



COUNTY OF SISKIYOU

Flood Control and Water Conservation District

P.O. Box 750 □ 1312 Fairlane Rd
Yreka, California 96097
www.co.siskiyou.ca.us

(530) 842-8005
FAX (530) 842-8013
Toll Free: 1-888-854-2000, ext. 8005

December 11th, 2018

Dane Mathis, Supervising Engineering Geologist
Department of Water Resources
Division of Integrated Regional Water Management
South Central Region Office
3374 E Shields Ave
Fresno, CA 93726

Subject: Comments on the Department of Water Resources Draft Denial of the Shasta Valley Basin Boundary Modification Submittal

Dear Mr. Mathis:

The Siskiyou County Flood Control and Water Conservation (District), acting as the Groundwater Sustainability Agency (GSA) for the Shasta Valley Groundwater Basin (1-004), is submitting this letter to provide initial comments on the Department of Water Resources (DWR) draft notice denying the Shasta Basin Boundary Modification (BBM) request submitted by the GSA. The draft notification is received with deep disappointment and concern for the prospect of sustainable groundwater management in the Shasta Valley Basin. District staff has spent countless hours and significant resources working with DWR, basin stakeholders, UC Davis and others to develop its basin boundary modification submittal. Stakeholders within and outside of the Shasta Valley have evidenced extreme dedication to improving groundwater conditions and management in the basin and are strongly supportive of the boundary expansion.

Since mid-2016, Siskiyou County and District staff has coordinated with DWR staff on this effort. At numerous times over the last two years, DWR staff expressed the need to and benefits of expanding the basin boundary to include areas within the Shasta Valley that reflect the majority of groundwater use, activities and sources. During this period of coordination, DWR recognized that a basin boundary modification was critical to developing a comprehensive Groundwater Sustainability Plan (GSP), which gave the GSA confidence that pursuing the BBM was an important, worthwhile and pro-active approach. Over the last year, as County staff worked on developing a basin boundary map and justification, DWR was included as part of this process and provided useful input and feedback to perfect the GSA's application. The GSA wanted to ensure that DWR was included in this dialog to both foster a productive working relationship with DWR staff and to establish a strong

basis for BBM acceptance. After the BBM was submitted to DWR and the review process was initiated, DWR reached out to District staff to amend a small portion of the map to reflect a scientific justification as opposed to a jurisdictional one, again, suggesting to the District DWR's belief that a basis for approval of the BBM existed. This map amendment though being required to be brought to the District Board on short-notice was unanimously approved by the GSA. We appreciate DWR's local staff's efforts to assist District staff in this process; however, it is very discouraging that after all the work that was put in, coordination with DWR, and the truly exponential benefits to sustainable groundwater management of expanding the basin boundary, the BBM is abruptly being considered for denial.

The goal of SGMA is to promote long-term sustainability of a designated basin and/or sub-basin, but this goal cannot be achieved when the most significant influences of a groundwater basin are not included in the basin, which is currently the case with Shasta Valley basin. The conditions throughout the areas included in the BBM reflect overall groundwater production, recharge, movement and use. Through the GSA's efforts of developing and submitting a BBM, we were attempting to correct this issue in the hopes that a boundary that better reflects the broader basin would result in a comprehensive and logical GSP. In addition, in order to meet the requirements of SGMA, establish and address sustainability factors, and ensure groundwater health and reliability over the long-term; only a basin boundary that closely reflects the basin boundary map submitted by the GSA would accomplish these goals. For example, surface-water/groundwater interaction is one of the most significant sustainability factors that will need to be analyzed and addressed in the GSP; however, roughly only six-and-a-half miles of the lower 40 Shasta River miles are located within the current Bulletin 118 basin. By denying the BBM, DWR is forcing the GSA to develop a GSP that looks at the basin very narrowly, and without consideration of those areas that are the largest groundwater influencers. Essentially, denial of the BBM goes against the spirit- of SGMA.

There is tremendous momentum behind the BBM from those stakeholders who have participated and supported its development (including tremendous local support). The GSA has grant funding that was approved by DWR to assist in studying the basin and developing a comprehensive GSP, and the GSA's desire is to promote sustainability throughout the Shasta Valley.

DWR's draft denial is made in error and District staff will be working with our consultants, which include Larry Walker Associates, UC Davis and CSU Chico, to submit within the comment period additional analysis of the information the GSA has provided to DWR to further clarify that the BBM fits both the spirit and letter of the law. We urge DWR to carefully consider this letter and the scientific and legal analysis of existing submittals that will later follow, and use them to reconsider the prospect of an improper denial of the BBM.

If you have any questions, please free to contact Matt Parker, Natural Resource Specialist, at mparker@co.siskiyou.ca.us or 530-842-8019. This letter was approved by the Siskiyou County Flood

Control and Water Conservation District Board of Directors on December 11, 2018, by the following vote:

AYES: Supervisors Kobseff, Criss, Valenzuela, Nixon and Haupt
NOES: NONE
ABSENT: NONE
ABSTAIN: NONE

Sincerely,



Ray A. Haupt, Chair
Board of Supervisors

cc: Joaquin Esquivel, Board Member
State Water Resources Control Board

Tom Gibson, Undersecretary
California Department of Natural Resources

Jack Rice, Counsel
California Farm Bureau

Assemblyman Brian Dahle