

# COUNTY OF SISKIYOU

Flood Control & Water Conservation District

## Review Form

### Shasta Groundwater Sustainability Plan

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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 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](mailto: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 27<sup>th</sup>, 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

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Reviewer name: Scott Valley and Shasta Valley Watermaster District

Submission date: September 26, 2021

GSP sections reviewed:

Chapter	Page	Section	Line/Table/Figure #	Comment ( <i>please delete example text below once you submit</i> )
2	14	2.1.2.2	Line 233	Recommend: Amend to specify that “during dry seasons, groundwater springs in the Big Springs Complex provide an estimated 95 percent of baseflow to the lower Shasta River via the Big Springs Creek tributary” (Nichols et al, 2010). SSWD-001
2	19-20	2.1.2.12	449	Recommend: list BSID and MWCD separately, to identify them as the only irrigation districts that divert groundwater. Comment: If the descriptions of SWRA and GID are to remain in the plan, need to make clear that these are adjudicated surface water users that are not subject to SGMA. SSWD-002
2	20	2.1.2.12	450	Correction Needed: BSID abandoned 25 of 30 cfs priority 24 from Big Springs Lake in a letter dated 6/18/1987 to DWR. BSID then abandoned the remaining 5cfs in a letter dated 12/17/1996 to DWR. Therefore, BSID has no active water rights from Big Springs Lake. SSWD-003
2	20	2.1.2.12	451	Question: what entity will manage BSID’s groundwater diversion? SSWD-004

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2	20	2.1.2.12	454	Correction needed: Please clarify that BSID does not divert surface water. Is the “surface water management” described here referring to their delivery system?	SSWD-005
2	20	2.1.2.12	456-462	Correction needed: Please clarify that GID has surface water rights via the Shasta River Decree that are not subject to SGMA. Question: how/why will GID surface water management be incorporated into the GSP?	SSWD-006
2	20	2.1.2.12	472-476	Correction needed: Please clarify that SWRA has surface water rights via the Shasta River Decree that are not subject to SGMA. Question: how/why will SWRA surface water management be incorporated into the GSP?	SSWD-007
2	23	2.1.2.16	519-530	Comment: Thank you for editing this section from the previous draft. Lines 519-530 are now largely duplicative to lines 531-566, and could be deleted.	SSWD-008
2	24	2.1.2.16	567-568	Comment: SSWD may be prohibited from providing this level of diversion detail due to privacy regulations. However, we can consult with legal counsel as to what type of aggregate data we could provide.	SSWD-009

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2	78	2.2.1.5	1466-1468	Comment: This statement is not accurate. Please provide supporting documentation for the Willis source.	SSWD-010
2	107	2.2.2.6	2087	Recommend: Since Big Springs accounts for 95% of lower Shasta River baseflow during the irrigation season, please pursue research to address this data gap first, rather than the current research focus along the Little Shasta River.	SSWD-011
2	116	2.2.2.6	2209	Correction needed: No surface irrigation diversions were occurring at the time of this study. Please edit this sentence to reflect this fact.	SSWD-012
3	6	3.3	All	Comment: SSWD can assist in collecting data that will inform the “Depletions of Interconnected Surface Water (ISW)” component of the GSP. SSWD has a particular interest in addressing the SGMA undesirable result of “depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water” <i>Wat. Code § 10721(x)(1)- 93 (6)</i> .	SSWD-013
3	14-17	3.3	Table 1	Recommend: Highly recommend adding ISW monitoring sites near known groundwater pumping locations.	SSWD-014

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3	26	3.3.4.1	436	STRONGLY RECOMMEND: Need to evaluate groundwater contributions to the Shasta River year-round, or at least before, during, and after irrigation season.	SSWD-015
3	29	3.3.4.1	474	Recommend: SPU gage has value as indicator of surface water depletions, particularly immediately before and after the majority of groundwater pumps turn on in the spring.	SSWD-016
3	30	3.3.4.2	504	Recommend: SPU is currently maintained by DWR and has been since 2013. Please include the data from this gage.	SSWD-017
3	31	3.3.4.3	513	Recommend: Monitoring needs to occur prior to groundwater pumps turning on in the spring, in order to capture data to help determine how much groundwater pumping is depleting surface flows in the lower Shasta River.	SSWD-018
3	31	3.3.4.3	522	Recommend: If groundwater level sampling only occurs twice per year, it should be done pre and post irrigation season.	SSWD-019
3	42	3.4.3.2	791	Question: What are the identified reaches for ISW? Again, any useful ISW measurements need to be taken prior to, during, and after irrigation season.	SSWD-020
3	42	3.4.3.2	807-812	Comment: Computing baseflows at SRM using this formula for gaging	SSWD-021



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minimum thresholds during the irrigation season on a real-time basis can be very cumbersome and inaccurate due to all the variables involved including the large number of adjudicated and riparian surface water diversions between Dwinnell Reservoir and SRM, unknown surface and subsurface return flows from irrigation as well as the large flow travel time between these two sites which is estimated at about 18 hours at lower flows. For this method to be reliable, the flow at the upstream and downstream gages and the surface water and ground water diversions would have to be in a steady state at least 18 hours before the measurements as well as during the measurements. The watermaster would also need permission from the riparian diverters to measure their diversions along with the adjudicated diversions within a given day. Even so, this method does not account for the depletion of surface water due to ground water diversions.

Given all the variables involved, SSWD recommends that minimum thresholds be determined for SPU and real-time baseflows be computed

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SSWD-021  
contd.

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				using the SPU gage instead of SRM. When baseflows are approaching minimum thresholds, only a few surface water diversions will be occurring between Dwinnell Reservoir and SPU, no riparian diversions exist, the flow travel time is only about 6 hours and as the available flow data for SPU indicates, the baseflow at this gage equals near 100% of the inflow to the Lower Shasta during low flow periods and the actual flow at this gage would be close to the baseflow.	SSWD-021 contd.
3	43	3.4.3.2	Table 7	Correction needed: The SRM mean daily flow values for 2016 and 2017 in Table 7 do not agree with the USGS final data. These values should be 40.6, 48.8, 65.6, 67.4, 71.4 and 75.0 cfs, respectively. The flow values for 2018 – 2020 agree with the final data. Also, it appears that the terms “Baseflow” and “Groundwater Contributions” as used in Table 7 and Figure 10 are the same values, but this is confusing.	SSWD-022
3	45	3.4.3.4	Table 8	Recommend: SSWD recommends that the preliminary minimum threshold for baseflow be set at 115 cfs instead of 100 cfs and a trigger be	SSWD-023

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				set at 130 cfs instead of 115 cfs at SRM and that these values do not change depending on the year type.	↑ SSWD-023 contd.
3	45	3.4.3.3	849	Recommend: using 115 as the minimum threshold. This is consistent with the recent SWB Emergency Drought Regulation. If the SGMA process doesn't address drought conditions, the SWB likely will.  Note: The recent SWB Emergency Drought Regulation included a schedule of water right priorities for both surface water and groundwater users. It would behoove the SGMA Team to include this in the GSP.	SSWD-024
3	47	3.4.3.6	932	Recommend: CDFW will be installing a stream gage in Big Springs Creek, which is a major ISW area. Recommend including this gage into the monitoring network to provide real-time continuous flow data.	SSWD-025
4	6	4.1	Table 4.1	Correction needed: on Watermaster Tier 1: Please add first sentence: "Implements Shasta River Decree." Then, please replace "enforce" with "assists in managing."	SSWD-026
4	10	4.1	Table 4.1	Recommend: adding Tier 3 project titled "Coordinated Shasta Valley Irrigation Management," as a voluntary locally-led initiative	SSWD-027 ↓

