

Sept. 26, 2021

Siskiyou County Flood Control and Water Conservation District
1312 Fairlane Road
Yreka, CA 96097

Submitted via email : lauraf@lwa.com, katie.duncan@stantec.com, sgma@co.siskiyou.ca.us

Re: Public comment letter for Shasta Valley Draft Groundwater Sustainability Plan

Dear Dr. Laura Foglia, Matt Parker, GSA advisory committee, and technical team,

Shasta Headwaters is a forming coalition working to improve source water protection, resource conservation, and ecosystem restoration in Mount Shasta’s three distinct drainages; the Upper Sacramento, McCloud and Shasta River watersheds.

These comments focus primary on effective Stakeholder Engagement to ensure that PMA implementation translates into equitable, reasonable and practical actions that encourage appreciation for ecosystems, and generate tangible benefits for marginalized stakeholders, as well as ongoing opportunities for improved stewardship at the local level. Though we have only conducted a cursory review the draft plan, we participated in multiple GSA meetings throughout plan formation. Thank you for compiling such a comprehensive initial draft, and incorporating these comments into the final plan.

Recovering from a century of extractive resource management, and reeling from another summer of extreme drought and wildfire, public stakeholders in Northern California are relieved that groundwater is finally about to be regulated. To preempt state intervention in local water management, and avoid the most deleterious threats of climate disruption, Siskiyou County must embrace the urgency of issues outlined in its GSP’s, and the state must empower local water managers to adjust policies and practices to accommodate SGMA compliance.

Local grassroots organizations have participated in multiple collaborative efforts to conserve natural resources over the past few decades throughout the region. These include, but are not limited to: Renew Siskiyou - Climate Adaptation plan drafted in 2016, and the Upper Sacramento Integrated Regional Water Management (IRWM) Plan ratified in 2014. We have seen public and private funds spent on drafting smart plans, just to stagnate and collect dust on shelves. While the enforceability of SGMA is encouraging, we are concerned that without sufficient community buy-in and effective diverse stakeholder participation, GSP’s will primarily serve to allocate corporate welfare to large land-owners, and continue current “regulatory” trends that broaden economic disparities and favor private over public interests.

In general, the draft plan underestimates the Shasta River’s immense natural values, and it understates its historical significance to the third most productive salmon-supporting river in the contiguous western United States, and largest river restoration project in the nation/world. The plan should convey a tone of pride, honor, and duty to protect and restore the remarkable natural heritage of the Shasta River. By framing the task at hand through a solution-oriented lens, the plan should clarify that a thriving, charged, salmon-laden Shasta River is the ultimate indicator of sustainable groundwater management throughout the valley.

SH-023

SH-001

In addition to acknowledging its status as one of five priority anadromous fish spawning habitats by the state, we recommend:

- At the end of section 2.2.1.1 after line 784, emphasize how the valley's hydrogeology including its shallow grade, unique mineral deposits/chemical composition, and continual copious inputs of cold, clean, glacial-fed spring water made Shasta River prime salmon habitat, that historically boasted a significant majority percentage of salmon returning to spawn in the Klamath River system.
- Such hydrological conditions were guaranteed by consistent winter snowpack that is diminishing under current and projected warming. Please highlight how state and local water policy reform is necessary to adjust current practices to prospects of natural recharge, now and in the near future.

SH-002

SH-003

During one of the GSA sub-committee meetings, I inquired that since the ground-to-surface water interconnection is established, and it's common for the Shasta River to flow at a tiny fraction of its naturally occurring volume, how can the basin not be overdrafted? The team provided a lengthy explanation that sounded like technically, the basin may not be in overdraft. But practically speaking, a month later the state issued emergency drought curtailments to irrigators throughout the basin for the first time ever. If the basin is not in a state of overdraft, while the river that defines the basin is routinely getting dewatered, perhaps we need to redefine overdraft?

- I was unable to find an explanation of what constitutes overdraft in the draft plan. Please point me toward it, or include it as point of discussion/clarification.

SH-004

The plan also underestimates the power of coordinated, widespread, voluntary conservation efforts, grassroots stewardship, and community buy-in. We urge you to include more meaningful opportunities for public interest representation, as well as Tribal leadership. In addition to establishing a monitoring network and making important water information available to the public, we recommend:

- Include residential, municipal, and small agricultural water conservation education to the list of Tier I or II PMA's.
- Incorporate a mechanism for generating diverse stakeholder consensus on PMA prioritization and implementation.
- Include Friends of Shasta River in the Table 1 list of Shasta Valley Stakeholder Groups as an environmental organization or local NGO.
- Provide financial support for Tribal and/or environmental stakeholder leadership during plan implementation and maintenance.

SH-005

SH-006

SH-007

SH-008

SH-009

SH-010

Data access and water-use accountability are essential for sustainable water management. The plan does a good job of acknowledging the lack of existing data used to inform water use throughout the region. In addition to bridging data gaps, we urge the GSA to pay more attention to making better use of data we do have, and synthesize the many avenues of watershed data monitoring into a comprehensive, user-friendly, consistent data management system.

SH-011

We applaud the significant expansion of acreage that was included into the basin under the initial boundary modification, and we are aware that unlimited, unmonitored uses upstream may intensify conflicts between farmers and fish advocates downstream. We recommend:

- Coordinate PMA implementation among the four basins; Shasta, Scott, Butte, Tule Lake. SH-012
- Consolidate resources – combine the multiple water conservation/irrigation/service districts into one comprehensive Shasta River watershed authority. SH-013
- Coordinate data monitoring and plan performance between GSA’s and Integrated Regional Water Management (IRWM) groups operating in Siskiyou County. Specifically, the North Coast Resource Partnership and the Upper Sacramento Regional Water Action Group (RWAG). SH-014
- In the “upslope water yield projects’ category, include a mechanism for monitoring non-beneficial, industrial extraction. SH-015
- Include incentives for switching to less water-intensive crops, and adopting regenerative agricultural practices in Tier I or Tier II PMA’s SH-016
- Identify periodic updates of Bulletin 118 as an opportunity to mandate monitoring of unregulated groundwater upstream. SH-017

Distributing powers of authority to local jurisdictions is an important step toward long-term sustainable water management. Impediments to sustainability, however, often exist at the state level. For GSA’s to achieve SGMA compliance, regional, state, and local jurisdictions must remedy glaring obstacles to watershed stewardship, such as:

- Revisit and revise overly-complicated, fragmented, outdated, profit-motivated water management policies, and over-allocated water rights. SH-018
- Over-regulating small business, while under-regulating big business thereby pitting farmers against fish, while industrial users deplete dwindling supplies. SH-019
- Streamline permit processes and provide incentives for the deconstruction of impoundments that are not subject to FERC, but have outlived their useful lives. SH-020

For California to recover from climate disruption, and for communities to minimize exposure to incessant drought, the state must shift our water ethics from “use it or lose it” to “less is more”.

GSP’s should allocate a substantial percentage of SGMA grant funds to management actions that reward behavioral alternatives to wasteful water use, across sectors. Business-as-usual is threatening basic conditions for quality of life, enabled by many decades of neglecting the complicated task of regulating groundwater. In order for GSA’s to achieve desired results, stakeholders must do more than meter wells and monitor groundwater elevation. We must learn to appreciate ecosystem services, limit consumptive uses that primarily benefit private interests, invest downstream stakeholders in protecting supplies upstream, restore biodiversity habitat, and heed traditional ecological knowledge. SH-021

SH-022

Overall the plan is a refreshing consolidation of relevant data that is long overdue in a modern, democratic society. While we are mindful of California’s tendency to talk more than it walks, we also recognize this unique opportunity to galvanize shared interests around common goals. In short, we are tentatively hopeful that SGMA will provide a reliable platform for protecting communities against wildfire and drought by restoring a healthy Shasta River watershed.

Respectfully,

Angelina Cook
 (530) 859-2083
angelina@shastaheadwaters.com