July 30, 2015

Thaddeus L. Bettner, General Manager  
Glenn-Colusa Irrigation District  
P.O. Box 150  
Willows, CA 95988

Re: Groundwater Supplemental Supply Project

Dear Mr. Bettner:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Glenn-Colusa Irrigation District’s (District) Proposed Groundwater Supplemental Supply Project (Project). It is our understanding from the DEIR that this project will allow the installation of five new groundwater production wells to be used in conjunction with the five existing wells currently owned by the District to supplement the District’s surface water supplies during dry and critically dry years.

Table ES-1 provides a summary of impacts and mitigation measures for the Project and Section 3.1, Impact WR-2, discusses the potential for the depletion of aquifer volume or lowering of local groundwater levels such that the yield of existing wells is substantially reduced, rendering the existing wells incapable of supporting their existing land use. The DEIR lists this as a significant impact and discusses the implementation of a groundwater level monitoring program as mitigation to reduce this type of impact. In light of the Project’s proximity to the northwestern border of our county, the County of Butte feels that the mitigation measure to reduce impacts is insufficient to protect our residents. We assert that the goal of the District should be to eliminate the lowering of groundwater levels within Butte County associated with the Project and the mitigation should appropriately address it.

Another impact discussed in Table ES-1 is related to the potential for land subsidence. Impact WR-4 states that the project could result in substantial, permanent land subsidence that would adversely affect critical infrastructure such as wells or levees. Once again, the District’s approach to mitigation for land subsidence associated with the project would be the creation of a monitoring program to evaluate and assess potential changes in groundwater levels that may result in land subsidence. Since land subsidence has the potential to permanently alter the landscape and destroy valuable infrastructure, the County of Butte believes that the mitigation proposed is insufficient to protect our residents. We believe that the potential for land subsidence should be
carefully studied prior to the development of new production wells that could exacerbate the situation.

Finally, the County is concerned about the use of these wells for other purposes, such as a future groundwater substitution water transfer, which would move groundwater outside of the region. We have an ordinance requiring a permit for this type of water transfer from within Butte County and oppose the concept of transferring local groundwater to meet statewide water demands. Once these wells are developed, we are concerned that the District would use them for this purpose. In light of their proximity to our border, this type of water transfer could potentially cause or increase negative impacts to the residents of Butte County, such as those discussed above.

The project description states that the new wells will be used to increase system reliability and flexibility; to protect and maintain agricultural production in times of water shortage; to periodically reduce Sacramento River diversions to benefit migrating fish; and to offset reductions to the District's Settlement Contract diversions during drought years. Any other use of these wells is strongly opposed by Butte County.

In conclusion, the Butte County Board of Supervisors is concerned about the Glenn-Colusa Irrigation District Groundwater Supplemental Supply Project due to its potential to lower groundwater levels and/or cause permanent land subsidence within Butte County, which would have a negative impact on the residents of Butte County. In addition, the County of Butte is apprehensive about the incorporation of these groundwater wells into a future groundwater substitution transfer program, which we believe sets a precedent for other areas of the state to the detriment of our local economy.

Once again, thank you for the opportunity to comment on the DEIR for the District’s Proposed Groundwater Supplemental Supply Project. Any questions associated with these comments should be addressed to Paul Gosselin, Director of Water and Resource Conservation at (530) 538-3804 or pgosselin@buttecounty.net.

Sincerely,

Doug Teeter, Chair
Butte County, Board of Supervisors