

Butte Environmental Council



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Endangered Species Faire
Bidwell Park Cleanups
Chico Area Creek Cleanups
Wetlands Preservation

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July 15, 2013

Thermalito Water and Sewer District
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P.O. Box 9259, Chico, CA 95927
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Subject: Proposed 2013 Surface Water Transfer

Butte Environmental Council (BEC) opposes Thermalito Water and Sewer District's (TWSD) proposed surface water transfer of 2,500 acre-feet from Concow Reservoir to Westland Water District. TWSD's proposal is one of many that will transfer over 196,000 acre-feet of water from the Sacramento River watershed during the summer months in 2013. The location, magnitude, and impact of these many transfers will be impossible to quantify and will proceed on a piecemeal basis. While the TWSD transfer does not involve groundwater substitution, the District relies heavily on groundwater during the proposed period of transfer (according to the 2013 Butte County Grand Jury Reportⁱ, up to 34% of the District's supply is currently pumped from four wells).

BEC's policy statement regarding water identifies our concerns for our water resources. Specifically, we believe that County citizens should have control over local resources; that our water resources must be protected for future generations; and that our water resources should not be transferred out of the area to address misuse, waste, and over-allocation elsewhere in the state.

Butte County's watersheds, streams, and rivers must be controlled by Butte County residents, not external special interests. Northern California's watersheds should be protected for future generations, and its ground and surface water must not be exported to solve problems created by misuse, over allocation and waste outside our borders. Rather, we must focus on protecting clean water originating from the region and ensuring water for future generations.

Local control over local resources

Review of the TWSD website shows that this water transfer proposal was not made public during District Board meetings April through June 2013. In fact, there is no evidence on this site that such a proposal has been initiated by the District's Board of Directors and submitted to the State Water Resources Control Board. At what point did the District notify the public within the Concow watershed, the community of Thermalito, and the City of Oroville that this water transfer proposal was under consideration? Please provide a copy of all public notices referencing the District's consideration of this water transfer proposal for 2013.

Protection for future generations

The California Environmental Quality Act (CEQA) provides for disclosure of a

proposed project's potential adverse impact on the environment. An initial study and subsequent report allows agencies and the public to review the underlying criteria used in such an evaluation and provide comment. BEC requests copies of environmental documents prepared pursuant to CEQA for this transfer proposal.

Misuse, over allocation, and waste

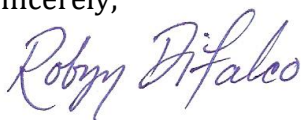
TWSD's proposal has the potential to transfer 125% of its annual average consumption (approximately 2000 acre-feet) out of this hydrologic region to Westlands Water District. It is inconceivable how the District can assert the transfer of water from a region rich in terrestrial and aquatic diversity to a region devoid of both is consistent with the public welfare. Transferring water to the desert via the California Aqueduct is a great waste: it has been estimated that over 47% of the water flowing through the Aqueduct is lost to evaporation. Westlands' conveyance agreement letter assumes 30% of the transferred water is lost due to 'operations' known as carriage losses. The District's actions surrounding this proposal are reprehensible and fail to conserve the public trust of this precious resource. ⁱⁱ

The purpose of the petition is to authorize the temporary transfer of water from the District to Westlands Water District ("Westlands") during July 1 through September 30 of 2013, to provide an additional water supply for irrigation purposes. This proposed transfer is pursuant to and would effectuate the State's policy of encouraging voluntary transfer of water and water rights by using water in an efficient manner consistent with the public welfare as described in Water Code section 109.

BEC requests that TWSD withdraw their proposal to transfer 2500 acre-feet of water to Westlands Water District. We request to be notified of any public hearings or environmental review documents associated with this proposal. This decision subverts the democratic process that allows County citizens control over local water resources; flouts all procedures afforded future generations for protection of those water resources; and blatantly subjects County water resources to misuse and waste.

We thank you for your consideration. If you have questions please contact me or Carol Perkins, Water Policy Advocate, Butte Environmental Council.

Sincerely,



Robyn DiFalco, Executive Director
robbynd@becnet.org

cc:

State Water Board
Thermalito Water And Sewer District Board
Butte County Board of Supervisors
Butte County Water and Resource Conservation
AquAlliance

ⁱ 2012-2013 Butte County Grand Jury Report – Water: Butte County's Vital Resource, p.94.

ⁱⁱ Petition for Temporary Change Involving Water Transfers (Application 1739), Thermalito Water and Sewer District, cover letter, p. 1.