

NORTHERN SACRAMENTO VALLEY CALFED ADVISORY GROUP

July 7, 1997

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Mr. Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, California 95814

**Re: CALFED Formal Response to Concerns Expressed By
Northern Sacramento Valley CALFED Advisory Group**

Dear Mr. Snow:

On Thursday, June 26, 1997 approximately 100 people attended a Storage and Conveyance workshop in Red Bluff. This meeting was coordinated by Anthony Saracino (consultant for CALFED) and the Northern Sacramento Valley CALFED Advisory Group. We would like to extend our thanks to Anthony for his efforts, and also acknowledge the participation and presentations delivered at the meeting by Anthony, Stein Buer, Steve Yaeger and Mark Cowin (CALFED), and Carl Hauge (Department of Water Resources).

At the June 26 meeting, mention was made to Steve Yaeger of the fact that, to date, a formal response has not been received from CALFED relative to concerns noted in two previous papers personally submitted to you by the Group on December 17 in Willows and on May 1 in Corning. Although the efforts shown by CALFED personnel relative to meeting with Group representatives are appreciated, many participants have expressed concern about the lack of formal response by CALFED to the written documents previously submitted by our organization.

At this time, we would like to formally request a written CALFED response to the concerns noted in the Key Position Statements delivered to you in Willows on December 17, 1996. These concerns require CALFED acknowledgment and action relative to the following statements:

1. New surface water facilities must be emphasized over groundwater banking and conjunctive use by CALFED.
2. Conjunctive use should only be pursued after associated upstream surface storage facilities are first developed.
3. CALFED must formally recognize that proposed transfers involving groundwater must comply with city and county ordinances and the appropriate groundwater management regulations of local public water agencies.
4. CALFED must formally recognize and incorporate the current protection provided to northern valley water users through existing water rights, area of origin and the Watershed Protection Act.
5. The CALFED financial plan must include significant financial commitments from state and federal agencies.
6. Proposed CALFED environmental restoration efforts must be accomplished with strong local input.
7. CALFED alternatives that recommend the purchase of farmland or fallowing are less desirable or unacceptable.
8. The CALFED process must employ the techniques of "good science" and avoid "conclusion-driven"

methods to support decision - making. The CALFED preferred alternative should propose actions which will effectively address the water supply problems of the entire state in addition to the more limited scope defined by Bay-Delta issues.

We also request a written CALFED response to the committee recommendations delivered to you on May 1 in Corning. These recommendations, which essentially derive from the general statements made above, include the following:

FLOOD MANAGEMENT COMMITTEE

Specific concerns applicable to the entire CALFED study area include the following:

1. **CALFED must construct upstream storage of surface water in the Sacramento Valley, with attendant flood control features..**
2. **The impacts associated with the development of setback levees must be closely scrutinized by CALFED.**
3. **CALFED agencies must develop assurances or a "safe harbor" program that will encourage landowners to participate in the development of habitat enhancement programs.**
4. **Northern Sacramento Valley landowners and businesses must be assured that CALFED ecosystem restoration efforts will not threaten essential facilities at critical locations.**

CALFED must address several unique issues which directly relate to the Sacramento River proper. These issues include the following:

1. **The establishment of a Conservation Area committee, similar to that proposed by the SB 1086 Advisory Council, controlled and managed by the local stakeholders, should be retained by CALFED.**
2. **CALFED must establish responsibility for potential liability caused by "limited meander".**
3. **The permitting process must be streamlined and a mechanism provided for funding of authorized flood control and bank protection works on the Sacramento River and its tributaries. CALFED, as a multi-agency organization, is in an excellent position to effectively streamline and refine the environmental permitting process on the Sacramento River.**

GROUNDWATER COMMITTEE

1. **The CALFED preferred alternative should propose actions which will effectively address the water supply problems of the entire state in addition to the more limited scope defined by Bay-Delta issues.**
2. **Conjunctive use definitions and programs proposed in the current CALFED planning process must prove to be reliable and consistent upon actual implementation.**
3. **Upstream storage of surface water on the west side of the northern Sacramento Valley must be constructed before implementing a statewide "conjunctive use" program that proposes to evacuate and export local groundwater during dry years.**
4. **CALFED must assure northern Sacramento Valley water users that their proposed groundwater programs will adhere to local groundwater management plans, monitoring programs, and city and county groundwater ordinances.**

Specific actions to address local concerns must be developed and implemented by CALFED in a timely and committed manner.

5. **CALFED must assess the combined impact of all proposed groundwater substitution / groundwater banking / conjunctive use programs on the northern Sacramento Valley.** Total combined annual conjunctive use / groundwater banking / groundwater substitution for the CALFED and DWR Supplemental Water Purchase programs in the Sacramento Valley could approach 700,000 acre-feet. Currently, approximately 2,000,000 acre-feet of groundwater are extracted annually from the entire valley. The proposed maximum additional extractions from both programs are very significant. Further, how does the CVPIA Water Acquisition Program tie into CALFED?

Potential impacts from the proposed additional groundwater extraction programs that must be assessed by CALFED include: A. Subsidence B. Permanent decline of groundwater levels (mining) C. Surface water / groundwater interaction and the impacts to surface supplies (i.e. Sacramento River and its tributaries) D. Decline in groundwater quality. E. Significant drop in summer groundwater levels.

All of these impacts should be evaluated by factoring into the assessment the importance of ultimate water needs, existing water rights and Area of Origin priority of northern Sacramento Valley counties.

Future growth and urban expansion in the northern Sacramento Valley will depend on groundwater for its water supply. An "ultimate needs" analysis should be completed for the entire region to determine if there is groundwater available for export before considering future demands in the area.

These impacts must be fully addressed by CALFED immediately, before implementation of any proposed conjunctive use programs.

STORAGE AND CONVEYANCE COMMITTEE

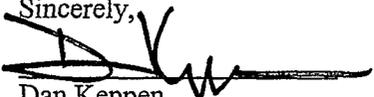
1. **CALFED must construct facilities for upstream storage of surface water in the Sacramento Valley.**

The storage and conveyance component inventory recently released by CALFED identifies several other surface storage facilities on the west side of the valley which also merit serious consideration by CALFED. These projects include Cottonwood Creek, Red Bank, Glenn Reservoir, and the Thomas- Newville complex. In addition to these locations and the large Sites project, CALFED should also evaluate the development of smaller reservoirs in western Yolo County, along Oat Creek, Sand Creek and Wilson Creek.

2. **The CALFED conveyance scheme should include the extension/expansion of the existing Tehama-Colusa Canal system.**

Thank you for your continued consideration of our concerns. We look forward to receiving your written response. If you have any questions relative to this letter, please do not hesitate to contact our office at (916)-385-1462.

Sincerely,


Dan Keppen

Water Resources Engineer - Tehama County Public Works
9380 San Benito Avenue Gerber, California 96035
Northern Sacramento Valley CALFED Advisory Group

cc: All Group Participants
Senator Barbara Boxer
Congressman Vic Fazio
Senator Dianne Feinstein
State Senator Maurice Johannessen
Assemblyman Tom Woods
Tehama County Board of Supervisors