

RECLAMATION

Managing Water in the West

FINDING OF NO SIGNIFICANT IMPACT

Central Valley Project Interim Renewal Contracts for City of Roseville, Sacramento Municipal Utility District, and Sacramento County Water Agency 2019-2021

Central California Area Office, Folsom California
FONSI CCAO 18-04

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U.S. Department of the Interior
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Background

The Environmental Assessment prepared in October 2018 examined the potential direct, indirect, and cumulative impacts to the affected environment associated with the Central Valley Project Interim Renewal Contracts for City of Roseville (Roseville), Sacramento Municipal Utility District (SMUD), and Sacramento County Water Agency (SCWA) 2019-2021. The Bureau of Reclamation (Reclamation) proposes to implement 24-month interim renewal CVP water service contracts with Roseville, SMUD and SCWA.

CVP water service contracts are between the United States of America and individual water users or districts and provide for an allocated supply of CVP water to be applied for beneficial use. Water service contracts are required for the receipt of CVP water under federal Reclamation law and among other things stipulates provisions under which a water supply is provided, to produce revenues sufficient to recover an appropriate share of the federal government's capital investment, and to pay the annual operations and maintenance (O&M) costs of the CVP.

In 2018, four contractors (Roseville, SMUD, SCWA, and PCWA) partnered to pursue a LTWSC. Currently, the contractors have initiated the development of the project and environmental analysis with a consultant. The project is anticipated for completion in 2020 and would subsequently be submitted to Reclamation for approval and contract execution.

Alternatives Including Proposed Action

No Action Alternative

City of Roseville

Under the No Action Alternative, the 2017 IRC between Roseville and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver CVP water to Roseville, and the existing needs of Roseville's customers would not be met through CVP contract supplies; however, Roseville would likely meet service area demands with other sources of non-CVP water, as described in Chapter 1.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the CVP consistent with its Operating Criteria and Plan. Accordingly, CVP water not delivered to Roseville would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet CVP purposes.

Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 Biological Opinions (2008/2009 BOs) from the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS), respectively on the Continued Long-Term Operations (LTO) of the CVP and State Water Project (SWP). This includes the Reasonable and Prudent Alternatives (RPAs) contained in the 2008/2009 BOs from the FWS and NMFS on the Effects of the Coordinated Operations of the CVP and SWP to species listed as threatened or endangered under the Endangered Species Act (ESA).

Sacramento Municipal Utility District

Under the No Action Alternative, the 2017 IRC between SMUD and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver up to 30,000 AFY of CVP water to SMUD, and the existing needs of SMUD's power customers would not be met through these CVP contract supplies. It is reasonably assumed that water use in the Contractor's service area for the two year IRC period of March 1, 2019 through February 28, 2021 would not substantially change because this deficit could be covered from surface water supplies made available to the Contractor from non-CVP sources or other CVP supplies. Interim contracts, such as the IRC for this Proposed Action, are intended to serve as a bridge between the expiration of a previous LTWSC and a new LTWSC as the contractor reaches build-out in their service area.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the Project consistent with its Operating Criteria and Plan. Accordingly, CVP water not delivered to SMUD would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet Project purposes.

Under the No Action Alternative, Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed species.

Sacramento County Water Agency

Under the No Action Alternative, the 2017 IRC between SCWA and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver up to 30,000 AFY of CVP water to SCWA, and the existing needs of SCWA's customers would not be met through these CVP contract supplies. It is reasonably assumed that water use in the Contractor's service area for the two year IRC period of March 1, 2019 through February 28, 2021 would not substantially change because this deficit could be covered from the Fazio contract and non-CVP supplies made available to the Contractor. However, Reclamation recognizes that demands in SCWA's Zone 40 service area are projected to be 72,921 AFY by the year 2040, and thus, SCWA has a projected need for this water as they reach build-out. Interim contracts, such as the IRC for this Proposed Action, are intended to serve as a bridge between the expiration of a previous LTWSC and a new LTWSC.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the CVP consistent with its Operating Criteria and Plan. Accordingly, water not delivered to SCWA would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet CVP purposes.

Under the No Action Alternative, Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed species.

Proposed Action

Under the Proposed Action, Reclamation would execute IRCs for the Roseville, SMUD, and SCWA contracts for a two year period (March 1, 2019 through February 28, 2021).

Roseville would continue to receive up to 32,000 AFY; SMUD would continue to receive up to 30,000 AFY; and SCWA would continue to receive up to 30,000 AFY of CVP water pursuant to the new two-year IRCs.

For purposes of this EA, the following assumptions are included in the Proposed Action:

- A 24-month interim renewal period, March 1, 2019 to February 28, 2021, is considered in the analysis;
- Execution of each IRC is considered to be a separate contract;
- The contracts would be renewed with the existing maximum contract quantities shown in Table 1 of the EA; and
- Reclamation would continue to comply with commitments made or requirements imposed by applicable environmental documents, such as existing BOs including any obligations imposed on Reclamation resulting from re-consultations.
- In the event a new LTWSC is executed under the proposed IRC, the IRC, then-in-effect, would be superseded by LTWSC and analyzed under a separate process.

Findings

The EA was posted for public review and comment from November 1, 2018 to November 30, 2018 on Reclamation's NEPA document website (<https://www.usbr.gov/mp/nepa/>). Reclamation received no comments. In accordance with NEPA, the Central California Area Office of Reclamation has found that approval of the Proposed Action is not a major federal action that will significantly affect the quality of the human environment. Consequently, an environmental impact statement is not required.

The following list describes why impacts from the Proposed Action are not significant:

1. Indian Trust Assets (ITA) - There are no known ITA's or treaty rights exercised by tribes, nor are there any reservations or trust lands located within or adjacent to the Proposed Action that will be affected. The Proposed Action does not have a potential to affect ITAs. (512 DM 2 Policy Memorandum dated December 15, 1993)

2. Indian Sacred Sites - There are no identified Indian Sacred Sites within the action area and therefore this project will not inhibit use or access to any Indian Sacred Sites. (EO 13007 and 512 DM 3)
3. Environmental Justice - The Proposed Action will not have any disproportionately negative impact on low-income or minority individuals within the project area. Conditions under the Proposed Action will be identical to conditions under the No Action Alternative. (EO 12898)
4. Cultural Resources - The Proposed Action will not affect historic properties or cultural resources pursuant to the regulations at 36 CFR Part 800.3(a) (1). A cultural resources compliance memorandum was completed on September 28, 2018.
5. Biological Resources - The Proposed Action will not have any adverse effect on species either currently federally listed or proposed for listing as candidate, endangered, or threatened species, and will have no adverse effect on designated critical habitat (40 CFR 1508.27(b) (9)).
6. Public health and safety -The Proposed Action will not significantly affect public health and safety. (40 CFR 1508.27(b)(3))
7. Important natural resources - The Proposed Action will not significantly impact natural resources and unique geographic characteristics such as historic or cultural resources; parks, recreation and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); floodplains (EO 11988); national monuments; migratory birds; and other ecologically significant areas. (40 CFR 1508.27(b)(3) and 43 CFR 46.215(b))
8. Uncertain or unknown risks - The Proposed Action will not have effects on the human environment that are highly uncertain or involve unique or unknown risks. (40 CFR 1508.27(b)(5))
9. Precedence - The Proposed Action will neither establish a precedent for future actions with significant effects nor represent a decision in principle about a future consideration. (40 CFR 1508.27(b)(6))
10. Highly controversial effects -There is no potential for the effects to be considered highly controversial. (40 CFR 1508.27(b)(6))
11. Cumulative effects -The Proposed Action will not have significant cumulative impacts. (40 CFR 1508.27(b)(7))

12. Facility operations - The Proposed Action would not result in changes to Folsom Reservoir operations or Folsom Reservoir's cold water pool volume and therefore, would not have any additional effect on Reclamation's ability to meet downstream fisheries requirements.

Implementation of the Proposed Action does not change hydrology for the water sources included in the Proposed Action. Reclamation is currently operating the overall CVP system to meet all regulatory requirements, downstream water needs, and environmental requirements.

The Proposed Action will not alter Folsom Reservoir water storage or release patterns, or the maximum volume of water to be delivered to the American River Division. The interim contract will provide for the continued delivery of the same quantities of CVP water to the same lands for the same M&I uses that are provided for under existing contracts. Facility operations will not be affected by the implementation of the Proposed Action.

RECLAMATION

Managing Water in the West

Environmental Assessment

Central Valley Project Interim Renewal Contracts for City of Roseville, Sacramento Municipal Utility District, and Sacramento County Water Agency 2019-2021

EA-18-04



U.S. Department of the Interior
Bureau of Reclamation
South-Central California Area Office

December 2018

Mission Statements

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

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

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Section 1 Introduction

1.1 Background

On October 30, 1992, the President signed into law the Reclamation Projects Authorization and Adjustment Act of 1992 (Public Law 102-575) that included Title 34, the Central Valley Project Improvement Act (CVPIA). Section 3409 of the CVPIA required that Reclamation prepare a programmatic environmental impact statement (PEIS) before renewing long-term Central Valley Project (CVP) water service contracts (LTWSC). The PEIS, completed in October 1999 and hereby incorporated by reference, analyzed the implementation of all aspects of the CVPIA, contract renewal being one of many programs addressed by this Act. CVPIA Section 3404(c) mandated that upon request all existing CVP contracts be renewed. Implementation of other sections of the CVPIA mandated actions and programs that require modification of previous contract articles or new contract articles be inserted into renewed contracts. These programs include water measurement requirements (Section 3405(b)), water pricing actions (Section 3405(d)), and water conservation (Section 3405(e)). The PEIS evaluated CVP-wide impacts of long-term contract renewal at a programmatic level. Upon completion of LTWSC negotiations, the local effects of renewals at the division level were evaluated in environmental documents that tiered from the PEIS.

Environmental documentation covering LTWSC renewal of American River Division water service contractors was completed in June 2005 (Reclamation 2005) and is hereby incorporated by reference. This documentation evaluated the effects of renewing long-term contracts for the City of Roseville (Roseville), Placer County Water Agency (PCWA), Sacramento County Water Agency (SCWA), San Juan Water District (SJWD), Sacramento Municipal Utility District (SMUD), El Dorado Irrigation District, and East Bay Municipal Utility District. The Record of Decision (ROD) for the American River Division LTWSC renewals was signed on February 28, 2006 (one day prior to the beginning of a new contract year). Three of the seven American River Division contractors, SJWD, El Dorado Irrigation District, and East Bay Municipal Utility District were able to execute the LTWSC prior to the beginning of the new contract year. The remaining Division contractors all had existing contracts in place that allowed for the continued delivery of water in the 2006 water year.

In accordance with Section 3404(c) of the CVPIA, Reclamation proposes to execute three interim renewal contracts beginning March 1, 2019 (Table 1). These three interim renewal contracts would be renewed for a 24-month period from March 1, 2019 through February 28, 2021. Interim renewal contracts (IRC) are issued under the authority of the CVPIA to provide a bridge between the expiration of the initial LTWSC and the execution of the next LTWSC. In the event a new LTWSC is executed, the IRC then-in-effect would be superseded by LTWSC.

Table 1 Contractors, Existing Contract Amounts, and Expiration Dates

Contractor	Contract Number	Contract Quantity (acre-feet per year)	Expiration of Existing Interim Renewal Contract
City of Roseville	14-06-200-3474A-IR4	32,000	2/28/2019
Sacramento Municipal Utility District	14-06-200-5198A-IR3	30,000	2/28/2019
Sacramento County Water Agency	14-06-200-5198B-IR3	30,000	2/28/2019

In conformance with the National Environmental Policy Act of 1969 (NEPA), as amended, Reclamation has prepared this Draft Environmental Assessment (EA) to evaluate and disclose any potential environmental impacts associated with the implementation of 24-month interim renewal CVP water service contracts with the Roseville, SMUD, and SCWA.

1.1.1 City of Roseville (Roseville)

Roseville has proposed a water service contract for interim renewal. Roseville has four IRCs previously executed following the expiration of the previous LTWSC. Roseville is one of seven contractors within the American River Division of the CVP and has an existing IRC with Reclamation for the delivery of CVP water from Folsom Reservoir. The existing IRC provides for up to 32,000 acre feet per year (AFY) for municipal and industrial (M&I) uses only. The Roseville service area includes the incorporated city, although two small areas within the city are served by two other water purveyors.

In addition to the IRC, a long-term Warren Act (WA) contract was executed with Roseville in November 2006, (expiring in February 2031) to convey up to 30,000 AFY of PCWA Middle Fork Project (MFP) water for diversion at Folsom Reservoir and conveyed through the Folsom Pumping Plant. This WA contract enables Roseville to provide adequate water supplies during peak demand.

In a separate agreement, Roseville conveys up to 4,000 AFY of American River surface water rights held by the SJWD. This water is diverted from Folsom Reservoir through the Folsom Pumping Plant and associated pipelines; Reclamation is not a party to any water purchase agreement between Roseville and SJWD. All water delivered to Roseville is diverted from Folsom Reservoir through the Folsom Pumping Plant and associated pipelines. The water is treated by the Roseville Water Treatment Plant.

Roseville currently operates six groundwater wells and plans to construct ten more. The existing wells are capable of delivering approximately 17,500 AFY of water supply if run in full-time. With the construction of the additional wells, Roseville's groundwater facilities would allow for the delivery of up to 43,800 AFY if run on a continuous basis. Roseville's groundwater wells are currently maintained for backup water supply and to improve water supply reliability during drought and emergency conditions (Roseville, 2016).

Roseville's surface water contract entitlements for American River water total 66,000 AFY for direct diversion at Folsom Dam. Additionally, Roseville, as a member of the Sacramento Water

Forum, is a signatory to the Water Forum Agreement¹ (WFA) and has agreed to limit its surface water diversions from the American River (Folsom Dam) to 58,900 AFY during normal/wet years² and 39,800 AFY during drier and driest years³. Per Roseville's contribution to the WFA, Roseville will increase its average and wet year American River diversions from a baseline level of 19,800 AFY to 54,900 AFY. In drier years, Roseville will decrease their surface water use from 54,900 AFY to 39,800 AFY and substitute groundwater for surface water along with using reclaimed water for irrigation purposes. Additionally, Roseville will enter into an agreement with PCWA for replacing up to 20,000 AFY of water to the American River in drier and driest years, from reoperation of PCWAs MFP reservoirs (Water Forum, 2000).

Roseville has considered numerous methods to reduce the water demand, including conservation and recycling. In 1991, Roseville adopted the Roseville Water Conservation and Drought Management Plan to respond to demand and future drought. Roseville also uses groundwater during dry periods to meet daily peak demands, especially during drought periods. Roseville's participation in the WFA, and access to non-CVP supplies will enable Roseville to meet customer demands in years when CVP allocations are reduced or constrained.

1.1.2 Sacramento Municipal Utility District (SMUD)

SMUD has proposed a water service contract for interim renewal. SMUD had three IRCs previously executed following the expiration of the previous LTWSC. SMUD is one of eight contractors within the American River Division of the CVP.

SMUD entered into a contract with Reclamation on November 20, 1970, which expired on December 31, 2012, for the delivery of up to 60,000 AFY of CVP water for M&I uses. This LTWSC also contained the authorization for delivery of up to 15,000 AFY of water rights water made available to SMUD by the City of Sacramento. This water was made available as a result of a previous assignment of water to SMUD from the City of Sacramento. The 60,000 AFY of CVP water under the contract was to be used by SMUD in its power generation operations, and was used for more than 15 years for the Rancho Seco nuclear power plant operations. In the 1980s, the nuclear power plant operations ceased.

In 2006 SMUD began operating two gas-powered generators at the Rancho Seco site known as the Cosumnes Power Plant (CPP). The CPP consists of a nominal 1000-megawatt combined-cycle natural gas fired plant. The plant was constructed in two phases, each consisting of 500 megawatts. SMUD has a need of 2,650 AFY of water for the exclusive use of the CPP.

¹ The WFA is a purveyor-specific agreement comprised of business and agricultural leaders, citizens groups, environmentalists, water managers, and local governments in Sacramento, Placer and El Dorado counties, to provide a reliable and safe water supply for the region's economic health and planned development to the year 2030; and preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River. This Agreement allows the region to meet its needs in a balanced way through implementation of integrated water management strategies ranging from increased surface water diversion, improving environmental conditions, managing groundwater supplies and meeting customer demands in dry years.

² Years when the projected March through November Unimpaired Inflow into Folsom Reservoir is greater than 1,600,000 AFY.

³ Years when the projected March through November Unimpaired Inflow into Folsom Reservoir is less than 1,600,000 AFY.

On July 12, 2006, SMUD assigned to SCWA the right, title, and interest in a portion of their CVP contract consisting of 30,000 AFY of CVP water. The assignment afforded SCWA any rights to renew the contract, thus reducing SMUD's CVP water to 30,000 AFY.

The delivery of the water rights water made available to SMUD by the City of Sacramento was separated from the 1970 LTWSC, and is now recognized under a WA contract between Reclamation and SMUD executed March 5, 2015. SMUD's surface water entitlements from the American River now total 44,481 AFY for diversion at Nimbus Dam. SMUD diverts their CVP and WA contract water from the American River at Nimbus Dam for delivery to their Rancho Seco service area through the Folsom South Canal (FSC).

1.1.3 Sacramento County Water Agency (SCWA)

SCWA has proposed a water service contract interim renewal. SCWA had three previously executed IRCs. SCWA is one of eight contractors within the American River Division of the CVP. SCWA was created by a special act of the California State Legislature in 1952. In 1985, the Agency formed "Zone 40" in order to provide funding for construction of water treatment and transmission facilities through the collection of fees for new development. Historically, Zone 40 relied solely on ground water for its water supply, with an average extraction of 19,000 AFY of ground water. Pumping in Zone 40 resulted in lowered ground water levels. In order to sustain the ground water resources in the Zone 40 service area, SCWA implemented a conjunctive use program to seek surface water supplies in order to allow for adequate recharge of the aquifer.

SCWA has two surface water contracts with the United States: a CVP water service contract with Reclamation (No. 6-07-20-W1372) for delivery of up to 15,000 AFY⁴ of water made available pursuant to PL 101-514 (colloquially referred to as Fazio contract), which provides a permanent water supply to Zone 40; and this Proposed Action for renewal of SCWA's IRC (No. 14-06-200-5198B-IR3) for up to 30,000 AFY of SMUD's assigned CVP water.

As previously discussed, SMUD assigned to SCWA the right, title, and interest in that portion of the LTWSC consisting of up to 30,000 AFY of CVP water including any rights to renew the contract in July 2006. SCWA then entered into a contract (Contract No. 14-06-200-5198B) with Reclamation for the up to 30,000 AFY of assigned CVP water from SMUD which expired December 31, 2012; at which point, SCWA entered into IRC No. 14-06-200-5198B-IR1 on December 31, 2012, maintaining continuity regarding SCWA's contractual right to up to 30,000 AFY of SMUD's assigned CVP water.

SCWA supplies the Zone 40 service area through an integration of surface water, ground water, recycled water and appropriative water resources that will be used to meet SCWA's projected Zone 40 demands of 72,921 AFY by the year 2040 (SCWA, 2016). SCWA's use of ground water is limited as a result of their conjunctive use program. As a condition of the second assignment of SMUD's CVP water, SCWA is obligated to provide groundwater to SMUD in dry and critically dry years. According to SCWA's Zone 40 Water Supply Master Plan, the maximum, minimum and average amount of groundwater needed to meet projected long-term

⁴ SCWA's Fazio CVP contract (No. 6-07-20-W1372) is for 22,000 AFY. SCWA's has since signed over a portion of that Contract to the City of Folsom for 7,000 AFY, bringing SCWA's contract total to 15,000 AFY.

demands is 69,900 AFY, 27,300 AFY and 40,900 AFY, respectively. Groundwater is considered to be the last priority in meeting water demands after surface water entitlements are used.

SCWA is also a member of the Sacramento Water Forum, and a signatory to the WFA⁵. SCWA's participation in the WFA includes a purveyor-specific agreement, designed to help meet the objectives of the WFA. SCWA will meet these objectives by additional surface water diversions, increased conjunctive use of surface water and groundwater, expanded water demand management programs, and recycled water. SCWA has also committed to meet these objectives through modifications to American River flow patterns, in order to improve in-stream fish habitat (Water Forum, 2000).

SCWA's 2005 Zone 40 Water Supply Master Plan identifies that SCWA purchases recycled water from the Sacramento Regional County Sanitation District, which is used primarily for landscape irrigation at parks, schools and rights-of-way. SCWA anticipates that 4,400 AFY of recycled water will be used in Zone 40 to meet non-potable demands by 2030.

SCWA submitted an application to the State Water Resources Control Board (SWRCB) for the appropriation of water from the American and Sacramento Rivers, which would later be authorized by the SWRCB on May 30, 1995. This water is considered 'intermittent water' that typically would be available during the winter months of normal or wet years and could be used for groundwater recharge. The maximum, minimum, and average annual use of appropriative water is 71,000 AFY, 0 AFY and 21,700 AFY, respectively (SCWA, 2005).

The Freeport Regional Water Project (FRWP) Final Environmental Impact Statement/Environmental Impact Report (FEIS/FEIR) was completed in March 2004 (Reclamation, 2004), and hereby incorporated by reference, evaluated the assignment of up to 30,000 AFY of CVP water from SMUD to SCWA for use within SCWA's Zone 40 Contract Use Area⁶ (Figure 3). CVP water assigned to SCWA would be delivered at two points of diversion for SCWA's CVP water (up to 30,000 AFY); (a) the intake for the Sacramento River Water Treatment Plant owned by the City of Sacramento (b) the intake for the FRWP on the Sacramento River (Figure 3). The terms of the proposed IRC will make available for delivery to SCWA up to 30,000 AFY of municipal and industrial (M&I) water.

⁵ The WFA is a purveyor-specific agreement comprised of business and agricultural leaders, citizens groups, environmentalists, water managers, and local governments in Sacramento, Placer and El Dorado counties, to provide a reliable and safe water supply for the region's economic health and planned development to the year 2030; and preserve the fishery, wildlife, recreational, and aesthetic values of the Lower American River. This Agreement allows the region to meet its needs in a balanced way through implementation of integrated water management strategies ranging from increased surface water diversion, improving environmental conditions, managing groundwater supplies and meeting customer demands in dry years.

⁶ Contract Use Area refers to the area to which the Contractor (SCWA) is permitted, subject to Article 5(c), to provide Project Water obtained under this Contract. The Contract Use Area is the area identified as "Zone 40." The Contractor's Service Area refers to all areas or locations within the Contract Use Area that receive surface water service or commingled ground water and surface water service from the Contractor.

1.1.4 Long-Term Renewal Contracts

CVP water service contracts are between the United States of America and individual water users or districts and provide for an allocated supply of CVP water to be applied for beneficial use. Water service contracts are required for the receipt of CVP water under federal Reclamation law and among other things stipulates provisions under which a water supply is provided, to produce revenues sufficient to recover an appropriate share of the federal government's capital investment, and to pay the annual operations and maintenance (O&M) costs of the CVP.

In 2018, four contractors (Roseville, SMUD, SCWA, and PCWA) partnered to pursue a LTWSC. Currently, the contractors have initiated the development of the project and environmental analysis with a consultant. The project is anticipated for completion in 2020 and would subsequently be submitted to Reclamation for approval and contract execution.

1.2 Need for the Proposed Action

The purpose of the Proposed Action is executing three IRCs to provide continued delivery of CVP water to Roseville, SMUD, and SCWA. The IRCs would continue to provide a bridge between the expiration of all three CVP LTWSCs and the new LTWSCs, for use by Roseville, SMUD, and SCWA. The contracts also continue reimbursement to the federal government for costs related to the construction and operation of the CVP.

As described in Section 1.1.4, execution of LTWSCs for the contracts listed in Table 1 is still pending. The Proposed Action is to execute three IRCs in order to extend the term of the contractors' existing IRCs for two years, beginning March 1, 2019 and ending February 28, 2021. Execution of these three IRCs is needed to continue delivery of CVP water to these contractors, and to further implement CVPIA Section 3404(c), until their new LTWSC can be executed. These LTWSCs have generally been negotiated but cannot be finalized until environmental compliance is completed.

1.3 Scope

Reclamation has prepared this environmental assessment (EA), which tiers from the PEIS, to determine the site specific environmental effects of executing the three IRCs listed in Table 1 for the period March 1, 2019 through February 28, 2021. Under the Proposed Action, CVP water would be delivered for existing M&I purposes within Roseville, SMUD, and SCWA's existing CVP service area boundaries using existing facilities within Reclamation's water right place of use. See Figures 1 through 3 for contractor-specific service area maps.

City of Roseville

Reclamation proposes to enter into a 24-month IRC with Roseville, an American River contractor, to provide Roseville with an interim CVP contract for up to 32,000 AFY of CVP water for M&I use in Roseville's CVP service area (Figure 1). Roseville has four IRCs previously executed following the expiration of the previous LTWSC. The Proposed Action is the fifth IRC for Roseville.

The term of the Roseville IRC would be from March 1, 2019 through February 28, 2021. In the event a new LTWSC is executed, the IRC, then-in-effect, would be superseded by the LTWSC. Effects of executing the LTWSC would be analyzed under a separate environmental document.

There would be no changes to Roseville's CVP service area and no construction is required as part of the Proposed Action. Changes to the CVP service area would be a separate federal action and would be analyzed under a separate environmental document.

The use of CVP water for M&I use under the proposed IRC would not change from the M&I purpose of use specified in Roseville's existing IRC.

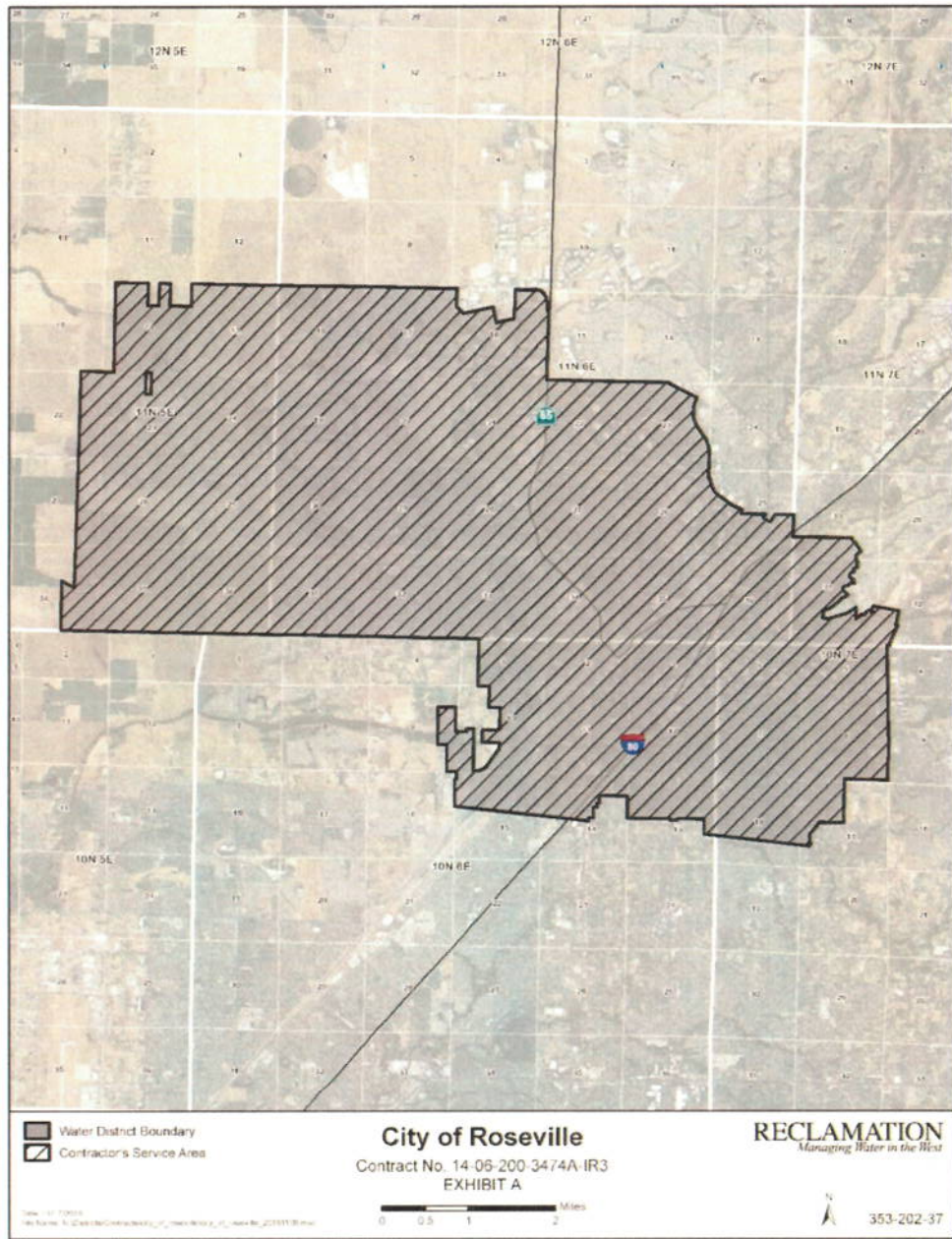


Figure 1. City of Roseville Service Area.

Sacramento Municipal Utility District

Reclamation proposes to enter into a 24-month IRC with SMUD, an American River contractor, to provide SMUD with an IRC for up to 30,000 AFY of CVP water for M&I uses in SMUD's Rancho Seco service area (Figure 2). SMUD had three IRCs previously executed following the expiration of the previous LTWSC.

The term of the SMUD IRC would be from March 1, 2019 through February 28, 2021. In the event a new LTWSC is executed, the IRC, then-in-effect, would be superseded by the LTWSC. Effects of executing the LTWSC would be analyzed under a separate environmental document.

There would be no changes to SMUD's CVP service area and no construction is required as part of the Proposed Action. Changes to the CVP service area would be a separate federal action and would be analyzed under a separate environmental document.

The use of CVP water for M&I use under the proposed IRC would not change from the M&I purpose of use specified in SMUD's existing IRC.

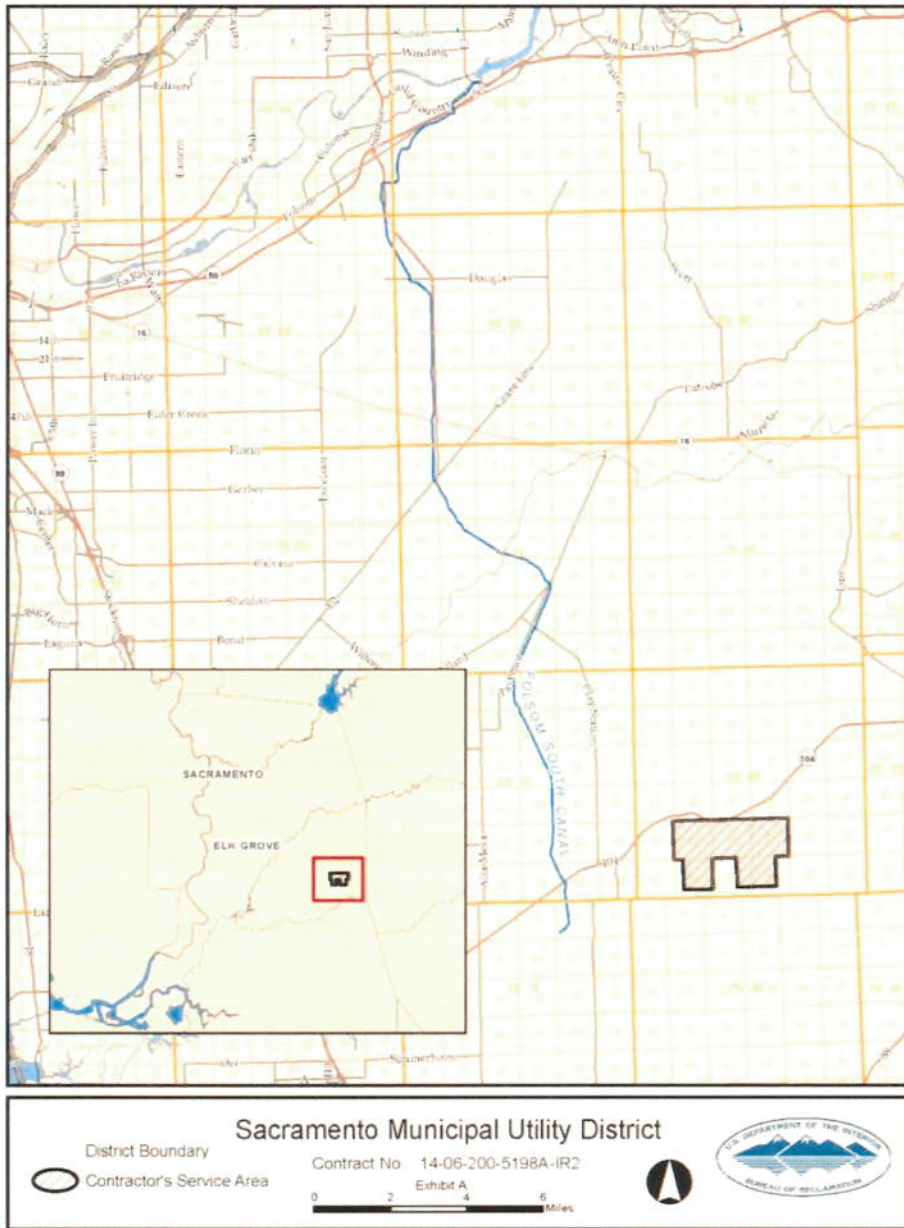


Figure 2. Sacramento Municipal Utility District's Rancho Seco Service Area.

Sacramento County Water Agency

Reclamation proposes to enter into a 24-month (fourth) IRC with SCWA to provide SCWA with an interim CVP contract for up to 30,000 AFY of CVP water for M&I use in SCWA's CVP service area (Figure 3).

The term of the SCWA IRC would be from March 1, 2019 through February 28, 2021. In the event a new LTWSC is executed, the IRC, then-in-effect, would be superseded by the LTWSC and analyzed under a separate environmental review process.

No changes to SCWA's CVP service area and no construction are required as part of the Proposed Action. Changes to the CVP service area would be a separate federal action and require separate environmental documentation.

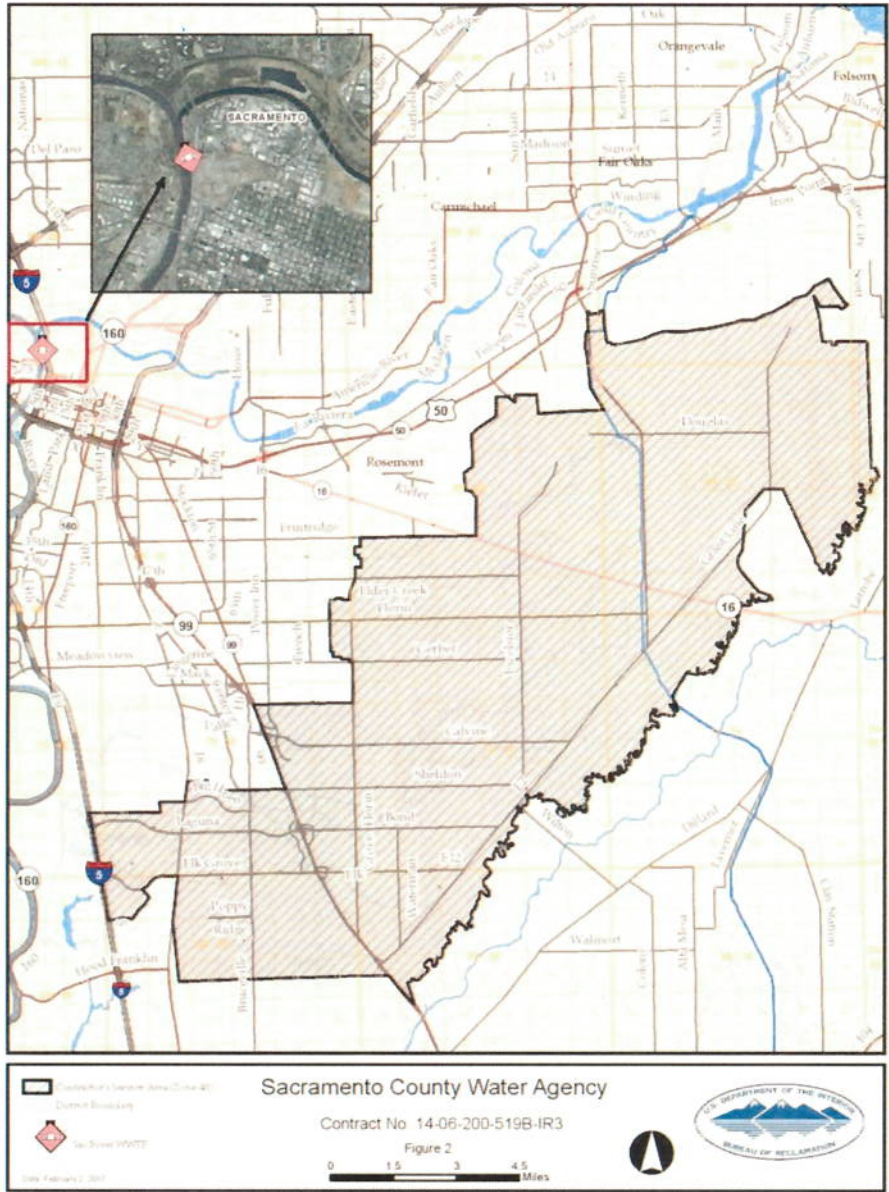


Figure 3. Sacramento County Water Agency's Service Area.

Section 2 Alternatives Including the Proposed Action

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

2.1 No Action Alternative

City of Roseville

Under the No Action Alternative, the 2017 IRC between Roseville and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver CVP water to Roseville, and the existing needs of Roseville's customers would not be met through CVP contract supplies; however, Roseville would likely meet service area demands with other sources of non-CVP water, as described in Chapter 1.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the CVP consistent with its Operating Criteria and Plan. Accordingly, CVP water not delivered to Roseville would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet CVP purposes.

Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 Biological Opinions (2008/2009 BOs) from the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS), respectively on the Continued Long-Term Operations (LTO) of the CVP and State Water Project (SWP). This includes the Reasonable and Prudent Alternatives (RPAs) contained in the 2008/2009 BOs from the FWS and NMFS on the Effects of the Coordinated Operations of the CVP and SWP to species listed as threatened or endangered under the Endangered Species Act (ESA).

Sacramento Municipal Utility District

Under the No Action Alternative, the 2017 IRC between SMUD and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver up to 30,000 AFY of CVP water to SMUD, and the existing needs of SMUD's power customers would not be met through these CVP contract supplies. It is reasonably assumed that water use in the Contractor's service area for the two year IRC period of March 1, 2019 through February 28, 2021 would not substantially change because this deficit could be covered from surface water supplies made available to the Contractor from non-CVP sources or other CVP supplies. Interim contracts, such as the IRC for this Proposed Action, are intended to serve as a bridge between the expiration of a previous LTWSC and a new LTWSC as the contractor reaches build-out in their service area.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the Project consistent with its Operating Criteria and Plan.

Accordingly, CVP water not delivered to SMUD would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet Project purposes.

Under the No Action Alternative, Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed species.

Sacramento County Water Agency

Under the No Action Alternative, the 2017 IRC between SCWA and Reclamation would expire on February 28, 2019. There would be no contractual mechanism for Reclamation to deliver up to 30,000 AFY of CVP water to SCWA, and the existing needs of SCWA's customers would not be met through these CVP contract supplies. It is reasonably assumed that water use in the Contractor's service area for the two year IRC period of March 1, 2019 through February 28, 2021 would not substantially change because this deficit could be covered from the Fazio contract and non-CVP supplies made available to the Contractor. However, Reclamation recognizes that demands in SCWA's Zone 40 service area are projected to be 72,921 AFY by the year 2040, and thus, SCWA has a projected need for this water as they reach build-out. Interim contracts, such as the IRC for this Proposed Action, are intended to serve as a bridge between the expiration of a previous LTWSC and a new LTWSC.

Under the No Action Alternative, Reclamation would still divert water under its CVP water rights permits and operate the CVP consistent with its Operating Criteria and Plan. Accordingly, water not delivered to SCWA would still be diverted by Reclamation under its water rights permits, and that amount of CVP yield would be used to meet CVP purposes.

Under the No Action Alternative, Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed species.

2.2 Proposed Action

Under the Proposed Action, Reclamation would execute IRCs for the contracts listed in Table 1 for a two year period (March 1, 2019 through February 28, 2021).

Roseville would continue to receive up to 32,000 AFY; SMUD would continue to receive up to 30,000 AFY; and SCWA would continue to receive up to 30,000 AFY of CVP water pursuant to the new two-year IRCs.

For purposes of this EA, the following assumptions are included in the Proposed Action:

- A 24-month interim renewal period, March 1, 2019 to February 28, 2021, is considered in the analysis;

- Execution of each IRC is considered to be a separate contract;
- The contracts would be renewed with the existing maximum contract quantities shown in Table 1; and
- Reclamation would continue to comply with commitments made or requirements imposed by applicable environmental documents, such as existing BOs including any obligations imposed on Reclamation resulting from re-consultations.
- In the event a new LTWSC is executed under the proposed IRC, the IRC, then-in-effect, would be superseded by LTWSC and analyzed under a separate process.

City of Roseville

The Proposed Action is to enter into an IRC with Roseville to facilitate the continued delivery of up to 32,000 AFY of CVP water from Folsom Reservoir. Water associated with this action would be delivered at Folsom Reservoir, which is the point of delivery for Roseville's CVP water (32,000 AFY).

The proposed contract quantity would remain the same as the existing IRC. Water can be delivered under the IRCs in quantities up to the contract total, although reduced quantities may be made available consistent with contract water shortage provisions in years when water supplies are limited. The terms and conditions of Roseville's IRC are incorporated by reference into the Proposed Action.

The Action Area consists of Folsom Reservoir and the American River from Folsom Reservoir to its confluence with the Sacramento River, and Roseville's service area that uses CVP water as shown in Figure 1.

Sacramento Municipal Utility District

The Proposed Action is to enter into an IRC with SMUD to provide the contract mechanism to facilitate the delivery of up to 30,000 AFY of CVP water from Folsom Reservoir.

Water associated with this action would be delivered at the point of delivery for SMUD's CVP water; milepost 24.681 (left side) on the FSC located at a point 700 feet upstream from the inlet transition of the Laguna Creek siphon. This point of diversion is an approved CVP point of diversion.

The contract service area for the proposed IRC has not changed from the current use or from that considered in the evaluation of LTWSCs conducted in 2005 (Reclamation, 2005). The proposed contract quantity will remain the same as SMUD's existing IRC. The Action Area consists of Folsom Reservoir downstream to the lower American River at the confluence of the Sacramento River, the FSC, and the SMUD Rancho Seco service area (Figure 2).

Sacramento County Water Agency

The Proposed Action is to enter into an IRC with SCWA to provide the contract mechanism to facilitate the delivery of up to 30,000 AFY of CVP water from Folsom Reservoir. Water

associated with this action would be delivered at the two points of diversion for SCWA's CVP water (up to 30,000 AFY); (a) the intake for the Sacramento River Water Treatment Plant owned by the City of Sacramento; and (b) the intake for the FRWP on the Sacramento River, as shown in Figure 3. These points of diversion are approved CVP points of diversion.

The contract service area for the proposed IRC has not changed from the current use or from that considered in the evaluation of LTWSCs conducted in 2005 (Reclamation 2005). The proposed contract quantity would remain the same as SCWA's existing IRC. Water can be delivered under the IRC in quantities up to the contract total, although reduced quantities may be made available consistent with contract water shortage provisions in years when water supplies are limited. The terms and conditions of the 2019 IRC are incorporated by reference into the Proposed Action.

The Action Area consists of the SCWA Zone 40 service area, Folsom Reservoir downstream on the American River to the confluence of the Sacramento River and the lower Sacramento River from its confluence with the American River to the Freeport Regional Water Project Intake Facility (Figure 3).

Section 3 Affected Environment and Environmental Consequences

Roseville's CVP contract service area is contained within the American River Division of the CVP along with seven other water purveyors. The service area boundary within Placer County where CVP water is served is identified in Figure 1. SMUD's CVP contract service area is contained within the American River Division of the CVP along with seven other water purveyors. The service area boundary within Sacramento County where CVP water is served is identified in Figure 2. SCWA's CVP contract service area is contained within the American River Division of the CVP along with seven other water purveyors. The service area boundary within Sacramento County where CVP water is served is identified in Figure 3.

This EA considers the potential effects of the IRC on the resources listed below. The analysis contained in the December 15, 2008 and June 4, 2009 BOs, including their RPAs, from the FWS and the NMFS respectively, on the *Continued Long-term Operations (LTO) of the CVP and State Water Project (SWP)* (USFWS 2008, NMFS 2009), and the ensuing 2016 LTO EIS and Record of Decision (ROD) is incorporated by reference into this document.

3.1 Resources Eliminated from Further Analysis

Reclamation formed an interdisciplinary team to identify any physical, biological, social, cultural or economic issues that might be affected by the alternatives. The analysis of these resources compares effects of the Proposed Action to the No Action Alternative. Reclamation considered and determined that the Proposed Action would not impact the following resources:

- **Indian Trust Assets:** Indian Trust Assets (ITAs) are legal interests in property or rights held in trust by the United States for Indian Tribes or individual Indians. Indian reservations, Rancherias, and Public Domain Allotments are common ITAs in California. There are no known ITAs present within the Action Areas; therefore, the Proposed Action does not have a potential to affect ITA's.
- **Indian Sacred Sites:** Executive Order 13007 (May 24, 1996) requires that federal agencies accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners, and avoids adversely affecting the physical integrity of such sacred sites on federal lands.

Indian sacred sites do not occur at the points of delivery for Roseville and SMUD on Folsom Reservoir and FSC; respectively. The service areas for Roseville and SMUD are not located on federal lands. In addition, the Sacramento River Water Treatment Plant, FRWP, and SCWA's service area are not located on federal lands. Therefore, the Proposed Action would not affect access to or use of Indian sacred sites on federal lands.

- **Environmental Justice:** Roseville and the area near the point of delivery do not constitute low-income or minority communities. Communities in SMUD's Rancho Seco service

area and areas near the points of delivery do not constitute low-income or minority communities. Communities in Zone 40 and areas near the points of delivery do not constitute low-income or minority communities. The IRC is a continuation of existing conditions and would not adversely change conditions at or near community gathering places, institutions, workplaces, or housing within the place of use or near the point of delivery. Therefore the action would have no disproportionate effect on low-income or minority communities.

- **Cultural Resources:** By implementing the Proposed Action Alternative, all water will be delivered within existing water service area boundaries utilizing existing water conveyance. The Proposed Action has no potential to cause effects on historic properties pursuant to 36 CFR §800.3(a)(1).

This EA provides analysis of the affected environment of the Proposed Action and No Action Alternative in order to determine the potential impacts and cumulative effects to the following environmental resources.

3.2 Biological Resources

3.2.1 No Action

The No Action Alternative also includes the operations of the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed threatened and endangered species under the Endangered Species Act.

Actions would continue to be taken to protect sensitive species in the American River including formulation of an annual water temperature management plan for steelhead, the Flow Management Standard for the lower American River, use of CVPIA Section 3406 (b)(2) water supplies to supplement flows in the Lower American River, flow and temperature requirements, and examinations of potential improvements to fish passage and structural temperature control options. There would be no adverse effects to biological resources under the No Action Alternative.

City of Roseville

Implementation of the No Action Alternative would mean that the existing IRC with Roseville would expire in February 2019. Roseville would not have a contract mechanism for the delivery of their CVP water.

The No Action Alternative assumes that water demands in Roseville's CVP service area would be met with non-CVP supplies or other CVP supplies.

Sacramento Municipal Utility District

Implementation of the No Action Alternative would mean that the existing IRC with SMUD would expire in February 2019, and SMUD would not have a contract mechanism for the delivery of their CVP water. The existing IRC provides CVP water to SMUD for M&I purposes.

The No Action Alternative assumes that water demands in SMUD's CVP service area would be met with non-CVP supplies or other CVP supplies. This is supported by other sources of water available to SMUD for use in their Rancho Seco service area.

Sacramento County Water Agency

Implementation of the No Action Alternative would mean that the existing IRC with SCWA would expire in February 2019, and SCWA would not have a contract mechanism for delivery of their CVP water.

The No Action Alternative assumes that water demands in SCWA's CVP service area would be met with non-CVP supplies or other CVP supplies. This is supported by other sources of water available to SCWA for use in their Zone 40 service area, including their Fazio contract, groundwater supplies and recycled water supplies. As discussed elsewhere, SCWA would rely on other CVP supplies, appropriative water rights, and other surface and ground water sources in order to meet demands of up to 30,000 AFY if not available under the proposed interim contract. With the same quantity of water needed for the same lands for the same M&I uses, use of the water from the proposed IRC, or from alternative sources, would result in the same consumptive use and impacts would remain the same in this regard.

3.2.2 Proposed Action

Impacts to biological resources under the Proposed Action would be identical to conditions under the No Action Alternative. The IRC would provide for the delivery of CVP water in the same quantity to the same lands for the same M&I uses as would be provided under the No Action Alternative. This would be no change from conditions under the existing IRC. Reclamation would continue to operate the CVP consistent with the 2008/09 BOs, and water deliveries would be made through existing CVP facilities.

The action does not require the construction of any new facilities, the installation of any new structures, or the modification of existing facilities. The water would be placed to beneficial use within the authorized place of use for CVP water from Folsom Reservoir. The potential effects to biological resources on the LTO of the CVP and SWP occurring within the action area of this Proposed Action have been analyzed in Chapter 9 of the 2016 LTO EIS. The impact analysis considered changes in the ecological attributes that affect fish and aquatic resources related to changes in CVP and SWP operations, including: changes in reservoir storage volumes, elevations, and water temperatures in primary storage reservoirs. Potential changes in reservoir storage, elevation and temperature could affect downstream fisheries by changing flow and temperature regimes.

The 2016 LTO EIS used modeling data to compare future average monthly hydrologic conditions between alternatives, such as reservoir elevation, storage and temperatures to understand the potential impacts to aquatic resources within the CVP and SWP. This

information was compared between each alternative to consider an environmentally preferable alternative to influence positive instream conditions for ESA-listed aquatic species, and to meet downstream water objectives. Reclamation concluded that the environmentally preferable alternative would be to operate the CVP consistent with the 2008/2009 BOs and their associated RPAs.

The analysis contained in Chapter 9 of the 2016 LTO EIS assumed delivery to all existing CVP contracts, including this Proposed Action, in respect to the potential effects on aquatic resources; these results are contained in Table 9.5 (pp. 9-424-9-426) of the LTO EIS (Reclamation, 2016). Implementation of the Proposed Action would not change biological resources within the Action Area; therefore, the biological resources analysis on the LTO of the CVP and SWP contained in Chapter 9 of the 2016 LTO EIS, which was conducted upon adoption of the 2008/2009 BOs, including their RPAs is incorporated by reference into this document. This action is also in accordance with Section 3404(c) of the CVPIA; in which the Final PEIS and Programmatic CVPIA BO were released in October 1999 and November 2000, respectively. The PEIS addressed the implementation of the CVPIA and the continued operation and maintenance of the CVP (incremental and cumulative effects).

In addition, as part of the essential fish habitat conservation consultation, NMFS analyzed the effects of the Proposed Action on fall-run Chinook salmon in the lower American River. NMFS identified the primary factors potentially limiting fall-run production within the Lower American River as high water temperatures, reduced flow magnitude, and flow fluctuations. NMFS identified RPAs to alleviate the effects of Folsom Reservoir operations on fall-run Chinook salmon in the Lower American River. The Proposed Action was addressed in the consultation and is subject to the NMFS 2009 BO.

Reclamation is currently operating the overall CVP system to meet all regulatory requirements, downstream water needs, and environmental requirements. Under the Proposed Action, Reclamation would continue to implement all current regulatory actions. The Proposed Action would not alter CVP operations, water storage or release patterns from CVP facilities, or the maximum volume of water to be delivered to the American River Division; therefore, conditions under the Proposed Action Alternative would be the same as those under the No Action Alternative.

3.3 Water Supply and Hydrology

3.3.1 No Action

Implementation of the No Action Alternative would mean that the existing IRCs would expire in February 2019. Reclamation would not enter into an IRC with Roseville. The up to 32,000 AFY of CVP water would not continue to be delivered to Roseville from the existing diversion points at Folsom Dam.

SMUD would not have a contract mechanism for the delivery of 30,000 AFY to their Rancho Seco service area. SMUD has access to additional surface water supplies, for use within their service area. It is reasonable to assume that SMUD would still have adequate supplies to meet their demands under the No Action Alternative.

SCWA would not have a contract mechanism for the delivery of up to 30,000 AFY to SCWA's Zone 40 site. SCWA has a variety of additional water supplies, including a separate CVP contract for use within their service area. It is reasonable to assume that SCWA would still have adequate supplies to meet their demands.

3.3.2 Proposed Action

Under the Proposed Action, Reclamation would execute IRCs for the contracts listed in Table 1 for a two year period (March 1, 2019 through February 28, 2021) to provide a contractual mechanism for the delivery of CVP supplies from Folsom Reservoir, for the quantities listed in Table 1.

The 2016 LTO EIS included analysis to evaluate potential impacts to Folsom Reservoir operations and Reclamation's management of the cold water pool with implementation of Roseville's CVP supply. This analysis indicates that the Proposed Action would not have any changes to cold water pool volume and therefore, would not have any additional effect on Reclamation's ability to meet downstream fisheries requirements. Because the implementation of these water service contracts was found not to affect Folsom Reservoir operations, it is reasonable to conclude that implementation of the Proposed Action would not result in any new effects to Reclamation's operation of Folsom Reservoir or management of the cold water pool, as this is a renewal for ongoing operations within the CVP.

The contract quantity was included in the impact analysis presented in the 2008/2009 BOs from the FWS and the NMFS, respectively, on the Continued LTO of the CVP and the SWP. In addition, this action is also in accordance with Section 3404(c) of the CVPIA; in which the Final PEIS and Programmatic CVPIA BO were released in October 1999 and November 2000, respectively. The PEIS addressed the implementation of the CVPIA and the continued operation and maintenance of the CVP (incremental and cumulative effects). The impact assessments for the CVPIA PEIS and the 2008/2009 BOs including the full deliveries, were able to adequately address the hydrologic, operational, and system-wide cumulative conditions expected under the future conditions.

The Proposed Action does not require the construction of any new facilities, the installation of any new structures, or the modification of existing facilities. With implementation of the Proposed Action, CVP reservoir storage and operations, surface water elevations, and release patterns would not change. The Proposed Action would not result in impacts to water resources.

3.4 Facility Operations

3.4.1 No Action

Under the No Action Alternative, Reclamation would continue to operate the CVP consistent with all requirements as described in the 2008/2009 BOs from the FWS and NMFS, respectively on the Continued LTO of the CVP and SWP. This includes the RPAs contained in the 2008/2009 BOs from the FWS and NMFS, respectively on the Effects of the Coordinated Operations of the CVP and SWP to federally listed species. Potential impacts to CVP facilities

and CVP operations resulting from the implementation of the 2008/09 BOs were analyzed in Chapter 5 of the 2016 LTO EIS, and these results are contained in Table 5.115 (pp 5-623-5-624) of the 2016 LTO EIS. The findings in this document are hereby incorporated by reference (Reclamation 2016).

City of Roseville

Implementation of the No Action Alternative would mean that the existing IRC with Roseville would expire in February 2019. Reclamation would not enter into an IRC with Roseville. The up to 32,000 AFY of CVP water would not continue to be delivered to Roseville from the existing diversion points at Folsom Dam. Roseville's surface water demand would remain the same as under current conditions and under the Proposed Action Alternative.

Sacramento Municipal Utility District

Implementation of the No Action Alternative would mean that the existing IRC would expire in February 2019 and SMUD would not have a contract mechanism for up to 30,000 AFY of CVP to be delivered through FSC to flow to SMUD facilities at Rancho Seco in the south eastern portion of Sacramento County. SMUD would not have a contract mechanism for delivery of their CVP water. SMUD would likely continue to meet demands within their Rancho Seco service area through the use of non-CVP surface water supplies, as described in Chapter 1.

Deliveries of non-CVP water through the FSC to SMUD have been analyzed under separate environmental documents.

Sacramento County Water Agency

Implementation of the No Action Alternative would mean that the existing IRC would expire in February 2019 and SCWA would not have a contract mechanism for delivery of up to 30,000 AFY of CVP water to SCWA's Zone 40 site. The No Action Alternative assumes that water demands in SCWA's CVP service area would be met with non-CVP supplies or other CVP supplies. This is supported by other sources of water available to SCWA for use in their Zone 40 service area, including their Fazio contract, groundwater supplies and recycled water supplies. SCWA's surface water demand would remain the same as under current conditions and under the Proposed Action Alternative.

3.4.2 Proposed Action

Under the Proposed Action, Reclamation would execute IRCs for the contracts listed in Table 1 for a two year period (March 1, 2019 through February 28, 2021) to provide a contractual mechanism for the delivery of CVP supplies from Folsom Reservoir, for the quantities listed in Table 1.

The 2016 LTO EIS included analysis to evaluate potential impacts to Folsom Reservoir operations and Reclamation's management of the cold water pool with implementation of Roseville's CVP supply. This analysis indicates that the Proposed Action would not have any changes to cold water pool volume and therefore, would not have any additional effect on Reclamation's ability to meet downstream fisheries requirements. Because the implementation of these water service contracts was found not to affect Folsom Reservoir operations, it is reasonable to conclude that implementation of the Proposed Action would not result in any new

effects to Reclamation's operation of Folsom Reservoir or management of the cold water pool, as this is a renewal for ongoing operations within the CVP.

The contract quantities were included in the impact analysis presented in the 2008/2009 BOs from the FWS and the NMFS, respectively, on the Continued LTO of the CVP and the SWP. In addition, this action is also in accordance with Section 3404(c) of the CVPIA; in which the Final PEIS and Programmatic CVPIA BO were released in October 1999 and November 2000, respectively. The PEIS addressed the implementation of the CVPIA and the continued operation and maintenance of the CVP (incremental and cumulative effects). The impact assessments for the CVPIA PEIS and the 2008/2009 BOs including the full deliveries, were able to adequately address the hydrologic, operational, and system-wide cumulative conditions expected under the future conditions.

The Proposed Action does not require the construction of any new facilities, the installation of any new structures, or the modification of existing facilities. With implementation of the Proposed Action, CVP reservoir storage and operations, surface water elevations, and release patterns would not change. The Proposed Action would not result in impacts to water resources.

3.5 Cumulative Impacts

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

The Proposed Action is a continuation of current CVP water conveyance and implementation of this action would be the continuation of existing conditions. The CVPIA PEIS includes the full contract deliveries in the assumptions regarding future use. By including full contract deliveries, these impact assessments were able to adequately address the hydrologic, operational, and system-wide cumulative conditions expected under future conditions. The analyses also indicated that future projects, including future water transfer projects, may improve CVP water supply reliability. These types of programs would modify water supply reliability, but not change LTWSC amounts or deliveries from within the historical ranges.

Additionally, full contract deliveries for this Proposed Action were included in the analysis of the 2016 LTO EIS, and is considered to be a continuation of current operations. Reclamation has determined that the Proposed Action has been adequately addressed in the Cumulative Effects analysis for the 2016 LTO EIS. A detailed description of the 2016 LTO EIS cumulative effects for water supply is described in Table 5.117 (pp. 5-276-78) of the 2016 LTO EIS (Reclamation, 2016).

The Proposed Action, when added to other past, present, and reasonably foreseeable future actions, would not result in additional cumulative effects to the surrounding environment, CVP operations, Folsom Reservoir operations, water supply or hydropower.

Section 4 Consultation and Coordination

This section presents the agencies and parties that were coordinated or consulted with during development of the document, the applicable federal, State and local requirements the project will comply with, and the distribution list.

It is reasonable to assume that the 2008 and 2009 BOs, and proceeding BOs have properly identified and analyzed biological impacts associated with the movement of this water through Folsom Reservoir. Furthermore, the 2008/2009 BOs provided additional analyses for the movement of this water and RPAs developed by NMFS and FWS allowed for continued and ongoing operation of the CVP. Therefore, renewal of this contract is seen as an administrative action and not a new action that will hinder current operations in managing Folsom Reservoir or the Lower American River.

The 2008 FWS BO and 2009 NMFS BO for the LTO of the CVP and SWP issued RPAs to ensure that project related effects on protected species and their habitats are ameliorated to the extent possible.

4.1 Public Review Period

Reclamation intends to provide the public with an opportunity to comment on the Finding of No Significant Impact (FONSI) and Draft EA during a 30-day public review period. The EA was posted for public review and comment from November 1, 2018 to November 30, 2018 on Reclamation's NEPA document website (<https://www.usbr.gov/mp/nepa/>). Reclamation received no comments.

4.2 Endangered Species Act (16 U.S.C. § 1531 et seq.)

Section 7 of the ESA requires Federal agencies, in consultation with the Secretary of the Interior and/or Commerce, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species, or result in the destruction or adverse modification of the critical habitat of these species.

The Proposed Action is consistent with: (1) CALFEDs 2000 Ecosystem Restoration Program Plan (ERPP) and Multi-Species Conservation Strategy (MSCS); (2) the programmatic determinations for the CALFED program, which include California Department of Fish and Wildlife's (CDFW) Natural Community Conservation Planning Act (NCCPA) approval and the 2009 NMFS, 2008 USFWS and 2004/2005 BOs; (3) USFWSs 1997 Draft Anadromous Fish Restoration Program (AFRP), which identifies specific actions to protect anadromous salmonids; (4) CDFWs 1996 Steelhead Restoration and Management Plan for California, which identifies specific actions to protect steelhead; and (5) CDFWs Restoring Central Valley Streams, A Plan for Action (1993), which identifies specific actions to protect salmonids.

4.3 National Historic Preservation Act (16 U.S.C. § 470 et seq.)

The NHPA of 1966, as amended (16 U.S.C. 470 et seq.), requires that federal agencies give the Advisory Council on Historic Preservation an opportunity to comment on the effects of an undertaking on historic properties, properties that are eligible for inclusion in the National Register. The 36 CFR Part 800 regulations implement Section 106 of the NHPA.

Section 106 of the NHPA requires federal agencies to consider the effects of federal undertakings on historic properties, properties determined eligible for inclusion in the National Register. Compliance with Section 106 follows a series of steps that are designed to identify interested parties, determine the APE, conduct cultural resource inventories, determine if historic properties are present within the APE, and assess effects on any identified historic properties.

Reclamation has considered the potential effects on cultural and historic resources resulting from the Proposed Action. The cultural resources compliance memorandum is contained in Appendix A.

Section 5 References

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U.S. Bureau of Reclamation (Reclamation). June 2005. Long-term Renewal of the American River Division water service contract.

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U.S. Department of the Interior. Bureau of Reclamation, U.S. Fish and Wildlife Service, Sacramento, California. Central Valley Project Improvement Act Programmatic Environmental Impact Statement, October 1999.

U.S. Fish and Wildlife Service (USFWS). December 15, 2008. Biological Opinion on the Continued Long-term Operations of the Central Valley Project and the State Water Project.

Appendix A: Cultural Resources

Compliance Memo

CULTURAL RESOURCES COMPLIANCE Division of Environmental Affairs Cultural Resources Branch (MP-153)

MP-153 Tracking Number: 18-CCAO-191

Project Name: Central Valley Project Interim Renewal Contracts for City of Roseville, Sacramento Municipal Utility District, and Sacramento County Water Agency 2019-2021

NEPA Document: CCAO-EA-18-04

NEPA Contact: Sarah Perrin, Natural Resource Specialist

MP 153 Cultural Resources Reviewer: Scott Williams, Archaeologist *SW*

Date: September 28, 2018

Reclamation proposes to enter into a 24-month IRC with the City of Roseville, an American River contractor, to provide Roseville with an interim CVP contract for up to 32,000 AFY of CVP water for M&I use in Roseville's CVP service area. Roseville has four IRCs previously executed following the expiration of the previous long-term water service contract. The Proposed Action is the fifth IRC for Roseville. This is the type of undertaking that does not have the potential to cause effects to historic properties, should such properties be present, pursuant to the NHPA Section 106 regulations codified at 36 CFR § 800.3(a)(1). Reclamation has no further obligations under NHPA Section 106, pursuant to 36 CFR § 800.3(a)(1).

City of Roseville

Reclamation proposes to enter into a 24-month IRC with the City of Roseville, an American River contractor, to provide Roseville with an interim CVP contract for up to 32,000 AFY of CVP water for M&I use in Roseville's CVP service area. Roseville has four IRCs previously executed following the expiration of the previous long-term water service contract. The Proposed Action is the fifth IRC for Roseville.

Sacramento Municipal Utility District

Reclamation proposes to enter into a 24-month IRC with SMUD, an American River contractor, to provide SMUD with an interim CVP contract for up to 30,000 AFY of CVP water for M&I uses in SMUD's Rancho Seco service area. SMUD has three IRCs previously executed following the expiration of the previous long-term water service contract.

Sacramento County Water Agency

Reclamation proposes to enter into a 24-month (fourth) IRC with SCWA to provide SCWA with an interim CVP contract for up to 30,000 AFY of CVP water for M&I use in SCWA's CVP service area.

The term of all three IRCs would be from March 1, 2019 through February 28, 2021. In the event new long-term water service contracts are executed, the IRCs, then-in-effect, would be superseded by the long-term water service contracts and analyzed under a separate environmental review process. There will be no changes to all three contractor's CVP service

areas and no construction is required as part of the Proposed Action. Changes to the CVP service areas would be separate federal actions and require separate environmental documentation.

This document is intended to convey the completion of the NHPA Section 106 process for this undertaking. I concur with item 8 that this action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)). Please retain a copy in the administrative record for this action. Should changes be made to this project, additional NHPA Section 106 review, possibly including consultation with the State Historic Preservation Officer, may be necessary. Thank you for providing the opportunity to comment.