a ramp down to the minimum flow requirement. This schedule provides a smooth and gradual transition from minimum flow to targeted transfer rates and back down again. Table 1 lists the 2026 proposed transfer release schedule.

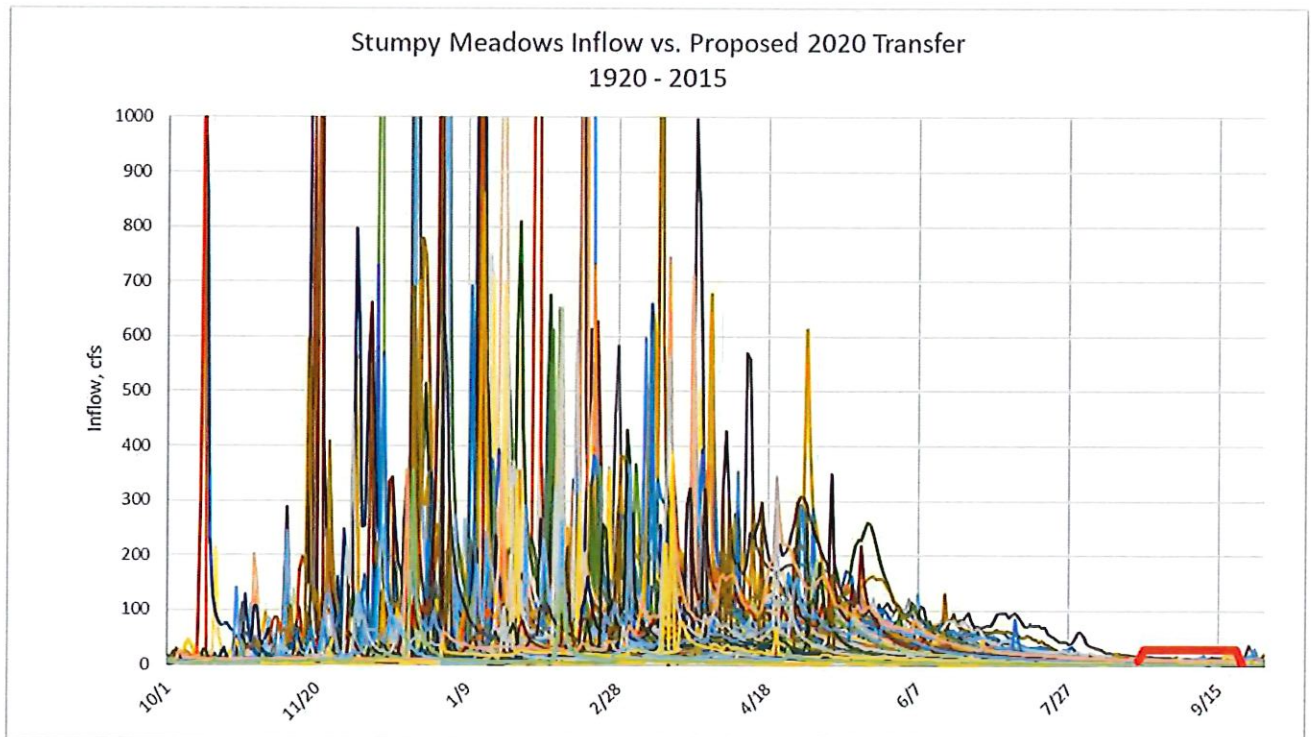
Table 1: 2026 Proposed Transfer Release Schedule

Transfer Schedule	Transfer Release
8/1 – 8/9	Gradual increase from 10 cfs to 50 cfs
8/10 – 8/31	Steady release of 50 cfs
9/1 – 9/9	Gradual decrease from 50 cfs to 10 cfs
9/10	Approximate end of transfer

The watershed from which runoff supplies Stumpy Meadows Reservoir encompasses approximately 14.9 square miles. Below the dam, Pilot Creek drains numerous perennial and ephemeral drainages within the Pilot Creek Watershed which encompasses approximately 6.1 square miles between Stumpy Meadows Dam and the Pilot Creek diversion dam. Annual average inflow to Stumpy Meadows is approximately 23,500 AF.

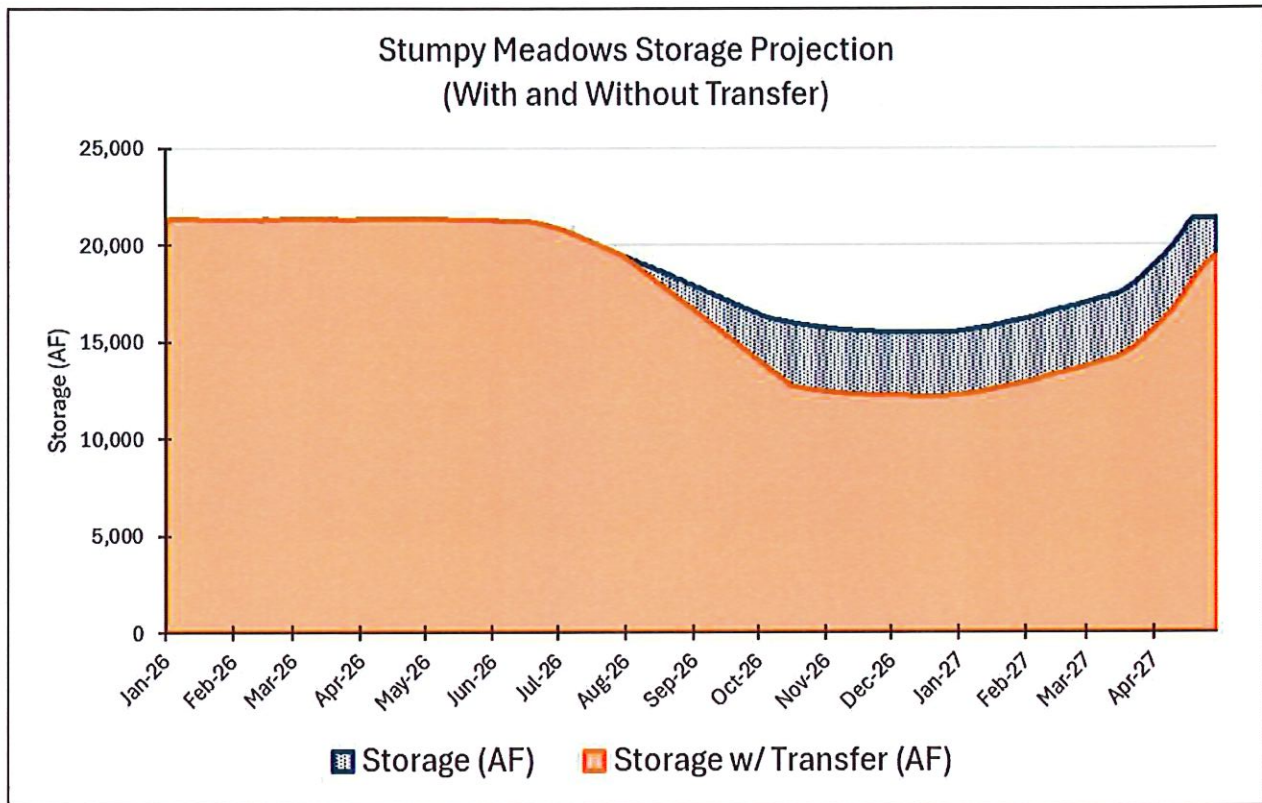
Figure 1 illustrates the 1920 - 2015 natural inflow to Stumpy Meadows Reservoir plotted on a water year and compared to the proposed transfer ramping rates and magnitude, shown in red during the August – September period. During the wet season inflow can exceed 3,500 cfs. The Figure 1 the Y-axis scale has been capped at 1,000 cfs so that the proposed transfer schedule can be seen. The proposed transfer will occur at a time when natural inflow is usually very low.

Figure 1 – Pilot Creek Inflow to Stumpy Meadows vs Proposed 2020 Transfer



Ramping up to the targeted transfer rate will begin on August 1 at approximately 10 cfs above the without transfer release rate and increase by 5 cfs each day until reaching nearly 50 cfs by August 9, then maintain an average of about 48 cfs through August. Releases will then gradually decline in early September, dropping by about 5 cfs daily until the target transfer amount is reached on or around September 10. Using this schedule, the total transfer volume is approximately 3,250 AF. Figure 1 illustrates a comparison between the normal operations (without transfer) and the transfer operations. The orange area shows the forecasted Stumpy Meadows storage assuming the 3,250 AF transfer occurs.

Figure 2 - 2026 Transfer Operations



The blue area represents the storage difference between the without-transfer operations and the with-transfer operations. Once the transfer is complete, the difference in storage is approximately 3,250 AF. The top of the blue area is the without-transfer storage and the bottom of the blue area is the resulting with-transfer storage. On August 1st, the proposed transfer releases begin. As the transfer begins, the storage deviates from the without-transfer operations. The orange area shows a decrease in storage until the transfer is complete on or about September 10. The resulting transfer storage is approximately 3,250 AF below the without-transfer storage and reaches a low-point of around 12,000 acre-feet in storage around mid-December (based on historic average inflow hydrology). This low-point occurs at the same time as would be anticipated under a without-transfer condition.

5.2 Refill Operations

Following any transfer, the GDPUD will seek to refill Stumpy Meadows Reservoir as soon as possible, while making fishery flow releases specified in Exhibit 15 of Decision 893. As the reservoir fills, the District will monitor Folsom Reservoir operations to identify whether Folsom Reservoir meets the conditions specified in the Refill Agreement (Attachment C). If the conditions are met, the District may return to normal Stumpy Meadows Project operations. If the conditions are not met, the District will need to release to Folsom Reservoir an amount of Stumpy Meadows Reservoir water equal to the Folsom Storage Deficiency caused by the transfer. On those occasions when the District needs to release stored Stumpy Meadows water owed to Folsom, the District will operate to the same ramping rates as those proposed for transfers.

6.0 DEMONSTRATING COMPLIANCE₆ WITH WATER CODE STATUTES

The following provides the SWRCB with necessary information to answer the key questions articulated in Water Code §1727, namely:

- §1727(b)(1) The proposed temporary change would not injure any legal user of the water, during any potential hydrologic condition that the board determines is likely to occur during the proposed change, through significant changes in water quantity, water quality, timing of diversion or use, consumptive use of the water, or reduction in return flows.
- §1727(b)(2) The proposed temporary change would not unreasonably affect fish, wildlife, or other instream beneficial uses.

6.1 Information to Support Finding of No-Injury from Proposed Changes to Stumpy Meadows Reservoir Re-operation

The water proposed for transfer pursuant to this temporary change consists of water previously stored in Stumpy Meadows Reservoir pursuant to Water Right Permit 12827. In the absence of the proposed transfer, the water would remain in storage for future use by GDPUD and would not be available to other water users. There will be no change in return flows for GDPUD's service area. Further, the releases from storage pursuant to the temporary transfer will not reduce the available supply to any other legal user of water downstream of Stumpy Meadows Reservoir. Refill of the storage vacated for the transfer will only occur during periods when it will not affect the amount of water that would otherwise have been available to other legal users downstream of Stumpy Meadows Reservoir.

The transfer is subject to a reservoir refill agreement with Reclamation and DWR ensuring that future refill to replace the stored water released for transfer will not reduce the amount of water that Reclamation, DWR, or other water users could otherwise divert under their water rights during the refill period.

6.2 Information to Support Finding of No Unreasonable Effects on the Environment from Stumpy Meadows Reservoir Re-operation

An analysis of effects from GDPUD's proposed water transfer on fish and wildlife in Stumpy Meadows Reservoir, Pilot Creek, and downstream watercourses indicates that the proposed transfer will not result in any unreasonable effects on those resources. **Technical Appendix A** to this attachment specifically addresses potential project effects on biological resources and resources present in Stumpy Meadows Reservoir, Pilot Creek, the Rubicon River below its confluence with Pilot Creek, Ralston Afterbay, Middle Fork American River, North Fork American River, Folsom Reservoir, Lake Natoma, and Sacramento River. Transfer water would be stored in Folsom Reservoir and later released in the 2026/2027 water year for conveyance through the Lower American River and Sacramento River to the Jones or Banks Pumping Plant, which would convey the GDPUD water to the Delta-Mendota Canal.

All water diverted at Banks will be done in accordance with the criteria contained in D-1641 and related Biological Opinions (BOs). DWR and Reclamation will continue to meet the objectives specified in D-1641 or any subsequent orders in effect at the time of the export. The quantity of transfer water to be conveyed through the Delta, including other currently planned transfers, is well within the quantities analyzed in current BOs and environmental documentation on the coordinated operation of the State Water Project

and Central Valley Project and relevant BOs. The proposed transfer agreement will be subject to all existing restrictions regarding use of the Delta Pumps, included existing BOs.

7.0 OTHER RELEVANT INFORMATION

In addition to DWR, Reclamation, and SWRCB, WWD is coordinating with appropriate local, state and federal agencies to obtain all necessary approvals, consultations or noticing for the proposed transfer including:

- California Department of Fish and Wildlife;
- California Regional Water Quality Control Board; and
- All counties affected by the transfer, including: El Dorado, Fresno, and Kings.

7.1 California Department of Fish and Wildlife (CDFW)

Consistent with Water Code § 1726, a copy of this Petition will be sent prior to Public Notice to Briana Seapy, the CDFW Region 2 Coordinator, at 1701 Nimbus Road, Rancho Cordova, CA 95670, 916-358-2909, and to Morgan Kilgour, Regional Manager — CDFW Fisheries. As detailed in **Technical Appendix A**, the transfer has been determined to not have unreasonable effects on fish and wildlife.

7.2 California Regional Water Quality Control Board

GDPUD has not formally contacted the Regional Board staff but intends to send a copy of this Petition prior to the posting of the Public Notice and opening of the comment period. The water proposed for transfer is very high-quality runoff derived from snowmelt and rains falling in eastern El Dorado County.

The proposed transfer would not violate any water quality standards or waste discharge requirements. The proposed transfer would use existing reservoirs, streams, and rivers operating within all applicable requirements. Given ambient flow conditions and the relatively small amount of transfer water released, there would not be any existing water quality standards or waste discharge requirements that would not be met. The relatively small amount of the transfer (up to 3,250 acre-feet) being added to Folsom Reservoir would not violate water quality standards or waste discharge requirements. Agricultural activities in WWD's service area would not change as a result of the proposed transfer, and no new violations in water quality standards or waste discharge requirements would occur.

7.3 County Notifications

GDPUD will provide a copy of the petition to the counties of El Dorado, Fresno, and Kings as required by Water Code Section 1726(c) *[A petitioner shall provide a copy of the petition to ...the board of supervisors of the county or counties in which the petitioner currently stores or uses the water subject to the petition, and the board of supervisors of the county or counties to which the water is proposed to be transferred.]*

7.4 Proposed New User Information

Westlands Water District
P.O. Box 6056
3130 N. Fresno Street
Fresno, CA 93703-6056

Russ Freeman, P.E., Deputy General Manager – Resources
559-241-6241 (Office)
559-816-1556 (Mobile)
rfreeman@wwd.ca.gov

Technical Appendix to Attachment A

Analysis of the Effects of the Proposed 2026 GDPUD Water Transfer on Stumpy Meadows Reservoir, Pilot Creek, and Downstream Fish and Wildlife Resources

1.0 INTRODUCTION

This Technical Appendix was prepared in support of GDPUD's obligation under §1727(b)(2) of the California Water Code to demonstrate that a proposed temporary 2026 water transfer would not unreasonably affect fish, wildlife, or other instream beneficial uses. Specifically, this TA addresses the potential effects of the proposed transfer on fish and wildlife resources of GDPUD's Stumpy Meadows Reservoir, Pilot Creek, the Rubicon River below its confluence with Pilot Creek, Ralston Afterbay, the Middle Fork American River below its confluence with the Rubicon, North Fork American River, and Folsom Reservoir between August 2026 and September 2026. The transfer water would be released from Folsom Reservoir into Lake Natoma, which is impounded by Nimbus Dam and serves as the re-regulating afterbay for Folsom Reservoir. Transfer operations would be coordinated by WWD in accordance with applicable Warren Act contract requirements. Specifically, each day's transfer volume delivered to Folsom Reservoir would be released from storage within 30 days of delivery, such that no transferred water would remain in Folsom Reservoir for longer than 30 days. Water would then be released simultaneously from Nimbus Dam into the Lower American River, and subsequently would flow into the Sacramento River and the Delta.

The proposed transfer includes no modification of the existing Federal water conveyance facilities and all water would be delivered within existing water service area boundaries utilizing existing water conveyance facilities. The transfer would not change any land use or zoning designations and does not have a potential to affect land use.

1.1 Water Supply and Hydrology

1.1.1 *Affected Environment*

The following section describes the existing setting for water supply and hydrology in areas potentially affected by the proposed transfer.

Stumpy Meadows Reservoir and Pilot Creek

The Stumpy Meadows Project was completed in 1962 using funds from a loan administered by Reclamation. The main feature of GDPUD's water supply is Mark Edison Dam and Stumpy Meadows Reservoir. Stumpy Meadows Reservoir impounds 20,000 AF and has a surface area of about 330 acres. Minimum pool elevation is 4,170 feet, with a minimum pool storage of 1,200 AF and useable storage of 18,800 AF.

Wet season peak flows in Pilot Creek below Stumpy Meadows have rarely exceeded 5,000 cfs since the creation of Stumpy Meadows Reservoir. Typically, peak flows do not exceed 200 cfs on an annual basis. In dry years, flow in the creek may not exceed 10 cfs at any time during the year. Flow in Pilot Creek as measured just below Mutton Canyon typically ranges from a recorded low of 1.9 cfs to a high of 5.6 cfs in mid-August, since the implementation of minimum flow standards for the creek below Stumpy Meadows. Flows during that time are typically between 4.0 to 4.5 cfs. Flow rates in Pilot Creek below Mutton Canyon between August and September do not vary substantially on a day-to-day basis. Accretion to

Pilot Creek downstream Mutton Creek and above its confluence with the Rubicon River occurs from a number of seasonal and perennial drainages. Generally, however, accretion from these sources is very limited during the time at which the proposed transfer would be carried out, i.e., August through September.

Rubicon River and Middle Fork American River Below Oxbow Powerhouse

The American River is a major tributary to the Lower Sacramento River. The Middle Fork American River watershed extends westward to the confluence with the North Fork American River, east of Auburn (elevation 650 feet). The average annual yield for the Middle Fork American River for the period of 1959 through 1991 was 805,000 AF. The Rubicon River is the main tributary to the Middle Fork American River, and elevations range from 538 ft to over 9,900 ft at the headwaters of the Rubicon. The main reservoirs in the Middle Fork watershed are French Meadows, Hell Hole, Rubicon, Loon Lake, Gerle Creek, and Stumpy Meadows Reservoir. Placer County Water Agency (PCWA) and Sacramento Municipal Utility District (SMUD) operate most of the reservoirs in the Middle Fork American River watershed. The Middle Fork American River drains 616 square miles of water to the American River Confluence at the North Fork. Water flow in the Middle Fork American River has been largely modified by dams and diversions, with late spring-early summer high flows stored in reservoirs to generate hydropower later in the year when Sierra Nevada runoff is lowest annually.

North Fork American River

The North Fork American River drains 996 square miles and flows largely unregulated until the North Fork Dam (a small debris dam) at Lake Clementine that is just upstream of the confluence with the Middle Fork American River. The Middle Fork American River joins the North Fork American River before flowing into Folsom Reservoir. The North Fork American River flows are a combination of regulated (Middle Fork American River) and unregulated flows (North Fork American River) until they reach Folsom Reservoir (SRWP 2015a). The flows are highest during snow melt in April and May.

Folsom Reservoir and Dam

Folsom Dam is located approximately 30 miles east of Sacramento and has a maximum storage elevation of 466 feet amsl (SRWP 2015b). Folsom Reservoir, a federal facility, would be used to convey and store water under the proposed Warren Act contract. Folsom Reservoir is the principal reservoir on the American River, with a maximum storage capacity of 976,000 AF (Reclamation 2020b). Reclamation operates Folsom Dam and Reservoir for the purposes of flood control, meeting water contract obligations, providing downstream releases for the Lower American River, and helping to meet Delta water quality standards. The El Dorado Irrigation District, Placer County Water Agency (PCWA), City of Roseville, San Juan Water District, California State Prison, and the City of Folsom are the main entities that divert water from Folsom Reservoir (Reclamation 2014).

Lake Natoma and Nimbus Dam

Lake Natoma serves as the Folsom Dam afterbay and was formed as a result of Nimbus Dam. Lake Natoma has a maximum storage capacity of 8,760 AF, and inundates approximately 500 acres (Reclamation 2020c). Lake Natoma is operated as a re-regulating reservoir that accommodates the diurnal flow fluctuations caused by the power peaking operations at Folsom Power Plant. Nimbus Dam, along with Folsom Dam, regulates water releases to the Lower American River (Reclamation 2014).

Nimbus Dam releases are nearly always controlled during significant portions of a water year by either flood control requirements, fishery requirements under the Central Valley Project Improvement Act (CVPIA) 3406(b)(2), or through coordination with other CVP and State Water Project (SWP) releases to meet downstream SWRCB Decision 1641 requirements in the Delta and CVP water quality objectives (Reclamation 2014).

Lower American River

The Lower American River consists of the 23-mile stretch of river from Nimbus Dam to the confluence of the American and Sacramento rivers in the City of Sacramento. Average Lower American River annual flows downstream of Folsom Dam at Fair Oaks are approximately 2,650,000 AF (Reclamation 2013).

Sacramento River

The Sacramento River originates near the slopes of Mount Shasta and flows southward to Suisun Bay. Sacramento River flows are controlled primarily by Reclamation's Shasta Dam. Flows in the Sacramento River normally peak during December through February. The drainage area upstream of the City of Sacramento is 23,502 square miles. The historical average annual flow for the Sacramento River at Freeport (water-gage recorder south of Sacramento) is 16,677,000 AF. The Feather and American rivers are the two largest contributors to the Sacramento River. The Lower Sacramento River is defined as that section of the river downstream of its confluence with the Lower American River (Reclamation 2014).

Sacramento-San Joaquin Delta

The Sacramento-San Joaquin Delta is the confluence of the Sacramento and San Joaquin rivers and where freshwater meets saltwater from the Pacific Ocean. The Delta legal boundary extends north along the Sacramento River to just south of the American River, south along the San Joaquin River to just north of the Stanislaus River, east to the City of Stockton, and west to Suisun Bay. Runoff from a variety of Central Valley streams accounts for approximately 95 percent of the inflows into the Delta (Reclamation 2013 and 2014). The Delta receives flows directly from the Sacramento, San Joaquin, Mokelumne, Cosumnes, and Calaveras rivers.

Inflows to the Delta averaged 27,800,000 AF annually from 1980 through 1991 and outflows to Suisun Bay averaged 21,020,000 AF during that period (Reclamation 2014). To a large extent, releases from Shasta, Folsom, New Melones, and Millerton reservoirs of the CVP, Lake Oroville of the SWP, and several locally operated reservoirs in the San Joaquin River Basin control the volume and timing of freshwater entering the Delta (Reclamation 2014).

The Delta is a major operational focus for SWP and CVP project facilities. The SWP operates the Banks Pumping Plant, which lifts the water to the California Aqueduct. Current CVP and SWP operations in the Delta are governed by a series of regulations and agreements with the SWRCB, US Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and California Department of Fish and Wildlife (CDFW) (Reclamation 2014).

1.1.2 *Projected Effects of the Proposed Transfer on Hydrology*

The analysis of the potential effects on water supply and hydrology associated with the proposed transfer was based on whether a reduction in Folsom Reservoir storage or lower American River flows below Nimbus Dam would be of sufficient magnitude to affect the water supply availability to CVP contractors. This analysis was based on the conveyance and withdrawal of 3,250 AF of Stumpy Meadows Reservoir water.

Stumpy Meadows Reservoir and Pilot Creek

As noted in *Section 1.1.1 Affected Environment*, wet season peak flows in Pilot Creek below Stumpy Meadows have rarely exceeded 5,000 cfs since the construction of Stumpy Meadows Reservoir. Typically, peak flows do not exceed 200 cfs on an annual basis. In dry years, flow in the creek may not exceed 10 cfs at any time during the year. Flow in Pilot Creek as measured below Mutton Canyon typically ranges from a recorded low of 1.9 cfs to a high of 5.6 cfs in mid-August, since the implementation of minimum flow standards for the creek below Stumpy Meadows. Flows on that date are typically between 4.0 to 4.5 cfs. Flow rates in the creek below Mutton Canyon do not vary substantially on a day-to-day basis.

The addition of up to 50 additional cfs into Pilot Creek below Stumpy Meadows Reservoir during the proposed transfer would substantially increase flows typical for that time of year. This increase would be most apparent in the reach of Pilot Creek between Stumpy Meadows and Mutton Canyon. Between Mutton Canyon and Pilot Creek's confluence with the Rubicon River, however, the increase in typical streamflow due to the transfer would be somewhat ameliorated due accretion to the creek from other tributaries to the creek.

The proposed transfer would not adversely affect water supply for GDPUD customers. Water in storage at Stumpy Meadows Reservoir would be sufficient to meet all GDPUD

contractual obligations, including GDPUD's own use, with the implementation of the proposed transfer.

Rubicon River, Middle Fork American River Below Oxbow Powerhouse, and North Fork American River

To transfer this water, additional on-peak generation would be needed. The minimum and maximum flow rates for the day in the Rubicon River and Middle Fork American River would remain the same as under the No Action Alternative, although the duration of the maximum flow would increase during the daily on-peak generation period. Flows in the North Fork American River below the confluence with the Middle Fork American River would be similarly affected, although to a lesser extent due to downstream attenuation of the temporal distribution of flow. Therefore, because water storage in Stumpy Meadows Reservoir is sufficient to meet contractual obligations, and flows would not be reduced in the Rubicon River, the Middle Fork River below Oxbow Powerhouse, or in the North Fork American River, water availability or the capability to divert the water would not change. With the proposed transfer, the flow rate would increase temporarily at a maximum rate of 50 cfs from August through early September 2026 in these three bodies of water; however, the rate would not be significant relative to the natural flows of the North Fork American River.

Folsom Reservoir and Dam

Under the proposed transfer, Folsom Reservoir storage increase would be imperceptible to most users due to the size of the transfer relative to the size of the reservoir. The transfer volume is 3,250 AF while the reservoir capacity is 976,000 AF. The transferred water would be released from Folsom Reservoir into Lake Natoma, which is impounded by Nimbus Dam and serves as the re-regulating afterbay for Folsom Reservoir. Compared to the No Action Alternative, a small temporary increase in reservoir storage and cold water pool resources would occur with the proposed transfer, water supply availability for CVP customers would not be decreased, and there would be no effect to CVP customers (Reclamation 2020b).

Lake Natoma, Nimbus Dam, Lower American River, Sacramento River, and San Joaquin Delta

Under the proposed transfer, the transfer water would be released at a steady rate over a maximum of 1.5 months beginning August 1st through early September, from Nimbus Dam into the Lower American River, and subsequently would flow into the Sacramento River and the Delta (Reclamation 2014). These increased flows would be imperceptible compared to the No Action Alternative.

1.2 Water Quality

Water quality parameters address potential water quality problems (i.e. impairments of beneficial uses or deterioration of water quality). Water quality problems are typically attributed to the intensity and type of past and present activities of primary discharge sources and the volume, quality, and uses of the receiving waters affected by the discharges (CVRWQCB 2011) of pollutants such as pesticides, heavy metals, nutrients, temperature, pathogens, sediment, pathogens, salinity, organics, inorganics, and toxicity. Water quality for each section within the proposed transfer Area is discussed below.

1.2.1 *Affected Environment*

Stumpy Meadows Reservoir and Pilot Creek

Due to its high elevation within the watershed, Stumpy Meadows Reservoir inflow mainly comes from snowmelt and as a result the reservoir does not receive a high level of contaminants. Water in Stumpy Meadows Reservoir and Pilot Creek is generally considered to be of good quality.

Rubicon River, Middle Fork American River below Oxbow Powerhouse, and North Fork American River

Water quality in the North Fork American River meets required water quality objectives and standards for suitable beneficial uses with the exception of mercury (SWRCB 2010). Historical mining activities have produced a water quality issue due to mercury that places this water body on the impaired waterbodies list (SWRCB 2010).

Within the Middle Fork American River watershed, minimal urbanization has occurred that could be a source of water quality degradation. In addition, there are no active landfills or municipal wastewater systems permitted to discharge treated effluent into this reach. In 2007, PCWA conducted a comprehensive water quality and temperature monitoring program in the Middle and North Fork American rivers. All constituents sampled met regulatory criteria or were within the expected ranges for the criteria that do not have established objectives. Turbidity measures were low (<0.6 NTU), indicating the river carries relatively little sediment or other suspended organic matter during low flows. Historic water quality data from the 1960s to 1980s collected by the United States Geological Survey (USGS), SWRCB, and Reclamation from the North Fork American River indicate that generally all the constituents analyzed complied with current regulatory standards (Reclamation 2014).

Folsom Reservoir and Lake Natoma

Water discharged from the North Fork American River into Folsom Reservoir and Lake Natoma is considered high quality with the exception of mercury (SWRCB 2010) and seldom exceeds the State of California's water quality objectives due to the relatively

undeveloped North Fork American River Watershed (Folsom 2006). Beneficial uses currently defined for these water bodies include M&I water, irrigation, industrial power, water contact and non-contact recreation, warm and cold freshwater habitat, warm freshwater spawning habitat, and wildlife habitat, along with potential beneficial uses for industrial service supply (Folsom 2006). Water quality parameters including temperature, toxic metals concentrations, pH, turbidity, dissolved oxygen (DO), total organic carbon (TOC), nitrogen, phosphorus, electric conductivity, total dissolved solids (TDS), and fecal coliform generally do not exceed recommended limits (Reclamation 2014; LSA 2003). The allowable fecal coliform bacteria levels assigned to Folsom Reservoir in the Basin Plan are half of the allowable levels of other waters in the region that are designated for water contact recreation (LSA 2003).

In general, water quality in Folsom Reservoir and Lake Natoma is acceptable to meet these beneficial uses. However, reports of changes in taste and odor have occurred in municipal water supplies diverted from Folsom Reservoir. Blue-green algae blooms that periodically occur in the reservoir as a result of elevated water temperatures during late summer have been identified as the source of the diminished water quality (Reclamation 2014; Folsom 2006).

Lower American River

Water quality parameters of concern (i.e. pathogens, nutrients, TDS, TOC, priority pollutants, and turbidity) for the Lower American River are typically affected by urban development and associated runoff, and storm water discharges. TOC and TDS levels in the river are relatively low in comparison to other waterbodies such as the Sacramento River and the Delta (Reclamation 2014). Water quality parameters for the Lower American River have generally been within acceptable limits to achieve water quality objectives and beneficial uses identified for this waterbody (Reclamation 2014).

Although heavy metal concentrations in the river are generally within the range of drinking water standards, SWRCB has listed segments of the Lower American River as impaired waters due to mercury, PCBs, and other unknown toxicity (SWRCB 2010). In addition, reports of changes in taste and odor have occurred in the Lower American River during late summer. Elevated summer temperatures have been attributed to increased concentrations of bacteria, specifically an actinomyces microorganism that has been identified as the source of the problem (Reclamation 2014; SWRCB 2015).

Sacramento River

The Sacramento River is a major component to the CVP water supply, which delivers water downstream to urban development and agricultural lands (Reclamation 2014). Several segments of the Sacramento River have been listed as impaired waters, particularly at the confluences between the Sacramento River and Feather River and the Sacramento River

and the Delta (Reclamation 2014). Pollutants identified along the Sacramento River (Knights Landing to the Delta) include pesticides (chlordane, dichlorodiphenyltrichloroethane [DDT], and dieldrin), heavy metal concentrations of mercury, polychlorinated biphenyls (PCBs), and unknown toxicity (SWRCB 2010).

Storm water and urban runoff is discharged into the Lower Sacramento River, either directly or indirectly (through tributary inflow), from the cities of Sacramento, Roseville, Folsom, and smaller surrounding communities. Directly upstream of the American River and Sacramento River confluence, the Natomas East Main Drainage Canal discharges to the American River transferring both agricultural and urban runoff into the Sacramento River (Reclamation 2014).

Sacramento-San Joaquin Delta

Water quality parameters of concern in the Delta generally include pH, metals (mercury and selenium), pesticides (chlordane, DDT, and dieldrin), other organics (dioxin, furan, and PCBs), nutrient enrichment and associated eutrophication, parameters associated with suspended sediments and turbidity, and those parameters of specific concern to drinking water including salinity, bromide, and organic carbon (Reclamation 2014; SWRCB 2010). The Delta is the source of drinking water for more than 25 million Californians located in the San Francisco Bay area, Central Valley, Central Coast, and Southern California

regions. Extended periods of reverse flow have been shown to contribute to increased levels of salinity, potentially causing adverse effects to water quality in the Delta and export pumps. CVP and SWP currently offset this effect by increasing Delta outflow to reduce salinity levels (Reclamation 2014).

1.2.2 Effects of the Proposed Transfer on Water Quality

The analysis of potential changes in water quality associated with the proposed water transfer within the North Fork American River Basin was based on the temporary increase in flow and the end-of-month reservoir storage at Folsom Reservoir, that could contribute to the cold water pool and increased water quality in Folsom Reservoir, Lake Natoma, the Lower American River, and the Sacramento River.

Stumpy Meadows Reservoir and Pilot Creek

The volume of flow in Pilot Creek during the time of release from Stumpy Meadows Reservoir would temporarily increase. The higher flows in the creek and the lower storage level of the reservoir would not result in an increase in the concentration of contaminants

or a decrease in water quality in Pilot Creek.

Rubicon River

The volume of flow in the Rubicon River during the time of release would temporarily increase under the proposed transfer. The higher flows in the Rubicon River would not result in an increase in the concentration of contaminants or a decrease in water quality in the river downstream of the confluence with Pilot Creek.

Middle Fork American River

The volume of flow in the Middle Fork American River during the time of release would temporarily increase under the proposed transfer. The higher flows in the Middle Fork American River would not result in an increase in the concentration of contaminants or a decrease in water quality in the river downstream of the confluence with the Rubicon River.

North Fork American River

The volume of flow in the North Fork American River during the time of release would temporarily increase under the proposed transfer. The higher flows in the North Fork American River would not result in an increase in the concentration of contaminants or a decrease in water quality in the river downstream of the confluence with the Middle Fork American River.

Folsom Reservoir and Lake Natoma

Reservoir storage would not decrease under the proposed transfer, resulting in no degradation to the water quality in Folsom Reservoir and Lake Natoma. The increase in the cold water pool and reservoir storage, although minor, would be beneficial and would not degrade the water quality in Folsom Reservoir and Lake Natoma under the proposed transfer.

Lower American

The additional 3,250 AF of water that would be released from Folsom Reservoir by the proposed transfer would be released steadily during a four to five week period (August through early September as stated in *Section 2.2.1 Operations*). The slight increase in flow would not degrade or adversely change the water quality in the Lower American River below Nimbus Dam. Augmenting Folsom Reservoir's cold water pool with 3,250 AF would help Reclamation meet temperature objectives, protect aquatic fishery resources and critical habitat in the lower American River, and enhance water quality in the Delta.

Sacramento River

The proposed transfer would not significantly change the flows in the Sacramento River (below the confluence with the Lower American River). Therefore, the proposed transfer would not affect water quality in the Sacramento River.

Sacramento-San Joaquin Delta

The SWRCB D-1641 requires the implementation of the 2006 Bay-Delta Water Quality Control Plan, in which DWR and Reclamation are responsible for mitigating water quality effects. There would be no change in the ability of CVP or SWP to meet D-1641 standards under the proposed transfer which would convey an additional 3,250 AF of high quality water to the Delta which would otherwise be stored in Stumpy Meadows reservoir. The ability of DWR and Reclamation to meet the 2006 Bay-Delta Water Quality Control Plan objectives would not be compromised. No changes to water quality would occur as a result of the proposed transfer.

1.3 Terrestrial and Riparian Resources

1.3.1 Affected Environment

The following section describes the existing biological resources within the proposed transfer Area including terrestrial plant and wildlife communities, and special-status species potentially occurring in the action area. Special-status species include those listed pursuant to the Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA) consisting of endangered or threatened species, candidate FESA and CESA species, and species of concern.

Stumpy Meadows Reservoir, Pilot Creek, and Rubicon River

Habitats associated with this area include montane woodland and forests (mixed conifer and oak), montane riparian, upland scrub, urban-agriculture, montane riverine aquatic, and non-tidal freshwater permanent emergent wetlands. Montane woodlands and forests are predominantly ponderosa pine (*Pinus ponderosa*) forests (Reclamation 2014).

The Stumpy Meadows/Pilot Creek study area supports habitat for resident mammal species such as California ground squirrel (*Otospermophilus beecheyi*), raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), mule deer (*Odocoileus hemionus*) and black bear (*Ursus americanus*). Many bird species may nest and forage within the area, including northern flicker (*Colaptes auratus*), American robin (*Turdus migratorius*), Steller's jay (*Cyanocitta stelleri*), common raven (*Corvus corax*), red-breasted nuthatch (*Sitta canadensis*), American dipper (*Cinclus mexicanus*), mallard (*Anas platyrhynchos*), turkey vulture (*Cathartes aura*), Anna's hummingbird (*Calypte anna*), oak titmouse (*Baeolophus*

inornatus), and belted kingfisher (*Megasceryle alcyon*). Common reptiles that might be encountered include western fence lizard (*Sceloporus occidentalis*), Southern alligator lizard (*Elgaria multicarinata*), California kingsnake (*Lampropeltis getula*), Pacific gopher snake (*Pituophis catenifer*), western terrestrial garter snake (*Thamnophis elegans*), Sierra garter snake (*T. couchii*), common garter snake (*T. sirtalis*), rubber boa (*Charina bottae*), and western rattlesnake (*Crotalus oreganus*). Amphibians that inhabit the area include Sierra newt (*Taricha sierrae*), American bullfrog (*Lithobates catesbeianus*), Sierra chorus frog (*Pseudacris sierra*), and western toad (*Anaxyrus boreas*).

Two species of concern are known to occur within Pilot Creek, the MFAR, and tributaries. These are yellow-legged frog (*Rana boylei*) a species listed as Threatened under the California ESA, and northwestern pond turtle (*Actinemys marmorata*), a California Species of Special Concern (CDFW 2020). Multiple foothill yellow-legged frog records are noted both upstream of the confluence with MFAR, and downstream west of Oxbow Reservoir. Characterized as “one moderate and several small populations,” these occurrences are in the Rubicon River and the tributaries of Long Canyon and Pilot Creek (Center for Biological Diversity 2016). Additional records occur in Pidgeon Roost Canyon northeast of Stumpy Meadows Reservoir.

Only one record for northwestern pond turtle occurs in the study area (CDFW 2020). This record is for northwestern pond turtles found in two ponds along Weber Creek near Sly Park. Northwestern pond turtles are likely to be more widely distributed than is presently recorded, however. The Weber Creek drainage is also an area known to be occupied by California red-legged frog (*R. draytonii*), but Sly Park and Weber Creek populations will not be affected by the Proposed Action because Weber Creek’s confluence is with the South Fork American River (SFAR). SFAR drainage does not confluence with the MFAR until the Folsom Reservoir.

Middle Fork American River Below Oxbow Powerhouse and North Fork American River

The Middle Fork American River below Ralston Afterbay/Oxbow Powerhouse is characterized primarily by alder-willow-cottonwood communities. Riparian vegetation is distributed as a continuous narrow corridor along the channel and bar margins, and relatively dense except in areas that have experienced bank failures or other mass wasting events, or in areas of exposed bedrock (Reclamation 2014).

Several special-status plant species potentially occurring in this study area include Pleasant Valley mariposa lily (*Calochortus clavatus* var. *avius*), Sierra arching sedge (*Carex cyrtostachya*), Butte County fritillary (*Fritillaria eastwoodiae*), Red Hills soaproot (*Chlorogalum grandiflorum*), and Sierra blue grass (*Poa sierrae*) (Reclamation 2014, CDFW 2020). Special-status terrestrial wildlife species potentially occurring, but not limited to, the Middle Fork American River, include California red-legged frog, foothill yellow-legged

frog, yellow warbler (*Setophaga petechia*), California spotted owl, northern goshawk (*Accipiter gentilis*), bald eagle (*Haliaeetus leucocephalus*), willow flycatcher (*Empidonax traillii*), Townsend's big-eared bat (*Corynorhinus townsendii*), Yuma myotis (*Myotis yumanensis*), fisher (*Pekania pennanti*), Sierra Nevada red fox (*Vulpes vulpes necator*), and ringtail (*Bassariscus astutus*) (Reclamation 2014, CDFW 2020).

Plant communities found within the North Fork American River corridor are predominately riparian communities dominated by alder-willow riparian (Reclamation 2014). Riparian vegetation is relatively undisturbed from the North Fork American River to the confluence of the Middle Fork American River. However, riparian vegetation downstream of the confluence is highly disturbed and is characterized by unstable slopes and rock outcrops, which are largely devoid of vegetation (Reclamation 2014). In addition to the riparian vegetation communities, three types of woodland occur in this area including live oak woodland, mixed evergreen forest, and foothill woodland, as well as various wetland habitats (Placer County 2007).

Wildlife species are numerous and at least 47 species of mammals, 238 birds, 10 amphibians, and 20 species of reptiles are supported by the American River Canyon habitats including similar species found in the vicinity of Stumpy Meadows Reservoir and Pilot Creek (refer to previous section above) (Reclamation 2014).

Folsom Reservoir, Lake Natoma, and Nimbus Fish Hatchery

Plant communities found in proximity to Folsom Reservoir and Lake Natoma include non-native annual grassland, blue oak woodland/savanna, interior live oak woodland, chamise chaparral, cottonwood/riparian woodland, freshwater marsh, northern claypan and northern hardpan vernal pools, and seasonal wetlands (DPR 2007; Reclamation 2014). Vegetation is absent within the lake shoreline fluctuation zones, with the exception of willow shrubs (*Salix* spp.) and non-native grasses including wild oat (*Avena fatua* L.), ripgut brome (*Bromus diandrus*), and Italian rye grass (*Festuca perennis*). Ruderal and barren areas occur where human activity has heavily impacted vegetation along roadsides, boat-launch aprons, and camping and picnic areas (DPR 2007; Reclamation 2014).

These plant communities provide habitat for a variety of terrestrial wildlife including common reptile and amphibian species such as western fence lizard (*Sceloporus occidentalis*), California whipsnake (*Masticophis lateralis*), and northern pacific rattlesnake (*Crotalus oreganus*); bird species including western scrub-jay (*Aphelocoma californica*), American goldfinch (*Spinus tristis*), red-tailed hawk (*Buteo jamaicensis*), and turkey vulture (*Cathartes aura*); and numerous mammal species such as bobcat (*Lynx rufus*), coyote (*Canis latrans*), and mule deer found in the oak woodland (DPR 2007).

Several special status plants and animals potentially occur in the vicinity of Folsom

Reservoir and Lake Natoma. Special-status plant species that potentially occur in the vicinity include Jepson's onion (*Allium jepsonii*), big-scale balsamroot (*Balsamorhiza macrolepis* var. *macrolepis*), Parry's horkelia (*Horkelia parryi*), Hartweg's golden sunburst (*Pseudobahia bahifolia*), and Boggs Lake hedge-hyssop (*Gratiola heterosepala*) (Reclamation 2014). Special-status terrestrial wildlife species that potentially occur within the vicinity include the valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), California red-legged frog, mountain yellow-legged frog, pallid bat, northwestern pond turtle (*Actinemys marmorata*), tricolored blackbird (*Agelaius tricolor*), bald eagle (*Haliaeetus leucocephalus*), California black rail (*Laterallus jamaicensis coturniculus*), and purple martin (*Progne subis*) (Reclamation 2014, CDFW 2020).

Lower American River

The dominant plant community within the Lower American River is riparian, characterized as Fremont cottonwood and willow riparian forest. Other plant communities, however, include freshwater marsh and emergent wetland, riparian scrub, oak woodland, and non-native grassland (Reclamation 2014; Sacramento County 2008). In addition, and due to recent human disturbances, areas of non-native vegetation occur in adjacent areas along the river. These disturbed areas are generally associated with fallow and active agricultural fields, borrow pits, dredger mine tailings, levee slopes, and areas subject to periodic fire, frequent flood inundation, or scour occur along the Lower American River (Sacramento County 2008).

The Lower American River supports a variety of terrestrial wildlife species. More than 220 species of birds and 30 species of mammals exist within the river corridor (Reclamation 2014). In addition, the riparian forests support numerous amphibian and reptile species, the most common include western toad (*Bufo boreas*), Sierra chorus frog (*Pseudacris sierra*), bullfrog (*Rana catesbeiana*), northwestern pond turtle, western fence lizard, common garter snake (*Thamnophis sirtalis*), and gopher snake (*Pituophis catenifer*) (Reclamation 2014).

Many of the special-status plant species potentially occurring in the vicinity of Folsom Reservoir and Lake Natoma also occur in the vicinity of the Lower American River including, but not limited to, valley elderberry longhorn beetle, western pond turtle, bald eagle, bank swallow (*Riparia riparia*), and Western burrowing owl (*Athene cunicularia*) (Reclamation 2014). Additional special-status species that may occur in the vicinity of the Lower American River include giant garter snake (*Thamnophis gigas*), and Swainson's hawk (*Buteo swainsoni*).

Sacramento River

The Sacramento River within the area affected by the proposed transfer is identified as the segment of the Sacramento River from Princeton to the Delta near Chipps Island.

Levees were constructed directly adjacent to the river spanning approximately 60 miles from the Sacramento River and Lower American River confluence to Collinsville. Plant communities are generally absent along the levees, with the exception of single rows of Fremont cottonwood, sycamore, or willow trees. The levees are generally bordered by agricultural land consisting of rice, dry grains, pastures, orchards, and row crops (Reclamation 2014).

Common terrestrial wildlife species found within the Sacramento River include mammals such as the North American river otter (*Lontra canadensis*) and muskrat (*Ondatra zibethicus*), which utilize riverine habitats for foraging and cover (Reclamation 2014). Freshwater/emergent wetlands provide habitat for numerous amphibians and some reptiles such as northwestern pond turtle, American bullfrog, and Sierra chorus frog. Agricultural land adjacent to the river levees provides foraging habitat for various raptor species such as red-tailed hawk (Reclamation 2014). Special-status plant and terrestrial wildlife species potentially occurring in the vicinity of the Lower Sacramento River are similar to those previously described for the Folsom Reservoir/Lake Natoma and Lower American River (see descriptions above).

Sacramento-San Joaquin Delta

The Sacramento-San Joaquin Delta (Delta) was formerly a large tidal freshwater marsh, located at the confluence of the Sacramento and San Joaquin Rivers. Levees were built in the 1800s to allow draining of the marsh for agricultural development. Today the Delta is comprised of 57 separate "islands" bound by water. Plant communities are limited, consisting of primarily agricultural fields adjacent to ruderal non-native grasslands (Reclamation 2014). Native plant communities include some marginal riparian vegetation, brackish and freshwater marshes, and emergent marsh, which provide important habitat for many resident and migratory wildlife species (Reclamation 2014).

Common terrestrial wildlife species known to occur within the Delta include, but are not limited to, coyote, muskrat, North American river otter, Great egret (*Casmerodius albus*), Least sandpiper (*Erolia minutilla*), Northern harrier (*Circus cyaneus*), red-tailed hawk, and northwestern pond turtle (Sacramento County 2011).

Potentially occurring special-status plant species in the vicinity of the Bay Delta include, but are not limited to, Boggs Lake hedge-hyssop, Sanford's sagittaria (*Sagittaria sanfordii*), Mason's lilaeopsis (*Lilaeopsis masonii*), and rose mallow (*Hibiscus lasiocarpus*). Potentially occurring special-status terrestrial wildlife species in the vicinity of the Bay Delta are similar to those described for the Lower American and Sacramento Rivers, as previously described. Species include, but are not limited to, valley elderberry longhorn beetle, northwestern pond turtle, giant garter snake, tricolored blackbird, Swainson's hawk, and northern harrier (Reclamation 2014, CDFW 2020).

1.3.2 Environmental Consequences

The analysis of potential effects on plants and terrestrial wildlife species associated with the proposed transfer was based on changes in reservoir storage or river flows of adequate scale to adversely affect plants and terrestrial wildlife species and potentially occurring special-status species (including direct loss of individuals or habitat loss). Biological resources potentially affected by the proposed transfer include plant and terrestrial wildlife species, including special-status species, and their associated habitats that occur within the inundation areas of the reservoirs or are supported by flows within the proposed transfer Area.

The Stumpy Meadows Reservoir full mark is at an elevation of 4,262 feet amsl. The water transfer of 3,250 AF, in combination with the minimum required streamflow (5 cfs), and GDPUD customer demand (8,500 AF) would result in a reservoir surface elevation just above 4,234 feet amsl during a dry year. There is no established riparian vegetation below the full reservoir mark in Stumpy Meadows Reservoir and the magnitude of the flow changes in Pilot Creek and reservoir water surface elevation changes in Stumpy Meadows Reservoir with the proposed transfer would not affect plants and terrestrial wildlife species, special-status species, geomorphic processes or impact riparian growth.

The highest potential for transfer-related impacts is within Pilot Creek. The creek provides breeding habitat for foothill yellow-legged frog (FYLF) and northwestern pond turtle. The proposed transfer has the potential to flush tadpoles downstream, to eliminate tadpole rookeries (side pools and channels, gravel point bars with low velocity where tadpoles graze on diatoms and algae), to lower or raise water temperatures below or above optimal temperatures for growth, to strand tadpoles in unsuitable (drying) microhabitats as the transfer volume ramps down, and to reduce basking habitat for juvenile and adult frogs. Monitoring will be established to ensure FYLF are not unreasonably affected by the transfer (see below).

The changes in flow within Pilot Creek would increase water flows to above normal seasonal fluctuations in August and September 2026 which are generally quite stable and range between 4.0 and 4.5 cfs. The anticipated increase in flow to as high as 50 cfs during the proposed transfer window is not expected to adversely affect environmental conditions for plants and terrestrial wildlife species, including special-status species with the possible exception of FYLF. The increase in flows may provide minor benefits to riparian vegetation and species that are supported by riparian habitats during a dry year.

The conveyance flows between Pilot Creek and Folsom Reservoir are expected to have a diminutive effect on plants and wildlife species; considering that the proposed maximum increase of 50 cfs into the North Fork American River would occur in August and September when average daily flows in the North Fork American River between the

confluence with the Middle Fork American River and Folsom Reservoir range between 1,200 and 1,900 cfs (USGS 2015). The nominal increase in the overall flows in this reach of the North Fork American River would not create fluctuations in flows beyond current minimum and maximum ranges, and would thereby not affect the current baseline conditions for plant and wildlife species in this reach.

Similarly, the August through September releases from Folsom Reservoir would be nominal and would not create fluctuations in flows beyond current minimum and maximum ranges, and would thereby not affect the current baseline conditions for plant and wildlife species downstream of Folsom Reservoir/Nimbus Dam. The transfer water is approximately 0.2% of the 976,000 AF of Folsom Reservoir's storage capacity (Reclamation 2009b). This amount of water would not be noticeable within the large storage and flow volumes of Folsom Reservoir, Lake Natoma, Lower American River, Sacramento River or the Delta.

Foothill Yellow-Legged Frog Monitoring Strategy

Of potential concern is the volume and velocity of released water on the sensitive life stages of foothill yellow-legged frog (*Rana boylei*), a California-listed threatened species occurring within the Pilot Creek/Rubicon/Middle Fork American watershed. The most sensitive life stages of foothill yellow-legged frog are egg masses and tadpoles. Both are susceptible to human-mediated changes in water release volumes. With increasing volume and velocity, egg masses can be scoured from attachment sites on shallow cobble bars and boulders, destroying them. Tadpoles can be flushed from slackwater and edgewater foraging sites into deeper water where predation, increased energetic output, and lack of forage greatly increase mortality. Conversely, quickly decreasing volume, velocity, and elevation can strand egg masses and tadpoles to either warmer pockets of non-circulating water, or to open air; both conditions being fatal to young. Metamorphosed, juvenile, and adult foothill yellow-legged frogs are motile and much better able to cope with changing water conditions.

To ensure that take, harm, or harassment of foothill yellow-legged frogs does not occur as a result of the proposed transfer, a triphasic monitoring approach for frogs and water parameters will be undertaken.

One baseline, pre-transfer survey set will be performed at 2 survey sites prior to the transfer. Standard methods will be used to quantify relative abundance of yellow-legged frogs of each life stage (adult, juvenile, larva, and egg mass) in each survey reach. Standard hydrological transects will be placed at suitable areas to determine base-flow volume and velocity. Thermochron ibuttons will be deployed prior to the transfer to record ambient and water temperatures at representative locations prior to, during, and after the transfer. The preconstruction survey is intended to confirm that sensitive life

stages (egg masses and tadpoles) are absent from the receiving reach, with the timing of the survey and transfer being past the maturation phase for both life stages. If the survey shows presence of either life stage, the release timing may be deferred until a subsequent survey shows that eggs and tadpoles have transformed to metamorphic frogs.

A second survey set will occur at the height of the transfer, again collecting frog relative abundance data and hydrological data at stream transects. A post-transfer amphibian survey and hydrology survey will be conducted at the study sites after cessation of the transfer. Ibutton temperature loggers will be collected at that time. A brief summary report will compile foothill yellow-legged frog survey data, hydrological data, and temperature data at the completion of the transfer. As a requirement of state-issued collecting permits, all anuran survey data will be provided to California Department of Fish and Wildlife's Natural Diversity Database (NDDDB) system.

1.4 Fisheries and Aquatic Resources

1.4.1 Affected Environment

Species of primary management concern include those that are recreationally or commercially important (fall-run Chinook salmon [*Oncorhynchus tshawytscha*], steelhead [*Oncorhynchus mykiss*], American shad [*Alosa sapidissima*], and striped bass [*Morone saxatilis*]); Federal- and/or State-listed species within the Action Area (winter- and spring-run Chinook salmon, steelhead, delta smelt [*Hypomesus transpacificus*], longfin smelt [*Spirinchus thaleichthys*], and green sturgeon [*Acipenser medirostris*]); and State species of special concern (late fall-run Chinook salmon, green sturgeon, hardhead [*Mylopharodon conocephalus*], river lamprey [*Lamptera ayresi*], Sacramento perch [*Archoplites interruptu*], Sacramento splittail [*Pogonichthys macrolepidotus*], and California roach [*Hesperoleucus symmetricus*]).

Special emphasis is placed on these species of primary management concern to facilitate compliance with the State and Federal ESAs. Table 1 lists the special-status fish species potentially occurring within the Action Area. This focus is consistent with: (1) CALFED's 2000 Ecosystem Restoration Program Plan and Multi-Species Conservation Strategy; (2) the programmatic determinations for the CALFED program, which include CDFW's Natural Community Conservation Planning Act approval and the 2009 NMFS, 2009 USFWSBO; (3) USFWS's 1997 Draft Anadromous Fish Restoration Program (AFRP) which identifies specific actions to protect anadromous salmonids; (4) CDFW's 1996 Steelhead Restoration and Management Plan for California, which identifies specific actions to protect steelhead; and (5) CDFW's Restoring Central Valley Streams, A Plan for Action (1993), which identifies specific actions to protect salmonids.

Table 1. Special-Status Fish Species within the Action Area			
Common Name	Scientific Name	Status*	Location
Central Valley fall-/late fall-run Chinook salmon	<i>Oncorhynchus tshawytscha</i>	CSC	Lower American River, Sacramento River, and the Delta
Central Valley spring-run Chinook salmon	<i>Oncorhynchus tshawytscha</i>	T, ST	Lower American River, Sacramento River, and the Delta
Central Valley winter-run Chinook salmon	<i>Oncorhynchus tshawytscha</i>	E, SE	Sacramento River and the Delta
Central Valley steelhead	<i>Oncorhynchus mykiss</i>	T	Lower American River, Sacramento River, and the Delta
Delta smelt	<i>Hypomesus transpacificus</i>	T, ST	Sacramento River and the Delta
Southern Distinct Population Segment of North American green sturgeon	<i>Acipenser medirostris</i>	T, CSC	Sacramento River and the Delta
Hardhead	<i>Mylopharodon conocephalus</i>	CSC	Lower American River and Sacramento River
Longfin smelt	<i>Spirinchus thaleichthys</i>	ST	Sacramento River and the Delta
River lamprey	<i>Lampetra ayresi</i>	CSC	Lower American River, Sacramento River, and the Delta
Sacramento perch	<i>Archoplites interruptus</i>	CSC	Sacramento River and the Delta
Sacramento splittail	<i>Pogonichthys macrolepidotus</i>	CSC	Lower American River, Sacramento River, and the Delta
California roach	<i>Hesperoleucus symmetricus</i>	CSC	Lower American River and Sacramento River

Status Key*

E = Endangered Officially listed (in the Federal Register) as being endangered

T = Threatened Federally listed as likely to become endangered within the foreseeable future

SE = State Endangered State listed as endangered
ST = State Threatened State listed as likely to become endangered
CSC = State Species of Special Concern CDFW species of special concern
Source: Reclamation 2014

Stumpy Meadows Reservoir and Pilot Creek

Increased flows could potentially adversely affect sensitive aquatic resources and plant and animal species in riparian habitats. With the proposed transfer, changes in flow would result in only a minor change to river flows and reservoir elevations. The small changes in flows through Pilot Creek are not expected to adversely affect environmental conditions for aquatic species, including special-status species, and the resident coldwater fish species community which includes rainbow trout (*Oncorhynchus mykiss*) and non-native brown trout (*Salmo trutta*). It should be noted that young-of-the-year (YOY) fish occurring in the creek will be free-swimming juveniles by the time the ramp down occurs in late summer and, thus, have an ability to move out of habitats near the channel margins on their own volition prior to becoming stranded in any isolated pools created by the ramp down.

Rubicon River

Young-of-the-year (YOY) fish occurring in the Rubicon River will be free-swimming juveniles by the time the ramp down occurs in late summer and, thus, have an ability to move out of habitats near the channel margins on their own volition prior becoming stranded in any isolated pools created by the ramp down.

Middle Fork American River Below Oxbow Powerhouse and North Fork American River

Warm water fish including smallmouth bass (*Micropterus dolomieu*), Sacramento pikeminnow (*Ptychocheilus grandis*), Sacramento sucker (*Catostomus occidentalis*), riffle sculpin (*Cottus gulosus*), brown bullhead (*Ictalurus nebulosus*), and green sunfish reside year-round in the North Fork American River, located downstream of the confluence with the Middle Fork American River (Reclamation 2014). Typically, warm water species have wider thermal tolerance ranges and habitat preferences than salmonids and other cold water species. For example, warm water species such as Sacramento pikeminnow and Sacramento sucker are generally found in low- to mid-elevation streams and rivers with deep pools, long runs, undercut banks, and overhanging vegetation (Reclamation 2014).

In general, temperatures are too warm for spawning and early-life stage rearing of cold water species to occur in the North Fork American River downstream of the confluence, although some rainbow trout and brown trout are still present (Reclamation 2014). Quality riverine habitat for trout consists of cool to cold water, silt-free rocky substrate, and relatively stable water flow and temperature (Reclamation 2014). The majority of trout that do occur are considered to be transitory downstream adult and/or sub-adult migrants that have migrated from upstream habitats (Reclamation 2014).

No special-status fish species are reported to occur in the North Fork American River (Reclamation 2014).

Folsom Reservoir

Folsom Reservoir provides flood control, hydroelectricity, drinking water and water for irrigation, and releases of water from Folsom Dam can vary greatly to meet changing demands for water and power. Folsom Reservoir supports a stratified fishery habitat from April through November where the warm epilimnion (or warm water layer) provides habitat for warm water fishes and the reservoir's lower metalimnion and hypolimnion (or cold water layer) form a "cold water pool" that provides habitat for cold water fish species (Reclamation 2014).

Common native species that occur in the Folsom Reservoir include Sacramento pikeminnow, as well as introduced non-native species including largemouth bass (*Micropterus salmonids*), smallmouth bass, spotted bass (*Micropterus punctulatus*), bluegill (*Lepomis macrochirus*), black and white crappie (*Pomoxis nigromaculatus* and *P. annularis*), and catfish (*Ictalurus* spp. and *Ameiurus* spp.), which comprise the predominant warm water sport fisheries of Folsom Reservoir (Reclamation 2014). Cold water sport species are also present in the reservoir and are currently, or have been, stocked by CDFW. These species include rainbow and brown trout, kokanee salmon (*Oncorhynchus nerka*), and Chinook salmon (Reclamation 2014). These cold water salmonid species are stream spawning, and likely spawn upstream in the North Fork American River (Reclamation 2014).

Seasonal releases from the Folsom Reservoir's cold water pool provide important thermal conditions in the Lower American River that support annual in-river reproduction of fall-run Chinook salmon and Central Valley steelhead (Reclamation 2014). However, Folsom Reservoir's cold water pool is limited in availability as it is not large enough to facilitate cold water releases during the summer months to provide the optimal temperature for over-summering juvenile Central Valley steelhead developing in the Lower American River (see discussion below). In order to compensate for limited cold water pool availability, Folsom Reservoir is managed on an annual basis, typically scheduling cold water pool releases during October and November to increase the quality of thermal conditions to benefit fall-run Chinook salmon immigration, spawning, and embryo incubation (Reclamation 2014).

As described above, special-status fish species potentially occurring within Folsom Reservoir include hardhead, and seasonal releases from the Folsom Reservoir's cold water pool provide important thermal conditions in the Lower American River that support annual in-river reproduction of fall-run Chinook salmon and Central Valley steelhead (Reclamation 2014).

Lake Natoma

Lake Natoma is a regulating afterbay for Folsom Reservoir, located approximately 132 feet amsl. Although relatively small in size (operational range of 2,800 AF), Lake Natoma can influence the temperature of water flowing through it due to high residence times in the lake, especially during the summer months, which have a warming effect on water released from Folsom Reservoir (Reclamation 2014).

Similar fish species that are found in Folsom Reservoir (rainbow trout, bass, green sunfish, and catfish) are also found in Lake Natoma, many of which likely originate from the reservoir or are stocked by CDFW (Reclamation 2014). However, colder epilimnetic water temperatures (relative to Folsom Reservoir) and

daily elevation fluctuations are a few of the environmental factors that contribute to reduced size and annual production of fish populations in Lake Natoma (Reclamation 2014).

Nimbus Fish Hatchery

The Nimbus Salmon and Steelhead Hatchery is operated by CDFW, under contract with Reclamation and the American River Trout Hatchery. Both of these hatcheries, which produce anadromous fall-run Chinook salmon and steelhead, and non-anadromous rainbow trout, respectively, are located at the same facility directly downstream of Nimbus Dam (Reclamation 2014). Annually, there are close to four million salmon produced by the Nimbus Hatchery that are trucked and released into the Delta Estuary. Central Valley steelhead are released into the Sacramento River at either Miller Park or Garcia Bend, and trout are stocked in various water bodies throughout the region (Reclamation 2014). Water temperatures in the hatchery are greatly influenced by the temperature of water redirected from Lake Natoma to Nimbus Fish Hatchery via a 60-inch diameter pipeline. The temperature of the water redirected from Lake Natoma for hatchery operations is recurrently higher than the requirement for successful hatchery production of salmonids. In order to attain more desirable conditions, increasing releases at Folsom Dam and/or releasing cold water from a lower elevation within the reservoir may result in more suitable temperatures. However, due to Folsom Reservoir's limited cold water pool, it is essential that hatchery operations are timed appropriately for seasonal in-river benefits that result from such releases (Reclamation 2014).

Lower American River

The Lower American River supports numerous resident native and introduced fish species, including several anadromous fish species (Reclamation 2014). A total of at least 43 species of fish occur in the Lower American River, however only a select few require close management attention due to population decline or because of their importance as a recreational and/or commercial fish (Reclamation 2014). As described previously, Central Valley steelhead is one of these species since it is listed as "threatened" pursuant to the FESA. Other important recreation/commercial fish species include Central Valley fall-run and spring-run Chinook salmon, striped bass, American shad, and Sacramento splittail (*Pogonichthys macrolepidotus*). The Lower American River supports a mixed run of hatchery and naturally produced fish, providing spawning and rearing habitat for fall-run and spring-run Chinook salmon and Central Valley steelhead below the Nimbus Dam (Reclamation 2014).

Potentially occurring special-status fish species within the Lower American River include hardhead, river lamprey (*Lampetra ayresi*), Sacramento splittail, California roach (*Hesperoleucus symmetricus*), Central Valley steelhead, spring-run Chinook salmon, and fall-run/late-fall-run Chinook salmon.

Sacramento River

The Lower Sacramento River aquatic habitat is generally described as slow-water glides and pools with low water clarity and little habitat diversity. More than 30 fish species, resident and anadromous cold- and warm water, are known to occur in the Sacramento River. Many of these species' survival are contingent upon river flows carrying their larval and juvenile life stages to downstream nursery habitats (Reclamation

2014). Native and non-native introduced warm water fish species predominantly use the lower Sacramento River for spawning and rearing. Anadromous fish species also use the lower river for rearing to some extent; however, it is mostly utilized as an immigration route to upstream spawning habitats and an emigration route to the Delta (Reclamation 2014). Anadromous native and non-native introduced species include Chinook salmon, Central Valley steelhead, green and white sturgeon, striped bass and American shad (Reclamation 2014). Other common fish species found in the Sacramento River include Sacramento splittail and striped bass, as well as resident fish species such as rainbow and brown trout, largemouth and smallmouth bass, channel catfish, sculpin, Sacramento pikeminnow, Sacramento sucker, hardhead, and common carp (*Cyprinus carpio*) (Reclamation 2014).

Special-status aquatic species potentially occurring in the Sacramento River include Sacramento perch (*Archoplites interruptus*), Central Valley winter-run Chinook salmon, Central Valley fall-/late fall-run Chinook salmon, Central Valley spring-run Chinook salmon, California Central Valley Distinct Population Segment (DPS) steelhead, delta smelt, longfin smelt (*Spirinchus thaleichthys*), and Southern DPS North American green sturgeon (*Acipenser medirostris*).

Sacramento-San Joaquin Delta

The northern Delta, the most upstream portion of the Delta estuary and confluence of the Sacramento and San Joaquin Rivers, is a triangle-shaped area comprised of islands, river channels, and sloughs (Reclamation 2014). Covering a surface area of approximately 75 square miles, the Delta's tidally influenced channels and sloughs support a number of resident freshwater fish and macro invertebrate species, as well as over 100 documented introductions of non-native, invasive species into the Delta estuary. The marsh plains and tidal channels regularly drain and fill with the ocean tide, allowing movement of fish. The inundation from ocean tides allows for an abundance of phytoplankton and zooplankton inshore, increasing foraging success for pelagic fish. These intertidal habitats are used as migration corridors between upstream freshwater riverine habitat and coastal marine waters and rearing grounds for anadromous fish, as well as spawning and rearing habitat for other estuarine species (Reclamation 2014).

Potentially occurring special-status fish species within the vicinity of the Delta include, but are not limited to, those anadromous fish species previously described above for the lower Sacramento River (Reclamation 2014; DWR and Reclamation 2013).

1.4.2 Environmental Consequences

The reduction in storage in Stumpy Meadows Reservoir and the temporary minor increase in storage in Folsom Reservoir are within the range of normal fluctuations of storage/water surface elevations that occur annually and would not significantly change the existing conditions. Based on modeling conducted for the forecasted release the proposed transfer would increase streamflow below Stumpy Meadows Reservoir into Pilot Creek during August and September 2026 from 2 cfs (minimum streamflow requirement) to 50 cfs. The temporary increase would not be significant relative to historic flows and would not increase water flows to above normal seasonal

fluctuations in August and September. The reduced levels in Stumpy Meadows Reservoir and increased flows in Pilot Creek would not adversely impact fisheries and other aquatic resources as they fall within normal operating conditions for Stumpy Meadows Reservoir and are within normal seasonal flow fluctuations in Pilot Creek.

The proposed transfer would not create a fluctuation in flows in the Rubicon River, Middle Fork American River, and North Fork American River beyond current minimum and maximum ranges (Reclamation 2014), and fishery and aquatic resources are managed throughout the year to account for seasonal changes in river and reservoir conditions. Therefore, fishery and aquatic resources would remain unchanged (Reclamation 2014).

Furthermore, the proposed 3,250 AF increase to Folsom Reservoir in September 2026, from the North Fork American River may potentially benefit the cold water fishery habitat in Folsom Reservoir (Reclamation 2014). Increases in cool metalimnetic water into Folsom Reservoir during the summer months and a blending of cold hypolimnetic water and cool metalimnetic water through powerhouse intakes would generate a temperature mechanism that may potentially allow greater flexibility in beneficial cold water releases to Lake Natoma, the Nimbus Fish Hatchery, and the Lower American River (Reclamation 2014). As such, the proposed transfer may potentially provide a biological benefit to the special-status salmonids in the river systems by contributing to cooler summer water temperatures but would not result in impacts to fisheries. However, this amount of water would not be noticeable within the large storage and flow volumes of Folsom Reservoir, Lake Natoma, Lower American River, Sacramento River or the Delta.

Due to the small scale of the water transfer (3,250 AF released from Folsom Reservoir over a 40 day period from August through early September) and the associated negligible effects related to changes in flows and reservoir elevations, the proposed transfer would not result in significant impacts to biological resources downstream of Folsom Reservoir.

2.0 REFERENCES

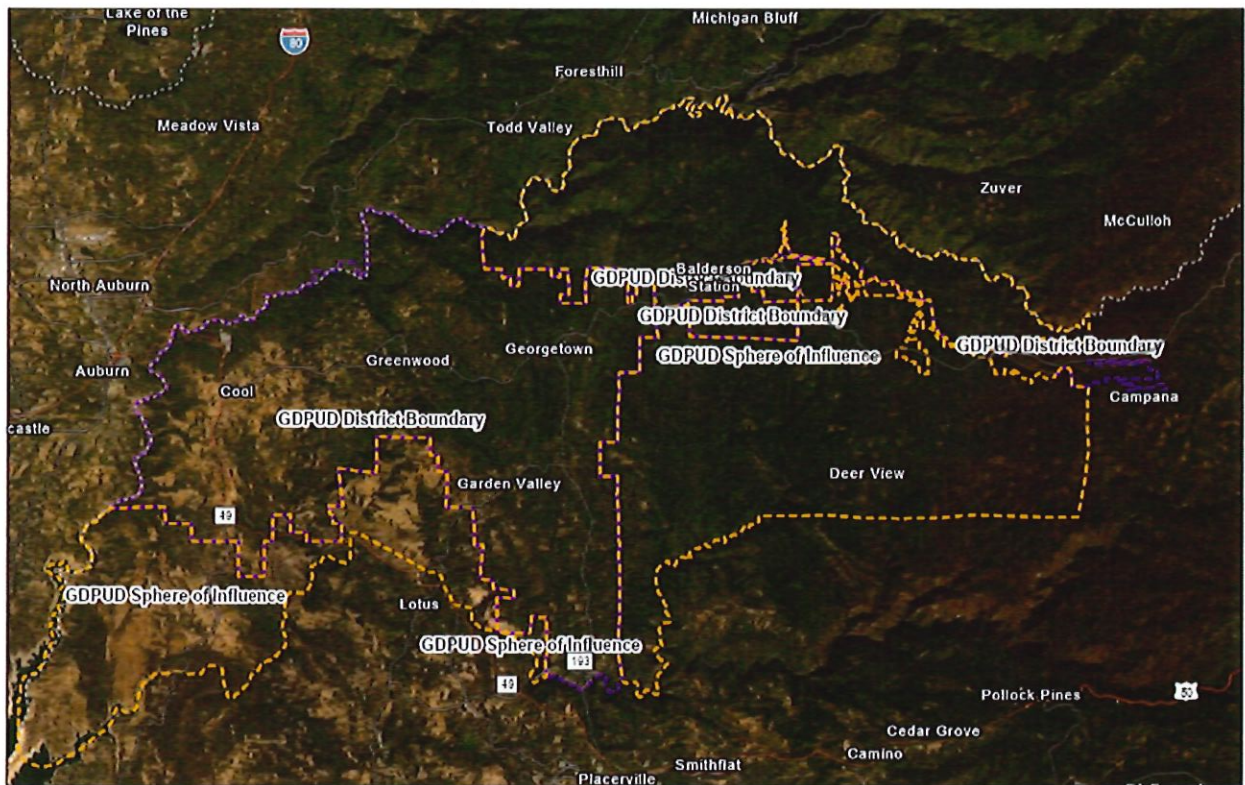
- CALFED. 2000. *Ecosystem Restoration Program Plan and Multi-Species Conservation Strategy*.
- [California] State of California. 2020. *Westlands Water District History*. <https://wwd.ca.gov/about-westlands/history/>. Accessed May 2020.
- [CDFW] California Department of Fish and Wildlife. 2020. Rarefind Natural Diversity Database Program. Version 5.2.14, commercial version dated: June 20, 2020. California Natural Diversity Database (CNDDDB). The Resources Agency, Sacramento. Accessed June 2020.
- [CVRWQCB] Central Valley Regional Water Quality Control Board. 2011. *Fourth Edition of the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins*. http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr.pdf. Accessed June 2020.
- [DPR] California Department of Parks and Recreation. 2007. *Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park, General Plan/Resource Management Plan, Chapter II: Existing Conditions*. <http://www.parks.ca.gov/pages/21299/files/folsom%20gp-rmp--vol.%201--part%20iii--chapter%202%20existing%20conditions.pdf>. Accessed June 2020.
- [Folsom] City of Folsom. 2006. *Draft Environmental Impact Statement/Environmental Impact Report, Folsom Dam Safety and Flood Damage Reduction. Chapter 3: Affected Environment Impacts Analyses, and Mitigation Measure, Section 3.2 Hydrology, Water Quality, and Groundwater*. December 2006. <http://www.usbr.gov/newsroom/newsrelease/detail.cfm?RecordID=14741>. Accessed June 2020.
- [GDPUD] Georgetown Divide Public Utility District. 2020. *History*. <https://www.gd-pud.org/history>. Accessed June 2020.
- [LSA] LSA Associates, Inc. 2003. *Environmental Conditions Water Quality, Folsom Lake State Recreation Area*. April 2003.
- Reclamation. 2020a. *Auburn Folsom South Unit Project*. <https://www.usbr.gov/projects/index.php?id=480>. Accessed May 2020.
- Reclamation. 2020b. *Folsom Dam*. <https://www.usbr.gov/projects/index.php?id=74>. Accessed May 2020.
- Reclamation. 2020c. *Nimbus Dam*. <https://www.usbr.gov/projects/index.php?id=222>. Accessed May 2020.
- Reclamation. 2013. *Execution of Warren Act Contracts for Storage and Conveyance of Non-CVP Water from Placer County Water Agency to Westlands Water District*. Environmental Assessment EA/FONSI 13-07-MP. May 2013.
- Reclamation. 2014. *Warren Act Contract for Storage and Conveyance of Non-CVP Water from Placer County Water Agency to Westlands Water District in 2014*. Environmental Assessment EA/FONSI 14-15-MP. July 2014. https://www.usbr.gov/mp/nepa/includes/documentShow.php?Doc_ID=18241. Accessed June 2020.

- Reclamation. 2015. *Warren Act Contract for Storage and Conveyance of Non-CVP Water from Foresthill Public Utility District to Santa Clara Valley Water District in 2015*. Environmental Assessment EA/FONSI. April 2015.
- Sacramento County. 2008. *American River Parkway Plan 2008*.
https://regionalparks.saccounty.net/Parks/Documents/Parks/ARPP06-021909_sm.pdf.
 Accessed June 2020.
- Sacramento County. 2011. *Draft SEIS/SEIR Sacramento River Deep Water Ship Channel*. Available at:
http://www.spn.usace.army.mil/Portals/68/docs/SRDWSC/32_Biological_Characteristics.pdf.
 Accessed June 2020.
- [SRWP] Sacramento River Watershed Program. 2015a. *Upper American River Watershed*.
<http://www.sacriver.org/aboutwatershed/roadmap/watersheds/american/upper-american-river-watershed>. Accessed May 2020.
- SRWP. 2015b. *Lower American River Watershed*.
<http://www.sacriver.org/aboutwatershed/roadmap/watersheds/american/lower-american-river-watershed>. Accessed May 2020.
- [SWRCB] State Water Resources Control Board. 2010. *2010 Integrated Report (Clean Water Action Section 303(d) List / 305(B) Report)*.
http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml. Accessed June 2020.
- SWRCB. 2020. *Impaired Water Bodies*.
https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml.
 Accessed June 2020.
- [USGS] United States Geological Survey. *Current Conditions for USGS 11427000 NF AMERICAN R A NORTH FORK DAM CA*. https://waterdata.usgs.gov/nwis/uv?site_no=11427000. Accessed June 2020.
- [USFWS] United States Fish and Wildlife Service. 1997. *Draft Anadromous Fish Restoration Program*.
- USFWS. 2001. *Final Anadromous Fish Restoration Program*.
- USFWS. 2005. *Biological Opinion on the Effects of the Proposed Long-Term Operations Criteria and Plan for the Central Valley Project and State Water Project*.
- USFWS. 2008. *Formal Endangered Species Act Consultation on the Proposed Coordinated Operations of the Central Valley Project (CVP) and State Water Project (SWP)*.
- Western Hydrologics. 13 May 2020. *Stumpy Meadows Reservoir 2020-21 Operations Plan*.

Appendix B

GDPUD Service Area

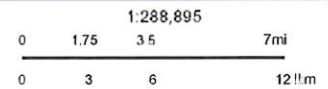
GOPUD Boundary



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Reference_Layers - District Boundaries | GOPUD Sphere of Influence

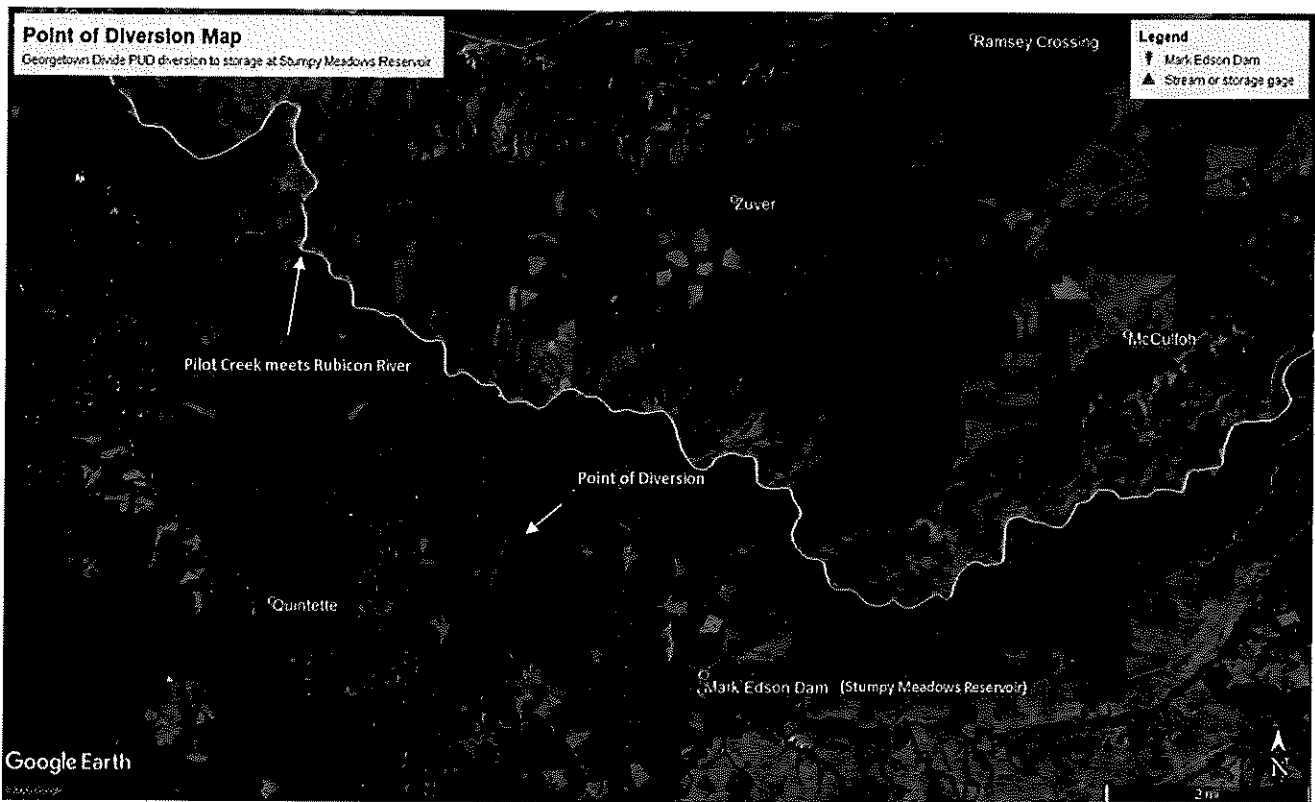
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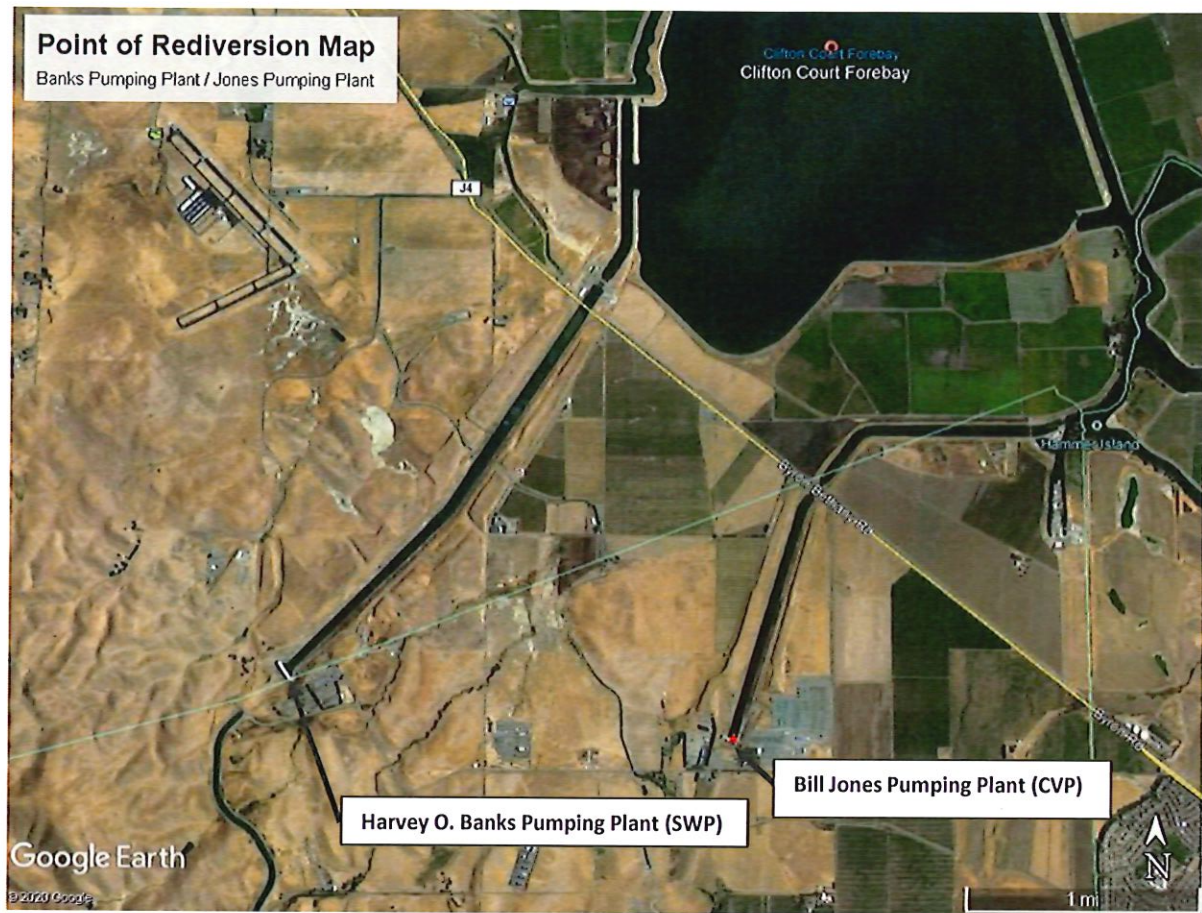
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus

GOPUD

Present Point of Diversion Map



Proposed Point of Rediversion Map

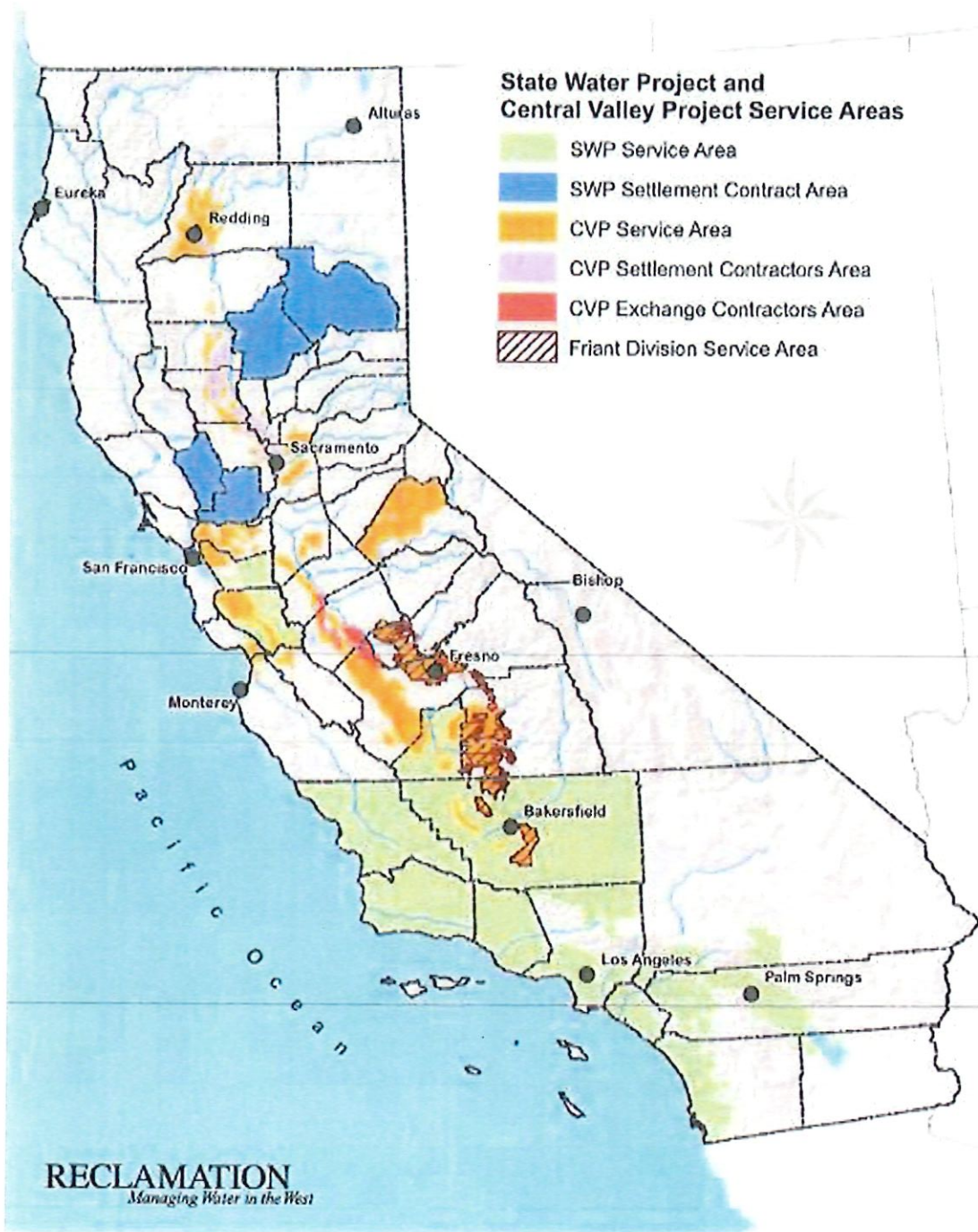


Google Earth Image, screen shot May 15, 2020



Google Earth Image, screen shot May 15, 2020

CVP Contractors Service Area
SWP Contractors Service Area



CVP Contractors Service Area and SWP Contractors Service Areas

www.water.ca.gov

Photographs to Support Petition for Change

Photo 1 - Stumpy Meadows Reservoir and Upstream Habitat (Google Earth Image, screen shot May 15, 2020)

Appendix F



Photo 2 - Stumpy Meadows Reservoir and Downstream Habitat (Google Earth Image, screen shot May 15, 2020)



Photo 3 - Folsom Reservoir and Upstream Habitat (Google Earth Image, screen shot May 15, 2020)

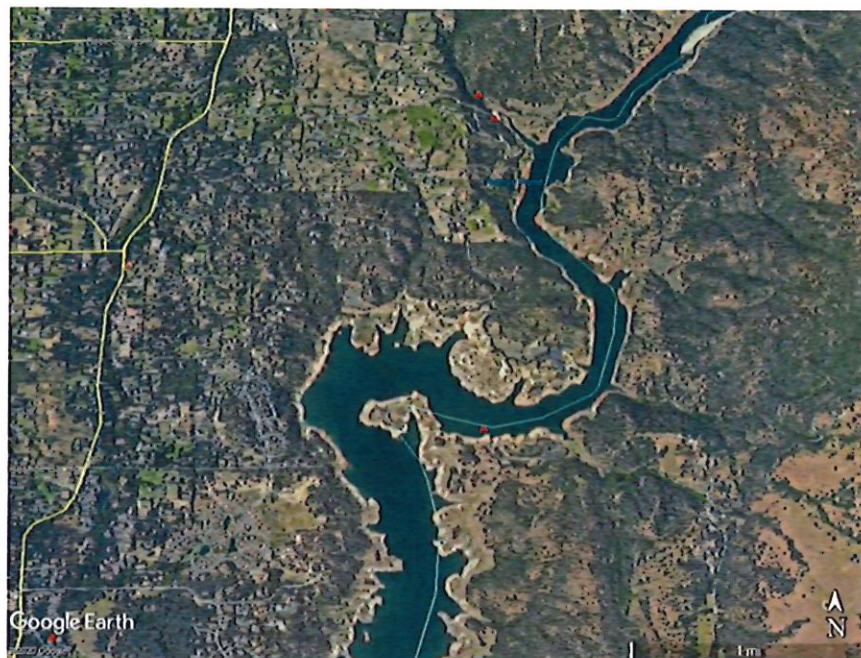


Photo 4 - Folsom Reservoir and Downstream Habitat (Google Earth Image, screen shot May 15, 2020)

