



SISKIYOU RESOURCE CONSERVATION DISTRICT

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Siskiyou County Flood Control & Water Conservation District
1312 Fairlane Rd.
Yreka, CA 96097

September 25, 2021

Re: Scott Valley Groundwater Sustainability Plan: public comments

Dear Members of the Flood Control and Water Conservation District Board,

The Board of the Siskiyou Resource Conservation District is providing you our overall comments on the public draft report of the Scott Valley Groundwater Sustainability Plan, in addition to detailed comments (submitted separately). One of our directors, Tom Jopson, has also participated as a member of the GSP committee since its beginning.

The Plan specifically mentions “coordination with local resource conservation districts” as a means to “effectively advance SGMA implementation” (Ch. 1, p. 7). We agree, but such coordination did not seem to occur during the development of GSP implementation ideas. Our ongoing and proposed RCD projects that are related, directly or indirectly, to groundwater management were not included in Chapter 4’s table of Projects & Management Actions (PMAs). We have tried correcting that omission in our detailed comments. Outreach by your District, county staff, and consultants to our RCD staff would be appreciated in the development and implementation of PMAs.

SRCD-001

As you are aware, the Siskiyou RCD also has extensive experience with surface water, groundwater, and fisheries monitoring in our watershed, but grant funding has not been consistently available to sustain continued data collection, leaving gaps in everyone’s understanding of their interrelationships. The UCD Integrated Hydrologic Model for Scott Valley will benefit in its accuracy from such additional data. Adding “Monitoring” as a category to Ch. 4’s Table 1 and listing needed monitoring efforts will help focus funding attention to this critical need.

SRCD-002

In addition to the above issues, Chapter 4’s Table 1 currently appears to be a laundry list of ongoing and potential projects, with no ranking of “cost-effectiveness”. Buried in Appendix 5-A is a draft “PMA Prioritization and Scoring System”, which offers an initial method to help sort out good projects from ineffective ones. Working through these criteria and scoring options with the GSP Committee before final adoption of the plan, or shortly thereafter, by your Board would provide a more useful list of PMAs that could pursue immediate funding.

SRCD-003

Thank you for this opportunity to better involve our RCD in the Scott Valley GSP.

Sincerely,

DocuSigned by:
Caroline Luiz
3FE780A7DE764D7
Caroline Luiz
RCD Board Chair

COUNTY OF SISKIYOU

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Review Form Scott Groundwater Sustainability Plan

Dear Reviewer,

Per SGMA requirements, a Groundwater Sustainability Plan (GSP) has been developed for the Scott 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 *PDF version* 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. These examples 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 (sgma@co.siskiyou.ca.us). 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 September 26, 2021. Comments will not be accepted on or after September 27th, 2021.

Please use the following file nomenclature in saving your review document:

ScottGSP_PublicReviewDRAFT_[Your name]_date

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

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Reviewer name: Lindsay Cummings – Siskiyou Resource Conservation District

Submission date: 9/26/2021

GSP sections reviewed: Chapter 4

Chapter	Page	Section	Line/Table/Figure #	Comment
4	7	4.1	Line: 224 Table: 1	<p>The following projects fits within the PMA framework</p> <p>Tier: I Title: South Fork Scott River Floodplain Connectivity Project Description: This three-phase project reconnects historical floodplains in the South Fork of the Scott River that were disconnected as a result of historical mining activity. In addition to reconnecting floodplains, the project creates habitat improvements through engineered log jams and wood loading in a mile-long stretch of the South Fork of the Scott River. Lead Agency: Siskiyou Resource Conservation District Category: Supply augmentation, Habitat Improvement Status: Existing/ Ongoing Anticipated Time Frame: Phase I and II complete. Phase III completion by 2021-2022 Targeted Sustainability Indicator(s)/ beneficiaries:</p>

SRCD-004

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4	7	4.1	Line: 224 Table: 1	<p>Increased groundwater levels, interconnected surface water, instream habitat improvement, improved habitat for GDEs (coho salmon)</p> <p>Tier:I</p> <p>Title: Lower Scott River Side Channel Connectivity and Habitat Enhancement project</p> <p>Description:As a continuation of the recently constructed off-channel pond (2020), SRCD will complete restoration efforts within the mainstem and oxbow side-channel area to improve channel function and enhance access to slow water habitat. This project will incorporate side channel activation, BDA (beaver dam analogs) and engineered log jams.</p> <p>Lead Agency: Siskiyou Resource Conservation District</p> <p>Category: Habitat Improvement</p> <p>Status: Existing / Ongoing</p> <p>Anticipated Time Frame: Off channel pond complete in 2020. Channel connectivity and instream habitat improvements completion by 2022.</p> <p>Target Sustainability Indicator(s)/ beneficiaries: Increased groundwater levels, interconnected surface water with off-channel pond, instream</p>	SRCD-004, Cont'd	SRCD-005
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4	8	4.1	Line: 224 Table: 1	<p>habitat improvement, improved habitat for salmonids</p> <p>Tier: II</p> <p>Title: Instream Habitat Improvement on the East Fork Scott River.</p> <p>Description: Improve stream flow, create scour pools, and increase habitat for spawning and over summering salmonids in the E Fork of the Scott River on the Beaver Valley Headwater Preserve.</p> <p>Lead Agency: Siskiyou Resource Conservation District</p> <p>Category: Habitat improvement</p> <p>Status: Planning Phase</p> <p>Anticipated Time Frame: Planning Phase</p> <p>Target Sustainability Indicator(s)/beneficiaries: increased surface water connectivity, habitat improvement for GDE (coho salmon)</p>	<div style="border: 1px solid black; padding: 2px;">SRCD-005, Cont'd</div>
4	8	4.1	Line: 224 Table: 1	<p>As a tier II PMA, the SRCD would like to include a section for trend line monitoring of water levels, temperature, and water quality in the tributaries of the Scott River. Earlier in the 2000s, the RCD maintained a network of monitoring wells. Such activities are no longer supported. However, this network could be revived and</p>	<div style="border: 1px solid black; padding: 2px;">SRCD-006</div> <div style="border: 1px solid black; padding: 2px; margin-top: 10px;">SRCD-007</div>

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expanded and fulfill needs laid out in Section 4.5, lines 1116-1123

Tier: II

Title: Scott River Basin Stream Flow Monitoring

Description: Reinstate historic stream flow monitoring activated throughout the watershed to improve knowledge of stream flow response in relation to existing and modified conditions. The SRCD will reinstall instream monitoring devices and monitoring wells to measure water levels, temperature, and water quality across all tributaries to the Scott River. This network will assess surface water contributions to groundwater and will augment and inform the SVIHM (as laid out in Chapter 3, Section 3.3, lines 238-246). This network will also be used to inform agencies involved with protecting and conserving GDEs in the system.

Lead Agency: Siskiyou Resource Conservation District

Status: Planning Phase

Anticipated Time Frame: Current, TBA

Targeted Sustainability

Indicator(s)/ benefits: Realtime data available to developers of the

SRCD-007,
Cont'd

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SVIHM, water users, and various conservation organizations in the Scott Valley.			
4	7	4.1	<p>Line: 224 Table: 1</p> <p>Tier: I Title: Scott River Groundwater Monitoring Description: This project will provide monitoring services related to groundwater enhancement and recharge projects. During the 2020 drought, the SRCD will be involved with groundwater transactions in Reach 9 of the Scott River (between Highway 3 and the National Forest Land). This includes daily monitoring of the groundwater response to curtailments in irrigation in both Scott River and in adjacent fields through temporary wells and established wells. Lead Agency: Siskiyou Resource Conservation District Category: Supply augmentation, recharge Status: Ongoing and in development Anticipated Time Frame: Current, TBA Targeted Sustainability Indicator(s)/ benefits: Increased groundwater levels, interconnected surface water, improved water</p>

SRCD-007,
Cont'd

SRCD-008

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4	7	4.1	Line: 224 Table: 1		<p>temperature, improved habitat for GDEs (coho salmon)</p> <p><i>This project is complementary to and in conjunction with other projects mentioned in Chapter 4 namely: "MAR&ILR -NFWF Scott Recharge Project" and "MAR & ILR"</i></p> <p>Tier: II Title: Scott Valley Managed Aquifer Recharge Projects Description: The SRCD continues to work with landowners, water districts, and ditch companies to develop potential managed aquifer recharge projects within critical areas of the Scott River Basin. Project implementation will improve groundwater to surface water interactions via recharge efforts and enhance stream quantity during periods of low flow. Lead Agency: Siskiyou Resource Conservation District Category: Supply augmentation, recharge Status: In development Anticipated Time Frame: TBA Targeted Sustainability Indicator(s)/beneficiaries: Increased groundwater levels, interconnected surface water,</p>	SRCD-008, Cont'd	
						SRCD-009	

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improved water temperature,
improved habitat for GDEs (coho
salmon)

SRCD-009,
Cont'd

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