



Salmonid Restoration Federation

September 24, 2021

Ray Haupt, Chair
Siskiyou County Flood Control & Water Conservation District
P.O. Box 750
1312 Fairlane Rd.
Yreka, CA 96097

Submitted by email to: SGMA@co.siskiyou.ca.us

RE: Comments on Public Draft of Scott Valley and Shasta Valley Groundwater Sustainability Plans

Dear Chairman Haupt:

The mission of Salmonid Restoration Federation (SRF) is to promote restoration and stewardship of California's native salmon, steelhead, and trout populations and their habitat. We appreciate the opportunity to comment on the public drafts of the Groundwater Sustainability Plans (GSPs) for Scott Valley and Shasta Valley. We have briefly reviewed the GSPs and comments submitted by other entities.

We appreciate the County stepping up to lead development of the GSPs, and the tremendous amount of effort put into GSP development; however, we are disappointed by the contents of the GSPs. Our concerns fall primarily into two categories: 1) failure to properly characterize the adverse impacts on beneficial uses of the surface water caused by groundwater pumping, including a failure to propose actions that adequately address these adverse impacts, and 2) a lack of transparency which will severely impair the effectiveness of groundwater management.

The rivers and streams in the Scott and Shasta watersheds are severely depleted of water throughout large portions of each year. Due in large part to this flow depletion, salmon populations in these two watersheds have declined precipitously from historical abundance over the past century and have continued their decline in recent decades and years. There are multiple factors contributing to this water depletion, including excessive diversion of surface water, excessive extraction of groundwater, and a warming climate that is diminishing snowpack and increasing the prevalence of droughts. Groundwater extraction from areas where wells can be regulated under SGMA are just one of these causes of flow depletion. Therefore, GSPs are not

SRF-001

responsible for reversing the streamflow depletion caused by surface diversions or groundwater outside SGMA jurisdiction (e.g., wells near the mainstem Scott River, in the zone subject to surface water adjudication). However, the draft GSPs do not meet the SGMA requirements for addressing the impacts of groundwater extraction from wells inside SGMA jurisdiction.

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SGMA requires that a GSP define minimum thresholds for streamflow depletion that cause adverse impacts on beneficial uses of the surface water, and then propose actions to ensure that such thresholds are avoided. Instead, the Scott Valley GSP does that process backwards, first defining actions that are easily achievable by groundwater users and then setting the minimum thresholds based on that. There is no consideration of the actual effects of streamflow depletion on surface water beneficial uses. This approach does not meet SGMA requirements.

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The lack of transparency in the GSPs is troubling. Effective water management requires reliable data upon which to develop scientific understanding of how the hydrologic system operates, how the system is likely to respond to potential management actions, and ongoing monitoring to track progress in meeting goals. The methods and data used must be transparent and verifiable. There is currently a lack of basic information such as the amount of groundwater extracted. Neither the Scott or Shasta GSP require metering of groundwater extraction, nor public sharing of groundwater elevation data in a form that is transparent and verifiable (i.e., sharing the actual raw data rather than summaries). Without metering and data sharing, GSP policies such as “Avoiding Significant Increase of Total Net Groundwater Use from the Basin” are illusory and easy to game. In the absence of universal metering, the only other way to ensure avoiding increases in net groundwater use would be to not allow new well construction and not allow irrigation in areas not currently irrigated; however, the GSPs contain no such prohibition.

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SRF-004

Thank you for your consideration of these comments.

Sincerely,



Dana Stolzman, Executive Director
Salmonid Restoration Federation