Flood Control & Water Conservation District

Review Form

Shasta Groundwater Sustainability Plan

Dear Reviewer,

Per SGMA requirements, a Groundwater Sustainability Plan (GSP) has been developed for the Shasta Valley groundwater basin. The GSA has released a complete draft GSP and has initiated a 45-day public review and comment period and seeks input from all beneficial users of groundwater.

REVIEWER INSTRUCTIONS:

Given the large number of reviewers, accommodating track changes or other editing options within the original draft sections distributed to all committee members is not possible. Please consider using this reviewer form with the following instructions:

- Use the form below to provide comments. Feel free to add additional lines to the form as needed.
- For suggested text changes, please copy and paste the text you wish to change and place your suggested edits in track changes or strikethrough features in this document. What's important is that technical staff can see *both* the original draft text and your distinct suggestions.
- Note the Chapter, Page, Section, and line number—from the <u>PDF version</u> of the draft GSP section—where your comment, question or suggested text edit begins.
- Examples of how to provide feedback are listed in the review form below. <u>These examples</u>
 are not actual comments and are made up to show how the table should be used. Feel free to
 delete these examples with your submission, and only include your feedback.
- To comment on a figure or table, in the line number column on the reviewer form note the figure number and the page number and type your comment in the text section to the right.

Please email comments directly to (<u>sgma@co.siskiyou.ca.us</u>). Include in the subject line the basin you are commenting on. If you are making comments on multiple basins, send as separate comments.

Please send your comments no later than end of day <u>September 26, 2021</u>. Comments will not be accepter on or after September 27th, 2021.

Please use the following file nomenclature in saving your review document: ShastaGSP PublicReviewDRAFT [Your name] date

Thanks for contributing to the draft Groundwater Sustainability Plan for the Shasta Valley Groundwater Basin

Flood Control & Water Conservation District

<u>Reviewer name</u>:

Submission date:
GSP sections reviewed:

Chapter	Page	Section	Line/Table/Figure #	Comment (please delete example text below once you submit)	_
ES	3	ES-1	98	Available for the Basin dates back to eat least (typo)	CT-001
101	3	ES-1	101	What is Error! Reference source not found?	CT-002
2	4	2.1.1	91	cover a-the northern (typo)	CT-003
2	12	2.1.2	162	This section never mentions the Public Trust Doctrine despite the GSP acknowledging that groundwater and surface water in the basin are interconnected (line 110)	CT-004
2	28	2.1.4.2	695-697	"[t]here is not substantial enough data to include groundwater use estimates from illegal cannabis production in the overall and future water budgets." → How can the GSA ensure accurate water budgets if it excludes this potentially significant, albeit illegal, use of groundwater?	CT-005
2	39	2.2.1.2	Figure 12	Is this the updated figure?	CT-006
2	63	2.2.1.4	1136	"soil groups are described in Table (XXX)" → what table does this refer to?	CT-007
2	105	2.2.2.6	2052-2054	"the Shasta River surface water network contains many miles of stream channel that are connected to groundwater. The Shasta River and	CT-008

					\
				its major tributaries are all considered	
				part of the interconnected surface	
				water system in the Basin." → Given	
				this statement, the GSP needs to	CT-008
				include Public Trust considerations,	(contd.)
				as the public trust doctrine applies to	
				the management of groundwater that	
				impacts a public trust resource (here,	
				the Shasta River).	OT 000
3	6	3.3	134	Per 23 C.C.R. § 354.34(b)(1-4)	CT-009
3	6	3.3	152	Section 351(1)	CT-010
3	7	3.3	179-180	"Owners and/or operators of	
				groundwater wells, meeting a certain	
				criteria, are <i>encouraged</i> to report	CT-011
				pumping volumes" (emphasis added)	01 011
				→ what is landowners do not want to	
				share information?	
3	30	3.3.4.2	511	Why will this take 10 years?	CT-012
			1138-1139	"Arsenic, boron, iron, manganese,	
				and pH do not have an SMC because	
				they are naturally occurring." →	CT-013
				what if groundwater pumping	0.010
				increases the concentration of these	
				constituents?	
4	6-10	4.1	Table 4.1	General thoughts about PMAs:	
				- Most of the tier 1 actions rely	
				on another entity acting	
					CT-014
				groundwater pumping is in	
				Tier 3, it will likely not be	
				implemented soon enough to	
				improve conditions. This	

					.
				triggers public trust doctrine concerns.	CT-014 (contd.)
5	10	5.1.2	299-337	Concerning that the only concrete	
				action the GSA commits to is	CT-015
				"coordination." What is the GSA's	
				strategy for implementing this GSP?	J

