

Memorandum

Date: MAY 01 2019

To: Mr. Erik Ekdahl, Deputy Director
Division of Water Rights
State Water Resources Control Board
Post Office Box 2000
Sacramento, California 95812-2000

SWRCB - DWR
19 MAY 7 AM 10:07

From: Pedro Villalobos, Chief
State Water Project Analysis Office
Department of Water Resources

Subject: 2019 Petition for Temporary Change to modify the State Water Project and Central Valley Project Authorized Places of Use

Enclosed is the Department of Water Resources' (DWR) and the United States Bureau of Reclamation's (Reclamation) Petition for Change to temporarily consolidate the authorized place of use for the State Water Project (SWP) and Central Valley Project (CVP). Approval of the Petition would change (1) the DWR permit to include the CVP authorized places of use downstream of Jones Pumping Plant (Jones) and (2) the Reclamation permits to include the SWP authorized place of use downstream of Harvey O. Banks Pumping Plant (Banks).

DWR and Reclamation request that the above changes become effective on July 3, 2019 and remain in effect for one year from the date of any order approving this Petition.

These changes will allow DWR and Reclamation to more effectively and efficiently utilize the potential operational flexibility of the combined SWP and CVP facilities and water supply south of Banks and Jones. The requested changes will facilitate the delivery of available Project supplies south of the Delta and maximize the beneficial use of available Project supplies. Approval of this petition will not increase the quantity or alter the timing of diversions from the Delta or the San Joaquin River.

Also included are (1) a check of \$133,013.00 for the Division of Water Rights fee, (2) a check of \$850 for the Department of Fish and Wildlife fee.

Mr. Erik Ekdahl, Deputy Director

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If you or your staff wish to discuss this petition further, please contact me at (916) 653-4313 or Anna Fock of my staff at (916) 653-0190 or you may contact Richard Woodley, Mid-Pacific Region, Reclamation at (916) 978-5201.



Pedro Villalobos, Chief
State Water Project Analysis Office
(916) 653-4313

Attachments

cc: (See attached list.)

Mr. Erik Ekdahl, Deputy Director

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cc:

Jennifer Pierre
General Manager
State Water Contractors
1121 L Street, Suite 1050
Sacramento, California 95814

Amy Aufdemberg
Office of the Solicitor
U.S. Department of the Interior
2800 Cottage Way, Room E-1712
Sacramento, California 95825

Richard Woodley
Regional Resources Manager
U.S. Department of Interior
Bureau of Reclamation
3310 El Camino Avenue
Sacramento, California 95825

Ray Sahlberg
U.S. Department of the Interior
Bureau of Reclamation
2800 Cottage Way
Sacramento, California 95825

David Sholes
Central Valley Regional Water Quality
Control Board, Region 5
1685 E Street
Fresno, California 93706-2007

San Francisco Bay Regional Water
Quality Control Board, Region 2
1515 Clay Street, Suite 1400
Oakland, California 94612

Lahontan Regional Water Quality
Control Board, Region 6
15095 Amargosa Road,
Building 2 - Suite 210
Victorville, California 92394

Central Coast Regional Water Quality
Control Board, Region 3
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Los Angeles Regional Water Quality
Control Board, Region 4
320 W. Fourth Street, Suite 200
Los Angeles, California 90013

California Department of Fish and
Wildlife
1234 East Shaw
Fresno, California 93710

U.S. Fish and Wildlife Service Habitat
Conservation
2800 Cottage Way, Room W-2928
Sacramento, California 95825-1846

Frances Mizuno
Assistant Executive Director
San Luis & Delta Mendota Water
Authority
842 – 6th Street, Suite 7
Office Box 2157
Los Banos, California 93635-2157

Jeffrey Kightlinger
General Manager
Metropolitan Water District of Southern
California
Post Office Box 54153
Los Angeles, California 90054-0153

Norma Camacho
Chief Executive Officer
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, California 95118-3686

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cc: (continued)

Curtis Creel
General Manager
Kern County Water Agency
Post Office Box 58
Bakersfield, California 93302-0058

Anthea Hansen
General Manager
Oak Flat Water District
Post Office Box 1596
Patterson, California 95363-1596

Tom Birmingham
General Manager
Westlands Water District
3130 Fresno Street
Post Office Box 6056
Fresno, California 93703-6056

Steve Collup
Director of Water Resources
Arvin Edison Water Storage District
Post Office Box 175
Arvin, California 93203-0175

Steven Dalke
General Manager
Kern-Tulare Water District
5001 California Avenue #102
Bakersfield, California 93309-1692

Fresno County Board of Supervisors
2281 Tulare St # 301
Fresno, California 93721-2198

Kern County Board of Supervisors
1115 Truxtun Avenue, 5th floor
Bakersfield, California 93301

Kings County Board of Supervisors
1400 West Lacey Boulevard
Hanford, California 93230

Los Angeles County Board of
Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Suite 383
Los Angeles, California 90012

Merced County Board of Supervisors
2222 M Street
Merced, California 95340

Orange County Board of Supervisors
333 W. Santa Ana Boulevard, Room
465
Santa Ana, California 92702-0687

Riverside County Board of Supervisors
4080 Lemon Street, 4th Floor
Riverside, California 92501

San Benito County Board of
Supervisors
481 4th Street, 1st Floor
Hollister, California 95023-3840

San Bernardino County Board of
Supervisors
222 West Hospitality Lane, 3rd floor
San Bernardino, California 92415-0018

San Diego County Board of Supervisors
County Administration Center
1600 Pacific Highway, Room 402
San Diego, California 92101

San Joaquin County Board of
Supervisors
222 East Weber Avenue
Stockton, California 95202

Santa Clara County Board of
Supervisors County Government Center
70 West Hedding Street
10th floor, East Wing
San Jose, California 95110

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cc: (continued)

Stanislaus County Board of Supervisors
City/County Administration Building
1010 10th Street, Suite 6500
Modesto, California 95354

Tulare County Board of Supervisors
2800 West Burrel Ave.
Visalia, California 93291

Ventura County Board of Supervisors
800 S. Victoria Avenue
Ventura, California 93009

Please indicate County where your project is located here:

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

Permit

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:

Proposed:

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

Present:

Proposed:

Purpose of Use

Present:

Proposed:

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:

Downstream Location:

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.

Amount of Water to be Transferred

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.

None

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.

None

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)

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.

Insert the attachment number here, if applicable:

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:

Insert the attachment number here, if applicable:

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

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

Person Contacted:

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
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If necessary, provide additional information below:

Insert the attachment number here, if applicable:

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 rediversion, 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.)

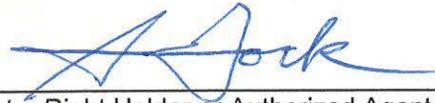
Pursuant to California Code of Regulations, title 23, section 794, petitions for change submitted without maps may not be accepted.

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 5/1/2019 at Sacramento, CA.



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.)

2019 PETITION FOR TEMPORARY CHANGE TO MODIFY THE SWP AND CVP AUTHORIZED PLACES OF USE

California Department of Water Resources

Application Number 14443, Permit 16479

U.S. Bureau of Reclamation Permits for the Central Valley Project

Application Numbers: 23, 234, 1465, 5626, 5628, 5638, 9363, 9364, 9368, 13370, 13371, 15374, 15375, 15764, 16767, 17374, 17376

License Number 1986 and Permit Numbers: 11885, 11886, 12721, 11967, 11887, 12722, 12723, 11315, 11316, 11968, 11969, 12727, 12860, 11971, 11973, 12364

Requested Change

The California Department of Water Resources (DWR) and the United States Bureau of Reclamation (Reclamation) request the State Water Resources Control Board (State Water Board) modify the permits listed above to temporarily change the authorized place of use of: (1) the above DWR permit to include the Central Valley Project (CVP) authorized place of use downstream of the Jones Pumping Plant (Jones) as shown on **Map 1**, and (2) the above Reclamation permits to include the State Water Project (SWP) authorized place of use downstream of the Harvey O. Banks Pumping Plant (Banks) as shown on **Map 2**. The authorized SWP and CVP places of use are located within Fresno, Kern, Kings, Los Angeles, Merced, Orange, Riverside, San Benito, San Bernardino, San Diego, San Joaquin, Santa Clara, Stanislaus, Tulare, and Ventura counties. This document collectively refers to the SWP and CVP as the Projects.

DWR and Reclamation request that the above changes become effective on July 3, 2019 and remain in effect for one year from the date of any order approving this Petition. These changes will allow DWR and Reclamation to more effectively and efficiently utilize the potential operational flexibility of the combined SWP and CVP facilities and water supply south of Banks and Jones. The requested changes will facilitate the delivery of available Project supplies south of the Sacramento-San Joaquin Delta (Delta) and maximize the beneficial use of available

Project supplies. Approval of this Petition will not increase the quantity or alter the timing of diversions from the Delta or the San Joaquin River.

Reason for the Requested Changes

The proposed changes in place of use will not result in diversion of additional water from the Delta, a change in the timing of SWP or CVP diversions, or the delivery of more water from the Projects than has been delivered historically. Instead, the requested changes will provide the Projects with operational flexibility to deliver available Projects supplies to contractors when there are capacity limitations at either Project's facilities. The requested changes will also allow for the recovery of previously banked groundwater supplies without physical extraction and thus, effectively reduce energy consumption and greenhouse gas emissions.

Proposed Exchanges/Transfers Requiring a Change in Authorized Place of Use

All exchanges/transfers covered by this Petition will occur south of the Delta and total amount of water transferred or exchanged will not exceed **436,720 acre-feet**. Details are as follows.

A. Santa Clara Valley Water District

Santa Clara Valley Water District (Valley Water) contracts for water supplies from both SWP and CVP. DWR delivers SWP water to Valley Water through the South Bay Aqueduct (SBA) and Reclamation delivers CVP water to Valley Water from the San Luis Reservoir through the San Felipe Division. In 2019 and 2020, the approval of this Petition will provide Valley Water with flexibility to manage its annual SWP and CVP water supplies through **up to 75,000 acre-feet** of exchanges to address potential operational and maintenance issues.

i. Reduced CVP Delivery from San Felipe Division

Based on historical operating conditions, total storage in San Luis Reservoir may drop to levels that result in operational and/or water quality problems. When this occurs, Valley Water has limited pumping capacity through the CVP San Felipe Division and low water levels degrade water quality that can cause water treatment problems. This can reduce the amount of CVP water through the CVP San Felipe Division and increase Valley Water's treatment costs. While this is unlikely to happen in 2019, there is still uncertainty for the Projects' water supply allocations and operations in 2020.

Another issue is the aging infrastructure on the San Felipe Division. In 2019 and 2020, Valley Water has identified the following planned activities that will limit its ability to receive water through the San Felipe Division: 1) scheduled maintenance, including shutdown of the Pacheco Pumping Plant and Pacheco Conduit for 2.5 weeks in September 2019; 2) inspection and rehabilitation on the Cross Valley Pipeline from early September 2019 through early December 2019, and 3) inspection and rehabilitation on the Central Pipeline that feeds to the Rinconada Water Treatment Plant. The reduction or cease in Valley Water's CVP deliveries through the San Felipe Division will force Valley Water to rely on SWP water and other local water supplies to meet demands, which will restrain Valley Water's operational flexibility.

With the approval of this Petition, during reduction of CVP deliveries from the San Felipe Division, DWR will export and deliver SWP water equivalent to the reduced CVP amount through SBA to help Valley Water to maintain its operational flexibility. Reclamation will return an equal amount of CVP water at the O'Neill Forebay to DWR for use within the SWP service area south of the O'Neill Forebay.

ii. Outages on the South Bay Aqueduct

The SBA has also experienced many unplanned outages over the last several years due to ageing infrastructure that resulted in Valley Water being almost completely reliant on CVP deliveries to meet its demands. Valley Water anticipates unplanned shutdowns on the SBA may limit SWP deliveries to its service area. Additionally, there is a planned partial shutdown at the Penitencia Water Treatment Plant, which will also limit delivery of SWP supplies from the SBA to Valley Water.

With the approval of this Petition, Reclamation will export and deliver CVP water through the San Felipe Division to help Valley Water maintain its operational flexibility when there are reductions in SWP deliveries from the SBA. DWR will return an equal amount of SWP water at the O'Neill Forebay to Reclamation for use within the CVP service area south of the O'Neill Forebay.

iii. Recovery of Banked CVP Water in Semitropic Water Storage District's Groundwater Bank

Valley Water has previously banked CVP water in the Semitropic Water Storage District's (Semitropic) groundwater bank. Due to geographic location, recovery of the Valley Water's stored CVP water in the Semitropic groundwater bank must be accomplished through an exchange.

With the approval of this petition, Semitropic will extract Valley Water's banked CVP water from the aquifer and pump the stored water into the California Aqueduct through Semitropic's turn-in facilities for delivery to the SWP service area south of Semitropic. In exchange, DWR will deliver an equal amount of SWP water to Valley Water through the SBA.

B. Oak Flat Water District–Del Puerto Water District

Oak Flat Water District (Oak Flat), a SWP contractor, and Del Puerto Water District (Del Puerto), a CVP contractor, are adjacent districts located north of the San Luis Reservoir in San Joaquin, Stanislaus, and Merced counties. These two districts share common landowners. Landowners with water supplies from both Projects have requested the ability to optimize the application of available supplies on their combined properties. Oak Flat and Del Puerto will participate in **up to 3,000 acre-feet** of exchanges.

i. Exchange of SWP and CVP Supplies

With the approval of this Petition, DWR will deliver **up to 1,000 acre-feet** of SWP water to lands within Oak Flat and receive a like amount of CVP water at the O'Neill Forebay and/or Reclamation will deliver up to 1,000 acre-feet of CVP supplies to lands within Del Puerto and receive a like amount of SWP water at the O'Neill Forebay. This exchange will facilitate the delivery of CVP water to Oak Flat and SWP water to Del Puerto for the purposes of efficiently delivering water to landowners with contractual access to both supplies of water.

The collective deliveries under this exchange will not exceed 1,000 acre-feet. Reclamation and DWR will deliver water that they receive at the O'Neill Forebay to their contractors south of the O'Neill Forebay.

ii. Delivery of CVP water to Del Puerto Water District through Exchange

A portion of the lands within Del Puerto adjacent to Oak Flat are more efficiently served from Oak Flat's turnouts on the California Aqueduct by gravity flow to reduce energy consumption. With the approval of this Petition, DWR will deliver **up to 2,000 acre-feet** of SWP water to Del Puerto through Oak Flat's turnouts on the California Aqueduct to Oak Flat's distribution system. Reclamation will return an equal amount of CVP water to DWR at the O'Neill Forebay for use within the SWP service area south of the O'Neill Forebay.

C. Kern County Water Agency

Kern County Water Agency (KCWA) is a SWP contractor with numerous member units within Kern County. Only some of its member units are inside the CVP place of use. On the other

hand, the entire Kern County is inside the SWP water place of use. The proposed exchanges between KCWA and other entities will be **up to a total of 139,300 acre-feet** under the actions listed below.

i. Kern County Water Agency–Kern-Tulare Water District Exchange: Cross Valley Canal Capacity Limitations

Kern-Tulare Water District (KTWD) is within Kern County and has a contract for CVP water through the Cross-Valley Canal (CVC). Due to limited capacity at Jones, when SWP capacity is available, DWR facilitates conveyance of CVP water through the CVC under an existing agreement in accordance with the Joint Point of Operations (JPOD) authorized under Water Right Decision 1641 (D-1641). Due to projected 2019 hydrologic conditions and operations, it is anticipated that there will not be capacity to move CVC water through Jones or Banks until late 2019 and/or early 2020. To assist KTWD in meeting peak irrigation demands, DWR will deliver **up to 53,300 acre-feet** of KCWA's SWP water to the SWP place of use within KTWD during the 2019 summer months.

With the approval of this Petition, Reclamation will return the same amount of KTWD's CVP water in later 2019 and/or early 2020 at the O'Neill Forebay for DWR to deliver to use within KCWA's member units.

ii. Kern County Water Agency–Westlands Water District Exchange of Banked CVP Water in Semitropic Water Storage District's Groundwater Bank

Westlands Water District (Westlands), a CVP contractor outside of SWP place of use, has stored CVP water in Semitropic's groundwater bank. Poso Creek LLC and Harris Farms Inc. own lands in both Westlands and KCWA. With the approval of this Petition, DWR will deliver **up to 5,000 acre-feet** of KCWA's SWP water to Poso Creek LLC's and Harris Farms Inc's (up to 2,500 acre-feet for each) lands in Westlands through the Joint-Use San Luis Canal. In return, an equivalent amount of Westland's CVP water stored in the Semitropic groundwater bank will be delivered to KCWA to use in their service area in the same year.

iii. Kern County Water Agency–Rosedale-Rio Bravo Water Storage District Groundwater Bank.

Rosedale-Rio Bravo Water Storage District (Rosedale), a member unit of KCWA, receives SWP water. It operates a groundwater bank inside both the CVP and SWP place of use that stores CVP water, SWP water, and local water for its banking partners.

Three of the banking partners, who are also SWP contractors, want to recover portion of stored water in Rosedale: Santa Clarita Valley Water Agency (Santa Clarita) will recover up to 3,000 acre-feet of previously stored SWP and Kern River water; Coachella Valley Water District (Coachella) will recover up to 5,000 acre-feet of previously stored Kern River water; and Irvine Ranch Water District (Irvine) will recover up to 2,000 acre-feet of previously stored SWP and Kern River water.

With the approval of this Petition, Santa Clarita, Coachella, and Irvine will transfer **up to 10,000 acre-feet** of their water stored in Rosedale's groundwater bank to Rosedale's CVP banking partners. In return, Reclamation will deliver **up to 10,000 acre-feet** CVP water¹ from the CVP banking partners to DWR at the O'Neill Forebay for delivery to Santa Clarita, Coachella, and Irvine.

iv. Kern County Water Agency – San Joaquin River Exchange Contractors Water Authority

In 2017, the San Joaquin River Exchange Contractors Water Authority (SJRECWA) and Rosedale entered into an unbalanced exchange program. SJRECWA delivered 23,522 acre-feet of its CVP water in 2017 to lands within Rosedale service area in the CVP place of use for banking and direct use. Return of this exchange water will require the approval of this Petition. Rosedale will forego **up to 5,000 acre-feet** of their SWP water. DWR will make this foregone water available at the O'Neill Forebay for Reclamation to deliver to the SJRECWA service area, which is outside of the SWP place of use. The exchange will not result in an increase in allocations to either district.

Absent this exchange, Rosedale would either bank their SWP water or use it in their service area. For the SJRECWA, this exchange will not result in additional return flows to the San Joaquin River. They will use the exchange water to irrigate their lands that otherwise would have been irrigated by groundwater, resulting in the same amount of return flows with or without the exchange.

¹CVP water includes CVP contract deliveries for KTWD, San Joaquin River Exchange Contractors, Delano-Earlimart Irrigation District, Arvin-Edison Water Storage District, Lower-Tule Irrigation District, and/or Shafter-Wasco Irrigation District. All these parties have agreements to bank water in Rosedale's groundwater bank.

v. *Transfer of San Joaquin River Restoration Program Recaptured Recirculation Flows to Kern County Water Agency*

As part of the San Joaquin River Settlement Agreement, recaptured Recirculation Flows can be transferred for the purpose of reducing or avoiding impacts to the CVP Friant Unit contractors. Recaptured Recirculation Flows are storage releases from the Millerton Lake for fishery benefits in the San Joaquin River, generally down to the Mendota Pool but also to a smaller degree down to approved diversion points in the lower San Joaquin River. Diversions from the Mendota Pool and diversion points in the San Joaquin River are delivered to south of Delta CVP contractors in exchange for water diverted from the Delta. The San Joaquin River Restoration Program (SJRRP) anticipates allocating up to 30,000 acre-feet of recaptured Recirculation Flows to Friant Contractors. Various Friant Contractors propose to transfer and/or bank the recaptured flows within KCWA's service area. The KCWA service area is within the SWP place of use but not wholly within the CVP place of use.

The CVP Friant Unit contractors exchange SJRRP water with south-of-Delta CVP contractors' stored CVP water in San Luis Reservoir. The CVP Friant Unit contractors are proposing to transfer the stored CVP water in San Luis Reservoir to KCWA. With the approval of this Petition, Reclamation will provide **up to 30,000 acre-feet** of SJRRP water at the O'Neill Forebay for DWR to deliver to KCWA. KCWA will then provide the SJRRP water to its member units as follows: up to 6,138 acre-feet to Belridge Water Storage District (BWSD), up to 5,391 acre-feet to Berrenda Mesa Water District (BMWD), up to 10,380 acre-feet to Lost Hills Water District (LHWD), and up to 8,091 acre-feet to Wheeler Ridge-Maricopa Water Storage District. There would be no change in San Joaquin River flows or Delta pumping as a result of this transfer, as this water is released under the SJRRP as Restoration Flows and does not flow into the Delta.

vi. *San Joaquin River Exchange Contractors Water Authority – Kern County Water Agency*

Reclamation delivers CVP water to the SJRECWA from the Delta in order to divert water from the San Joaquin River for the CVP Friant Division. SJRECWA has implemented a Water Transfer Program for non-critical year water transfers with CVP contractors. Water is made available through a conservation/tailwater recovery program (i.e. reduction in consumptive use), described in the "[Water Transfer Program for the San Joaquin River Exchange Contractors, 2014 – 2038 Environmental Impact Statement/Environmental Impact Report](#)" approved by Reclamation on July 30, 2013.

For the period of July 2019 through June 2020, SJRECWA anticipates making more transfer water available under the recovery program than CVP contractors can receive. With the approval of this Petition, Reclamation will make **up to 10,000 acre-feet** of the SJRECWA's CVP water available at the O'Neill Forebay for delivery by DWR to common landowner lands within SJRECWA and KCWA. KCWA will distribute the water to its member units: BWSD (up to 3,334 acre-feet), BMWD (up to 3,333 acre-feet) and LHWD (up to 3,333 acre-feet) who are outside the CVP place of use.

vii. Kern County Water Agency – Arvin Edison Water Storage District

Members of the Westside Mutual Water Company (WMWC) have lands in BWSD, BMWD, and LHWD in Kern County that receive SWP water and are outside the CVP place of use. Arvin-Edison Water Storage District (AEWSD) is a CVP contractor with both Delta and Friant contract supplies. AEWSD and WMWC want to do an exchange to more efficiently manage their available water supplies and allow for additional flexibility. The exchange will not result in an increase in allocation to any district.

With the approval of this Petition, Reclamation will make **up to 20,000 acre-feet** of AEWSD's CVP supplies available at the O'Neill Forebay for delivery by DWR to BWSD (up to 6,667 acre-feet), BMWD (up to 6,667 acre-feet), and LHWD (up to 6,666 acre-feet). In return, DWR will make available an equivalent amount of SWP water at the O'Neill Forebay for Reclamation to deliver to AEWSD.

viii. Kern County Water Agency – Pleasant Valley Water District: Banked Kern River Water

Pleasant Valley Water District (PVWD) is partially inside the CVP place of use but outside the SWP place of use and has acquired Kern River water supply from Buena Vista Water Storage District (BVWSD), a member unit of KCWA who receives SWP water. With the approval of this Petition, DWR will make available **up to 6,000 acre-feet** of KCWA's SWP water at the O'Neill Forebay for delivery to PVWD. In exchange, PVWD will transfer an equivalent amount of Kern River water stored in BVWSD to KCWA.

D. Arvin-Edison Water Storage District–Metropolitan Water District

Metropolitan Water District of Southern California (MWDSC) is a SWP Contractor. AEWSD is a CVP contractor within both the CVP and SWP place of use. With approval of this petition, the CVP place of use will be expanded to include MWDSC, which will allow AEWSD to exchange **up to a total of 150,000 acre-feet** of CVP water supplies (CVP Delta, San Luis Reservoir, or Friant) with MWDSC SWP water under the three (3) programs described below.

For each of the three (3) programs, the following conveyance mechanisms would take place for MWDSC to receive AEWS D CVP water:

- CVP Friant water would be conveyed either: (1) from the Friant-Kern Canal through AEWS D's distribution system connected to the California Aqueduct at Milepost 227 (Reach 14C), or (2) from the Friant-Kern Canal through the CVC to the California Aqueduct (Tupman), or;
- Reclamation will make AEWS D's CVP Delta/San Luis water available at the O'Neill Forebay for DWR to deliver through the California Aqueduct to MWDSC.

In return, at a later time, DWR will make MWDSC's SWP water available at the O'Neill Forebay and deliver to AEWS D system through two routes: (1) the California Aqueduct at Milepost 227 (Reach 14C), or (2) the California Aqueduct/CVC turnout (Tupman).

i. Groundwater Banking

Currently, depending on annual SWP allocations, MWDSC stores a portion of its SWP supply in the AEWS D's groundwater banking facilities, which are located within AEWS D's service area. When requested by MWDSC, AEWS D is obligated to return MWDSC's previously banked SWP water to MWDSC. Absent this proposed exchange, AEWS D would return previously banked SWP water through groundwater extraction and deliver the water to MWDSC through the California Aqueduct.

To increase the flexibility of returning water to MWDSC, AEWS D seeks to exchange MWDSC's previously banked water with their CVP water supplies. AEWS D would use MWDSC's previously banked SWP water within their service area. This also allows AEWS D greater flexibility in the scheduling and use of its CVP water supplies, as well as a reduction in energy and costs associated with the groundwater extraction. Furthermore, this will enhance the water quality and timing of water returned to MWDSC.

With approval of this Petition, Reclamation will deliver AEWS D's CVP water supplies to MWDSC to use in their service area in lieu of AEWS D physically extracting and delivering MWDSC's previously stored SWP water. Upon AEWS D's CVP water delivered to MWDSC, MWDSC will then transfer an equivalent amount of its stored SWP water in the groundwater bank to AEWS D for AEWS D's use.

This will be a balanced exchange (one-for-one) and will only occur if MWDSC has a positive balance in AEWS D's groundwater banking facilities.

ii. Regulation Program

MWDSC has more system flexibility to regulate available water supplies. Through this exchange, MWDSC can facilitate AEWS's management of its CVP water supplies to better match irrigation demands. In the absence of this exchange, AEWS would use more energy to recharge CVP supplies when available and extract the stored CVP water later.

This balanced exchange of one acre-foot of AEWS's CVP water for one acre-foot of MWDSC's SWP water will only occur if MWDSC has a positive balance in AEWS's groundwater banking facilities.

iii. Spill Prevention Program

Wet hydrologic conditions may limit carry over of AEWS's CVP water in CVP reservoirs. To reduce the risk of spill and subsequent potential loss of water supplies, AEWS proposes to exchange their CVP water with MWDSC's SWP water. MWDSC is willing to provide water management services to assist in regulating the available CVP supplies.

This is an unbalanced exchange to reflect MWDSC's willingness to provide water management services to AEWS and therefore, MWDSC would return a lesser amount (i.e. two acre-feet for every three acre-feet received). In the absence of the exchange with MWDSC, AEWS would attempt to avoid spilling the water by delivering the available CVP contract supplies to groundwater banking programs within the AEWS service area or other areas that are within the CVP place of use.

E. Byron Bethany Irrigation District–Musco Olive Products Inc.

Byron Bethany Irrigation District (BBID) is a CVP contractor. Musco Olive Product Inc. (Musco) has a water service contract with BBID and is within the CVP place of use. Pursuant to this contract, BBID is to provide up to 800 acre-feet per year of CVP water to Musco.

BBID and Reclamation are physically unable to convey CVP water to Musco. Musco is located near Reach 2A on the California Aqueduct (north of the O'Neill Forebay). With the approval of this Petition, DWR will deliver **up to 570 acre-feet** of SWP water to Musco for BBID.

Reclamation will return an equal amount of CVP water to DWR at the O'Neill Forebay for use within the SWP service area south of the O'Neill Forebay.

F. Tulare Lake Basin Water Storage District–Westlands Water District, San Luis Water District, and Pleasant Valley Water District

Westlands and SLWD are CVP contractors; a portion of the PVWD is in the CVP place of use. Growers within these three districts will purchase up to 65,000 acre-feet of pre-1914 Kings River water from J. G. Boswell Company (Boswell), a local landowner within Tulare Lake Basin Water Storage District (TLBWSD). TLBWSD is a SWP contractor inside both SWP and CVP place of use.

With the approval of this Petition, TLBWSD will receive **up to 65,000 acre-feet** of Boswell's purchased pre-1914 Kings River² water and will forgo a like amount of SWP water from DWR. In exchange, DWR will make the same amount of SWP water available at the O'Neill Forebay for delivery to Westlands, SLWD, and PVWD through the California Aqueduct for use within the CVP place of use.

G. Department of Veteran Affairs' San Joaquin Valley National Cemetery

The Department of Veteran Affairs' San Joaquin Valley National Veteran's Cemetery (Cemetery) is a Reclamation Contractor and its contract is up to 850 acre-feet. Reclamation cannot physically deliver CVP water to the Cemetery when the use of JPOD under D-1641 or the California Aqueduct-Delta Mendota Canal intertie is not available. The Cemetery is located near Reach 2B on the California Aqueduct (north of the O'Neill Forebay).

With the approval of this Petition, DWR will deliver **up to 850 acre-feet** of SWP water to the Cemetery. Reclamation will return an equal amount of CVP water to DWR at the O'Neill Forebay for use within the SWP service area south of the O'Neill Forebay.

² The Kings River Watermaster administers the Kings River water rights in trust for the Kings River member units. The Watermaster reports diversions to the State Water Board under 6 licenses. In early 2014, as part of the pre-1914 quantification process, State Water Board staff analyzed the amount of pre-1914 water included in the water right licenses held in trust by the Kings River Water Association. The total amount is 1.6 Million Acre-Feet. Boswell is a landowner and shareholder in multiple Kings River member units through which it has access to pre-1914 water. TLBWSD is fully within the place of use for Boswell's pre-1914 Kings River water.

H. Transfer of San Joaquin River Restoration Program Recaptured Recirculation Flows to Dudley Ridge Water District

This is the same type of action as KCWA under section C(v). Lands within Dudley Ridge Water District will receive **up to 3,000 acre-feet** of SJRRP flows.

Potential of Additional Exchanges/Transfers

The above exchanges/transfers include are anticipated as of the date of this Petition. However, SWP and CVP contractors continue to explore other opportunities to retrieve previously stored Project supplies and optimize the delivery (quantity and timing) of their Project supplies from all available sources. DWR and Reclamation anticipate that throughout the coming year more needs and opportunities for exchanging SWP and CVP water may be developed. DWR and Reclamation request that any order approving this Petition to consolidate the SWP and CVP places of use south of the Delta to include the approval of potential future exchanges/transfers that meet certain specific criteria. To allow the State Water Board to make the findings required by Water Code Section 1725, any exchanges/transfers not specifically detailed above would need to meet the following criteria:

1. The exchange/transfer would not result in any increase in the amount of water diverted from the Delta. The water to be exchanged/transferred would be part of any available Project allocations, water currently stored in San Luis Reservoir, or previously placed in groundwater storage south of the Delta.
2. The water to be exchanged/transferred would have been consumptively used or stored in the absence of the exchange/transfer.
3. The total quantity of water delivered to SWP or CVP contractors as a result of the change will not exceed historic deliveries.
4. The exchange/transfer will not result in the net loss of San Joaquin River or Sacramento River flow.
5. The exchange/transfer will not result in an increase in saline drainage to the San Joaquin River.
6. Prior to initiating any exchange/transfer not specifically listed above, DWR or Reclamation will provide the State Water Board with a description of the proposed exchange/ transfer for review and approval of a change in place of use.
7. DWR and Reclamation will develop, in coordination with the State Water Board staff, a reporting plan that will account for all water exchanged/transferred under the provisions

of any order approving the consolidated place of use. The reporting plan will include the parties to the exchange/transfer, how much water was exchanged/transferred, how the water was made available, and the facilities required to affect the exchange/transfer.

General Information

The Amount of Water to be Exchanged/Transferred Would Have Been Consumptively Used or Stored in the Absence of the Transfer

The exchanges/transfers proposed under this Petition, including any potential future exchanges/transfers meeting the criteria outlined above, involve water that is part of the SWP and/or CVP contractors 2019 allocated supplies diverted from the Delta consistent with all applicable regulatory requirements and exported from the basin in which it was developed, as well as local supplies made available through exchange with CVP or SWP 2019 allocated supplies. Some of the proposed exchanges/transfers result in more efficient storage and recovery of water from existing conjunctive use programs. The proposed exchanges/transfers include only allocated SWP and CVP water supplies and will not result in an increase in the allocations to any SWP or CVP contractors. In the absence of the proposed exchanges/transfers, the available water supplies would be consumptively used or stored in existing SWP or CVP surface storage or local groundwater storage facilities. The proposed exchanges/transfers will allow agencies to recover previously stored water or optimize the beneficial use of their existing water supplies.

Analysis of Potential Changes in Streamflow, Water Quality, Timing of Diversions or Use, Return Flows, or Effects on Legal Users

The change in place of use requested by DWR and Reclamation will not result in any measurable changes to streamflow, water quality, timing of diversion or use, or return flows. There will be no impact to other legal users of water. The water to be exchanged/transferred is diverted out of the watershed from which it originates in conformance with the provisions of the respective DWR and Reclamation water rights permits and regulatory restrictions governing those diversions, including those contained in the D-1641 and the current Biological Opinions. There are no other legal users downstream of the points of diversion that would be affected by the proposed exchanges/transfers.

The quantity and timing of diversions from the Delta will not change. The delivery rates from San Luis Reservoir may be slightly different. The scheduling of the deliveries will be coordinated between DWR and Reclamation so as not to adversely impact any SWP or CVP contractor

deliveries. Adequate capacity in the California Aqueduct and in the Delta-Mendota Canal is available, and will not be adversely impacted as a result of the exchanges.

The proposed exchanges/transfers will not result in a measurable change in quantity or quality of return flows. There will be no increase in either SWP or CVP allocations as a result of the proposed exchanges/transfers. There could be some shift in the timing of deliveries of SWP and CVP supplies south of the Delta; however this will not affect streamflow. All the water to be exchanged/transferred is water that would have been consumptively used or stored in the absence of the exchanges/transfers. Exchanges/transfers similar to those proposed above were conducted in several previous years consistent with the State Water Board orders approving DWR's and Reclamation's Petitions for Change to consolidate the SWP and CVP places of use. No measurable effects on other legal users of water, fish and wildlife or the environment were noted from those exchanges/transfers.

The Exchanges/Transfer Will Not Result in Unreasonable Impacts to Fish and Wildlife or the Environment

The change requested by DWR and Reclamation will not result in unreasonable impacts to fish and wildlife or the environment. The water was previously diverted out of the watershed from which it originates in conformance with the provisions of the respective DWR and Reclamation water rights permits and regulatory restrictions governing those diversions including those contained in D-1641 and the current Biological Opinions. There will be no change in the pumping schedule or the amount of SWP or CVP water diverted at the Banks or Jones. Therefore, there will be no change in flow or water quality conditions in the Delta. The proposed exchanges/transfers are conducted south of the Delta and will not affect pumping from the Delta. All the water to be exchanged/transferred is water that would have been consumptively used or stored in the absence of the exchanges/transfers.

The proposed exchanges/transfers will not result in a measurable change in quantity or quality of return flows. There will be no increase in either SWP or CVP allocations as a result of the proposed exchanges/transfers. There could be some shift in the timing of deliveries of SWP and CVP supplies south of the Delta, however this will not affect streamflow.

Exchanges/transfers like those proposed above have been implemented in previous years by both DWR and Reclamation. No measurable effects on other legal users of water, fish and wildlife or the environment were noted from those transfers. For the above reasons, DWR and Reclamation believe the facts support a finding that approval of this Petition would not result in injury to other legal water users or unreasonable impacts to the environment.



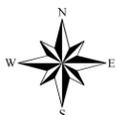
Submitted with Petition for Temporary Change to revise the SWP and CVP authorized Places of Use for Permits 16479, 11315, 11316, 11885, 11886, 11887, 11967, 11968, 11969, 11971, 11973, 12364, 12721, 12722, 12723, 12727, and 12860 and License 1986.

Map 1: Areas to be added to CVP Authorized Place of Use (POU)

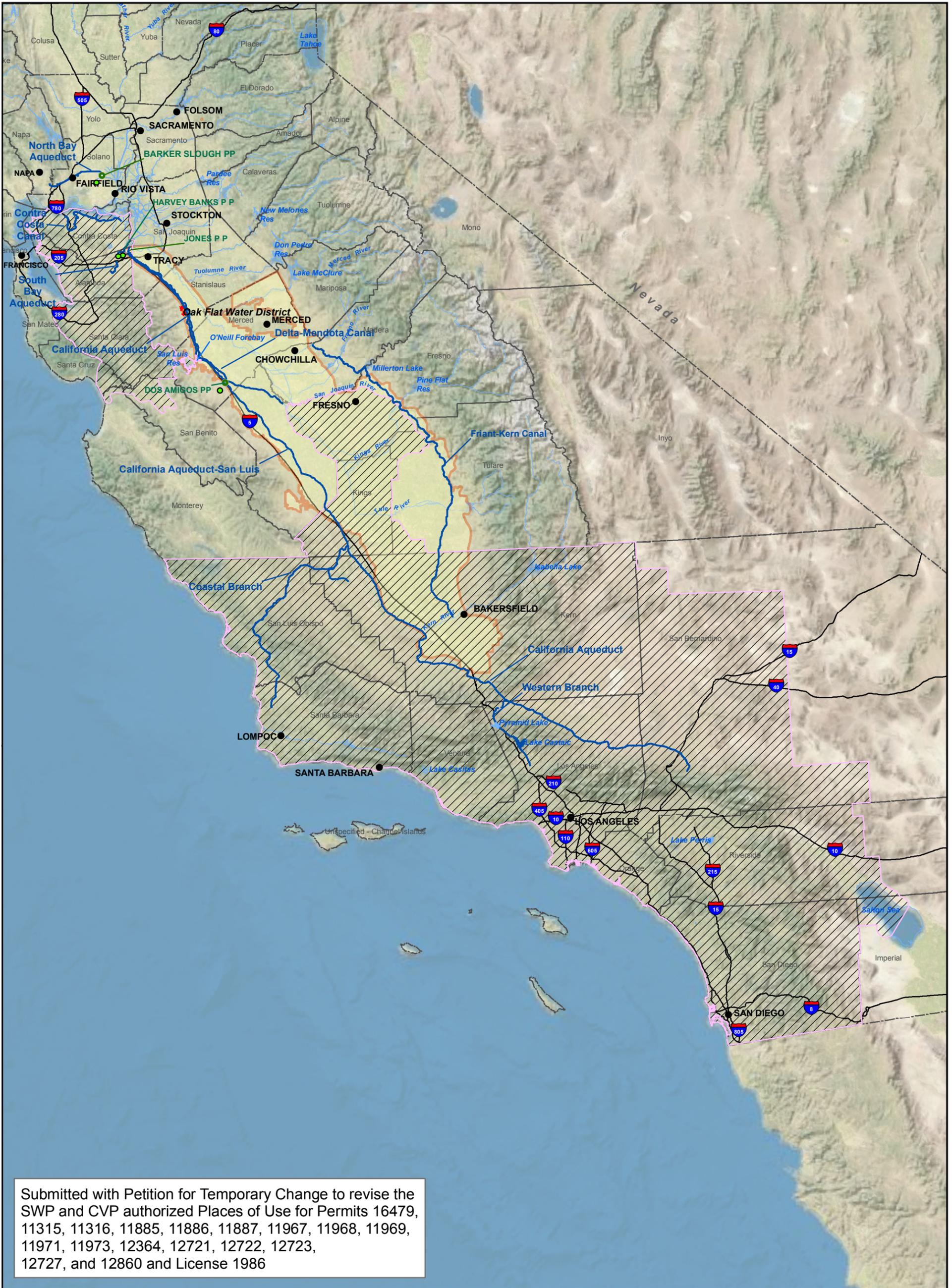
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RECLAMATION
Managing Water in the West



-  Existing Central Valley Project POU
-  State Water Project POU
-  Oak Flat Water District (within SWP POU)
-  SWP and Federal Facilities
-  SWP and Federal Canals



Submitted with Petition for Temporary Change to revise the SWP and CVP authorized Places of Use for Permits 16479, 11315, 11316, 11885, 11886, 11887, 11967, 11968, 11969, 11971, 11973, 12364, 12721, 12722, 12723, 12727, and 12860 and License 1986

Map 2: Areas to be added to SWP Authorized Place of Use (POU)

0 25 50 100 150 Miles



RECLAMATION
Managing Water in the West



- Existing State Water Project POU
- Central Valley Project POU
- Oak Flat Water District (within SWP POU)
- SWP and Federal Facilities
- SWP and Federal Canals