

AUGUST 2021

CHAPTER 5:
IMPLEMENTATION

SISKIYOU COUNTY FLOOD CONTROL & WATER
CONSERVATION DISTRICT

Shasta Valley Groundwater Sustainability Plan

PUBLIC DRAFT REPORT



**SISKIYOU COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
GROUNDWATER SUSTAINABILITY AGENCY
SHASTA VALLEY GROUNDWATER SUSTAINABILITY PLAN**

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Note: Appendix 5-B will be provided when available.

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67 Groundwater management has been conducted in the Shasta Valley Basin (Basin) for
68 decades. As described in prior sections, a variety of project and management actions
69 (PMAs) are currently, or have previously been, implemented, that support groundwater
70 levels, groundwater storage and interconnected surface waters. Existing and planned
71 PMAs will contribute to the attainment of the groundwater sustainability goal in the Basin
72 over the planning horizon of this Groundwater Sustainability Plan (GSP). These PMAs,
73 as described in Chapter 4, enable the continued use of groundwater and protection of
74 groundwater uses and users into the future.

75 In this section, the GSP implementation plan for the Basin is defined. Elements of this
76 plan include:

- 77 1) Management and Administration
 - 78 a. GSA management, administration, legal and day-to-day operations.
 - 79 b. Reporting, including preparation of annual reports and 5-year evaluations
80 and updates.
 - 81
- 82 2) Implementation
 - 83 a. Implementation of the GSP monitoring program activities described in
84 Chapter 3.
 - 85 b. Technical support, including model updates, data collection and other
86 technical analysis.
 - 87 c. Projects and Management Actions (PMAs) as described in Chapter 4.
 - 88
- 89 3) Outreach and Education
 - 90 a. Coordination activities with stakeholders and entities in the Basin.
 - 91 b. Ongoing outreach activities to stakeholders

92
93 Cost estimates and funding methods for GSP implementation are also presented in this
94 section.

95 **5.1. DESCRIPTION OF GSP IMPLEMENTATION ELEMENTS**

96 The following tasks and functions will be required for implementation of this GSP:

97 **5.1.1 Management and administration**

98 **GSA management, administration, legal and day-to-day operations**

99 GSA functions associated with the management and administration of the GSP
100 implementation activities are covered under this category, which includes the
101 administrative, technical and finance staff support and related expenses, office supplies
102 and materials, insurance, and grant writing to support funding for specific projects and/or
103 management actions. GSA staff will provide work products, administrative support, staff
104 leadership, and management for the GSA.

105 As the GSP implementation begins in February 2022, staffing support and ongoing
106 administrative and management needs will be further evaluated so that the budget can
107 be refined, as necessary. Staffing needs will be reevaluated annually during the early

108 years of GSP implementation to gain a better understanding of the support required and
109 associated costs.

110 GSA administration activities include coordination meetings with other organizations on
111 projects or studies, email communications for updating GSA stakeholders about ongoing
112 activities within the Basin, administration of projects implemented by the GSA, and
113 general oversight and coordination. Other oversight and administrative activities will occur
114 on an as-needed basis.

115 The GSA is responsible for, and authorized to take, appropriate action to achieve
116 sustainable management of groundwater within the Basin based on the authority granted
117 under Section 6 of the California Water Code. On an as-needed basis, the GSA may seek
118 legal services to assist in the interpretation of legal requirements and provide legal advice
119 during GSP implementation.

120 **Reporting, including preparation of annual reports and 5-year evaluations and**
121 **updates**

122 As part of GSP implementation starting in 2022, the GSA must prepare and submit to
123 DWR annual reports and 5-year assessments. Annual reports will be submitted to DWR
124 by April 1st of each year and an initial 5-year GSP assessment and update will be due to
125 DWR by April 2027. Requirements for each of these reports are explained below.

126 ***Annual Reporting***

127 Per Water Code Sections 10727.2, 10728, and 10733.2, SGMA regulations require the
128 GSAs to submit an annual report on the implementation of the GSP to the Department of
129 Water Resources (DWR). Development of the annual report will begin at the beginning of
130 each water year, October 1, to assess the previous water year. The report will be
131 submitted to DWR on April 1st of the following calendar year. A template for annual
132 reporting is provided as Appendix 5-B. The annual reports will be completed in a format
133 consistent with Section 356.2 of the SGMA regulations and will include three key sections:

134 ***General Information***

135 General information will include a map of the Basin and an executive summary that
136 includes a description of the sustainability goal, ongoing PMAs in the subbasin, jointly
137 funded PMAs and their progress, as well as an updated implementation schedule.

138 ***Basin Conditions***

139 This section will describe the current groundwater conditions and monitoring results, used
140 to evaluate how groundwater conditions have changed in the Basin during the previous
141 year. SGMA regulations require the following key components to be included in this
142 section:

- 143 • Groundwater elevation data from monitoring wells, including (1) groundwater
144 elevation contour maps for the principal aquifer in the Basin depicting seasonal
145 high and low groundwater conditions, and (2) hydrographs of historical-to-current-
146 reporting-year data showing groundwater elevations and water year type.

- 147 • Groundwater extractions during the preceding water year summarized by water
148 use sector, including a map showing the general location and volume of
149 groundwater extractions, as well as the method of measurement (direct or
150 estimate) and accuracy of measurements. Metering of groundwater extraction is
151 only included as a voluntary action and this information will be collected as the
152 PMA is implemented, also based on availability of funding.
- 153 • Surface water supply for managed groundwater recharge or in-lieu use, including
154 the annual volume and sources for the preceding water year.
- 155 • Total water uses by water use sector and water source type, including the method
156 of measurement (direct or estimate) and accuracy of measurements.
- 157 • Maps of changes in groundwater storage for the principal aquifer and a graph
158 depicting historical-to--current-reporting-year water year type, groundwater use,
159 annual change in groundwater in storage, and the cumulative change in
160 groundwater storage for the Basin.

161 This information may change over time to incorporate potentially revised GSA priorities
162 and to reflect new Basin conditions and applicable SGMA requirements.

163 *Plan Implementation Progress*

164 The progress made toward achieving interim milestones, as well as implementation of
165 PMAs, will be explained in this section, along with a summary of plan implementation
166 progress and sustainability progress.

167 ***Periodic Evaluations every Five Years***

168 Per Water Code Sections 10727.2, 10728, 10728.2, 10733.2, and 10733.8, SGMA
169 regulations require the GSA to provide a written assessment of GSP implementation and
170 progress towards meeting the sustainability goal at least every five years. A similar
171 evaluation must also be submitted whenever the GSP is amended. The five-year
172 assessment reports will be completed in a format consistent with Section 356.4 of the
173 SGMA regulations and include the following elements:

174 *Sustainability Evaluation*

175 The overall Basin sustainability and current groundwater conditions for each applicable
176 sustainability indicator will be described, including progress toward achieving interim
177 milestones and measurable objectives, and an evaluation of groundwater elevations at
178 each of the representative monitoring points (RMPs) in relation to minimum thresholds.

179 *Plan Implementation Progress*

180 This section will describe the current implementation status of PMAs, along with the effect
181 on groundwater conditions resulting from their implementation, if applicable.

182 *Reconsideration of GSP Elements*

183 Elements of the GSP may require revision due to one or more of the following: collection
184 of additional monitoring data during GSP implementation; implementation of PMAs;
185 significant changes in groundwater uses or supplies and/or land uses. Such new

186 information may require revision to the following GSP elements: Basin setting, water
187 budgets, monitoring network, SMC, or PMAs.

188 *Monitoring Network Description*

189 This section will provide an assessment of the monitoring network's function, an analysis
190 of data collected to date, a discussion of data gaps and the needs to address them, and
191 identification of areas within the Basin that are not monitored in a manner commensurate
192 with the requirements of Sections 352.4 and 354.34(c) of the SGMA regulations.

193 *Consideration of New Information for Basin Setting and SMC*

194 New information made available after GSP adoption will be described and evaluated. If
195 new information would warrant a change to the GSP, including a re-evaluation of the
196 Basin setting and SMC, then corresponding revised descriptions will be included in the
197 five-year evaluation report.

198 *Regulations or Ordinances*

199 If DWR adopts new regulations that impacts GSP implementation, the update will also
200 identify and address those requirements that may require updates to the GSP.

201 *Legal or Enforcement Actions*

202 Any enforcement or legal actions taken by the GSA or their member agencies to
203 contribute to attainment of the sustainability goal for the Basin will be summarized.

204 *Plan Amendments*

205 Each five-year assessment report will include a description of amendments to the GSP,
206 including adopted amendments, amendments that are underway during development of
207 the report, and recommended amendments for future adoption.

208 *Coordination*

209 A summary of coordination that has occurred between Basin, with different agencies in
210 the Basin, or with agencies with jurisdiction over land use and well construction will be
211 incorporated in the five-year assessment report.

212 The five-year assessments will also include any other information deemed appropriate by
213 the GSA to support DWR in its periodic review of GSP implementation, as required by
214 Water Code Section 10733.

215

216 **5.1.2 Implementation**

217 **Implementation of the monitoring program activities described in Chapter 3**

218 This category covers the functions associated with monitoring activities, including logistics
219 and coordination with third party entities performing monitoring in the GSP Monitoring
220 Network and any related monitoring data management. The GSP Monitoring Networks

221 for groundwater level and groundwater quality, including the agencies performing that
222 monitoring, are detailed in Chapter 3.

223 To address data gaps (extended data gap section is presented in Appendix 3-A) that are
224 identified during GSP implementation, improvements to or expansion of the GSP
225 Monitoring Network may be necessary. In that event, additional monitoring wells,
226 monitoring well instrumentation; sampling and in-situ measurements; sample analysis;
227 and associated data management and analysis may be required in the future. Costs for
228 those facilities and activities are not addressed in this section.

229 Monitoring and data-related activities include:

- 230 • Groundwater Elevation Monitoring.
- 231 • Groundwater Quality Monitoring.
- 232 • Streamflow Monitoring.
- 233 • Monitoring data management (including data management system (DMS)
234 maintenance), data validation (QA/QC), data entry and security, and data sharing.

235

236 **Technical support, including SVIHM model updates, SMC tracking, other data**
237 **analysis and technical support**

238 **SVIHM updates** – Management activities and ongoing performance evaluation of the
239 SMC are informed by SVIHM model output, which will require periodic updates and
240 refinements as more data become available. Model updates and refinements help
241 maintain, and potentially improve, the model functionality and its capabilities in providing
242 more representative simulation results. These activities include incorporation of new
243 model tools and features, data input and model parameter updates, calibration updates
244 as additional data from the monitoring network and stream gauges is obtained, use of
245 SVIHM to update water budgets, assess water usage, and assess the status of Basin-
246 wide storage volumes, and related work to support ongoing simulations of PMAs,
247 including recharge projects.

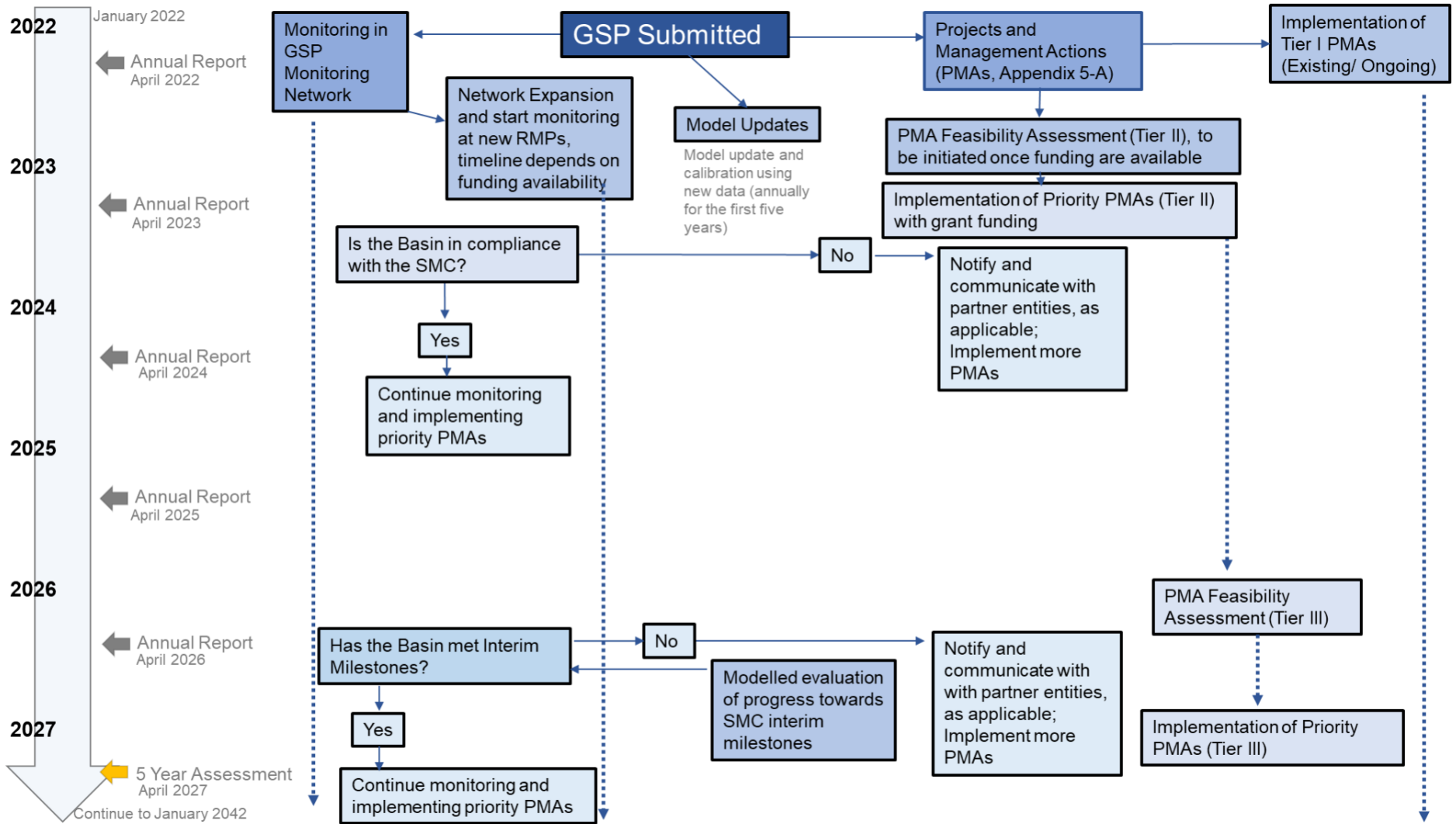
248 **SMC tracking** – synthesis of data to analyze and track the status of compliance with SMC
249 at the representative monitoring points (RMP) wells in the Monitoring Network. This
250 information will comprise an essential element of the annual reports and 5-year updates.
251 A template for SMC tracking based on the annual report requirements from DWR is
252 available in Appendix 5-B

253 **Data analysis** – Additional data analysis and associated technical support, outside of the
254 GSA’s resource capabilities, will be needed for annual reporting and 5-year GSP update
255 and outreach activities. The GSA will also have an ongoing need for technical support
256 for the Basin management, such as vulnerability assessments for climate change,
257 hydrologic technical support, assessment of managed aquifer recharge opportunities,
258 economic and funding mechanisms assessments, and studies to address data gaps. It is
259 anticipated that the GSA may also require various planning and programmatic support
260 assistance for ongoing GSP- and SGMA-related requirements.

261 Results of the monitoring program activities inform GSA actions and next steps. The
262 flowchart shown in **Error! Reference source not found.** illustrates the process and

263 decision points for the first five years of GSP implementation. This process will be refined,
264 as necessary, throughout the first five years of GSP implementation and will be updated
265 in parallel with the five-year evaluations. Further detail on the prioritization and
266 implementation timeline of PMAs can be found in the discussion of PMAs below, and in
267 Appendix 5-A.

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269 Figure 1: GSP implementation process for the first 5-years implementation. The road map is expected to be similar for the following 5-years cycles.

270

271 **Projects and Management Actions described in Chapter 4.**

272 Chapter 4 of this GSP identifies three different tiers of projects and management actions
273 (PMAs) in the Basin, as follows:

- 274 1. Tier I: Existing PMAs that are currently being implemented and are anticipated to
275 continue to be implemented.
- 276 2. Tier II: PMAs planned for near-term initiation and implementation (2022–2027) by
277 individual member agencies.
- 278 3. Tier III: Additional PMAs that may be implemented in the future, as necessary
279 (initiation and/or implementation 2027–2042).

280 The PMAs listed in Chapter 4 reflect a collection of potential options that may be
281 employed to support the sustainability goals outlined in this plan. Although PMAs have
282 been categorized into three tiers based on the anticipated timeframe for initiation and
283 implementation, **these categorizations may change as additional monitoring data,
284 information, and sources of funding are gained and as conditions change.** Tier I
285 PMAs are anticipated to continue to be implemented throughout the GSP implementation
286 period. A preliminary strategy for PMA prioritization and associated criteria, have been
287 developed for PMAs. As a first step in Plan implementation, PMAs identified in the Tier II
288 category will be ranked using criteria including the effectiveness, completeness,
289 complexity, cost, uncertainty, and level of support for the project or management action.
290 A full description of the criteria used in this evaluation and associated scoring system can
291 be found in Appendix 5-A as well as a preliminary PMA assessment table. This
292 preliminary prioritization step will be initiated immediately after submission of the GSP to
293 provide the GSA with enough time to evaluate projects feasibility and include the selected
294 projects into future funding requests. The GSA is expected to continue to refine this
295 prioritization as more information on the feasibility, costs and anticipated benefits
296 becomes available for these PMAs.

297 The management actions that will be undertaken by the GSA or in partnership with other
298 entities active in the basin, include:

- 299 • A variety of coordination activities, including:
- 300 ○ Coordination with agencies with local land use authority
 - 301 ○ Coordination with entities sponsoring major beneficial projects
 - 302 ○ Coordination to support water use efficiency measures
 - 303 ○ Coordination with Siskiyou County Environmental Health Division

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309 **5.1.3 Outreach**

310 **Coordination activities with other entities**

311 The GSA will need to budget for ongoing coordination during GSP implementation.
312 Coordination will be required with the following entities on the following topical areas:

- 313 • With agencies in the Basin with land use jurisdiction to identify and communicate
314 regarding activities that may impact Basin sustainability.
- 315 • With water supply agencies, such as irrigation districts or municipal providers, to
316 obtain updated information regarding water use efficiency programs, encourage
317 such programs, and obtain information regarding the impacts of those programs
318 on water demands.
- 319 • With entities sponsoring projects, such as recharge or efficiency improvements, in
320 the Basin that will provide benefits to attainment of sustainability goals and
321 objectives, including support for grant funding.
- 322 • With any other entities working in the Basin to support the sustainability goal and
323 aspirational watershed goal, as applicable.

324 To achieve this coordination, the GSA will need to develop governance and
325 communication processes to support these activities efficiently and effectively.

326

327 **Outreach to stakeholders**

328 Activities under this element of the GSP implementation plan include continuation of
329 education, outreach, and engagement with stakeholders, building off the framework and
330 activities established in the Communication and Engagement Plan, as described in
331 Chapter 1. Such activities performed during GSP implementation include maintaining the
332 Basin webpage on the County website and the online/social media presence, community
333 meetings, workshops, and public events. These activities may also include electronic
334 newsletters, informational surveys, coordination with entities conducting outreach to
335 diverse communities in the Basin, and development of brochures and print materials.
336 Decisions regarding the nature and extent of these outreach activities will be made by the
337 GSA.

338 **5.2 ESTIMATE OF GSP IMPLEMENTATION COSTS**

339 The implementation costs for the Shasta Valley GSP will include funding for functions
340 associated with the GSP implementation elements described above, including GSA
341 management and administration, monitoring, technical support, data management,
342 coordination, reporting, management actions, and outreach. GSP implementation costs
343 will also cover the building of sufficient fiscal reserves to address other potential costs for
344 the twenty-year implementation horizon.

345 Implementation of the GSP over the 20-year planning horizon is projected to cost between
346 \$150,000 and \$262,500 per year. Table 1 summarizes the breakdown of these costs by
347 implementation element. These costs are based on the best available estimates at the
348 time of Plan development and may vary throughout the period of Plan implementation.
349 Grant awards may offset some costs. If the GSA develops additional projects or

350 management actions during the GSP implementation period, the cost estimates will be
 351 refined and reported to DWR through the annual reports or five-year periodic
 352 assessments.

353 Development of this GSP was funded largely through a Proposition 1 Groundwater Grant
 354 Program and Proposition 68 Grant. The GSA will pursue additional grant funding for GSP
 355 implementation as it is available. In the following analysis, it is assumed that the GSA will
 356 identify other sources of funding to cover GSP implementation costs.

357 Table 1: Summary of Annual GSP Operation and Implementation Costs [PRELIMINARY]

GSP Implementation Tasks	Recurring Annual Cost
GSA Management, Administration, Legal and Day-to-Day Operations \$12,500-\$31,250	
Administrative Staff Support /Accounting	TBD
GSA management and staff support	TBD
Legal support	TBD
Data management	
Monitoring and Technical Support	
Technical Work: SWHM maintenance	\$50,000-\$100,000
Monitoring, data analysis and management	\$56,250-\$75,000
GSP Reporting	
Annual Reports	\$18,750-\$31,250
5-Year GSP Assessments	\$12,500
GSP Management Actions	
Management Action – Coordination activities	TBD
Ongoing Outreach Activities to Stakeholders	
Outreach & Education	\$12,500-\$25,000
Contingency	
Contingency (10%)	
Total	\$150,000-\$262,500

358

359 **Financial Reserves and Contingencies**

360 To mitigate financial risks associated with expense overruns due to unanticipated
 361 expenditures and actual expenses exceeding estimated costs, the GSAs may carry a
 362 general reserve with no restrictions on the types of expenses for which it can be used.
 363 Adoption of a financial reserves policy is authorized by SGMA Sections 10730(a) and
 364 10730.2(a)(1). A reserve for operations usually targets a specific percentage of annual
 365 operating costs and may consider factors such as billing frequency and the recurrence of
 366 expenses to address cash flow constraints.

367 **Total Implementation Costs Through 2042**

368 The total annual cost is estimated at \$168,750 to \$287, 500 based on the best available
 369 information at the time of Plan preparation and submittal. These costs include a grant
 370 writing component in addition to the costs of GSP implementation, discussed above and
 371 presented by major budget category in Table 1.

372

373 **5.3 SCHEDULE FOR IMPLEMENTATION**

374 The final GSP will be presented to the GSA Board for adoption in November or December
 375 2021 and will be submitted to DWR no later than January 31, 2022. The preliminary
 376 schedule for agency administration, management, and coordination activities, GSP
 377 reporting, and community outreach and education are provided in Table 2. While most
 378 activities are continuous during GSP implementation, annual reports will be submitted to
 379 DWR by April 1st of each year and periodic five-year assessment reports will be submitted
 380 to DWR by April 1st every 5 years after the initiation of Plan implementation in 2022 (i.e.,
 381 assessment report submittal in 2027, 2032, 2037, and 2042).

382

Table 2: GSP Implementation Schedule

	Start	2022-2042																				
		2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Data Management and Reporting																						
Milestones																						
GSP Submitted to DWR	January 2022	•																				
Groundwater Sustainability Goal Attained	January 2042																					•
Reporting																						
Annual Reporting	April 2022	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
5-Year Evaluations	April 2027						•					•					•					
Monitoring																						
Monitoring: Groundwater (all)	Quarterly or Continuous																					
Monitoring: Streamflow	Continuous																					
Monitoring: stream transects	Continuous																					
Groundwater Quality Monitoring Network Expansion	January 2022																					
Data Management	Continuous																					
Outreach and Education																						
Stakeholder Outreach and Education	Continuous																					
Projects and Management Actions																						
Tier I PMAs: ongoing	January 2022																					
Tier II PMAs Feasibility study and prioritization upon funding availability	January 2022	•																				
Tier II PMAs Implementation of highly prioritized PMAs (based on funding availability)	January 2023		•																			
Tier III PMAs Feasibility Study (based on funding availability)	January 2023			•																		

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388 **5.4 FUNDING SOURCES AND MECHANISMS**

389 SGMA authorizes GSAs to charge fees, such as pumping and permitting fees, to fund the
390 costs of groundwater management and sustainability programs.

391 The GSA will pursue various funding opportunities from state and federal sources for GSP
392 implementation. As the GSP implementation proceeds, the GSA will further evaluate
393 funding mechanisms and fee criteria and may perform a cost-benefit analysis of fee
394 collection to support consideration of potential refinements. A funding-options-analysis
395 was conducted by SCI Consulting Group and the results of this analysis are presented as
396 technical memorandum in Appendix 5-C. This technical memorandum summarizes the
397 estimated costs for implementation, the recommended path to identify and prioritize
398 funding during GSP implementation, and general funding recommendations. The
399 recommended approach to funding is summarized in the “game plan”, included on page
400 31 of Appendix 5-C, and shown below.

401 Game Plan:

- 402 1. Conduct community outreach regarding the Plan and its implementation.
- 403 2. Pursue use of existing revenue sources to fund implementation.
- 404 3. Pursue Grants and Loan Opportunities to fund implementation
- 405 4. Implement Regulatory Fees to offset eligible implementation costs.

406 If additional revenue is needed:

- 407 5. Conduct a survey and stakeholder outreach to better evaluate
- 408 a. Community priorities and associated messaging.
- 409 b. Optimal rate.
- 410 c. Preference of non-balloted property related fee versus special tax.
- 411 6. Use results of surveys, stakeholder input and other analyses to develop a
- 412 community outreach plan.
- 413 7. Implement community outreach
- 414 8. Implement a property related fee or special tax balloting:
- 415 a. Include a cost escalator schedule or mechanism
- 416 b. Include the use of rate zones or other distinguishing factors.
- 417 c. Do not include a rate expiration date (also known as a “Sunset Clause”).
- 418 d. Include a Discount Program to encourage better groundwater management
- 419 by well owners.

420

421 Table 3 presents examples of potential financing options and the degree of certainty
422 associated with each funding option. The “game plan” reflects an approach and order of
423 priority given to seeking funding sources. The GSA is the lead in developing these funding
424 sources, in partnership with other entities and agencies where appropriate. A working
425 group will be convened in the first year of GSP implementation to identify and evaluate
426 these funding sources.

427

428 Table 3: Potential Funding Sources for GSP Implementation.

Funding Source	Certainty
Feepayers ¹	High – User fees pay for operation and maintenance (O&M) of a utility’s system. Depends upon rate structure adopted by the project proponent and the Proposition 218 rate approval process. Can be used for project implementation as well as project O&M.
General Funds or Capital Improvement Funds (of Project Proponents)	High – General or capital improvement funds are set aside by agencies to fund general operations and construction of facility improvements. Depends upon agency approval.
Special taxes, assessments, and user fees (within Project Proponent service area or area of project benefit)	High - Monthly user fees, special taxes, and assessments can be assessed by some agencies should new facilities directly benefit existing customers. Depends upon the rate structure adopted by the project proponent and the Proposition 218 rate approval process.
Bonds	Low – Revenue bonds can be issued to pay for capital costs of projects allowing for repayment of debt service over 20 to 30-year timeframe. Depends on the bond market and the existing debt of project proponents. Not anticipated in the Basin.
Integrated Regional Water Management (IRWM) implementation grants administered by the California Department of Water Resources (DWR)	Medium – Proposition 1, IRWM Implementation Grants.
Proposition 68 grant programs administered by various state agencies	Medium – Grant programs funded through Proposition 68, which was passed by California voters in June 2018, administered by various state agencies are expected to be applicable to fund GSP implementation activities. These grant programs are expected to be competitive, where \$74 million has been set aside for Groundwater Sustainability statewide.
Disadvantaged Community (DAC) Involvement Program	Medium –DWR’s DAC Involvement Program This program is not guaranteed to be funded in the future.

429 [1] Feepayers can be well-owners or property owners depending on the selected
 430 approach.