

Soil and Water - APPENDIX I

GROUNDWATER MITIGATION PLAN

Groundwater Monitoring

This groundwater monitoring program was provided in Attachment 5 of the Project Design Refinements (DB2009r) submitted to the CEC by the applicant in June 2009. As proposed by the applicant, the following describes the groundwater mitigation plan to be incorporated if the use of site groundwater is approved by CEC for power plant operation.

Proposed Groundwater Monitoring Program

To provide for land owner protection and participation in evaluation of project impacts, a Fremont Valley Groundwater Monitoring Committee will be formed. The committee will include a representative from the following:

- California City
- Community of Cantil
- Rancho Seco
- Honda
- Beacon Solar LLC

The monitoring committee's function will be to implement and oversee the groundwater monitoring program and to verify that there are no unacceptable impacts to groundwater levels or quality in water supply wells adjacent to the BSEP.

Gather Historic Water Level and Water Quality Data

- Secure access, if authorized by the land owner, for the purpose of monitoring of water levels and water quality for those water supply wells predicted by the numerical groundwater model to experience a change of 10 feet or more in its water level by comparison to the non-Project condition over the term of the project (30 years).
- Through the access agreement, obtain all historic water level and water quality data for each water supply well identified by the model. Additionally, obtain well completion information, historic well performance data, including pumping and non-pumping water levels and pump specifications for each well to be monitored.
- Update the application for certification (AFC) water level and geochemical and water level database with all new information.

- Prepare time series graphs (i.e., trend plots) for water level and total dissolved solids (TDS) data, as information is available for each well.
- Perform statistical trend analysis using Mann-Kendall Trend Test and Sen's Slope Estimator for water levels and the TDS data. The Mann-Kendall Trend Test and the Sen's Slope Estimator are proposed to statistically analyze the data because they are the accepted non-parametric trend analysis methods for data that are not normally distributed. Use trend analysis to determine the significance of an apparent trend and to estimate the magnitude of that trend. Further, use adjacent well data to evaluate local affects from pumping in water level trends.

Establish Pre-Project Baseline Water Quality and Water Level Database

- To the extent possible, prior to project construction collect groundwater levels from the off-site and on-site wells to evaluate groundwater levels in the area of wells that could be impacted by project pumping as indicated by the model. Additionally, collect groundwater samples to provide baseline TDS data for both on-site and off-site wells. Analyze TDS samples using Standard Methods 2540C by a California Certified Analytical Laboratory.
- Map TDS data and groundwater levels within the Koehn Sub-basin from the groundwater data collected prior to construction. Update trend plots and statistical analyses, as data is available.

Groundwater Monitoring During Construction

- During construction, collect water levels on a quarterly basis for a period of one year or on a quarterly basis through the construction period, and collect TDS data at the end of the construction period and prior to site operations.

Groundwater Monitoring During Operation

- On a quarterly basis for the first five years, collect water level measurements from the wells and collect TDS data to evaluate operational influence from the project. Additionally, monitor quarterly operational parameters (i.e., pumping rate) of the water supply wells.
- After a period of five years, on a well-by-well basis, evaluate the data and determine if the sampling frequency and TDS sampling should be revised or eliminated.
- Subsequently, evaluate the data set every five years and determine if the sampling frequency and TDS sampling should be revised or eliminated.

Proposed Mitigation Options

Water Level Offset Mitigation Options

Based on the results of the statistical trend analyses, determine if the project pumping has induced a drawdown in the water supply at a level of five feet or more below the baseline trend. If water levels have been lowered below pre-site operational trends, then implement any of the following options, as appropriate and considering the cost effectiveness of each option.

- Electrical cost reimbursement – If the pumping water level falls below a depth of 5 feet from an average of the baseline measurements, the well owner will be compensated for the additional electrical costs commensurate with the additional lift required to pump. The water level in the well will be assessed relative to the pumping rate during pre-site operational period.
- Pump lowering – In the event that groundwater is lowered and existing pumps are day lighted, pumps can be lowered to maintain production in the well.
- Deepening of wells – If the groundwater is lowered enough that there is insufficient water in the well and pump lowering is not an option, then wells can be deepened.

Groundwater Storage Mitigation Options

Expected groundwater usage during BSEP operation is estimated to be 1,388 acre feet per year (AFY). Options to offset that water consumption include implementation of a partial ZLD and tamarisk removal program, which are described in the Project Design Refinements (DB 2009r). The project owners shall develop in coordination with Bureau of Land Management and other stakeholders, a voluntary tamarisk removal program. This program will initially identify areas of tamarisk infestation, provide annual funding for tamarisk eradication and will be implemented in conjunction with site groundwater extraction.

