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October 14, 2014

Brad Hubbard  
Bureau of Reclamation  
2800 Cottage Way, MP-410  
Sacramento, CA 95825

Subject: Draft EIS/EIR on Proposed Long-Term Water Transfer Program

Dear Brad,

The Glenn-Colusa Irrigation District (GCID) is providing this initial response letter to Reclamation on the Proposed Long-Term Water Transfer Program Draft EIS/EIR. The purpose of this letter is to inform Reclamation of GCID's intent to develop an independent Groundwater Supplemental Supply Program, as well as provide Reclamation with the District's position on the Long-Term Water Transfer Program. GCID wants to ensure that our local effort and Reclamation's project are not in conflict, and that the project selected to move forward for the Long-Term Program meets GCID's objective to ensure the long term sustainability of surface and groundwater resources in our region. GCID's position is that it will pursue, as a priority, the proposed Groundwater Supplemental Supply Program over any proposed transfer program within the region, including Reclamation's Long-Term Water Transfer Program (LTWTP). In addition, GCID's potential participation in Reclamation's LTWTP is ultimately subject to the consideration and approval of the GCID Board of Directors, and that has not occurred.

Following is a summary of GCID's proposed Groundwater Supplemental Supply Program, and some preliminary comments on LTWTP Draft EIS/EIR.

#### **GCID Groundwater Supplemental Supply Program**

GCID is proposing to install and operate five new groundwater production wells and operate an additional five existing groundwater wells to augment surface water diversions for use within GCID during dry and critically dry water years. The wells would have a production well capacity of approximately 2,500 gallons per minute, and would operate as needed during dry and critically dry water years for a cumulative total annual pumping volume not to exceed 28,500 acre-feet. Additional information is available at: <http://gcid.net/GroundwaterProgram.php>.

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The primary objective is to develop a reliable supplemental water source for GCID during dry and critically dry years. The proposed project goals are as follows:

- Increase system reliability and flexibility
- Offset reductions in Sacramento River diversions by GCID during drought years to replace supplies for crops and habitat
- Periodically reduce Sacramento River diversions to accommodate fishery and restoration flows
- Protect agricultural production

GCID's surface water supply reliability is becoming less certain as a result of the following:

- Litigation by environmental organizations challenging the renewal of the Sacramento River Settlement Contracts
- Increased delta flow requirements for delta smelt and delta outflows
- Increased flows and temperature requirements for fisheries

#### **USBR Long-Term Water Transfer Program**

GCID received the Draft EIS/EIR this week and has only initially begun its review. It is important for Reclamation to understand that GCID has not approved the operation of any District facilities attributed to the LTWTP Action/Project that is presented in the draft EIR/EIS. GCID will be conducting groundwater modeling for the Groundwater Supplemental Supply Program and will include an analysis of any potential cumulative impacts associated with GCID's Project and the LTWTP.

Based on our initial review of Reclamation's LTWTP Draft EIS/EIR, GCID has the following comments:

#### **Figure 3.3-25. Simulated Groundwater Substitution Transfers**

This figure demonstrates those years that a groundwater substitution program would likely occur and the associated quantities of groundwater substitution pumping. To meet the needs of GCID's Supplemental Supply Program, it is likely that pumping would occur simultaneously in many of these years. For example, 1992, 1994, and 1997 were critical water years in which GCID received a 75% water supply allocation and in those years the district would have pumped these wells for supplemental supply only. It is important to

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underscore that GCID would prioritize pumping during dry and critically dry water years for use in the Groundwater Supplemental Supply Program, and thus wells used under that program would not otherwise be available for the USBR's LTWTP.

Table 3.3-3 Water Transfer through Groundwater Substitution

Table 3.3-3 lists 11 GCID wells with associated flow rates between 2,389-3,305 and well depths ranging from 500-1200 feet. GCID would need to thoroughly review this information in greater detail with Reclamation to make sure that well locations, proposed operational parameters, and well characteristics are accurate and which wells, if any, could be included in UBSR'S LTWTP.

Figures 3.3-26 thru 3.3-31

The figure does not accurately represent an assessment of cumulative groundwater effects on the groundwater system resulting from other groundwater wells in other districts. As previously mentioned, for the Groundwater Supplemental Supply Program GCID will perform groundwater modeling and will develop new water elevation maps in the vicinity of GCID's project.

As mentioned above, these comments are very preliminary as GCID conducts a more in-depth review of the EIR/EIS. If you would like to meet to discuss GCID's program or our initial comments, please contact me at 530-934-8881.

Sincerely,



Thaddeus L. Bettner  
General Manager

Cc: Frances Mizuno, Executive Director,  
San Luis Delta-Mendota Water Authority