



**MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER**  
Honoring and Protecting our Mountain Environment Since 1988

September 26, 2021

To: The Siskiyou County Flood Control and Water Conservation District

re: Shasta GSP Comments

submitted via email to: [sgma@co.siskiyou.ca.us](mailto:sgma@co.siskiyou.ca.us)

Thank you for the opportunity to comment on the Shasta Valley Groundwater Sustainability Plan.

The Mount Shasta Bioregional Ecology Center submits the following comments:

We believe that this current document, at its heart, will fail to address ongoing impacts to the public trust resources of the Shasta Valley. This plan de-emphasizes the fact that the Shasta River is in a perilous state due to agricultural diversions of surface water and over pumping of groundwater.

MSEC-001

The Shasta River, as is described many times in the draft document, is intimately connected to the ground water in the basin. The river is listed 303(d) impaired for both temperature and dissolved oxygen. Many past assessments have described a river system that is heavily impacted by irrigation diversion of surface water and groundwater extraction. This summer agricultural users nearly de-watered the river and one of the lowest flow events ever recorded resulted (3.5 cfs at the Yreka gage).

We believe parts of this plan will serve to improperly establish baseline coverage of current practices, delay implementation of management actions, or even promote projects which could increase groundwater pumping. In doing so, the GSP seems to be designed to protect agricultural overreliance on groundwater in the Shasta River basin.

MSEC-002

The GSP points towards an over reliance on future studies or future projects when it is evident that in order to consider groundwater sustainability in the Shasta Valley, one could simply consider only the agricultural water use during agricultural irrigation season. During the driest time of the year, agricultural use of interconnected surface water and groundwater vastly tips the water budget out of any semblance of sustainable. Once the irrigation season ends, groundwater recharge is rapid.

MSEC-003

As this region has continued to experience more “very dry” years, it has become more and more apparent that there is simply not enough water during the summer months to

MSEC-004

support current agricultural users, protect the public trust resources, and maintain suitable aquatic habitat for native salmonids.

The county remains averse to addressing the current conditions, minimizing the evidence that agricultural groundwater use plays an increasing role in pushing the Shasta Valley further from groundwater sustainability.

We assert that generic projects in the preliminary list of PMA's aimed at "irrigation efficiency" or "flow management strategies/plans" (SHA's) will simply allow increased water consumption and expansion of irrigated acreages. None of these theoretical projects puts more water in the river or ground; they would simply ratify extractive water uses under a banner of "beneficial" use.

This GSP does little to acknowledge the shifting considerations being made throughout state code which serve to address issues of racial and environmental justice (see SWRCB Racial Equity Initiative and the CA Fish and Game Commission working on an equity resolution and initiative). We have reached a critical moment in the evolving state regulatory structure where we must not only acknowledge the systemic tribal, racial, and environmental harms and injustices that have been propagated through land and water use laws, but we must now act to cease such harms. As such, by not addressing this, the plan will act to extend the historic "beneficial" use of water in Shasta Basin to grow food for cattle and only secondarily extend considerations to the environment or disadvantaged communities.

With respect to developing, installing, and maintaining a modern monitoring system, we are troubled to see a shift in financing away from groundwater users and towards some notion that the whole county "benefits" from the cattle industry's continued overreliance on groundwater extraction. We do not think any taxpayers who reside outside of a specific basin should be asked to pay for any basin-specific monitoring network (tax increase). We believe that all monitoring equipment paid for with taxpayer money should be available in real time to the public. We believe that agricultural wells should be required to be metered for accuracy in reporting.

Overall, we would like to acknowledge the effort that has gone into this GSP. We hope that this document can remain buoyed by collaborative efforts and common goals and that it continues to evolve into a true guiding document for sustainable groundwater for all users in the Shasta Valley.

Nick Joslin  
nick@mountshastaecology.org  
Forest and Watershed Watch Program Director  
Mount Shasta Bioregional Ecology Center

MSEC-004  
contd.

MSEC-005

MSEC-006

MSEC-007

MSEC-008

MSEC-009

MSEC-010