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November 4, 2024

Jeff Sutton
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Subject: WATER REDUCTION PROGRAM AGREEMENT BETWEEN THE SACRAMENTO RIVER SETTLEMENT CONTRACTORS NONPROFIT MUTUAL BENEFIT CORPORATION, INDIVIDUAL SACRAMENTO RIVER SETTLEMENT CONTRACTORS, AND THE U.S. BUREAU OF RECLAMATION
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH No. 2024050834

Dear Jeff Sutton:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from Glenn-Colusa Irrigation District (GCID) for the Water Reduction Program Agreement Between the Sacramento River Settlement Contractors Nonprofit Mutual Benefit Corporation, Individual Sacramento River Settlement Contractors, and the U.S. Bureau Of Reclamation (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project spans Butte, Colusa, Glenn, Nevada, Placer, Plumas, Shasta, Sutter, Tehama, Trinity, and Yuba Counties, and involves water from Shasta Lake and the Sacramento River. The Project consists of an agreement between Sacramento River Settlement Contractors (SRSC) Corporation, individual SRSCs, and the U.S. Bureau of Reclamation (Reclamation) to implement a drought mitigation, voluntary water conservation, and water purchase program.

The agreement would involve SRSC and individual SRSCs foregoing a larger percentage of their contract supply in specified drought years in two phases: Phase 1, 2025 to 2035, and Phase 2, 2036 to 2045.

Under Phase 1 of the Agreement (2025 to 2035), the contractors would collectively incur a reduced contract supply of up to 500,000 acre-feet under their aggregated contracts during certain years (defined as Phase 1 Agreement Years) if the following four conditions are met:

- Reclamation forecasts end-of-April Shasta Lake storage to be less than 3.0 million acre-feet.
- Reclamation forecasts end-of-September Shasta Lake storage to be less than 2.0 million acre-feet.
- Combined actual and forecasted natural inflow to Shasta Lake from October 1 through April 30 is less than 2.5 million acre-feet.
- Reclamation forecasts a Critical Year under the Settlement Contracts.

Under Phase 2 (2036 to 2045), the contractors would agree to collectively incur a reduced contracted supply of up to 100,000 acre-feet under their aggregated contracts during

certain years (defined as Phase 2 Agreement Years) if the following two conditions are met:

- Combined actual and forecasted natural inflow to Shasta Lake from October 1 through April 30 is less than 2.5 million acre-feet.

- Reclamation forecasts a Critical Year under the Settlement Contracts.

Reduced contract supply would be accomplished through various actions by SRSC including groundwater substitution, cropland idling and shifting, conservation, and through implementing drought-resiliency projects. By reducing the amount of water that is released from Shasta Lake and diverted by the SRSC, the project would consequently allow for more water to be available to Reclamation to manage its operation of the Central Valley Project. In addition, SRSC will engage in drought-resiliency projects to address potential agricultural loss due to reduced contract supply.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist GCID in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the Project's avoidance of significant impacts on biological resources, CDFW concludes that an Environmental Impact Report is appropriate for the Project.

COMMENT 1: Crop Idling and Shifting Impacts

Issue: Crop idling may result in the growth of ruderal plant species that could provide nesting and foraging habitat for special status species. Crop idling and shifting may also reduce the quantity of or change the timing of diversions in Canals and ditches, and inundation quantity and timing in rice fields within the Project Area. This may impact aquatic and riparian species that rely on canals, ditches, and rice fields for habitat and/or connectivity corridors, including western pond turtle (WPT; *Actinemys marmorata*) and the State and federally-threatened Giant Garter Snake (GGS; *Thamnophis gigas*). GGS is listed as a threated species under CESA and as such it is afforded full protection under the act. It is unlawful to take a State-listed endangered or threatened species (Fish & G. Code §2050 et seq.). Take is defined as "hunt, pursue, catch, capture or kill or attempt to hunt, pursue, catch, capture or kill" (Fish & G. Code §86). CESA take authorization should be obtained if any activities associated with the Project have the potential to result in take of a State-listed plant or wildlife species. See *Comment 5: Giant Garter Snake* for additional recommendations.

Recommendation: CDFW appreciates MM-BIO-11, which is intended to address impacts to canal, ditch, and rice fields as a result of crop idling and fallowing. In addition to this mitigation measure, CDFW recommends GCID conduct surveys for special-status species in rice fields, canals, and ditches subject to impacts from crop idling or shifting. CDFW recommends that prior to initiation of any idling or shifting Project Activities, a Qualified

Biologist conduct surveys to identify special-status species and associated habitat to inform where to prioritize and/or avoid idling or shifting Project Activities. Surveys should be conducted within the footprint of idling or shifting activities, and immediately adjacent potential habitat. CDFW recommends GCID and the Qualified Biologist review survey protocols for special-status species available at https://wildlife.ca.gov/Conservation/Survey-Protocols. CDFW also recommends that GCID incentivize rice farmers to plant non-irrigated cover crops on at least 10% of their acreage when drought conditions are met and crop idling transfers are likely. Cover crops greatly increase biodiversity by providing improved nesting and foraging habitat for wildlife while also increasing soil quality. Furthermore, CDFW recommends that GCID require landowners to leave all vegetation (planted cover crops or volunteer vegetation) undisturbed from April 1 – July 15 when crop idling transfers occur.

COMMENT 2: Impacts to Winter-Flooded Rice and Managed Wetland Habitats

Issue: 90% to 95% of historical wetlands have been lost in the Central Valley due to historical land conversions. Efforts to meet international migratory flyway goals and regional wetland habitat goals by restoring and managing wetland habitats within the Sacramento basin remain challenged by limited resources and climate change. It is estimated that harvested rice fields provide 75% of the food energy available to waterfowl in the Sacramento planning region which incorporates the proposed Project Area and areas to the east of it. Reductions of planted acres through the Project's proposed cropland idling and crop shifting will further reduce the amount of winter-flooded rice available during critically dry years and exacerbate issues associated with lower acreages and quality of wetland habitat that depend on water drained off rice fields for fall flooding.

Recommendation: The DEIR should include an assessment of winter-flooded rice and managed wetland habitat lost due to the reductions of water supply as a result of Project implementation. CDFW appreciates MM-BIO-10 which is intended to benefit nesting birds and MM-BIO-11 which is intended to address impacts to canal, ditch, and rice fields as a result of crop idling and fallowing. In addition to these measures, CDFW recommends the DEIR analyze the impacts of rice idling on dependent managed wetlands and consider avoidance and mitigation actions that minimize the loss of habitat for migratory waterbird species.

COMMENT 3: Groundwater Substitution Impacts on Groundwater Dependent Ecosystems

Issue: Ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface are collectively known as groundwater dependent ecosystems (GDEs) (23 Cal. Code Regs. § 351(m)). These GDEs include seeps and springs; wetlands and lakes; rivers, streams, and estuaries; and terrestrial vegetation. Groundwater substitution activities have the potential to affect groundwater hydrology due to increased groundwater extraction and reduced groundwater recharge. Correlating effects could be temporary and/or long-term declines in groundwater levels, reduction of groundwater storage, depletions of interconnected surface water

(ISW), land subsidence, and degraded water quality. These effects have the potential to adversely impact GDEs and the species therein in basins where groundwater substitution occurs, including ISW GDEs that support several Sacramento Valley listed aquatic species. The DEIR does not discuss nor evaluate potential impacts to GDEs or ISWs as a result of groundwater substitution activities. Further, the DEIR does not map GDEs relative to potential Project locations.

Recommendation: The DEIR should include a thorough assessment of water resources in the Project vicinity, including mapping of GDEs and ISWs and identification of special status species therein. The analysis of Project impacts should assess potential localized declines in groundwater levels and associated reduction in shallow groundwater availability for GDEs and changes in rates of groundwater accretions to or depletions from ISWs, and how these impacts may affect special status species. Mitigation measures should be proposed, if warranted, to prevent groundwater-related Project impacts from adversely affecting special status and public trust resources.

COMMENT 4: Sustainable Groundwater Management Impacts

Issue 3.1: The groundwater hydrology section of the DEIR's Environmental Setting is not sufficiently specific in its description of current groundwater conditions in each Project Area subbasin, which can vary widely.

The DEIR acknowledges that among monitoring wells within the Project Area, from 1998 - 2018, approximately 98% demonstrated a neutral or decreasing trend. The DEIR then goes on to say that though the recent drought from 2021-2022 was the driest hydrologic period on record in portions of the Project Area and led to substantial declines in groundwater levels, following wetter conditions during 2023 and 2024, those portions of the Project Area "generally have seen recovery of these impacts."

DWR's 2024 Semi-Annual Update on California Groundwater Conditions instead states that during 2023, groundwater levels only partially rebounded from the drought years, and while 2024 helped stabilize groundwater levels, it will likely require several more wet years, focused efforts to increase recharge, and reduced pumping to recover from drought and accumulated depletions (DWR, 2024). According to DWR's California Groundwater Live, approximately 35% of wells located in the Sacramento River Hydrologic Unit are at below normal levels, well below normal levels, or all-time low levels. When reviewing the seasonal change in groundwater levels from Spring 2024 in the Sacramento River Hydrologic Unit, over a one-year period approximately 96% of wells have experienced no significant change or a decrease in groundwater levels; over a three-year period, approximately 93% of wells have experienced no change or a decrease in groundwater levels. (DWR, n.d.)

Recommendation 3.1: CDFW recommends that the DEIR include additional information about subbasin-specific groundwater conditions, leveraging the most recent annual reporting for each of the subbasins underlying the Project Area to include statistics on groundwater levels relative to Groundwater Sustainability Plan (GSP) measurable

objectives and minimum thresholds. This will provide a more accurate context for characterizing potential impacts of groundwater substitution to sustainable groundwater management, including impacts to environmental beneficial uses and users of groundwater.

Issue 3.2: As part of Project groundwater substitution activities, a total of 167,100 acre-feet and 33,420 acre-feet of additional, annual groundwater pumping is anticipated in Phases 1 and 2, respectively. The DEIR states that the potential for adverse drawdown effects increases with the amount of groundwater extracted. Additionally, other conservation activities such as cropland idling and reducing seepage losses will have a compounding effect through the simultaneous reduction in groundwater recharge.

Accordingly, the DEIR includes MM-HYD-2: install and operate groundwater wells in accordance with GSPs for all groundwater pumping activities undertaken under the agreement. While CDFW appreciates the inclusion of this measure, more information is needed to thoroughly assess the Project's installation and operation of additional groundwater wells in the context of each subbasin's GSP and in light of potential impacts to Public Trust resources.

For instance, the Colusa Subbasin GSP, over which the Project Area spans, was originally deemed incomplete by the Department of Water Resources, largely due to groundwater overdraft and land subsidence within the subbasin. In the Revised Colusa GSP, which was resubmitted in September 2024 and has yet to be approved, average annual overdraft from 2016 to 2021 was estimated to be 62,000 acre-feet per year (Colusa Groundwater Authority). The Revised Colusa GSP includes a proposal to plan and implement a demand management program, as well as projects meant to incentivize increased surface water use in lieu of continued or increased groundwater pumping. It is unclear how the increased groundwater pumping during Project years will impact overall progress toward groundwater sustainability as defined in each GSP for subbasin wide metrics such as reduction of groundwater storage, even with implementation of measure MM-HYD-2.

Recommendation 3.2: Though the DEIR describes the approximate maximum contract water reduction for each SRSC during Phases 1 and 2 of the agreement, it is unclear what portion of each SRSC's water reduction will be attributable to increased groundwater pumping. CDFW recommends specifying for each SRSC the estimated volume of water reduction that will come from increased groundwater use, as well as listing each SRSC's corresponding subbasin.

The DEIR should include a discussion of each subbasin GSP's estimated annual overdraft, sustainable yield, and how those values compare to the proposed increased groundwater use attributable to this Project. Additionally, the DEIR should more clearly describe how the volume and rates of groundwater pumping as a result of the Project will be adaptively managed and operated based on local GSA monitoring and management of groundwater withdrawals.

COMMENT 5: Drought-Resiliency Project Impacts

Issue: Drought-resiliency projects may involve piping open ditches or canals, lining canals, canal automation, installation of automated gates, on-farm improvements to irrigation systems, installation of weirs or check damn structures, pipeline recirculation programs, installation of new groundwater or deep aquifer wells, and implementation of a conjunctive use program. Impacts associated with these types of projects include temporary and permanent habitat disturbance and fragmentation. The DEIR does not provide details on design, scope, and locations of these proposed projects; therefore, it is difficult to fully evaluate the potential impacts to fish and wildlife associated with these projects and mitigation measures that may be required.

Recommendation: CDFW recognizes and appreciates the mitigation measures outlined in the Biological Resources section of the DEIR. While mitigation measures related to GGS are presented in MM-BIO-6, CDFW recommends avoidance measures be outlined for all special-status species that may occur within the Project Area. These measures should consider CESA threatened Swainson's hawk (*Buteo swainsoni*), fully protected white-tailed kite (*Elanus leucurus*), CESA threatened tricolored blackbird (*Agelaius tricolor*), CESA candidate burrowing owl (*Athene cunicularia*), and WPT. CDFW recommends these measures be detailed and made publicly available as design plans and project locations are finalized for specific, on-the-ground, drought-resiliency projects. If, upon finalization of drought-resiliency projects, impacts to listed species are unavoidable and project implementation may result in "take" under CESA (Fish & G. Code, § 2050 et seq.), the project proponent should seek related take authorization as provided by the Fish and Game Code.

COMMENT 6: Giant Garter Snake (GGS)

Issue: The DEIR indicates there is suitable GGS habitat present within the Project Area. Alteration of GGS habitat as described in the DEIR within areas such as canals, drainage ditches, and flooded rice fields, all of which contain suitable habitat for GGS, may cause "take" of the state threatened species.

Recommendation: In order for CDFW to evaluate Project impacts and provide recommendations for appropriate avoidance measures, the DEIR should incorporate a more in-depth evaluation of GGS habitat that may be impacted by Project Activities. Due to the presence of GGS habitat within the Project Area, CDFW recommends GCID Implement GGS avoidance measures in areas of suitable GGS habitat subject to impacts from crop idling and shifting and drought-resiliency projects. CDFW recommends GCID review the U.S. Fish and Wildlife Service's (USFWS) Guidelines for Permits Specific to the Giant Garter Snake available at https://www.fws.gov/sites/default/files/documents/survey-protocols-for-the-giant-garter-snake.pdf. CDFW recommends that avoidance measures for Project Activities that may impact GGS include:

Secure a Qualified Biologist
GCID should retain a Qualified Biologist(s), who is approved by CDFW prior to implementing Project Activities, and who will be responsible for evaluating GGS habitat before initiating crop idling or shifting or drought-resiliency Project Activities. The Qualified Biologist should be knowledgeable and experienced in the biology and natural history of GGS. The Qualified Biologist should be authorized to stop Project Activities, if necessary to protect GGS. If directed by the Qualified Biologist, GCID should take appropriate actions to ensure Project Activities are safely suspended and notify CDFW.

Establish Environmentally Sensitive Areas
With the expertise of a Qualified Biologist, GCID should establish Environmentally Sensitive Areas (ESAs) in the Project Area to minimize the disturbance of GGS habitat from idling, shifting, or drought-resiliency activities. All potential GGS habitat that can be reasonably avoided during construction activities should be identified as ESAs and should be marked by the Qualified Biologist. GCID should erect ESA fencing, as directed by the Qualified Biologist, 200 feet from the edge of potential aquatic GGS habitat. The Qualified Biologist should also identify and flag all potential small mammal burrows within the Project Area as ESAs. ESAs should be demarked by tying high visibility poly wire to stakes placed every 6 feet along the ESA boundary. The high visibility poly wire should be raised at least 4 feet above grade. The high visibility wire and stakes should be marked with high visibility flagging or markers. All construction personnel should avoid ESAs during all phases of construction. GCID should avoid ESAs when identifying all staging areas, spoils disposal areas, borrow pits, and construction equipment access routes. The Qualified Biologist should inspect ESA fencing before the start of each workday and GCID should maintain the fencing until the completion of the Project. GCID should remove all fencing material upon completion of the Project.

Work Window
CDFW recommends all activity within GGS upland and aquatic habitat, including activity within 200 feet of aquatic habitat, occur between May 1 and October 1. This is the active period for GGS and direct impacts are lessened because snakes are more active. More danger is posed to snakes during their inactive period, because they are occupying underground burrows or crevices and are more susceptible to direct impacts, especially during excavation. There is still potential for take during the active season. GGS use burrows while shedding, digesting, birthing, hiding, or during inclement weather, at which time they are not as mobile and may not readily move even when disturbed.

Pre-Construction Surveys
No more than 24 hours prior to the start of vegetation clearing or construction activities in any area within 200 feet of potential GGS aquatic habitat (i.e., those activities related to drought-resiliency projects), the Qualified Biologist should conduct pre-construction surveys for GGS that include surveying of burrows, soil cracks, and crevices that may be suitable for use by GGS. Burrows, soil cracks, and crevices should be flagged for avoidance. Surveys shall be repeated if Project Activities within 200 feet of potential GGS aquatic habitat are paused for 14 or more consecutive days.

COMMENT 7: Lake and Streambed Alteration Notification for Project Activities

Issue: The DEIR describes a variety of potential activities that involve modifications to canals, ditches, and surface water levels. CDFW believes activities associated with this Project may require notification for a Streambed Alteration Agreement.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

a. Substantially divert or obstruct the natural flow of any river, stream, or lake;

b. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or

c. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project Activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the environmental document should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the project may avoid or reduce impacts to fish and wildlife resources. LSA Notifications must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS. More information about LSA Notifications, paper forms and fees may be found at https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA.

Recommendation: CDFW recommends that GCID notify pursuant to Section 1602 of the Fish and Game Code as early as possible to determine if LSAs are needed for any Project Activities.

COMMENT 8: No Net Loss of Wetland Habitat

Issue: Potential impacts to riparian habitats and sensitive natural communities (i.e., managed wetlands) within and around the Project Area are addressed in Section 3.3.4.2. However, there is no mention of state or federal policies related to "no net loss" of wetland habitat and further analysis and discussion is needed.

Recommendation: In addition to federally owned and managed wildlife refuges occurring within the Project Area, there are a significant number of privately owned wetlands that rely on the tailwater of SRSC for their existence. The DEIR should include mention of both federal and state "no net loss" policies for wetland habitat applicable to federal and state agencies respectively.

COMMENT 9: Cumulative Impacts

Issue: Because the DEIR does not provide specific project locations nor does it quantify the number of potential project sites, locations, or activities within the larger Project Area, the Analysis of Cumulative Impacts is not adequate.

Recommendation: Prior to implementing any facet of the Project, GCID should consider the Project's likely cumulative impacts to biological and hydrological resources by characterizing and quantifying anticipated Project Activities and their potential collective and cumulative impacts to vegetation and habitat reduction.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative,

vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the DEIR for the Water Reduction Program Agreement Between the Sacramento River Settlement Contractors Nonprofit Mutual Benefit Corporation, Individual Sacramento River Settlement Contractors, and the U.S. Bureau Of Reclamation to assist GCID in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Alyssa Obester, Senior Environmental Scientist (Specialist) at alyssa.obester@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Morgan Kilgour
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Morgan Kilgour
Regional Manager

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References

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