

February 4, 1998

Mr. Les Gerton
6 Glacier Peak Street
Chico, California 95973

Dear Mr. Gerton:

Recently you contacted CALFED Bay-Delta Program with a proposal to construct a water well on your residential property to extract groundwater and discharge it into Sycamore Creek. Your stated intent is to: 1) augment instream flow for the benefit of fisheries, and 2) sell the water to a downstream buyer. Anthony Saracino, CALFED consultant, and Carl Hauge, Department of Water Resources, visited Sycamore Creek and the site of your proposed well to evaluate your water transfer proposal.

Although CALFED currently is not evaluating small-scale projects that involve the direct transfer of groundwater, your project raises a number of issues that may be relevant to other projects. Others may also wish to develop similar projects that involve the export or transfer of groundwater. CALFED's groundwater outreach program has identified many of the issues surrounding conjunctive use and groundwater transfers and Anthony Saracino, our outreach consultant, has prepared a summary report. A copy of the report is included with this letter.

Specific questions that must be answered include the following:

- 1) What are the potential third-party impacts associated with this project? An assessment and inventory of potential third-party impacts should be conducted. CALFED believes these impacts need to be identified and fully addressed prior to the implementation of a groundwater project. A discussion of third-party impacts is contained in the outreach report. CALFED supports a public process to allow input from neighbors and the community regarding their concerns about potential impacts. Additionally, an appropriate monitoring program, designed to detect potential impacts, should be part of the project.
- 2) What effect will pumping have on groundwater levels and nearby wells? A municipal well is located within about 1000 feet from the proposed well site. It will be very important to determine the potential effects of pumping on groundwater levels and on the municipal well.
- 3) What effect will pumping have on stream flows? Given the proximity of the proposed well to Sycamore Creek, it will be important to determine whether groundwater pumping will reduce flow in the creek because the creek may provide water to the aquifer. If flow reduction does occur, all of the water pumped into the creek may not be "new water."

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- 4) What will be the net increase in instream flow and will this volume benefit fisheries? This question is related to question number 3. Streambed infiltration rates should be measured so that the net increase in instream flow can be calculated. These data should be evaluated to determine whether the net flow increase will have any benefit to fisheries.
- 5) Have qualified biologists determined that the fishery(s) in Sycamore and Mud Creeks is viable and that increased water flow will enhance it?
- 6) What is the likely capacity of the well to be constructed? The well capacity will determine the amount of water available to pump into the creek.
- 7) Butte County ordinances regarding water transfers should be addressed. Butte County recently adopted Measure G, which requires a permit for the transfer of groundwater.

CALFED welcomes creative suggestions that, if implemented, will lead to "new" water supplies or improvements in managing existing supplies. However, as the above questions make clear, there are many issues surrounding groundwater and transfers that must be evaluated in an open, public process to ensure equity and consistency with CALFED principles. We anticipate that CALFED will be working in a partnership with the Counties and Water Agencies in the Sacramento Valley to establish such a process within the next year or so. Meanwhile we will keep your proposal in mind as we further develop our program. If you have any questions, please contact me at the above address or phone (916) 657-2666.

Sincerely,



Stein Buer
Assistant Director

cc: Anthony M. Saracino
Carl Hauge
Susan Tatayon
John Fielden

bcc: Lester Snow
Steve Yaeger
Judy Kelly
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