

May 14, 2013

Butte Environmental Council



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

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To the Members of the NSV IRWM Executive Committee,

This is a letter of endorsement for Mr. St. Amant's proposed voluntary moratorium on out-of-region water transfers (letter dated May 2, 2013). Butte Environmental Council (BEC) supports the request to place Mr. St. Amant's proposal on the June 3rd Board agenda. This proposal has provided a comprehensive set of tools that enables this Board to influence water policy regardless of administrative boundaries and statutory authority. The presence of this item on the Board agenda provides an extraordinary opportunity for a regional discussion worthy of our most precious public interest resource.ⁱ

Groundwater is a common shared resource with public interest at the core of its use, management and protection. BEC opposes the pumping of groundwater as a substitute upon the sale of surface water. Approximately 25,500 AF of water could be transferred out of the six county region as a result of multiple "willing sellers."ⁱⁱ The same counties that pledged voluntary cooperation and coordinated water policy planning under the NSV IRWMP. Any shift from surface to ground water is in essence conjunctive use of water that lacks common sense oversight of a comprehensive management program.^{iii,iv} BEC believes this is an example of the type of out-of-region conjunctive use that citizens and this Board opposed when adopting the Goals and Objectives of the NSV IRWMP. A use that is not sustainable for NSV water resources and that could adversely affect the ability of this region to meet its own water needs. This type of conjunctive use is the reason the term was removed from the NSV IRWMP foundational Goals and Objectives.

We believe that all transfers of public water out of the region must involve the public, as owners of California's water resources. And as such, any program that purports to work collaboratively must allow the public the determining role in the development and adoption of all policy addressing water use. To that end, BEC recognizes this Board as the one regional entity that provides the most inclusive voice of the Northern Sacramento Valley hydrologic region and its people.

Similar to what Robin Huffman stated in her February 2012 letter to West Yost Associates and Vickie Newlin, local planners should be advising and informing the State and in this case the federal government of the condition of the local water system. We cannot leave it to those agencies to exercise the aquifer as some sort of test of its efficacy for south of Delta water needs. That is not in the best interest of this region, and certainly not for the state of California. The NSV region is the state's headwaters with 86% of developed water flowing from this region. By sheer number and financial backing, entities outside the area will get more North State water unless local water is managed locally. We are dependent on the variable surface and groundwater supplies of this region and we must act responsibly as the stewards' of these natural water systems. BEC urges you to consider this proposal for placement on the June 3rd agenda to allow a collaborative, open discussion about the protection of our water resources.

Sincerely,

Robyn DiFalco
Executive Director, Butte Environmental Council

Table 2-1. Potential SRS Contract Sellers (Upper Limits)

	Acre feet
Water Agency (County)	Groundwater Substitution
Sacramento River Area	
Anderson-Cottonwood Irrigation District (Shasta)	2,400
Conaway Preservation Group (Yolo)	8,000
Eastside MWC (Colusa)	1,100
Glenn-Colusa Irrigation District (Glenn and Colusa)	5,000
Pelger MWC (Sutter)	1,730
Pleasant Grove-Verona MWC (Sutter)	8,100
Reclamation District 1004 (Glenn and Colusa)	7,175
Sacramento River Ranch (Yolo)	4,000
Totals	37,505

ⁱ NSV IRWMP statement of intent: “To establish a regional collaborative structure with the objective of ensuring an affordable, sustainable water supply that supports agricultural, business, environmental, recreational, and domestic needs of the Northern Sacramento Valley.”

ⁱⁱ See table on following page. Draft Environmental Assessment, 2013 Water Transfers. (Available at http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=13310)

ⁱⁱⁱ “In areas that lack reliable data to analyze groundwater conditions, the goal to better manage the resource will likely remain unattainable. In the absence of data and analysis, also ineffectual will be the goal of effectively using conjunctive management of groundwater.” (Available at <http://www.waterplan.water.ca.gov/docs/cwpu2013/workteams/charters/groundwater-charter.pdf>)

^{iv} “Conjunctive water use is often incidental as water users intuitively shift between surface water and groundwater sources to cope with changes and shortages. [But] it is also possible for conjunctive use to unintentionally harm the groundwater basin and other groundwater users who are not involved in conjunctive use . . .”

“An alternative to conjunctive water use is conjunctive water management. The difference between the two is more than semantics. Conjunctive water management engages the principles of conjunctive use... But, it also includes important components of groundwater management such a monitoring, evaluation of monitoring data to develop local management objectives, and use of monitoring data to establish and enforce local management policies. Scientific studies are needed to support conjunctive water management. ...to understand the geology of aquifer systems, how and where surface water replenishes the groundwater, and flow directions and gradients of groundwater.”

Fulton, Allan and Dudley, Toccoy. “Conjunctive Water Management: What is it? Why consider it? What are the challenges?” University of California Cooperative Extension, Tehama County, February 2006, p. 1. (Available at <http://ceteama.ucdavis.edu/files/20596.pdf>)