



SUTTER EXTENSION WATER DISTRICT

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March 19, 2021

RE: California Department Fish and Wildlife Comments on Draft Initial Study and Proposed Mitigated Negative Declaration for Sutter Extension Water District 2021 Water Transfer Program

Dear Ms. Quillman,

The purpose of this email is to provide information relative to comments received from the Department of Fish and Wildlife (DFW), by email dated March 11, 2021, regarding the draft Initial Study and Mitigation Negative Declaration (IS/MND) for Sutter Extension Water District's (SEWD) 2021 Water Transfer Program. Specifically, DFW recommended SEWD undertake the following relative to monitoring potential effects to Groundwater Dependent Ecosystems (GDE):

1. Identify monitoring wells within SEWD's well network that are located near the identified wetland area and any other GDEs located within one-half mile of production Wells #1 and #2.
2. Compare the groundwater levels at the identified GDE monitoring well locations pre-, during, and post-transfer to the rooting depths of the dominant vegetation types in the GDE communities to fully assess the potential for pumping-related groundwater depletion to have adverse impacts on the GDEs.
3. Analyze the results of this paired groundwater level and GDE monitoring to inform future water transfer proposals. Should impacts to GDEs be observed within the one-half mile radius of production Wells used for the transfer, consider expanding the scope of monitored GDEs under subsequent CEQA analyses.

As background, the IS/MND identifies that SEWD monitors a network of groundwater wells and uses these wells to record groundwater levels in the vicinity of the production wells to ensure that no substantial depletion of groundwater supplies occurs as a result of groundwater production. SEWD's monitoring efforts include a groundwater monitoring well located within one-half mile of SEWD's production well. SEWD implemented similar programs in 2014, 2015, 2018, and 2020 with no observable significant depletion of groundwater levels in the monitoring wells as a result of SEWD's groundwater substitution pumping. For the proposed 2021 Water Transfer, SEWD does not anticipate any adverse impacts resulting from substantial depletion of groundwater supplies or interference with groundwater recharge resulting in a net deficit in aquifer volume or lowering of local groundwater table level. SEWD will collect data from the monitoring wells and will cease operation of the production wells if monitoring data indicate any significant depletion of groundwater levels. The monitoring frequency and period will be in accordance with the draft Technical Information for Preparing Water Transfer Proposals dated

December 2019 (Draft Technical Information), prepared by the Department of Water Resources (DWR) and U.S. Bureau of Reclamation (Reclamation). The monitoring data is reported to DWR on a monthly basis prior to, during, and following groundwater substitution pumping. SEWD will review groundwater level monitoring data throughout the transfer period for comparison with historical low levels and will cease groundwater substitution pumping, if groundwater levels decline to historical low groundwater levels at the production well or the associated monitoring well. The monitoring data is also reviewed by DWR staff to ensure that the historical low groundwater levels are not exceeded, consistent with the Draft Technical Information and an agreement that is required with DWR for the proposed 2021 Water Transfer. Based on the information above, SEWD believes that the observance of historic low groundwater levels will protect GDEs near SEWD Well #1.

In addition to the information above, the IS/MND identifies that the Natural Communities Commonly Associated with Groundwater (NCCAG) database identifies a wetland area within one-half mile of Well #1. The NCCAG database does not identify vegetation or wetland areas within one-half mile of Well #2; and thus, this well is not discussed further in this memorandum. The wetland area identified in the NCCAG database near Well #1 is within or adjacent to existing natural waterways, irrigation ditches, drainage ditches, and irrigated fields. In particular, the wetland area near Well #1 appears to include a portion of SEWD's conveyance canal, which is operated to convey surface water diverted by SEWD for use within its boundaries. In addition, the wetland area near Well #1 appears to include a portion of the East Interception Canal, which conveys water from lands within and outside of SEWD's boundaries. During the period when groundwater substitution pumping would occur at Well #1, both the SEWD conveyance canal and the East Interception Canal would contain water, consistent with typical operational water levels that would occur absent the proposed 2021 Water Transfer. Therefore, SEWD does not believe additional monitoring is necessary for the wetland areas within one-half mile of SEWD's Well #1.

For the reasons identified above relative to SEWD's monitoring efforts and the operations of the canals that are identified as wetland areas in the NCCAG database, SEWD believes that no additional groundwater monitoring is necessary for the proposed 2021 Water Transfer. Therefore, we believe this information addresses the comments provided by DFW relative to GDEs.

Regards,



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