

Big Valley Groundwater Basin Groundwater Sustainability Plan

FINAL – REVISED

April XX, 2024



Prepared for:
Lassen County Groundwater Sustainability Agency
Modoc County Groundwater Sustainability Agency

Big Valley Groundwater Sustainability Plan

Adopted December 15, 2021; Revised GSP Adopted April XX, 2024

Prepared by:



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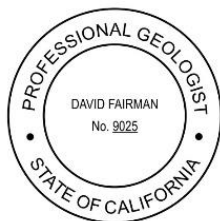
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**The Groundwater Sustainability Agencies' resolutions adopting this
Groundwater Sustainability Plan are included in Appendix 11F**

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Acronyms and Abbreviations

ACWA	Ash Creek Wildlife Area
AF	Acre-Feet
AFY	Acre-Feet Per Year
ASR	Aquifer Storage and Recovery
Basin	Big Valley Groundwater Basin
Basin Plan	Water Quality Control Plan
bgs	Below Ground Surface
BIA	U.S. Bureau of Indian Affairs
Big Valley	Big Valley Groundwater Basin
BLM	U.S. Bureau of Land Management
BMO	Basin Management Objective
BMP	Best Management Practices
BVGB	Big Valley Groundwater Basin
BVAC	Big Valley Groundwater Basin Advisory Committee
BVWUA	Big Valley Water Users Association
C&E	Communication and Engagement
CAL FIRE	California Department of Forestry and Fire Protection
CASGEM	California Statewide Groundwater Elevation Monitoring
CDEC	California Data Exchange Center
CDFA	California Dept of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFCC	California Financing Coordinating Committee
CGPS	Continuous Global Positioning System
CIMIS	California Irrigation Management Information System
CGS	California Geological Survey
CRP	Conservation Reserve Program
CVSC	Central Valley Salinity Coalition
CWA	Clean Water Act
CWC	California Water Code
DDW	State Water Resources Control Board's Division of Drinking Water
District	Lassen-Modoc County Flood Control and Water Conservation District
DMS	Data Management System
DOI	Department of the Interior
DTW	Depth to Water
DWR	California Department of Water Resources
EC	Electrical conductivity
EQIP	Environmental Quality Incentives Program
ET	Evapotranspiration
ETo	Reference Evapotranspiration
°F	Degrees Fahrenheit
Forest Service	U.S. Forest Service
FSA	Farm Service Agency
ft bgs	Feet Below Ground Surface

ft/d	Foot or Feet Per Day
ft/yr	Foot or Feet Per Year
GAMA	Groundwater Ambient Monitoring and Assessment Program
GAMA GIS	GAMA Groundwater Information System
GDE	Groundwater Dependent Ecosystem
GEI	GEI Consultants Inc.
General Order	Statewide ASR General Order
GIS	Geographic Information System
GP	General Plan
gpm	Gallons Per Minute
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCM	Hydrogeologic Conceptual Model
HSG	Hydrologic Soils Group
IC	Institutional Controls
ILRP	Irrigated Lands Regulatory Program
IM	Interim Milestone
in/hr	Inches Per Hour
InSAR	Interferometric Synthetic Aperture Radar, a technology used to detect subsidence
IRWMP	Upper Pit Integrated Regional Water Management Plan
IWFM	Integrated Water Flow Model
LCGMP	Lassen County Groundwater Management Plan
LCWD #1	Lassen County Waterworks District #1
LNAPL	Light non-aqueous phase liquid (found in petroleum hydrocarbons)
LUST	Leaking underground storage tank
M	Million
MCL	Maximum Contaminant Level
Mn	Manganese
MO	Measurable Objective
MOU	Memorandum of Understanding
msl	Mean Sea Level
MT	Minimum Threshold
MTBE	Methyl tert-butyl ether
MW	Monitoring Well
ng/L	Nanograms Per Liter
NCCAG	Natural Communities Commonly Associated with Groundwater
NGO	Non-Governmental Organization
North Cal-Neva	North Cal-Neva Resource Conservation and Development Council
NCWA	Northern California Water Association
NECWA	Northeastern California Water Association
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NR	Natural Resources
NRCS	Natural Resources Conservation Service
NSP	Nonpoint Source Program
OS	Open Space
OWTS	Onsite Water Treatment System

PFAS	Per/Polyfluoroalkyl Substances
PFOS	Perfluorooctane Sulfonate
PG&E	Pacific Gas and Electric
Plan	Groundwater Sustainability Plan
Reclamation	United States Bureau of Reclamation
RWMG	Regional Water Management Group
RWQCB	Regional Water Quality Control Board
RWQCB-R5	Regional Water Quality Control Board Region 5
Regulations	GSP Regulations, California Code of Regulations Title 23, Division 2, Chapter 1.5
SAGBI	Soil Agricultural Groundwater Banking Index
SB	Senate Bill
SC	Specific Conductance
SGMA	Sustainable Groundwater Management Act of 2014
SMC	Sustainable Management Criteria
SRI	Sacramento River Index of water year types
SSURGO	Soil Survey Geographic Database
State Water Board	California State Water Resources Control Board
SVE	Surprise Valley Electric
SVWQC	Sacramento Valley Water Quality Coalition
SWEEP	State Water Efficiency and Enhancement Program
SWRCB	State Water Resources Control Board
SY	Specific Yield
TBA	tert-Butyl alcohol
TDS	Total Dissolved Solids
TMDL	Total Maximum Daily Load Program
TNC	The Nature Conservancy
UCCE	University of California Cooperative Extension
U.S.	United States
USCB	United States Census Bureau
USDA	U.S. Department of Agriculture
USFS	U.S. Forest Service
USGS	United States Geologic Survey
UST	Underground Storage Tank
WAA	Water Availability Analysis
WCR	Well Completion Report
WDR	Waste Discharge Requirement
WMSA	Watermaster Service Area
WRP	Wetland Reserve Program
WY	Water Year (October 1 – September 30)

Executive Summary

ES.1. Introduction & Plan Area (Chapters 1 – 3)

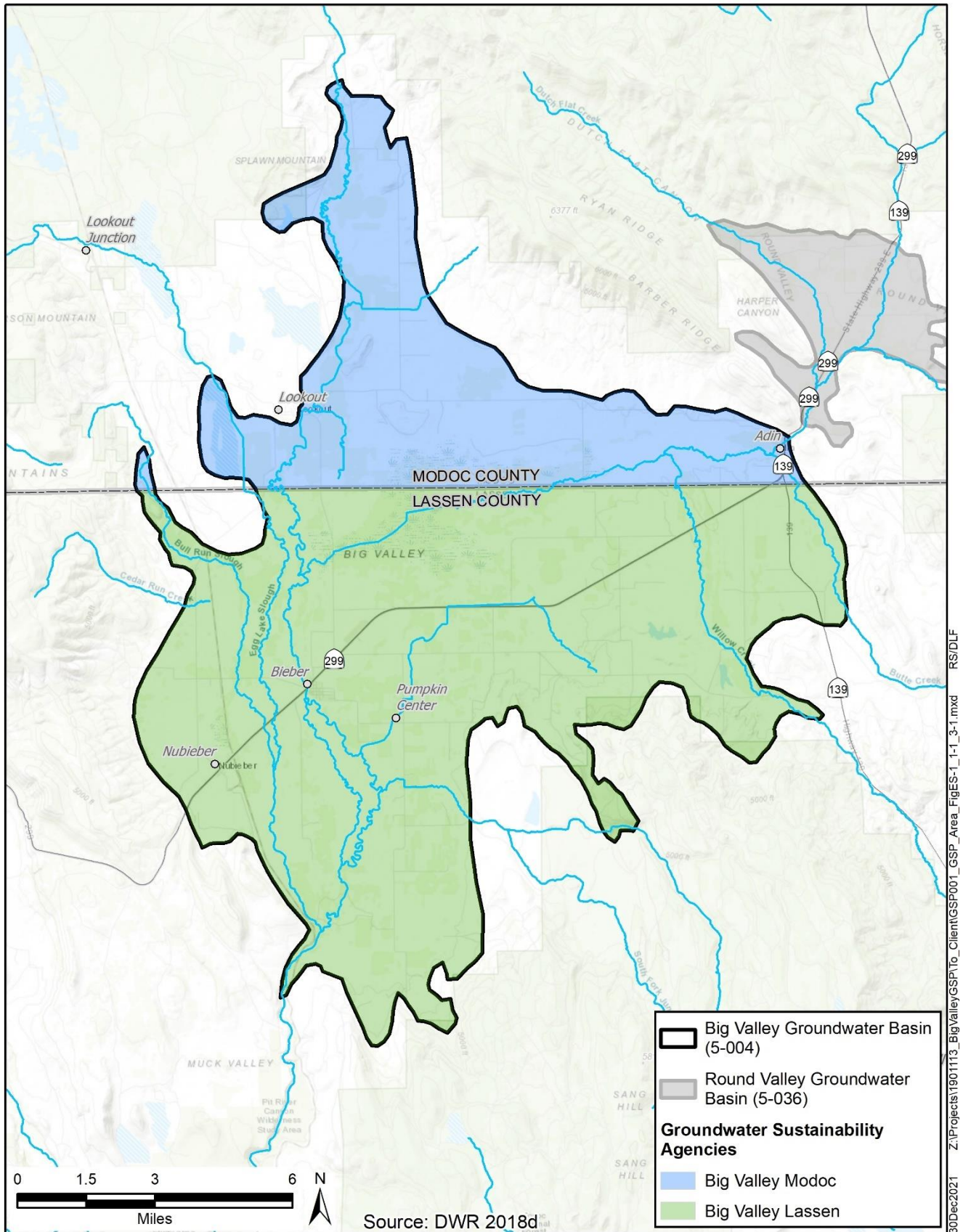
The Big Valley Groundwater Basin (BVGB, Basin, or Big Valley) lies on the border of Modoc and Lassen counties in one of the most remote and untouched areas of California. The sparsely populated Big Valley has a rich biodiversity of wildlife and native species who live, feed and raise young on the irrigated lands throughout the Basin. The snow-fed high desert streams entering the Basin have seasonal hydrographs with natural periods of reduced flows or complete cessation of flows late in the summer season. The Pit River is the largest stream and is so named because of the practice, employed by the Achumawi and other Native American bands that are now part of the Pit River Tribe, of digging pits in the river channel when it went dry to expose water and trap game that came to water at the river. Farming and ranching in Big Valley date back to the late 19th and early 20th centuries, when families immigrated to Big Valley and made use of the existing water resources. A large amount of the land in the Basin is still owned and farmed by the families who homesteaded here.

Historically, agriculture was complemented by a robust timber industry as a key component of the economy for Big Valley, which supported four lumber mills. Due to regulations and policies imposed by state and federal governments, the timber industry has been diminished over time and subsequently caused a great economic hardship to the Big Valley communities. Stakeholders realize that the Sustainable Groundwater Management Act of 2014 (SGMA) will unfortunately cause a similar decline to agriculture. The change in land management has transformed once-thriving communities in the Basin to “disadvantaged” and “severely disadvantaged” communities. Viable agriculture is of paramount importance to the residents of Big Valley because it supports the local economy and unique character of the community. As required by SGMA, stakeholders have developed a sustainability goal:

The sustainability goal for the Big Valley Groundwater Basin is to maintain a locally governed, economically feasible, sustainable groundwater basin and surrounding watershed for existing and future legal beneficial uses with a concentration on agriculture. Sustainable management will be conducted in context with the unique culture of the basin, character of the community, quality of life of the Big Valley residents, and the vested right of agricultural pursuits through the continued use of groundwater and surface water.

Lassen and Modoc counties are fulfilling their unfunded, mandated roles as Groundwater Sustainability Agencies (GSAs) to develop this Groundwater Sustainability Plan (GSP) after exhausting its administrative challenges to the California Department of Water Resources’ (DWR’s) determination that Big Valley qualifies as a medium-priority basin. Both counties are disadvantaged, have declining populations, and have no ability to cover the costs of GSP development and implementation.

35 The Basin, shown on **Figure ES-1**, encompasses an area of about 144 square miles (92,057 acres), with
36 Modoc County representing 28 percent and Lassen County comprising 72 percent of the Basin by area.
37 The Basin includes the towns of Adin and Lookout in Modoc County and the towns of Bieber and



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Figure ES-1-1 Groundwater Sustainability Agencies in Big Valley Groundwater Basin

40 Nubieber in Lassen County. The Ash Creek State Wildlife Area straddles both counties occupying
 41 22.5 square miles in the center of the Basin in the marshy/swampy areas along Ash Creek. Land use in
 42 the BVGB is detailed in **Table ES-1**.

43 **Table ES-1-1 2016 Land Use Summary by Water Use Sector**

Water Use Sector	Acres	Percent of Total
Community ^a	250	<1%
Industrial	196	<1%
Agricultural	22,246	24%
State Wildlife Area ^b	14,583	16%
Managed Recharge	-	0%
Native Vegetation and Rural Domestic ^c	54,782	60%
Total	92,057	100%
Notes: ^a Includes the use in the communities of Bieber, Nubieber and Adin ^b Made up of a combination of wetlands and non-irrigated upland areas ^c Includes the large areas of land in the Valley which have domestic wells interspersed Source: See Chapter 6 – Water Budget for explanation of approach		

44 **ES.2. Basin Setting (Chapters 4 – 6)**

45 **Hydrogeologic Setting**

46 The topography of BVGB is relatively flat in the central area with increasing elevations along the
 47 perimeter, particularly in the eastern portions where Willow and Ash Creeks enter the Basin. This low
 48 relief in the Basin results in a meandering river morphology and widespread flooding during large storm
 49 events. The Basin is underlain by a thick sequence of sediment derived from the surrounding mountains
 50 of volcanic rocks and is interbedded with lava flows and water-lain tuffs. The volcanic material is
 51 variable in composition and is Miocene to Holocene age (23 million to several hundred years ago). The
 52 compositions of the lava flows are primarily basalt¹ and basaltic andesite², while pyroclastic³ ash
 53 deposits are rhyolitic⁴ composition. In general, the Basin boundary drawn by DWR was intended to
 54 define the contact between the valley alluvial deposits and the surrounding mountains of volcanic rocks.
 55 During development of this GSP, the Basin boundary has been found to be grossly inaccurate in many
 56 areas and is not clearly isolated from areas outside the valley floor. The mountains outside of the
 57 groundwater Basin capture and accumulate precipitation, which produces runoff that flows into BVGB.
 58 Moreover, DWR (1963) stated that these mountains serve as “upland recharge areas” and provide
 59 subsurface recharge to BVGB *via* fractures in the rock and water bearing formations that underlie the
 60 volcanics.

¹ Basalt is an extrusive (volcanic) rock with relatively low silica content and high iron and magnesium content.

² Andesite is an extrusive rock with intermediate silica content and intermediate iron and magnesium content.

³ Pyroclastic rocks are formed during volcanic eruptions, typically not from lava flows, but from material (clasts) ejected from the eruption such as ash, blocks, or “bombs.”

⁴ Rhyolitic rocks are extrusive with relatively high silica content and low iron and magnesium. Rhyolites are the volcanic equivalent of granite.

61 The Bieber Formation (TQb), formed in the Pliocene-Pleistocene age (5.3 million to 12 thousand years
62 ago) and shown in **Figure ES-2**, is the main formation of aquifer material defined within the BVGB,
63 and DWR (1963) estimates that it ranges in thickness from a thin veneer to over 1,000 feet. The
64 formation was deposited in a lacustrine (lake) environment and is comprised of unconsolidated to
65 semi-consolidated layers of interbedded clay, silt, sand, gravel, and diatomite. The coarse-grained
66 deposits (gravel and sand) are aquifer material⁵ and are part of the Big Valley principal aquifer. The
67 “physical bottom” has not been clearly encountered or defined but may extend 4,000 to 7,000 feet or
68 deeper. The “practical bottom” of the aquifer is 1,200 feet because that depth encompasses the known
69 production wells and water quality may be poorer below that depth. As required by SGMA, 1,200 feet is
70 used as the “definable bottom” for this GSP. A single principal aquifer is used for this GSP because
71 distinct, widespread confining beds have not been identified in the subsurface.

72 The Natural Resources Conservation Service (NRCS) Hydrologic Soils Group (HSG) classifications
73 provide an indication of soil infiltration potential and ability to transmit water under saturated conditions
74 based on hydraulic conductivities of shallow, surficial soils. Characterizing these soils is important
75 because water must first penetrate the shallow subsurface to provide any chance of groundwater
76 recharge. According to the HSG dataset, the Basin is composed of only soils with “slow” or “very slow”
77 infiltration rates. While the soils are not highly permeable, some research and historical evidence has
78 found that water will penetrate through these soils, indicating that managed aquifer recharge projects
79 such as on-farm recharge may be viable.

80 **Groundwater Conditions**

81 Historical groundwater elevations are available from a total of 22 wells in Big Valley that are part of the
82 CASGEM⁶ monitoring network, six located in Modoc County and 16 in Lassen County. In addition to
83 these 22 wells, five well clusters were constructed in late 2019 and early 2020 to support the GSP.
84 Groundwater level hydrographs from the historical wells show that most areas of the Basin have
85 remained stable, and a few areas have seen some decline averaging 0.53 feet per year of groundwater
86 level decline in the last 38 years.⁷

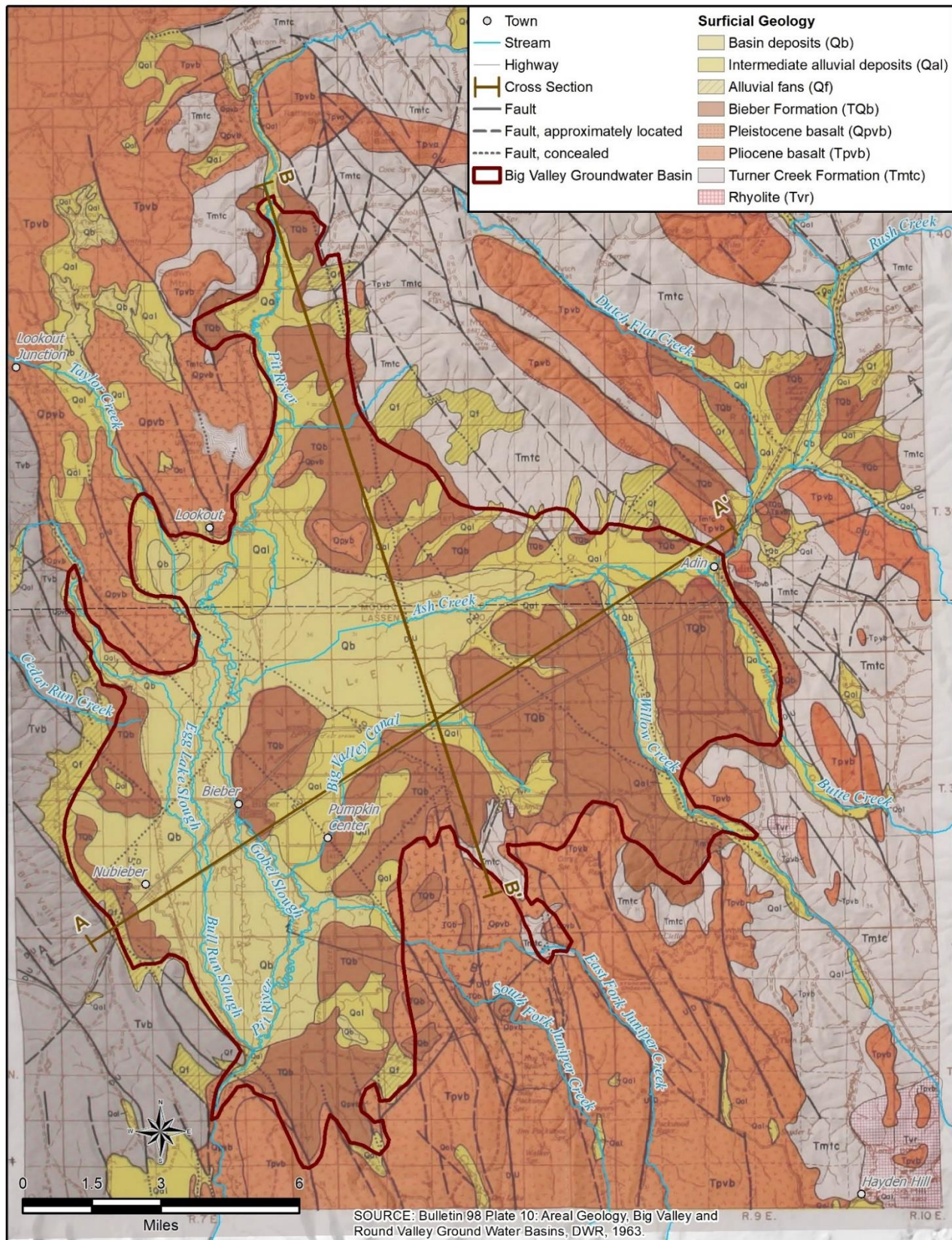
87 To determine the annual and seasonal change in groundwater storage, groundwater elevation surfaces⁸
88 were developed for spring and fall for each year between 1983 and 2018. **Figure ES-3** shows this
89 information graphically, along with the annual precipitation. This graph shows that groundwater storage
90 generally declines during dry years and stays stable or increases during normal or wet years. During the
91 period from 1983 to 2000, groundwater levels dipped in the late 1980s and early 1990s, then recovered
92 during the wet period of the late 1990s. After 2000, while most wells are still stable, a few wells have

⁵ Meaning the sediments contain porous material with recoverable water.

⁶ California Statewide Groundwater Elevation Monitoring Program

⁷ Average slope of the trend lines in Appendix 5A.

⁸ Groundwater elevation surfaces are developed from the known groundwater elevations at wells throughout the Basin and then estimating/interpolating elevations at intermediate locations *via* a mathematical method known as kriging. The kriging elevation surface is based on a grid covering the entire basin that has interpolated groundwater elevation values for each node of the grid.



30-Dec-2021 Z:\Projects\1901113_BigValley\GSP\To_Client\GSP023_Geology_DWR_FigES-2_4-4.mxd RS

Figure ES-1-2DWR 1963 Local Geologic Map

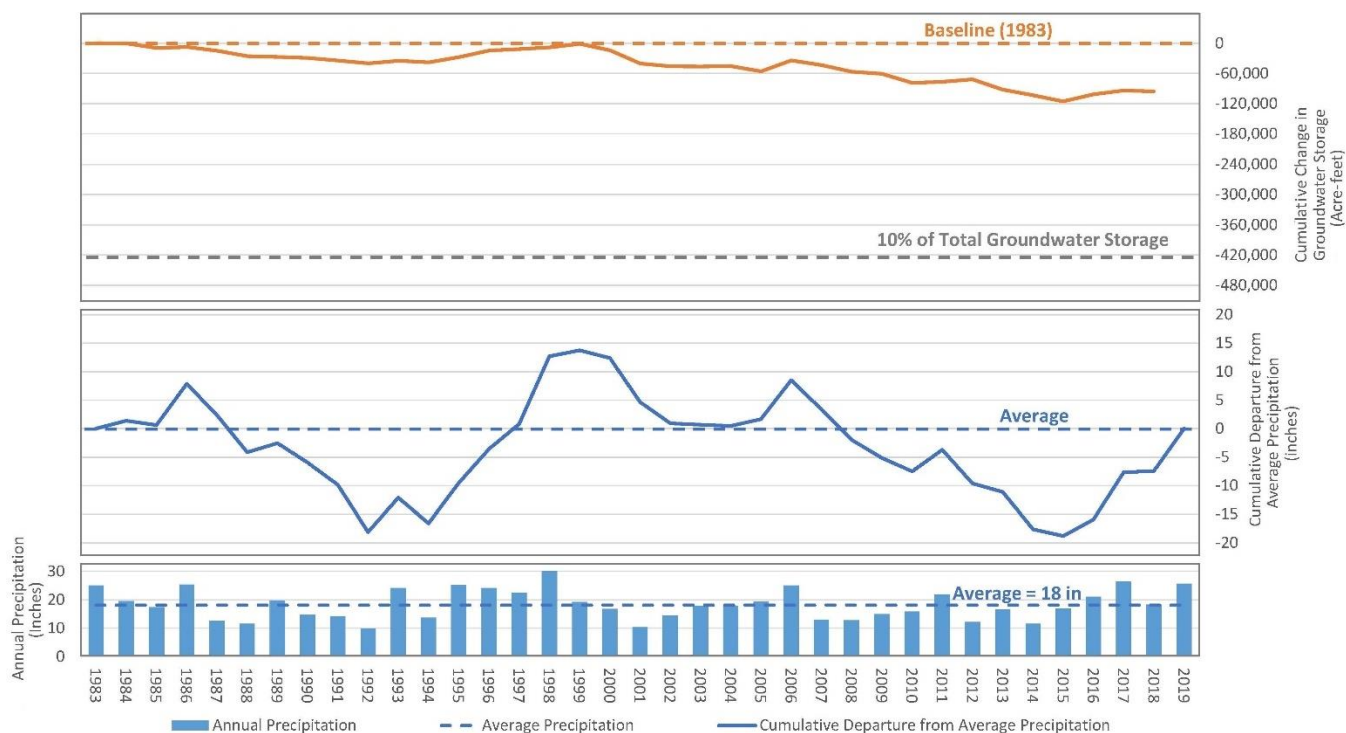


Figure ES-1-3 Cumulative Change in Groundwater Storage and Precipitation

generally declined, resulting in a reduction in overall groundwater storage. The amount of decline represents a cumulative reduction in storage of less than 2 percent of groundwater storage.⁹

Groundwater in the BVGB is generally of good to excellent quality (DWR 1963, United States Bureau of Reclamation [Reclamation] 1979). An analysis of available historical water quality indicates that some naturally occurring constituents associated with volcanic formations and thermal waters are slightly elevated. These elevated concentrations are extremely isolated and primarily not above thresholds that are a risk to human health nor does the water quality affect beneficial uses. There are no contamination plumes or cleanup sites that are likely to affect groundwater quality for beneficial use.

Water Budget

A historical water budget was developed for the 1983-2018 timeframe, shown in **Figure ES-4**. From this water budget analysis, a rough estimate for the sustainable yield is about 39,300 acre-feet per year (AFY) and a rough estimate of average annual overdraft is 5,000 AFY.

⁹ Based on assessment in Section 5.2, indicating storage has been reduced by about 96,000 AF since 1983 and using a total storage of about 5.2 million AF (92,057 acre basin area * 1,200 feet to definable bottom * 5% specific yield)

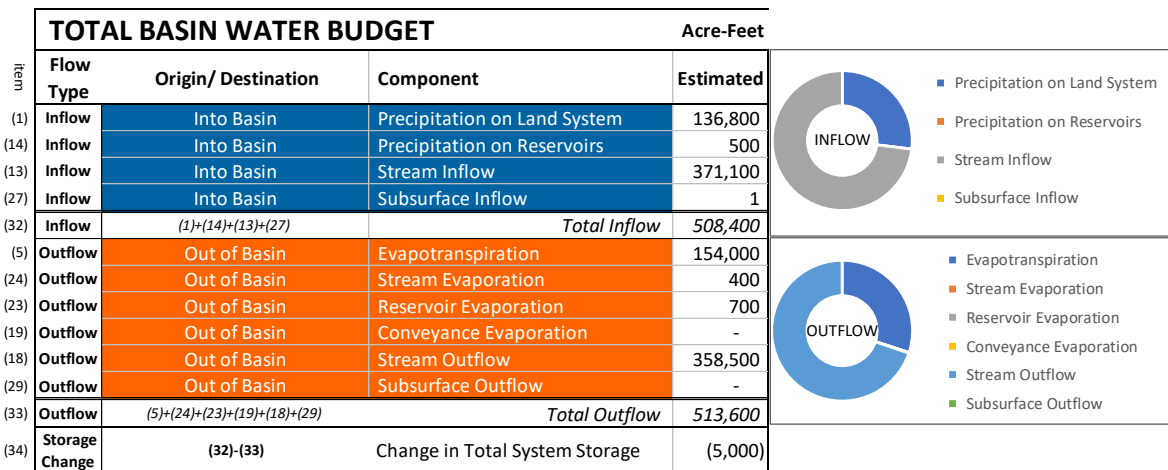


Figure ES-1-4 Average Total Basin Water Budget 1984-2018

ES.3. Sustainable Management (Chapters 7 – 9)

Sustainable Management Criteria

Sustainable Management Criteria (SMC) define the conditions that constitute sustainable groundwater management. The following is a description of the SMC for each of the six sustainability indicators:

- **Groundwater Levels:** Do not allow groundwater levels to decline to a level where the depletion of supply results in significant and undesirable reductions in the long-term viability of agriculture, community, domestic, and natural and wildlife uses in the Basin. The minimum threshold for each well in the monitoring network was determined to be 50 feet below the Spring 2015 groundwater level, or the Spring 2022 groundwater level for wells constructed after 2015.
- **Groundwater Storage:** Groundwater levels are used as a proxy for this sustainability indicator because change in storage is directly correlated to changes in groundwater levels.
- **Seawater Intrusion:** This sustainability indicator does not apply to Big Valley.
- **Water Quality:** Undesirable results for degraded water quality are defined as when the degradation of quality results in significant and undesirable impacts to the long-term viability of agriculture, community, domestic, and natural and wildlife uses in the Basin. Following the state's drinking water standards, the maximum thresholds for TDS and nitrate are set at their respective maximum contaminant levels (MCLs): 500 mg/L for total dissolved solids (TDS) (secondary MCL) and 10 mg/L for nitrate (primary MCL). Measurable objectives (MOs) for TDS and nitrate are the current quality, which is about 300 mg/L for TDS and less than 1 mg/L for nitrate. MOs are developed for each monitoring well.
- **Land Subsidence:** Based on evaluation of subsidence data from a continuous GPS station and Interferometric Synthetic Aperture Radar (InSAR) provided by DWR, no significant subsidence has occurred. Therefore, per §354.26(d), SMCs were not established for subsidence because undesirable results are not present and not likely to occur. At the five-year update of this GSP, subsidence data will be assessed for any trends that can be correlated with groundwater pumping.

- **Interconnected Surface Water:** Data for this sustainability indicator is limited. Currently there is no evidence to suggest that undesirable results have occurred or are likely to occur. At the five-year update, future data will be evaluated.

Monitoring Network

Monitoring networks are developed to promote the collection of data of sufficient quality, frequency, and distribution to characterize groundwater and related surface-water conditions in the Basin and to evaluate changing conditions that occur as the Plan is implemented. The GSAs developed monitoring networks for the parameters listed below. **Figure ES-5** shows the water level monitoring networks.

- Groundwater levels
- Groundwater storage *via* groundwater levels as proxy
- Shallow groundwater for interconnection of groundwater and surface water
- Groundwater quality
- Land subsidence
- Streamflow and climate
- Land use

Projects and Management Actions

Through an extensive planning and public outreach process, the GSAs have identified an array of projects and management measures that may be implemented to meet sustainability objectives in the BVGB. Some of the projects can be implemented immediately while others will take significantly more time for necessary planning and environmental review, navigation of regulatory processes, and implementation. The various projects and estimated timeline can be found in **Table ES-2**.

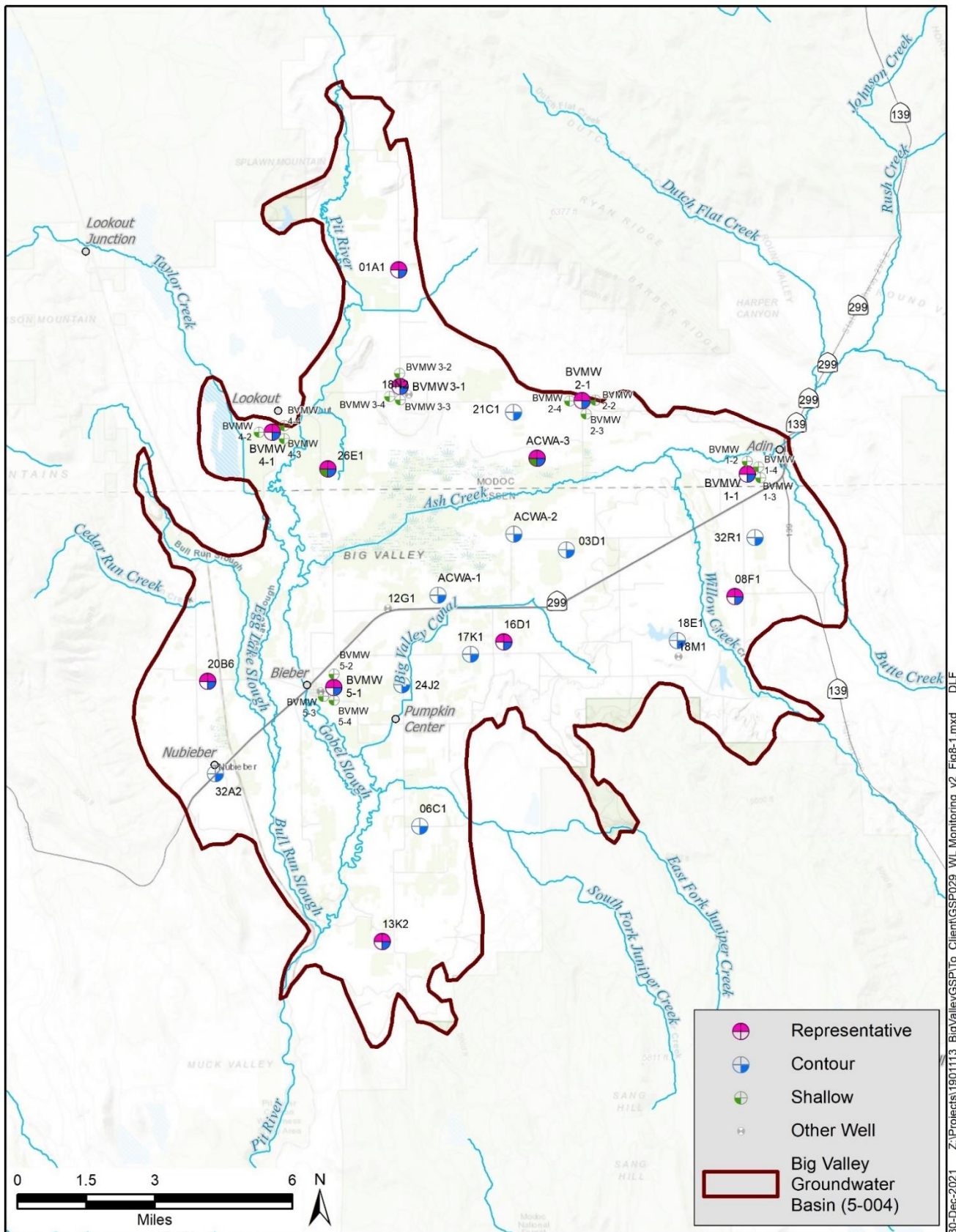


Figure ES-1-5 Groundwater Level Monitoring Networks

163 **Table ES-1-2 Projects and Potential Implementation Timeline**

No.	Category	Description	Estimated Time for Potential Implementation (years) ¹		
			0-2	2-8	>8
1	9.1 Basin Recharge Projects	Agriculture Managed Aquifer Recharge	X	X	X
2		Drainage or Basin Recharge	X	X	X
3		Aquifer Storage and Recovery and Injection Wells			X
4	9.2 Research and Data Development	Additional Stream Gages and Flow Measurement	C		
5		Refined Water Budget and Domestic and Adin Community Supply Assessment	X	X	
7		• Voluntary Installation of Well Meters	C	X	
8		Adaptive Management	X	X	X
9		Mapping and Land Use	X	X	
10	9.3 Increased Surface-water Storage Capacity	Expanding Existing Reservoirs	X	X	
11		Allen Camp Dam			X
12	9.4 Improved Hydrologic Function and Upland Recharge	Forest Health / Conifer and Juniper Thinning	X	X	X
13		Stream Channel Enhancement and Meadow Restoration	X	X	X
14	9.5 Water Conservation	Irrigation Efficiency	X	X	
15		Landscaping and Domestic Water Conservation	X	X	
16		Illegal Diversions and Groundwater Uses	X	X	
17	9.6 Public Education and Outreach	Public Communication	X		
18		Information and Data Sharing	X	X	
19		Fostering Relationships	X		
20		Compiling Efforts	X	X	
21		Educational Workshops	X		
22	9.7 Domestic Well Mitigation Program	Development and implementation of a domestic well mitigation program to assist domestic water users if their wells go dry due to declining groundwater levels	X	X	X

¹ C = Completed

ES.4. Plan Implementation (Chapters 10 – 11)

The GSP lays out a roadmap for addressing the activities needed for GSP implementation. Implementing this GSP requires the following activities:

- GSA Administration and Public Outreach:** The fundamental activities that will need to be performed by the GSAs are public outreach and coordination of GSP activities. Public outreach will entail updates at County Board of Supervisors' meetings and/or public outreach meetings. At a minimum, the GSAs will receive and respond to public input on the Plan and inform the public about progress implementing the Plan as required by §354.10(d)(4) of the Regulations. Coordination activities would include ensuring monitoring is performed, annual reports to DWR, five-year GSP updates, and coordinating projects and management actions.

- **Monitoring and Data Management:** Data collection and management will be required for both annual reporting and five-year updates. Monitoring data that will be collected and stored in the data management system (DMS) for reporting will include water levels, precipitation, evapotranspiration, streamflow, water quality, land use, and subsidence.
- **Annual Reporting:** According to §356.2 of the Regulations, the Big Valley GSAs are required to provide an annual report to DWR by April 1 of each year following the adoption of the GSP. The GSAs have developed and submitted annual reports for Water Years (WYs) 2019 through 2022 and are developing the annual report for WY 2023 concurrent with the development of the revised GSP. The WY 2023 Annual Report will be submitted by the April 1, 2024 deadline. The GSAs contend that DWR’s definition of a WY does not adequately characterize the climate and water use patterns in Big Valley¹⁰. The Annual Reports establish current conditions of groundwater within the BVGB, the status of the GSP implementation, and the trend towards maintaining sustainability.
- **Plan Evaluation (Five-Year Update):** Updates and amendments to the GSP can be performed at any time, but at a minimum the GSAs must submit an update and evaluation of the plan every 5 years (§356.4). While much of the content of the GSP will likely remain unchanged for these five-year updates, the Regulations require that most chapters of the plan be updated and supplemented with any new information obtained in the preceding 5 years.

Cost of Implementation

Cost is a fundamental concern to the GSAs and stakeholders in the BVGB, as the Basin is disadvantaged and there is no revenue generated in the counties to fund the state-mandated requirements of SGMA. Therefore, the GSAs will rely on outside funding to implement this unfunded mandated Plan.

¹⁰ The water year defined by DWR runs from October 1-September 30 to accommodate for the unique Mediterranean and annual grass growing season in much of the state. It does not fit well in the mountainous and great basin areas of the state like Big Valley that are primarily perennial native vegetation and cropping systems which do not follow the same growing cycle. In the annual system, plants start growing around the end of October, but in the perennial system, plants are still growing from the prior water year and October and soon go dormant for winter. This also mirrors the way that water is used in these areas as well. The end of irrigation season extends into October in the perennial system making water measurements sometimes difficult and not truly marking the end of the irrigation season. (Snell 2021)

197 **1. Introduction § 354.2-4**

198 **1.1 Introduction**

199 The Big Valley Groundwater Basin (BVGB, Basin, or Big Valley) is located in one of the most remote
200 and untouched areas of California. The sparsely populated Big Valley has a rich biodiversity of wildlife
201 and native species who feed, live, and raise young primarily on the irrigated lands throughout the Basin.
202 The Basin has multiple streams which enter from the North, East, and West. The Pit River is the only
203 surface-water outflow and exits at the southern tip of the Basin. The streams that enter the Basin are
204 some of the most remote, least improved, and most pristine surface waters in all of California. The
205 snow-fed high desert streams entering the Basin have seasonal hydrographs with natural periods of
206 reduced flows or complete cessation of flows late in the summer season. The Pit River is the largest
207 stream and is so named because of the practice, employed by the Achumawi and other Native American
208 bands that are now part of the Pit River Tribe, of digging pits in the river channel when it went dry to
209 expose water and trap game that came to water at the river. In addition to the Pit River, the Basin is also
210 fed by Ash Creek year-round, along with Willow Creek and many seasonal streams and springs.

211 Farming and ranching in Big Valley date back to the late 19th and early 20th centuries, when families
212 immigrated to Big Valley and made use of the existing water resources. A large amount of the land in
213 the Basin is still owned and farmed by the families that homesteaded here. The surnames on the
214 tombstones at any of the three cemeteries are the same names that can be overheard during a visit to the
215 Bieber Market or the Adin Supply store, local institutions and gathering places for the residents of this
216 tight-knit community. These stores are remaining evidence of a much more vibrant time in Big Valley.

217 Following World War II, with the advent and widespread use of vertical turbine pumps, farmers and
218 ranchers began using groundwater to irrigate the land, supplementing their surface-water supplies to
219 make a living in Big Valley. The local driller, Conner's Well Drilling, has drilled the majority of wells
220 in Big Valley and the third-generation driller, Duane Conner has been on the advisory committee during
221 the development of this Groundwater Sustainability Plan (GSP or Plan) (Conner 2020-2021).

222 Historically, agriculture was complemented by a robust timber industry, a key component of the
223 economy for Big Valley, which supported four lumber mills. Due to regulations and policies imposed by
224 state and federal government, the timber industry has been diminished over time which has caused a
225 great economic hardship to the Big Valley communities. Stakeholders realize that the Sustainable
226 Groundwater Management Act of 2014 (SGMA) will unfortunately cause a similar decline to
227 agriculture. The loss of jobs due to the closure of all four lumber mills and the reduction of timber yield
228 tax, which had provided financial support to the small rural schools and roads, is evident in the many
229 vacant buildings which once had thriving businesses. In addition to the loss of jobs, the reduced student
230 enrollment in local schools has caused an economic hardship to the school district, which struggles to
231 remain viable. The change in land management has transformed once-thriving communities in the Basin
232 to "disadvantaged" and "severely disadvantaged" communities as defined by multiple state agencies,

233 including the Department of Water Resources (DWR). The addition of SGMA will increase the severity
234 of the disadvantaged and severely disadvantaged status in the Basin due to increased regulatory costs
235 and potential actions that must be taken to comply with SGMA and is likely to intensify rural decline in
236 this area. With the increased cost of this unfunded mandate for monitoring, annual reports and GSP
237 updates, land values will likely decline and lower the property tax base.

238 The two counties that overlie the BVGB are fulfilling their unfunded mandated role as the Groundwater
239 Sustainability Agencies (GSAs) since there are no other viable entities that can serve as GSAs. Both
240 counties have severe financial struggles as their populations and tax base are continually declining. The
241 counties not only lack the tax revenue generated out of Big Valley to implement SGMA, but they have
242 no buffer from revenue generated county-wide to cover such costs. As such, the GSAs are depending
243 almost solely on outside funding sources for development and implementation of this Plan.

244 With the demise of the timber industry, agriculture has been the only viable industry remaining to
245 support residents living and working in the Basin, with many of the families who ranch and farm today
246 having cultivated the land for over a century. These families are fighting to maintain the viability and
247 productivity of their land so that their children and grandchildren can continue to pursue the rural
248 lifestyle that their forebearers established.

249 The ranchers and farmers have developed strategies to enhance the land with not only farming and
250 ranching in mind, but also partnerships with state and federal agencies as well as local
251 non-governmental organizations (NGOs). The purpose of these partnerships is to maintain and improve
252 the condition of privately-owned land for the enhancement of plant and animal populations while
253 addressing invasive plant and pest concerns.

254 The Ash Creek Wildlife Area (ACWA) is an example of a local rancher who provided land for
255 conservation efforts with an understanding that managed lands promote wildlife enhancement for the
256 enjoyment of all. The California Department of Fish and Wildlife (CDFW) has largely left the property
257 unmanaged. (Albaugh 2021, Conner 2021) While the ACWA does offer some refuge, most species
258 graze and rear their young on the private lands around the Basin which are actively being cultivated
259 because those lands offer better forage and protection from predators. Below is an account from the
260 former landowner of how the ACWA property has fared since being sold to the government.

261 The government bought the ranch as a refuge for birds and wildlife. When
262 I was running cattle on that ranch it was alive with waterfowl. They fed
263 around and amongst the cattle. It was a natural refuge. The cattle kept the
264 feed down so the birds didn't have to worry about predators, and they could
265 feed on the new growth grass. After the government got their hands on it all
266 the fences were removed, at taxpayer expense. In the years since, the
267 meadows have turned into a jungle -- old dead feed and tules. The birds are
268 gone, moved to other ranches where they get protection from skunks and
269 coyotes and other predators that work on waterfowl and wildlife. Under the
270 management of the U.S. Fish and Wildlife the value of the land has been
271 completely destroyed. All those acres of wonderful grass and the irrigation

system that for generations have produced food for the people of this country now *produce nothing*. (Stadtler 2007)

Recently the CDFW has attempted to manage the property by constructing a 65-acre wetland using their water rights from the Big Valley Canal. In conjunction with the project and to more efficiently move adjudicated water to users (including ACWA) down-canal, the CDFW constructed a ¾-mile pipeline to replace an unlined portion of the canal. The pipeline has purportedly increased flows down-canal of the pipeline from 4cfs to 8cfs. The abandoned portion of unlined canal travels through a private land-owner's property. Although CDFW asserts that there are no documented water rights holders on the abandoned canal, it has dried that portion of the land-owner's property and reduced groundwater recharge there. However, the constructed wetlands likely provide more recharge on the ACWA property than the abandoned canal provided on private property.¹¹ (CDFW 2021)

Such projects which advance state priorities over private landowners exacerbate the negative sentiments from local stakeholders toward state government and make them extremely wary of unintended consequences of government programs. This distrust, coupled with the burden imposed on locals through regulations such as SGMA, are some of the fundamental reasons why residents of this area generally consider themselves distinct from the rest of the state. Furthermore, local political leaders have pointed out that the state is behind on tax payments to the disadvantaged counties. (Albaugh 2021)

The BVGB differs physically from California's other groundwater basins because the climate sees extreme cold. On average, there are fewer warm-temperature days, making the growing season considerably shorter than in other parts of the state. Ground elevations in the Basin range from about 4,100 to over 5,000 feet, and along with its northerly latitude in the state, this creates conditions where snow can fall in any month of the year. According to the Farmer's Almanac, the average growing season for the Big Valley Basin is about 101 days. The typical crops for the Big Valley Basin are low-land-use-intensity and low-value crops such as native pasture, grass hay, alfalfa hay, and rangeland.

The vast majority of the farmed land utilizes low-impact farming, employing no-till methods to grow nitrogen-fixing crops which require little to no fertilizer or pesticide application. While this climate and range of viable crops is a challenge to farmers and ranchers, it helps maintain the pristine nature of surface water and groundwater. As an example of how local landowners have been good stewards of their water resources, they have participated in the Natural Resources Conservation Service's (NRCS's) Environmental Quality Incentives Program (EQIP), drilling wells away from streams to encourage watering of cattle outside of riparian corridors. Now these additional wells have increased the inventory of wells in the Basin, one of the criteria used by DWR to categorize Big Valley as medium priority and subject to the SGMA unfunded mandate of developing a GSP. (Albaugh 2020-2021)

The GSAs are also aware of the impact of poor water stewardship, such as illegal water uses (e.g. unlicensed marijuana growers). These operations may utilize groundwater, are known to have illegal diversions of surface water, and have a negative impact on water quality. However, the counties have not received the state and federal support needed to identify, eliminate, and prosecute these operations.

¹¹ This paragraph is based on information provided by CDFW and hasn't been verified.

The Big Valley Basin has a population of 1,046 residents and a projected slow growth of 1,086 by 2030. (DWR 2021a). The largest town (unincorporated community) within the Basin is Adin, California, which had a population of 272 residents according to the 2010 Census (USCB 2021). Located in Modoc County, Adin had a 2.43 percent decline in population from 2017 to 2018. Both Modoc and Lassen are experiencing a decline in population county-wide (USCB 2021).

As detailed in this GSP, there are three major beneficial uses of groundwater: agriculture, community/domestic, and environmental. However, the importance of agriculture to Big Valley cannot be overstated, as it is the economic base upon which community/domestic users rely and provides the habitat for many species important to healthy wildlife and biodiversity. Both groundwater and surface water are important to maintaining this ecosystem. There are efforts being made to diversify the economic base of the community. While economic diversity of Big Valley is not the purview of this GSP, it is acknowledged that at present and for the foreseeable future, the Big Valley communities rely almost solely on farming and ranching to support their residents. The financial and regulatory impact of implementing SGMA will negatively affect this disadvantaged community. Therefore, minimizing the GSP's impact to agriculture while complying with SGMA and working to enhance water supply in Big Valley is the thrust of this GSP.

1.2 Sustainability Goal

The GSAs are developing this GSP to comply with SGMA's unfunded mandates, maintain local control and preclude intervention by the State Water Resources Control Board (State Water Board), and prove that the Basin is sustainable and should be ranked as low priority. Satisfying the requirements of SGMA generally requires four activities:

1. Formation of at least one GSA to fully cover the basin (Multiple GSAs are acceptable and Big Valley has two GSAs.)
2. Development of this GSP that fully covers the Basin
3. Implementation of this GSP and management to achieve quantifiable objectives
4. Regular reporting to DWR

Two GSAs were established in the Basin: County of Modoc GSA and County of Lassen GSA, each covering the portion of the Basin in their respective jurisdictions. This document is a single GSP, developed jointly by both GSAs for the entire Basin. This GSP describes the BVGB, develops quantifiable management criteria that accounts for the interests of the Basin's legal beneficial groundwater uses and users, and identifies projects and management actions to ensure and maintain sustainability.

The Lassen and Modoc GSAs developed a Memorandum of Understanding (MOU) which details the coordination between the two GSAs. The MOU states that the Big Valley Advisory Committee (BVAC) is to be established to provide local input and direction on the development of a GSP. The counties solicited applicants to be members of the BVAC through public noticing protocols. Big Valley landowners and residents submitted applications to the County Boards of Supervisors, who then appointed the members of the BVAC. The BVAC is comprised of one county board member from each county, one alternate board member from each county, and two public applicants from each county. The

347 BVAC and county staff have dedicated countless hours to reviewing the data and content of the GSP,
348 largely uncompensated. After careful consideration of the available data and community input from the
349 BVAC and interested parties, the GSAs have developed the following sustainability goal:

350 The sustainability goal for the Big Valley Groundwater Basin is to maintain
351 a locally governed, economically feasible, sustainable groundwater basin
352 and surrounding watershed for existing and future legal beneficial uses with
353 a concentration on agriculture. Sustainable management will be conducted
354 in context with the unique culture of the basin, character of the community,
355 quality of life of the Big Valley residents, and the vested right of agricultural
356 pursuits through the continued use of groundwater and surface water.

357 The BVGB sustainability goal will be culminated through DWR's better understanding of the surface-
358 water and groundwater conditions over time and the implementation of projects and management
359 actions described in this GSP. Several areas of identified data gaps have been established, and while an
360 estimated future water budget has been completed, its accuracy is uncertain since many assumptions had
361 to be made due to the lack of available data. The monitoring network established under this Plan
362 includes new and existing monitoring wells, inflow/outflow measurement of surface water, groundwater
363 quality, and land subsidence.

364 The implementation of projects such as winter recharge studies currently in progress will help establish
365 the feasibility of immediate actions the GSAs can take to improve Basin conditions. A detailed
366 off-season water availability analysis has not been conducted on the Upper Pit River watershed, and this
367 has been identified as a data gap within the Basin. The GSAs are working to locate funds to conduct an
368 off-season and storage-capacity water accounting, which will provide the amount of available surface
369 water for potential winter recharge in the Basin. Additional research will be conducted on the available
370 use of non-active surface-water rights for storage. An additional stream gage is being installed where the
371 Pit River enters the Basin and will provide a more accurate accounting of the amount of surface water
372 entering the Big Valley Basin from the Pit River. While better accounting is needed, it should be noted
373 that SGMA and this GSP will not affect existing water rights in the Basin.

374 The understanding that has been further engrained by the GSAs is that with proper management,
375 coordination and support from federal and state landowner partners, the Big Valley Basin, which is not
376 currently at risk of overdraft, will remain sustainable for the benefit of all interested parties. The BVGB
377 should be re-ranked as low priority.

378 **1.3 Background of Basin Prioritization**

379 The Big Valley GSAs are being forced to develop this GSP after exhausting their challenges to the
380 California Department of Water Resources' (DWR's) determination that Big Valley qualifies as a
381 medium-priority basin. DWR first prioritized the state's basins in 2014, at which time Big Valley was
382 the lowest-ranked medium-priority basin that had to develop a GSP. In 2019, DWR changed their
383 prioritization process and criteria and issued draft and final prioritizations. In the end, Big Valley is still
384 the lowest-ranked medium-priority basin.

From the draft to final re-prioritization, the Big Valley GSAs recognize the scoring revisions made by DWR for Component 8.b, “Other Information Deemed Relevant by the Department.” However, the GSAs continue to firmly believe that the all-or-nothing scoring for Component 7.a, regarding documented declining groundwater levels, is inconsistent with the premise of SGMA: that prioritization levels recognize different levels of impact and conditions across the basins of the state. DWR’s adherence to treating all declines the same, assigning a fixed 7.5 points for any amount of documented groundwater level decline, renders meaningless the degrees of groundwater decline and penalizes those basins experiencing minor levels of decline, including Big Valley which has only experienced approximately 0.53 feet per year of groundwater level decline on average in the last 38 years.

Additionally, the GSAs recognize the adjustments made to Component 7.d regarding overall total water quality degradation. Noting that degradation implies a lowering from human-caused conditions, the Big Valley GSAs urge DWR to further refine the groundwater quality scoring process for Secondary MCLs – which are not tied to public health concerns, but rather aesthetic issues such as taste and odor. Secondary MCLs which are due to naturally occurring minerals should not be factored into the scoring process. In the BVGB, the water quality conditions reflect the natural baseline and are not indicative of human-caused degradation and cannot be substantially improved through better groundwater management.

The inaccurate Basin boundary was drawn with a 63-year-old regional scale map (CGS 1958), and subsequent geologic maps with more precision and detail are available. Additionally, the “upland” areas outside the Basin boundary are postulated to be recharge areas interconnected to the Basin, which is contrary to DWR’s definition of a lateral basin boundary as being, “...features that significantly impede groundwater flow” (DWR 2016c). The GSAs submitted a request to DWR for basin boundary modification to integrate planning at the watershed level and leverage a wider array of multi-benefit water management options and strategies within the Basin and larger watershed. DWR’s denial of the boundary modification request greatly hampers jurisdictional opportunities to protect groundwater recharge areas in higher elevations. The final boundary significantly curtails management options to increase supply through upland recharge, requiring that groundwater levels be addressed primarily through demand restrictions. *See Appendix 1A* for communications with DWR regarding Basin prioritization ranking and boundary modification. Due to information that has come to light during this process, the Basin boundary has been shown to be inaccurate. The GSAs will submit a Basin boundary modification.

Development of this GSP by the GSAs, in partnership with the BVAC and members of the community, does not constitute agreement with DWR’s classification as a medium-priority basin – nor does it preclude the possibility of other actions by the GSAs or by individuals within the Basin seeking regulatory relief.

1.3.1 Timeline

In September 2014, the state of California enacted SGMA. This law requires medium- and high-priority groundwater basins in California to take actions to ensure they are managed sustainably. DWR is tasked with prioritizing all 515 defined groundwater basins in the state as high, medium, low and very-low

424 priority. Prioritization establishes which basins need to go through the process of developing a GSP.
 425 When SGMA was passed, basins had already been prioritized under the California Statewide
 426 Groundwater Elevation Monitoring (CASGEM) program, and that existing ranking process was used as
 427 the initial priority baseline for SGMA.

428 DWR was required to develop its rankings for SGMA based on the first seven criteria listed in **Table**
 429 1-1. For the final SGMA scoring process, groundwater basins with a score of 14 or greater (up to a
 430 score of 21) were ranked as medium-priority basins (DWR 2019). Big Valley scored 13.5 and DWR
 431 chose to arbitrarily round the score up to put it in the medium-priority category as the lowest-ranked
 432 basin in the state required to develop a GSP. Lassen County reviewed the 2014 ranking process and
 433 criteria that were used and found erroneous data. The County made a request to DWR for the raw data
 434 that was used, which were eventually provided, and verified the error that would have put the BVGB
 435 into the low priority category. However, because the comment period for these rankings had already
 436 expired in 2014 (prior to the passage of SGMA), DWR would not revise their ranking. County staff
 437 were misled because when the rankings were first publicized, SGMA had not yet existed, and County
 438 staff were told that being ranked as a medium priority basin was insignificant and would actually be a
 439 benefit to the counties.

440 **Table 1-1 Big Valley Groundwater Basin Prioritization**

Criteria	2014	2018	2019	Comments
2010 Population	1	1	1	
Population Growth	0	0	0	
Public Supply Wells	1	1	1	
Total # of Wells	1.5	2	2	Existing information inaccurate and includes all types of wells, including newly constructed stockwatering wells under EQIP
Irrigated Acreage	4	3	3	
Groundwater Reliance	3	3.5	3.5	
Impacts	3	3	2	Declining water levels, water quality
Other Information	0	7	2	Streamflow, habitat, and "other information determined to be relevant"
Total Score	13.5	20.5	14.5	Medium priority each year

Source: DWR 2019

441 Once SGMA was passed and the onerous repercussions of being ranked as medium priority were better
 442 understood (and the counties identified erroneous data), DWR did not offer any recourse, simply saying
 443 the Big Valley Basin would remain ranked as medium priority and that the basins would soon be re-
 444 prioritized anyway.

In 2016, Lassen County submitted a request for a basin boundary modification as allowed under SGMA. The request was to extend the boundaries of the BVGB to the boundary of the watershed. The purpose of the proposed modification was to enhance management by including the volcanic areas surrounding the valley sediments, including federally managed timberlands and rangelands, that have an impact on groundwater recharge. The modification was proposed on a scientific basis but was denied by DWR because the request, "...did not include sufficient detail and/or required components necessary and evidence was not provided to substantiate the connection [of volcanic rock] to the porous permeable alluvial basin, nor were conditions presented that could potentially support radial groundwater flow as observed in alluvial basins." DWR therefore justifies denial based on inadequate scientific evidence, yet as stated above they used inaccurate, unscientific information to rank the Basin as medium priority in the first place.

In 2018, DWR released an updated draft basin prioritization based on the eight components shown in **Table 1-1** using slightly different data and methodology than previously used. For this prioritization, Big Valley's score increased from 13.5 to 20.5, primarily because of an addition of 5 ranking points awarded under the category of "other information determined to be relevant" by DWR. DWR's justification for the five points was poorly substantiated as "Headwaters for Pit River/Central Valley Project – Lake Shasta." Lassen and Modoc counties sent a joint comment letter questioning DWR's justification and inconsistent assessment of these five points as well as their methodology for awarding the same number of points for water level and water quality impacts to basins throughout the state regardless of the severity of the impacts.

In 2019, DWR released their final prioritization with the BVGB score reduced to 14.5, but still ranked as medium priority and subject to the development of a GSP. DWR's documentation of the 2019 prioritization can be viewed on their website (DWR 2019).

Meanwhile, throughout this time, Lassen and Modoc counties began moving forward to comply with SGMA unfunded mandates through a public process that established them as the GSAs in 2017. The establishing resolutions forming the GSAs adopted findings that it was in the public interest of both counties to maintain local control by declaring themselves the GSA for the respective portion of the Basin. The Water Resources Control Board would become the regulating agency if the counties did not agree to be the GSAs since there were no other local agencies in a position or qualified to assume GSA responsibility. The counties obtained state grant funding to develop the GSP in 2018 and began the GSP development process and associated public outreach in 2019.

1.4 Description of Big Valley Groundwater Basin

The BVGB is identified by DWR in Bulletin 118 as Basin No. 5-004 (DWR, 2016a). The inaccurate Basin boundary was drawn by DWR using a 1:250,000 scale geologic map produced by the California Geological Survey (CGS 1958) along the boundary between formations labeled as volcanic and those labeled as alluvial. The Basin boundary was not drawn with as much precision as subsequent geologic maps, and because of this the "uplands" areas outside the Basin boundary are postulated to be recharge areas interconnected to the Basin. The 63-year old map being used to define the Basin boundary is

483 inadequate and contrary to DWR’s definition of a lateral basin boundary as being “features that
484 significantly impede groundwater flow” (DWR 2016c).

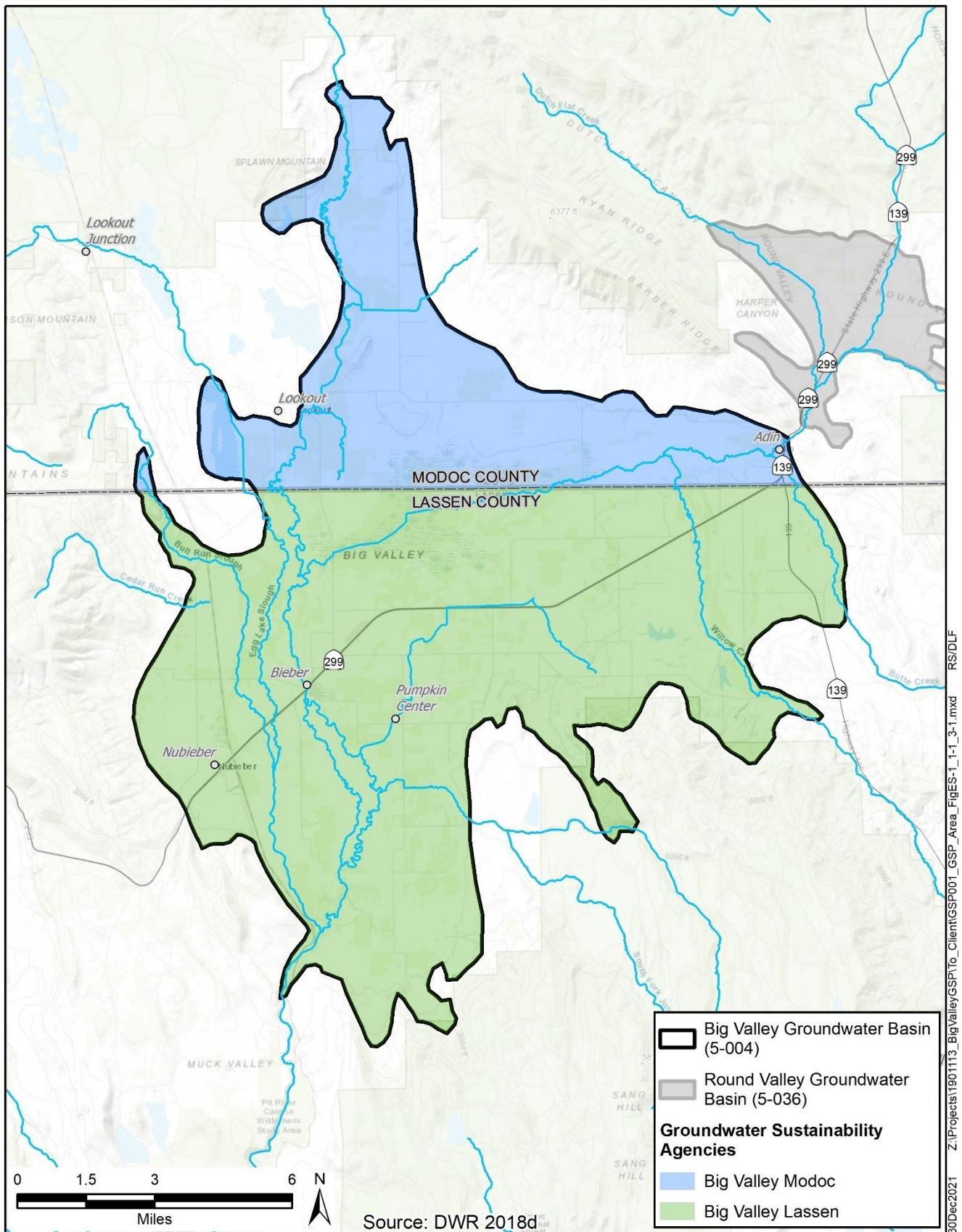
485 The Basin is one of many small, isolated basins in the northeastern region of California, an area with
486 widespread volcanic formations, many of which produce large quantities of groundwater and are not
487 included within the defined groundwater basin due to their classification as “volcanic” rather
488 than “alluvial.”

489 The boundary between Lassen and Modoc counties runs west-east across the Basin. Each county formed
490 a GSA for its respective portion of the Basin and the counties are working together to manage the Basin
491 under a single GSP. The Basin, shown on **Figure 1-1**, encompasses an area of about 144 square miles
492 with Modoc County comprising 40 square miles (28 percent) on the north and Lassen County
493 comprising 104 square miles (72 percent) on the south. The Basin includes the towns of Adin and
494 Lookout in Modoc County and the towns of Bieber and Nubieber in Lassen County. The ACWA is
495 located along the boundary of both counties, occupying 22.5 square miles in the center of the Basin
496 encompassing the marshy/swampy areas along Ash Creek.

497 The BVGB, as drawn by DWR, is isolated and does not share a boundary with another groundwater
498 basin. However, Ash Creek flows into Big Valley from the Round Valley Groundwater Basin at the
499 town of Adin. Despite the half-mile gap of alluvium which may provide subsurface flow between the
500 two basins, DWR doesn’t consider them interconnected due to the way the basin boundary was defined.

501 The surface expression of the Basin boundary is defined as the contact of the valley sedimentary
502 deposits with the surrounding volcanic rocks. The sediments in the Basin are comprised of mostly Plio-
503 Pleistocene alluvial deposits and Quaternary lake deposits eroded from the volcanic highlands and some
504 volcanic layers interbedded within the alluvial and lake deposits. The Basin is surrounded by Tertiary-
505 and Miocene-age volcanic rocks of andesitic, basaltic, and pyroclastic composition. These volcanic
506 deposits may be underlain by alluvial deposits in these upland areas. The boundary between the BVGB
507 and the surrounding volcanic rocks generally correlates with change in topography along the margin of
508 the valley.

509 Throughout the development of this GSP, the inaccuracies of the Basin boundary have become clear and
510 revisions to the boundary are needed. The hydrogeology of Big Valley is complex and requiring an
511 all-or-nothing (inside or outside Basin Boundary), one-size-fits-all approach to the Basin under SGMA
512 does not sit well with stakeholders and will be difficult to implement by the GSAs.



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Figure 1-1 Big Valley Groundwater Basin, Surrounding Basins and GSAs

515 2. Agency Information § 354.6

516 The two Big Valley GSAs were established for the entire BVGB to jointly develop, adopt, and implement
517 a single mandated GSP for the BVGB pursuant to SGMA and other applicable provisions of law.

518 2.1 Agency Names and Mailing Addresses

519 The following contact information is provided for each GSA pursuant to California Water Code (CWC)
520 §10723.8.

Modoc County
204 S. Court Street
Alturas, CA 96101
(530) 233-6201
tiffanymartinez@co.modoc.ca.us

Lassen County
Department of Planning and Building Services
707 Nevada Street, Suite 5
Susanville, CA 96130
(530) 251-8269
landuse@co.lassen.ca.us

521 2.2 Agency Organization and Management Structure

522 The two GSAs, Lassen and Modoc counties, were established in 2017 as required by the unfunded
523 SGMA-mandated legislation. **Appendix 2A** contains Lassen County resolution 17-013 and Modoc
524 County resolution 2017-09 forming the two agencies. Each GSA is governed by a five-member Board of
525 Supervisors. In 2019, the two GSAs established the BVAC through an MOU, included as **Appendix 2B**.
526 The membership of the BVAC is comprised of:

- 527 • one member of the Lassen County Board of Supervisors selected by said Board.
- 528 • one alternate member of the Lassen County Board of Supervisors selected by said Board.
- 529 • one member of the Modoc County Board of Supervisors selected by said Board.
- 530 • one alternate member of the Modoc County Board of Supervisors selected by said Board.
- 531 • two public members selected by the Lassen County Board of Supervisors. Said members
532 must either reside or own property within the Lassen County portion of the BVGB.
- 533 • two public members selected by the Modoc County Board of Supervisors. Said members
534 must either reside or own property within the Modoc County portion of the BVGB.

535 The decisions made by the BVAC are not binding, but the committee serves the important role of
536 providing formalized, local stakeholder input and guidance to the GSA governing bodies, GSA staff,
537 and consultants in developing and implementing the GSP.

538 **2.3 Contact Information for Plan Manager**

539 The plan manager is from Lassen County and can be contacted at:

540 Gaylon Norwood

541 Assistant Director

542 Lassen County Department of Planning and Building Services

543 707 Nevada Street, Suite 5

544 Susanville, CA 96130

545 (530) 251-8269

546 gnorwood@co.lassen.ca.us

547 **2.4 Authority of Agencies**

548 The GSAs were formed in accordance with the requirements of CWC §10723 et seq. Both GSAs are
549 local public agencies organized as general law counties under the State Constitution and have land-use
550 responsibility for their respective portions of the Basin. The resolutions of formation for the GSAs are
551 included in **Appendix 2B**.

552 **2.4.1 Memorandum of Understanding**

553 In addition to the MOU establishing the BVAC, the two GSAs may enter into an agreement to jointly
554 implement the GSP for the Basin. However, this agreement is not a SGMA requirement.

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3. Plan Area § 354.8

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3.1 Area of the Plan

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This GSP covers the BVGB, which is located within Modoc and Lassen counties and is about 144 square miles (92,057 acres). The Basin is a broad, flat plain extending about 20 miles north to south and 15 miles east to west and consists of depressed fault blocks surrounded by tilted fault-block ridges. The BVGB is designated as basin number 5-004 by the DWR and was most recently described in the 2003 update of Bulletin 118 (DWR 2003):

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The basin is bounded to the north and south by Pleistocene and Pliocene basalt and Tertiary pyroclastic rocks of the Turner Creek Formation, to the west by Tertiary rocks of the Big Valley Mountain volcanic series and to the east by the Turner Creek Formation.

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The Pit River enters the Basin from the north and exits at the southernmost tip of the valley through a narrow canyon gorge. Ash Creek flows into the valley from Round Valley and disperses into Big Swamp. Near its confluence with the Pit River, Ash Creek reforms as a tributary at the western edge of Big Swamp. Annual precipitation ranges from 13 to 17 inches.

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Communities in the Basin are Nubieber, Bieber, Lookout, and Adin which are categorized as census-designated places. Highway 299 is the most significant east-to-west highway in the Basin, with Highway 139 at the eastern border of the Basin. **Figure 3-1** shows the extent of the GSP area (the BVGB), as well as the significant water bodies, communities, and highways.

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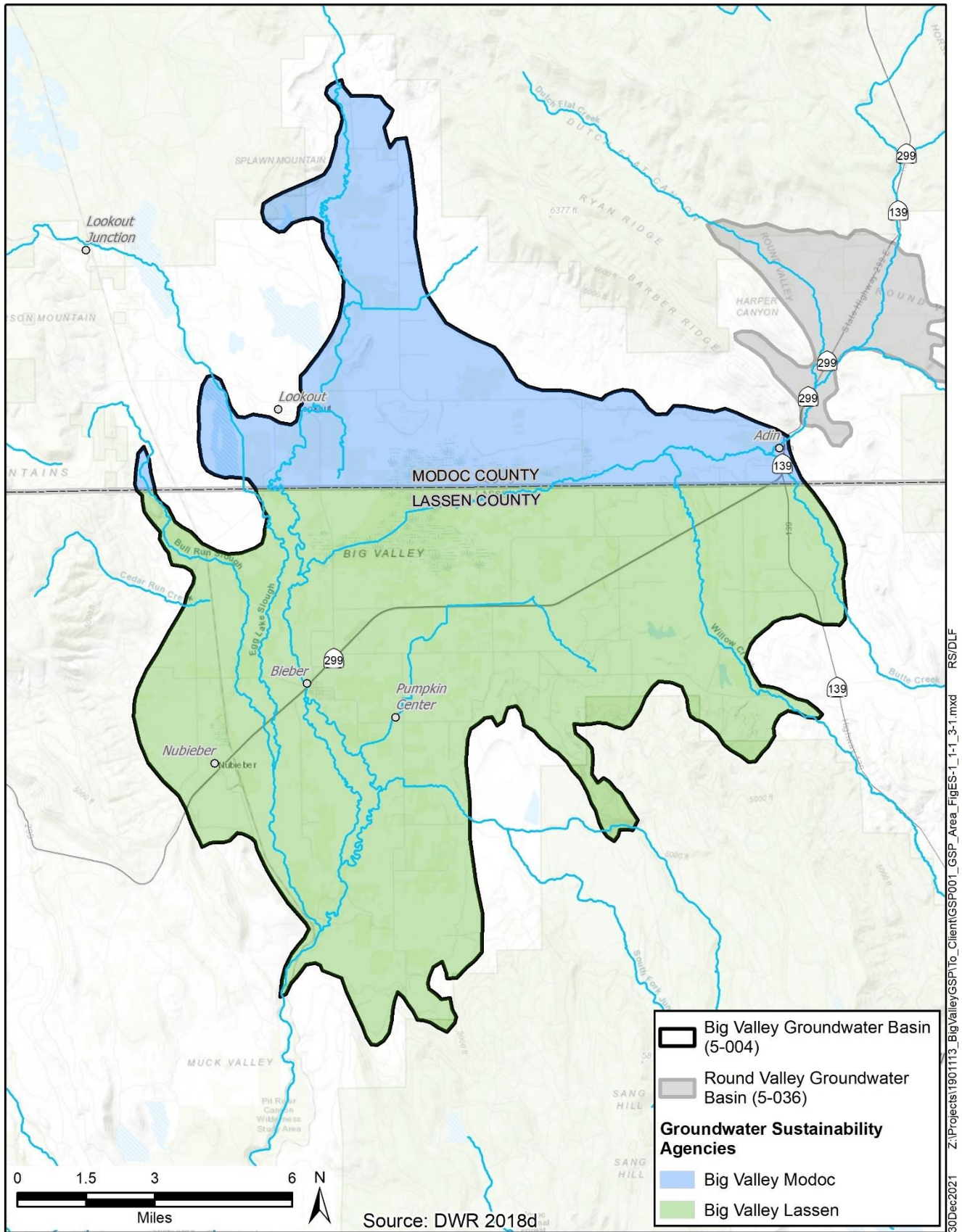
Lassen and Modoc counties were established as the exclusive GSAs for their respective portions of the Basin in 2017. **Figure 3-1** shows the two GSAs within the Basin. Round Valley Basin (5-036) is a very low-priority basin to the northeast; DWR does not consider it to be connected to Big Valley Basin, but there is a half-mile-wide gap of alluvium between the basins. The ACWA occupies 22.5 square miles (14,400 acres) in the center of Big Valley.

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No other GSAs are associated with the Basin, nor are there any areas of the Basin that are adjudicated or covered by an alternative to a GSP. **Landowners have the right to extract and use groundwater beneath their property.**



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Figure 3-1 Area Covered by the GSP

3.2 Jurisdictional Areas

In addition to the GSAs, other entities have water management authority or planning responsibilities in the Basin, as discussed below. A map of the jurisdictional areas within the Basin is shown on **Figure 3-2**.

3.2.1 Superior Courts

SGMA does not alter existing water rights. Therefore, water use in the Basin exists within the confines of state water law and existing water rights. These rights are ultimately governed by court decisions. In Big Valley, two decrees govern much of the surface-water rights allocations: Decree 3670 (1947) for Ash Creek and Decree 6395 (1959) for the Pit River. Any changes to these and any other judgments relevant to Big Valley would have to go through the Superior Court of Modoc County.

3.2.2 Federal Jurisdictions

The U.S. Bureau of Land Management (BLM) and the U.S. Forest Service (USFS or Forest Service) have jurisdiction over land within the Basin including portions of the Modoc National Forest, shown on **Figure 3-2**. Information on their Land and Resource Management Plan is described in Section 3.8. The Forest Service Ranger Station in Adin is a non-community public water supplier with a groundwater well, identified as Water System No. CA2500547 (SWRCB 2021).

3.2.3 Tribal Jurisdictions

The U.S. Bureau of Indian Affairs (BIA) Land Area Representations database identifies one tribal property in the BVGB (BIA 2020a). Lookout Rancheria, shown on **Figure 3-2**, is associated with the Pit River Tribe. There are other “public domain allotments” or lands held in trust for the exclusive use of individual tribal members within the Basin not shown (BIA 2020b).

3.2.4 State Jurisdictions

The CDFW has jurisdiction over the ACWA, as shown on **Figure 3-2**.

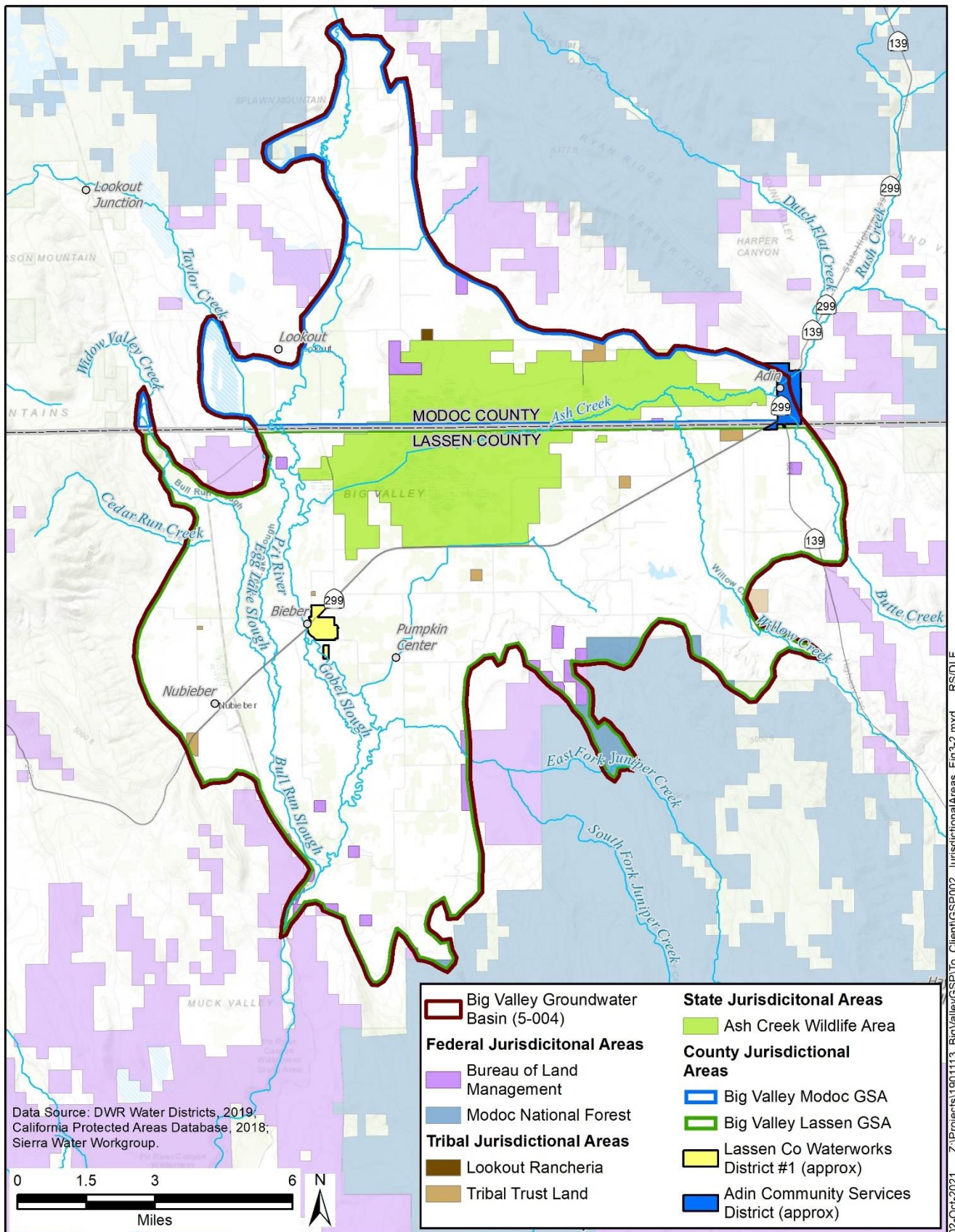
3.2.5 County Jurisdictions

The County of Modoc and the County of Lassen have jurisdiction over the land within the Basin in their respective counties as shown on **Figure 3-1** and **Figure 3-2**. Information on their respective General Plans is provided in Section 3.7 – Land Use Plans. Within the Basin, Modoc County includes the census-designated community of Adin and part of the community of Lookout. Lassen County contains the census-designated communities of Bieber and Nubieber.

3.2.6 Agencies with Water Management Responsibilities

Upper Pit Integrated Regional Water Management Plan

Big Valley lies within the area of the Upper Pit Integrated Regional Water Management Plan (IRWMP), which was developed by the Regional Water Management Group (RWMG). The IRWMP is managed by the North Cal-Neva Resource Conservation and Development Council (North Cal-Neva), a member of the RWMG along with 27 other stakeholders. Other stakeholders include community organizations,



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Figure 3-2 Jurisdictional Areas

622 environmental stewards, water purveyors, numerous local, county, state and federal agencies, industry,
623 the University of California, and the Pit River Tribe. The IRWMP addresses a 3-million-acre watershed
624 across four counties in northeastern California. **Figure 3-3** shows the Upper Pit IRWMP boundary and
625 the BVGB's location in the center of the IRWMP area. **Figure 3-3** also shows the complete watershed
626 that flows into the BVGB and the local watershed area. At 92,057 acres, the BVGB comprises about
627 3 percent of the IRWMP area at its center.

628 The IRWMP was established under the Integrated Regional Water Management Act (Senate Bill
629 [SB]1672) which was passed in 2002 to foster local management of water supplies to improve
630 reliability, quantity, and quality, and to enhance environmental stewardship. Several propositions were
631 subsequently passed by voters to provide funding grants for planning and implementation. Beginning in
632 early 2011, an IRWMP was developed for the Upper Pit River area and was adopted in late 2013.
633 During 2017 and 2018, the IRWMP was revised according to 2016 guidelines.

634 **Lassen-Modoc County Flood Control and Water Conservation District**

635 The Lassen-Modoc County Flood Control and Water Conservation District (District) was established in
636 1959 by the California Legislature and was activated in 1960 by the Lassen County Board of Supervisors
637 (LAFCo 2018). The entirety of the Lassen and Modoc counties portions of the Basin is covered by the
638 District, extending from the common boundary northward beyond Canby and Alturas, as shown on **Figure**
639 **3-3**. In 1965, the District established Zone 2 in a nearly 1000-square mile area encompassing and
640 surrounding Big Valley. In 1994, the District designated boundaries for management Zone 2A for,
641 "...groundwater management including the exploration of the feasibility of replenishing, augmenting and
642 preventing interference with or depletion of the subterranean supply of waters used or useful or of
643 common benefit to the lands within the zone" (LAFCo 2018). These zones are shown on **Figure 3-4**.

644 **Watermasters**

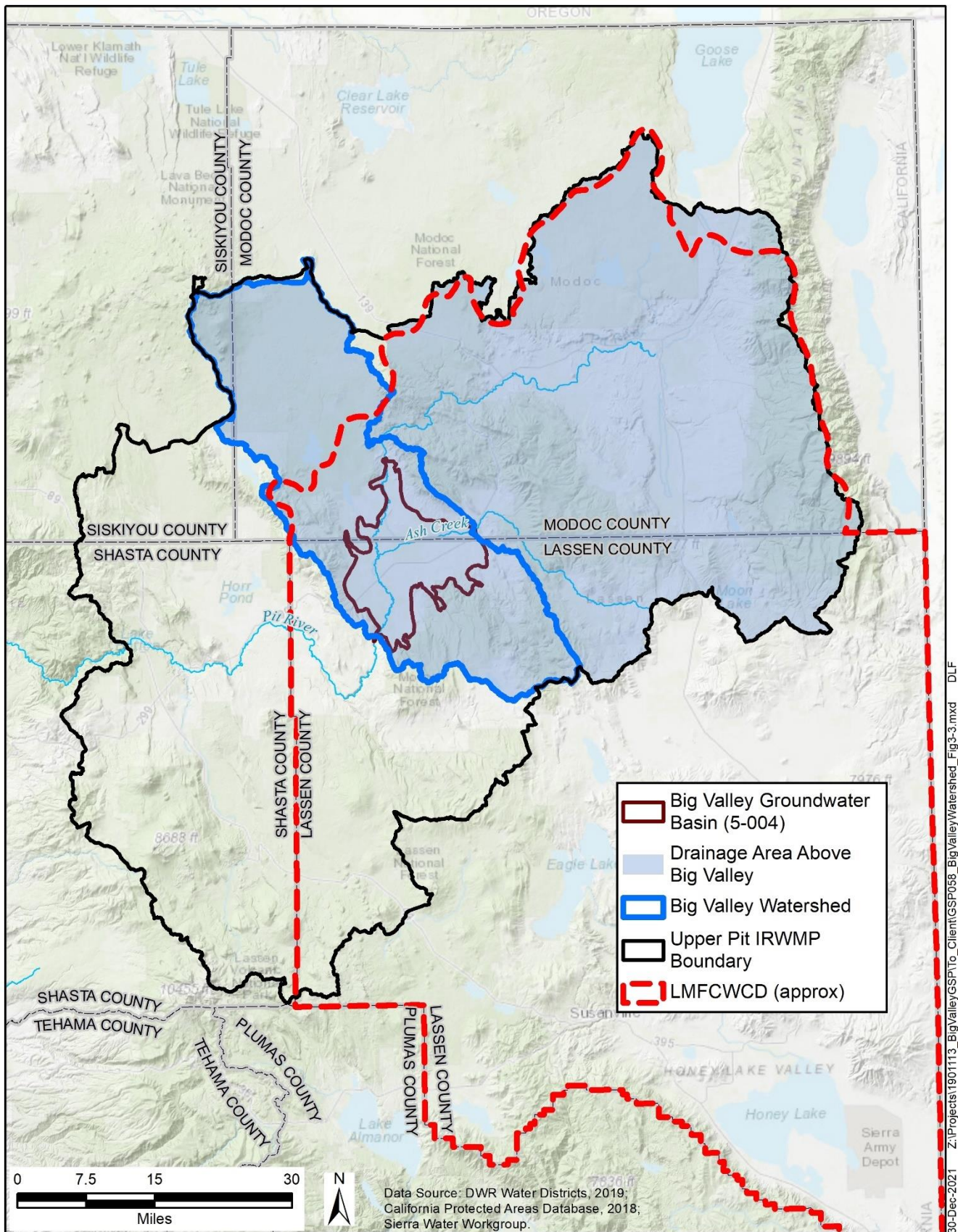
645 Two entities measure water diversions for reporting to the State Water Resources Control Board
646 (SWRCB). These include the Big Valley Water Users Association (BVWUA) and the Modoc County
647 Watermaster. The boundaries of these two entities are shown on **Figure 3-4**. Numerous private parties
648 also measure and report their water diversions.

649 **Lassen County Waterworks District #1**

650 Lassen County Waterworks District #1 (LCWD #1) was established in 1932 originally for the purpose
651 of fire protection. Homes started being added to the system in the 1940s. Eventually all residential and
652 commercial properties became part of the system, with most properties leaving their private wells
653 unused. LCWD #1 now provides both water and sewer services to the customers within its boundary
654 shown on **Figure 3-2**. (Hutchinson 2021)

655 **Adin Community Services District**

656 Adin Community Services District provides wastewater services to the town of Adin. The district
657 boundary is shown on **Figure 3-2**.



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Figure 3-3 Upper Pit IRWMP, Watershed, and LMFCWCD Boundaries

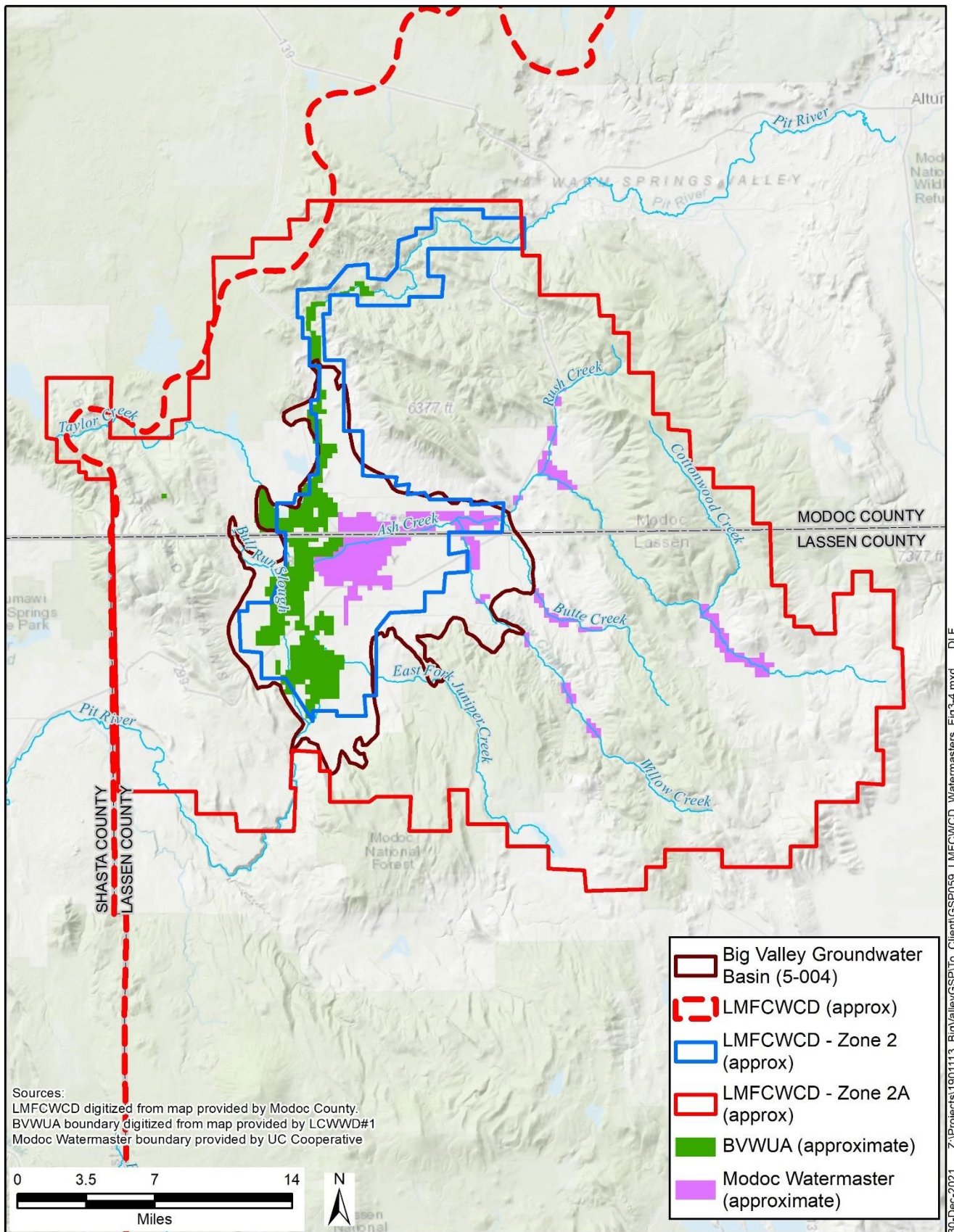


Figure 3-4 LMFCWCD Zones and Watermaster Service Areas

3.3 Land and Water Use

This section describes land use in the BVGB, water use sectors, and water source types using the best available data. The most recent, best available data for distinguishing surface-water and groundwater uses comes from DWR land-use datasets. This data is developed by DWR “...to serve as a basis for calculating current and projected water uses” (DWR 2021d). Surveys performed prior to 2014 were developed by DWR using some aerial imagery with field verification. These previous surveys also included DWR’s estimate of water source.

Since 2014, DWR has developed more sophisticated methods of performing the surveys with a higher reliance on remote sensing information. These more recent surveys do not make available the water source. **Table 3-1** is a listing of the years for which surveys are available.

Table 3-1 Available DWR Land Use Surveys

Year	Modoc County	Lassen County	Water Source Included
1997	Yes	Yes	Yes
2011	Yes	No	Yes
2013	No	Yes	Yes
2014	Yes	Yes	No
2016	Yes	Yes	No ^a
<p>Note: ^a DWR provided the GSAs a hybrid dataset with the 2011 and 2013 water sources superimposed onto the 2016 land use Source: DWR 2020d</p>			

Land use in the BVGB is organized into the water use sectors listed in **Table 3-2**. These sectors differ from DWR’s water use sectors identified in Article 2 of the GSP regulations because DWR’s sectors don’t adequately describe the uses in Big Valley. **Figure 3-5** shows the 2016 distribution of land uses and **Table 3-2** summarizes the acreages of each. Several data sources were used to designate land uses as described below, including information provided by DWR through a remote sensing process developed by Land IQ (DWR 2016d). Other data sources are described below.

- Community** This is non-agricultural, non-industrial water use in the census-designated places of Bieber, Nubieber, and Adin, although some of these areas may also have some minor industrial uses. These community areas were delineated using the areas designated as “urban” by DWR (2016d). DWR’s data included the areas north and northeast of Bieber (area of the former mill and medical center) as “urban.” For this GSP, those areas were re-categorized from urban to industrial, as that is more descriptive of the actual land use. In addition, parcels that make up the core of Nubieber were included as community.
- Industrial** There is limited industrial use in the Basin. The DWR well log inventory shows 6 industrial wells, all located at the inactive mill in Bieber. The areas north and northeast of Bieber, including the former mill and the medical center, have been categorized as industrial. In addition, the parcels associated with railroad operations in Nubieber were added. There is

some industrial use associated with agriculture, but that is included under the agricultural water use sector.

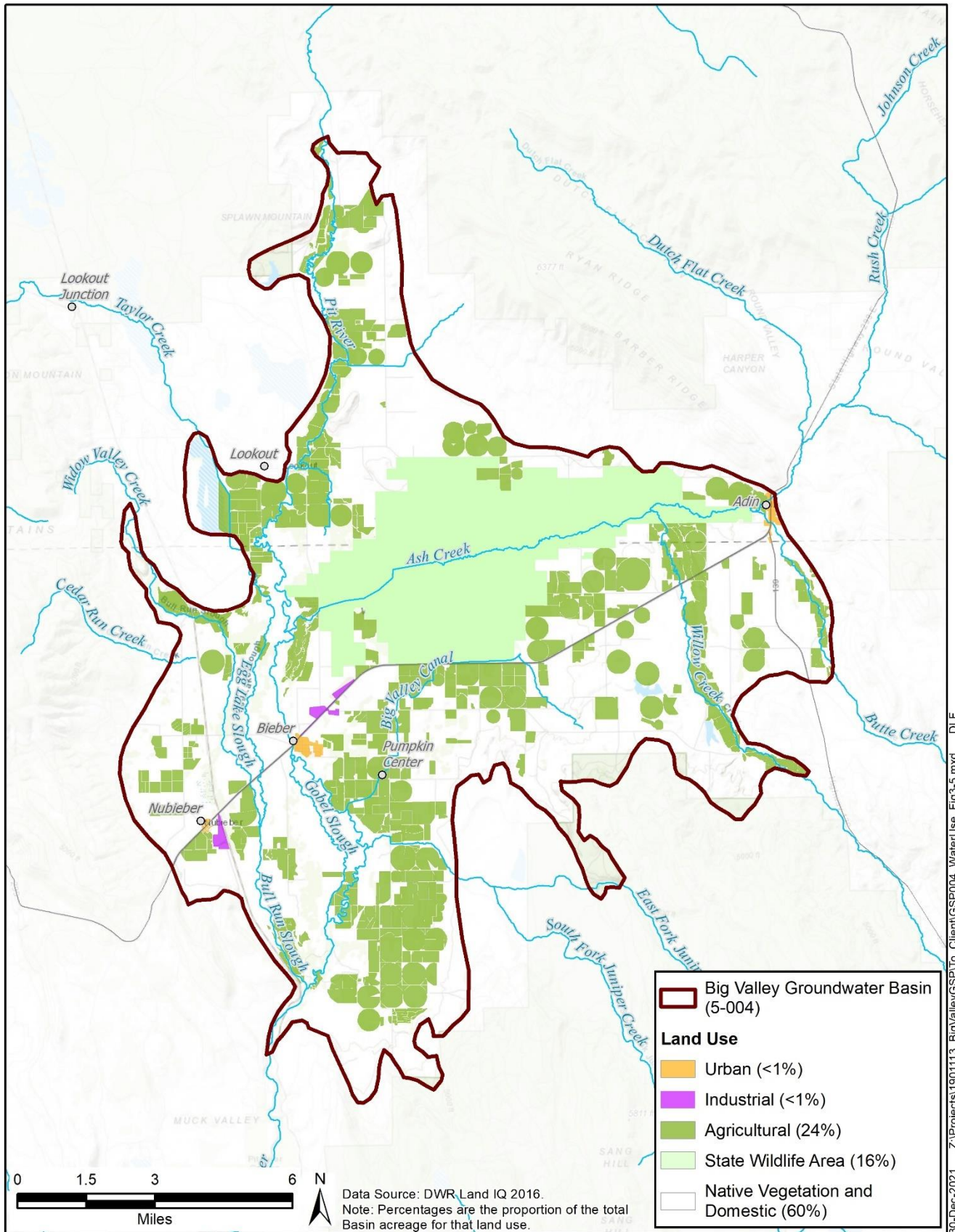
- **Agricultural** Agricultural use is spread across the Basin and was delineated using DWR’s (2016g) land-use data.¹² Agricultural users often use groundwater for both agricultural and domestic use.
- **State Wildlife Area** The area delineated in **Figure 3-5** is the boundary of the ACWA, located within the center of the Basin. The area includes some wetlands created by the seasonal flow of 6 streams and year-round flow from Ash Creek. The area also has upland ecosystems.
- **Managed Recharge** Flood irrigation of some fields and natural flooding of lowland areas provides recharge to the Basin even though it is not of a formalized nature that would put it into this managed recharge category. Some of the future projects and management actions in this GSP include managed recharge.
- **Native Vegetation** Native vegetation is widespread throughout the Basin. Many of the areas under this category also have domestic users. Native vegetation and domestic land uses are categorized together because it is not possible to distinguish between the two with readily available data.
- **Domestic** This sector includes water use for domestic purposes, for users that aren’t located in a community service district. Domestic use generally occurs in conjunction with agricultural and native vegetation and is best represented on the map categorized with native vegetation, as most of the agricultural area is delineated by each field and does not include residences.

Table 3-2 2016 Land Use Summary by Water Use Sector

Water Use Sector	Acres	Percent of Total
Community ^a	250	<1%
Industrial	196	<1%
Agricultural	22,246	24%
State Wildlife Area ^b	14,583	16%
Managed Recharge	-	0%
Native Vegetation and Rural Domestic ^c	54,782	60%
Total	92,057	100%
Notes: ^a Includes the use in the communities of Bieber, Nubieber and Adin ^b Made up of a combination of wetlands and non-irrigated upland areas ^c Includes the large areas of land in the Valley which have domestic wells interspersed Source: Modified from DWR 2020d		

Many of the lands within the Basin are enrolled in the Conservation Reserve Program (CRP) and Wetlands Reserve Program (WRP). The CRP is a land conservation program administered by the Farm

¹² This dataset has been identified as being inaccurate and has been included as a data gap.



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Figure 3-5 Land Use by Water Use Sector

Service Agency (FSA). In exchange for a yearly rental payment, farmers enrolled in the program agree to promote plant species that will improve environmental health and quality. Contracts for land enrolled in the CRP vary in length. The WRP is a similar program for wetlands and was available for enrollment until February 7, 2014. Land enrolled in the program before the end date continues to be enrolled until the termination of the contract.

In addition to the uses described above, the Big Valley GSAs are aware of illegal land-use activity within the Basin (i.e., unlicensed marijuana cultivation), which is likely having a negative impact on surface-water quality and quantity within the Basin and watershed. This illegal activity is occurring both within the alluvial portion of the Basin and the upstream watershed and may utilize groundwater and/or illegal diversions of surface water for cultivation. Lassen and Modoc counties have limited staff to monitor and enforce this situation on private land. However, in the last two growing seasons Lassen County Code Enforcement have identified and abated seven large-scale commercial marijuana grows within the Basin as public nuisances, and the Lassen County Sheriff has eradicated at least two under penal code. Some enforcement action is also within the purview of state and federal agencies. These agencies include the Bureau of Cannabis Control, CDFW, State Water Board, USFS, and BLM. The GSAs are not aware that these state and federal agencies have taken aggressive enforcement action against this illegal activity and according to county staff, the problem is getting noticeably worse over time. The timing and volume of water used for illegal marijuana cultivation and extent of the potential contamination cannot be quantified at this time.

3.3.1 Water Source Types

The Basin has two water source types: groundwater and surface water. Recycled water¹³ and desalinated water are not formally utilized in the Basin, nor is stormwater used as a formal, measured supplemental water supply at the time of the development of this GSP. Informal reuse of irrigation water occurs with capture and reuse of tail water by farmers and ranchers. Storm water is stored in reservoirs for future use as a water source. **Figure 3-6** and shows an approximate distribution of water sources to lands throughout the Basin. Chapter 6 – Water Budget provides details on how the sources were mapped for this figure.

There are three public water suppliers (as designated by the State Water Board) in the Basin which use groundwater: LCWD #1 in Bieber, the Forest Service Ranger Station in Adin, and the California Department of Forestry and Fire Protection (CAL FIRE) conservation camp west of the BVGB. The conservation camp is located outside the Basin boundary, but their supply well is inside the Basin and the water is pumped to the camp. Many domestic users have groundwater wells, but there are some surface-water rights from Ash Creek and the Pit River that are designated for domestic use. The ACWA is fundamentally supported by surface water, but the CDFW does have three wells that are utilized in the fall for ecological enhancement.

¹³ Recycled water generally refers to treated urban wastewater that is used more than once before it passes back into the water cycle. (WateReuse Association, 2020)

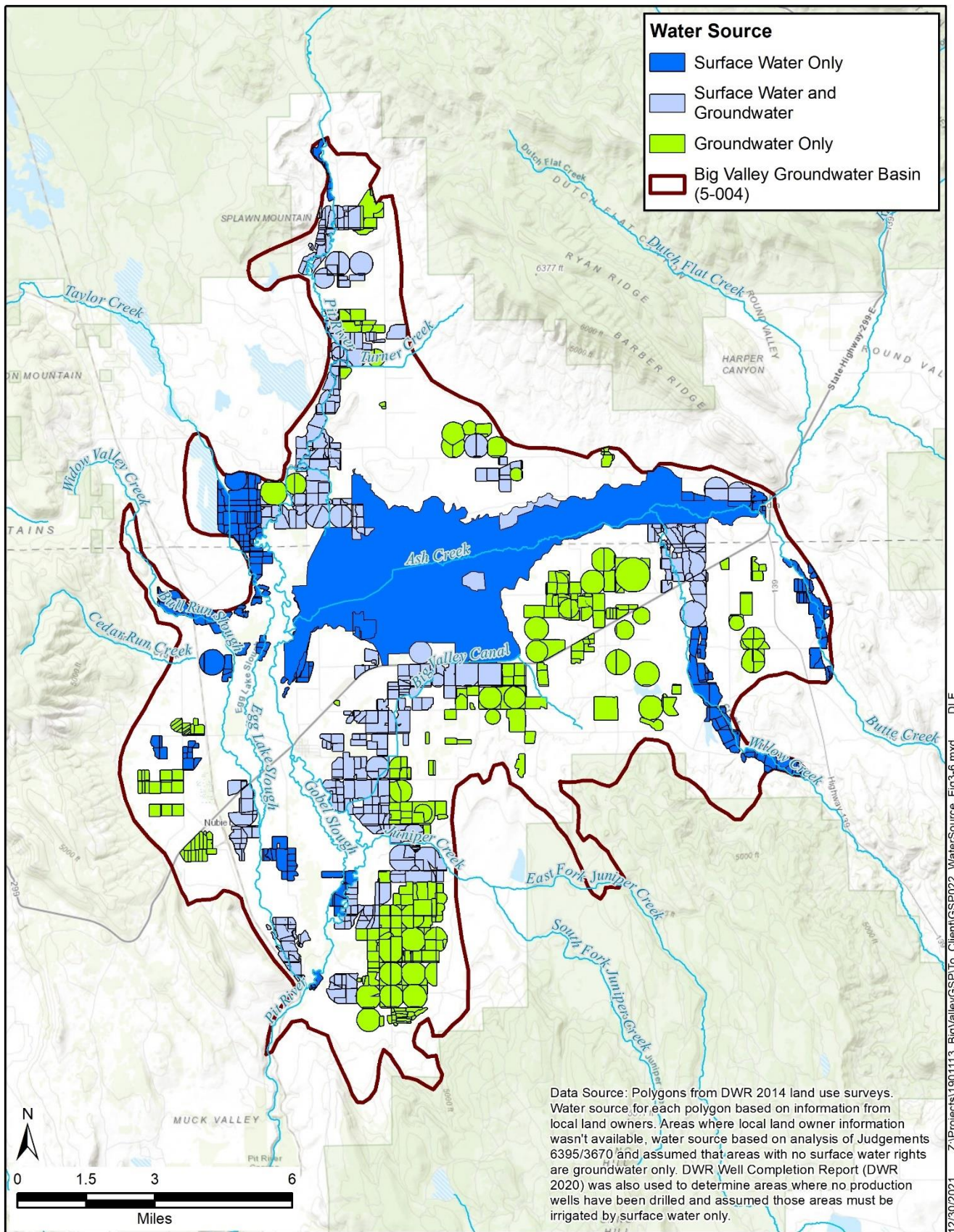


Figure 3-6 Water Sources

3.4 Inventory and Density of Wells

3.4.1 Well Inventory

The best available information about the number, distribution and types of wells in Big Valley comes from well completion reports (WCRs) maintained by DWR.¹⁴ The most recent catalog of WCRs was provided through their website (DWR, 2018c) as a statewide map layer. This data includes an inventory and statistics about the number of wells in each section under three categories: domestic, production, or public supply.¹⁵ **Table 3-3** shows the unverified number of wells in the BVGB for each county from this data. Many wells may be inactive or abandoned and this data gap will need to be filled over time. Once this data gap is filled, Basin priority could be affected.

Table 3-3 Well Inventory in the BVGB

WCR 2018 DWR Map Layer			DWR 2015 and 2017 WCR Inventory		
Type of Well ^a	Lassen County Total Wells	Modoc County Total Wells	Proposed Use of Well ^b	Lassen County Total Wells	Modoc County Total Wells
Domestic	136	81	Domestic	142	79
Production	177	76	Irrigation	157	65
			Stock	11	5
			Industrial	6	0
Public Supply	5	1	Public	5	1
Subtotal =476	318	158	Subtotal = 471	321	150
			Monitor	55	0
			Test	25	29
			Other	7	2
			Unknown	27	7
Total =476	318	158	Total = 623	435	188

Source:

^a DWR 2018 Statewide Well Completion Report Map Layer; downloaded April 2019

^b DWR Well Completion Report Inventories from DWR data provided to the counties in 2015 and 2017

Lassen and Modoc counties had requested and received WCRs for their areas from DWR during 2015 and 2017, respectively. An inventory of the wells was included by DWR. This data source had additional well categories included as shown in **Table 3-3**, which are more closely tied to the categories identified by the well drillers when each WCR is submitted and provides additional information about the use of the wells.

The correlation between the 2018 WCR map layer categories and the categories in the 2015 and 2017 WCR inventory provided to the counties is indicated in **Table 3-3** by the grey shading. The table shows

¹⁴ All water-well drillers with a C57 drilling license in California are required to submit a well completion report to DWR whenever a well is drilled, modified, or destroyed.

¹⁵ A section is defined through the public land survey system as a 1 mile by 1 mile square of land.

similar totals from the two datasets for the number of domestic, production, and public supply wells. It is unknown why these two datasets don't match exactly, but both datasets are provided to represent the data available for this GSP. As stated earlier, verification of the data in this table needs to occur. This table shows that more than 600 wells have been drilled, of which 476 are of a type that could involve extraction (e.g., domestic, production, or public supply).¹⁶ It is unknown how many wells are actively used, as some portion of them are likely abandoned. Abandoned wells no longer in use should be formally destroyed in accordance with state well standards. The 2015 and 2017 inventory of WCRs showed six well destructions, all on the Lassen County side of the Basin. It should be noted that some of the recent wells in the Basin were drilled in cooperation with the EQUIP program to provide stock watering outside the riparian area to improve surface-water quality.

3.4.2 Well Density

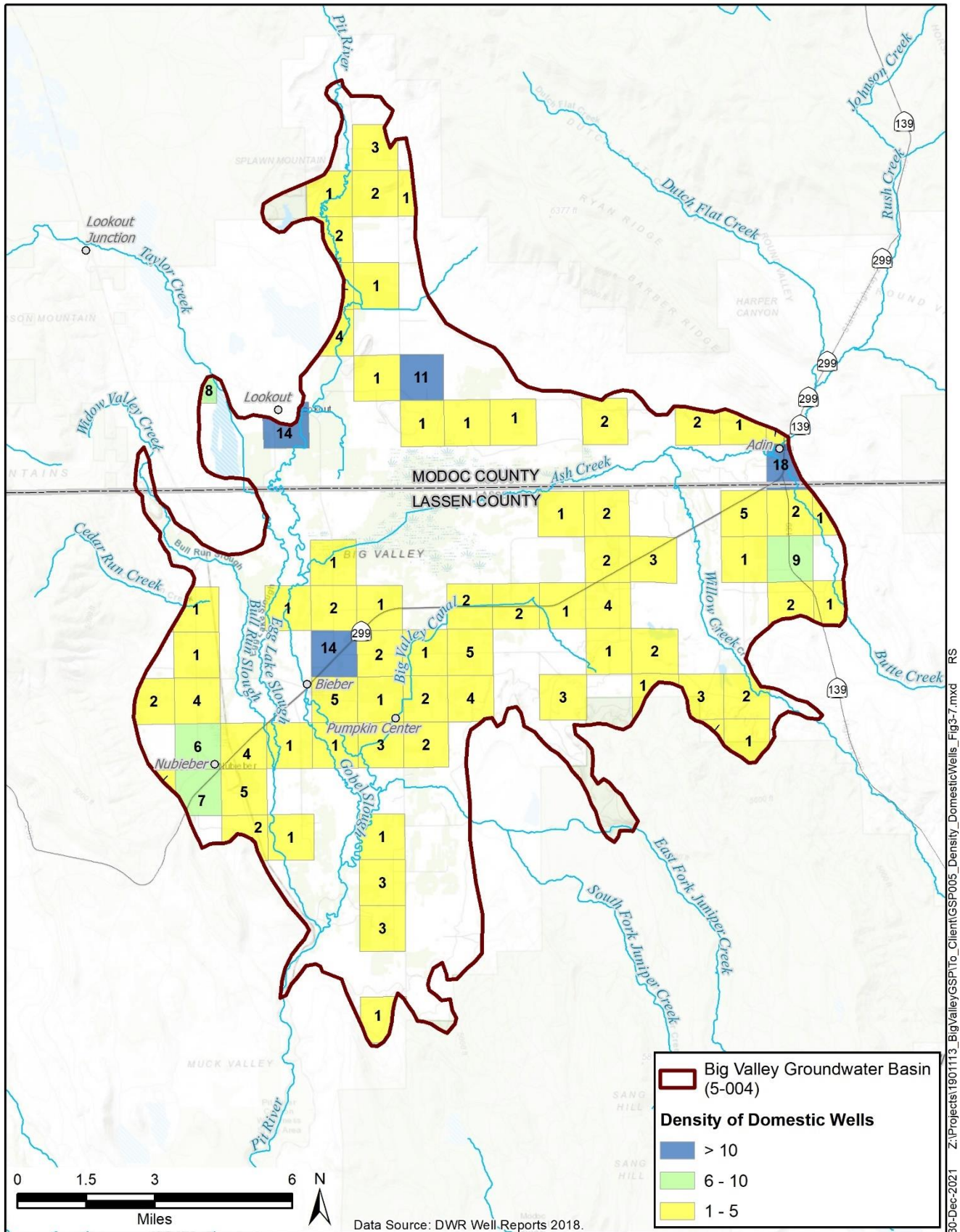
Figure 3-7, Figure 3-8, and Figure 3-9 show the density of wells in the Basin per square mile for domestic, production, and public supply, respectively, based on the 2018 WCR DWR map layer. These maps provide an approximation of extraction-well distributions and give a general sense of where groundwater use occurs.

Figure 3-7 shows that domestic wells are in 74 of the 180 sections (including partial sections) that comprise the BVGB. The density varies from 0 to 18 wells per square mile with a median value of two wells per section and an average of three wells per section. The highest densities of domestic wells are located near Adin, Bieber and Lookout. There are also sections east of Lookout and south of Adin which have high densities. In addition, 22 wells are present in the four sections around the town of Nubieber. Virtually all the domestic wells in Bieber are no longer used since the community water system was developed (Hutchinson 2020-2021).

Figure 3-8 shows that production wells (primarily for irrigation) are located in 93 of the 180 sections with a maximum density of nine wells per section (median: 2 wells per section, average: nearly 3 wells per section). The highest densities of production wells are located between the towns of Bieber and Adin, to the southeast of Bieber, and one section northeast of Lookout.

Figure 3-9 shows that public supply wells have been drilled in four sections. It should be noted that the designation as a public supply well that is depicted on the map is from the designation provided in the WCR by the driller when the well was drilled. The State Water Board identifies three public water suppliers in the BVGB: LCWD #1 which is a community system with two wells serve Bieber; the Forest Service station in Adin which maintains a well for non-community supply to its employees and visitors; and the CAL FIRE conservation camp west of the Basin. These public suppliers account for three of the six public wells with WCRs. The other three are either inactive or aren't designated by the State Water Board as public supply. The CAL FIRE conservation camp well does not show up as a public supply well in the WCR inventory, but its location is shown on **Figure 3-9**.

¹⁶ It should be noted that the majority of the stock watering wells were drilled in the 2009 to 2014 timeframe as part of the EQUIP program to move watering of stock away from stream channels and that this increase in the inventory of wells in the Basin was used by DWR to put Big Valley into the medium prioritization category.



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Figure 3-7 Density of Domestic Wells

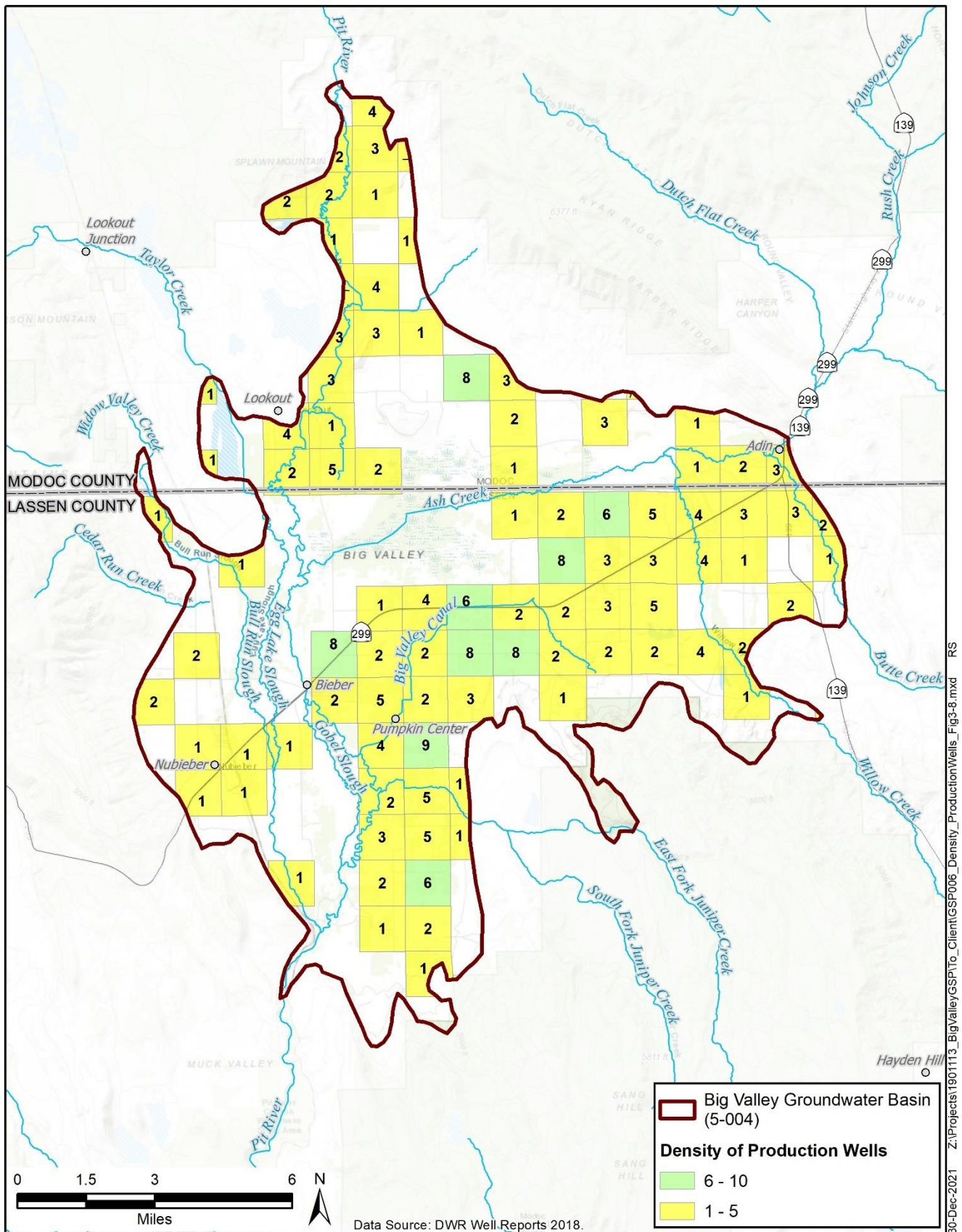
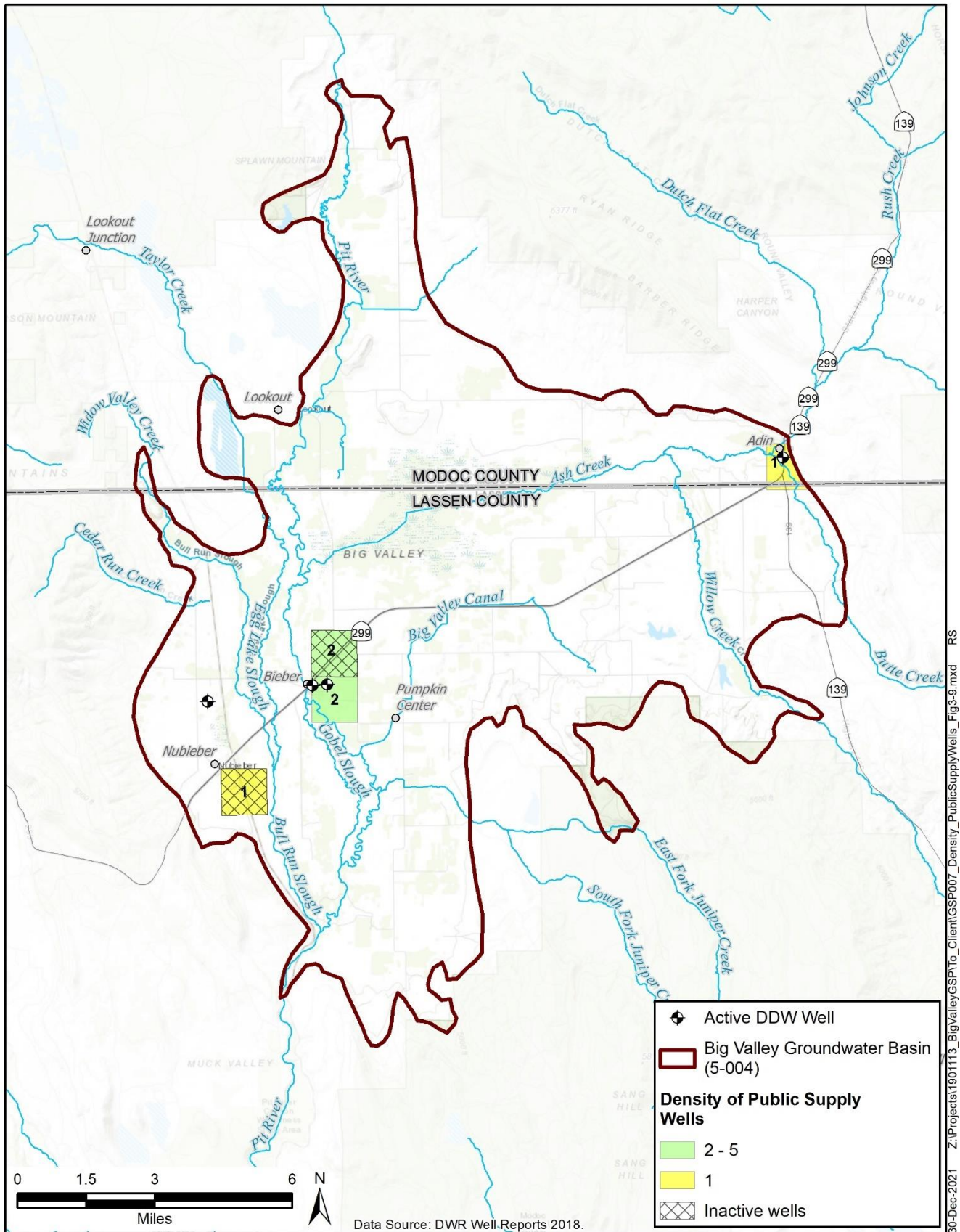


Figure 3-8 Density of Production Wells



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Figure 3-9 Density of Public Supply Wells

3.5 Existing Monitoring, Management and Regulatory Programs

3.5.1 Monitoring Programs

This section describes the existing monitoring programs for data used in this GSP and describes sources that can be used for the GSP monitoring networks.

3.5.1.1 Groundwater Monitoring Levels

Lassen and Modoc counties are the monitoring entities for the CASGEM program. Each county has an approved CASGEM monitoring plan which provides for water level measurements twice a year (spring and fall) for 21 wells. The monitoring is performed by staff from DWR on behalf of the counties. All but one of the wells have depth information, and depths range from 73 to 800 feet below ground surface [ft bgs] (median: 270 ft bgs, mean: 335 ft bgs). **Figure 3-10** shows the locations of the 21 CASGEM wells and one additional well which has historical data, but measurements were discontinued in the 1990s.

Lassen and Modoc counties drilled five monitoring well clusters between 2019 and 2020. Each cluster consists of three shallow wells and one deep well. The locations of these clusters and the depth of the deep well at each site is shown on **Figure 3-10**.

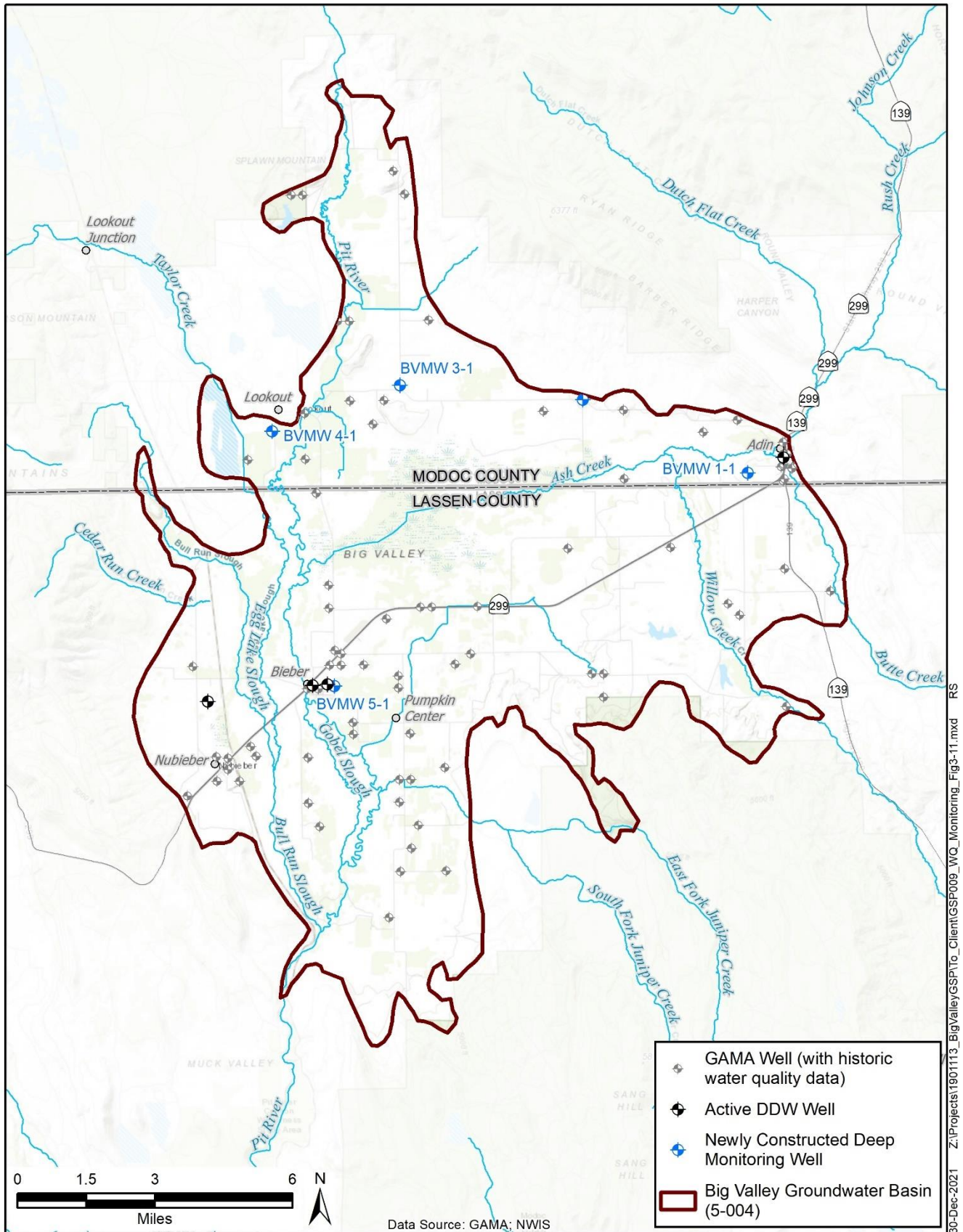
Quality

Water quality is regulated and monitored under a myriad of programs. **Table 3-4** describes the programs relevant to Big Valley. The State Water Board makes groundwater data from many of these programs available on their Groundwater Ambient Monitoring and Assessment (GAMA) Groundwater Information System (GAMA GIS) website (State Water Board 2019). **Table 3-5** lists and describes the groundwater programs from which historical data is available on GAMA GIS. The locations of wells with historical water quality data from GAMA GIS are shown on **Figure 3-11**.

Along with the many programs that monitor surface-water quality, the following are currently in place to monitor groundwater quality on an ongoing basis:

- Public Drinking Water Systems (State Water Board's Division of Drinking Water [DDW])
- Monitoring associated with Underground Storage Tanks (USTs) and Waste Discharge Requirement

The BVGB contains three active public water suppliers regulated by the DDW: Lassen County Water District #1 in Bieber, the Forest Service station in Adin, and the CAL FIRE conservation camp west of the Basin. Water quality monitoring at wells regulated by the DDW can be used for ongoing monitoring in the Basin, and their locations are shown on **Figure 3-11**. At each of five newly-constructed monitoring well clusters, the deep well at each site was sampled for water quality after construction. The locations of the well cluster sites are shown on **Figure 3-11**.



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Figure 3-11 Water Quality Monitoring

Table 3-4 Water Quality Monitoring Programs

Program	Description
Irrigated Lands Regulatory Program (ILRP)	Initiated in 2003 to prevent agricultural runoff from impairing surface waters; in 2012 groundwater regulations were added to the program. To comply with the ILRP, Big Valley growers were forced to join the Northeastern California Water Association (NECWA), which is a sub-watershed coalition of the Northern California Water Association. Growers pay increasing fees to NECWA for monitoring and compliance with the ILRP even though Big Valley farmers grow low intensity crops that generally don't require nitrogen application or cause water quality degradation.
Waste Discharge Requirements (WDR) Program	Also known as the Non-Chapter 15 Permitting, Surveillance and Enforcement Program, this is a mandated program issuing WDRs to regulate the discharge of municipal, industrial, commercial, and other wastes to the land that will, or has the potential to, affect groundwater.
Central Valley Salinity Coalition (CVSC)	Represents the stakeholder groups working with the State Water Board in the CV-SALTS collaborative basin planning process.
RWQCB Basin Plan	Adopted by the Regional Water Board and approved by the State Water Board and the Office of Administrative Law. The U.S. Environmental Protection Agency approves the water quality standards contained in the Basin Plan, as required by the Clean Water Act (CWA).
Public Drinking Water Regulations	Effective July 1, 2018, various sections of California Code of Regulations, Title 27 were revised. Revisions to Title 27 were necessary in order to reorganize, update and incorporate new parameters for administering the Unified Program and accomplishing the objectives of coordination, consolidation and consistency in the protection of human health, safety, and the environment.
Total Maximum Daily Load Program (TMDL) Program	TMDLs are established at the level necessary to implement the applicable water quality standards.
Local Agency Management Programs	These programs regulate Onsite Water Treatment Systems (OWTSs); the programs are designed to "correct and prevent system failures due to poor siting and design and excessive OWTS densities" (RWQCB 2021).
Underground Storage Tank Site Cleanup Program (UST)	The purpose of the UST Program is to protect the public health and safety and the environment from releases of petroleum and other hazardous substances from USTs.
National Pollutant Discharge Elimination System (NPDES)	The NPDES permit program, created in 1972 by the CWA, helps address water pollution by regulating point sources that discharge pollutants to waters of the U.S. The permit provides two levels of control: technology-based limits and water quality-based limits (if technology-based limits are not sufficient to provide protection of the water body).
Nonpoint Source Program (NSP)	NSP focuses and expands the state's efforts over the next 13 years to prevent and control nonpoint source pollution. Its long-term goal is to implement management measures by the year 2013 to ensure the protection and restoration of the state's water quality, existing and potential beneficial uses, critical coastal areas, and pristine areas. The state's nonpoint source program addresses both surface and ground water quality.
Other	Water quality samples are required when a property is sold and when a foster child is placed.

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Table 3-5 Datasets Available from State Water Board’s GAMA Groundwater Information System

Name	Source
DDW	Division of Drinking Water, State Water Board
DPR	Department of Pesticide Regulation
DWR	California Department of Water Resources
GAMA_USGS	Groundwater Ambient Monitoring and Assessment Program performed by USGS
USGS_NWIS	USGS National Water Information System
WB_CLEANUP	Water Board Cleanup
WB_ILRP	Water Board Irrigated Lands Regulatory Program
Source: GAMA GIS available at https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/	

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The Basin has five active groundwater cleanup sites in various stages of assessment and remediation, all located in the town of Bieber. These sites are not appropriate for ongoing monitoring for the GSP because they monitor only the shallow aquifer and represent a localized condition that may not be representative of the overall quality of groundwater resources in the Basin. One of the open sites is the Bieber Class II Solid Waste Municipal Landfill which has ongoing water quality monitoring. The Lookout Transfer Station also has ongoing water quality monitoring but is located outside the boundaries of the BVGB.

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Growers in Big Valley are required to participate in the ILRP, which imposes a fee per acre, through the Sacramento Valley Water Quality Coalition (SVWQC). The SVWQC Monitoring and Reporting Plan does not include any wells within the BVGB. Basin residents have expressed concerns with regulatory programs that involve costs, especially ongoing costs, particularly for a disadvantaged community. The Goose Lake Basin, which has similar land use and land-use practices, has recently been exempted from the ILRP by the SWRCB.

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3.5.1.2 Surface-water Monitoring

Streamflow

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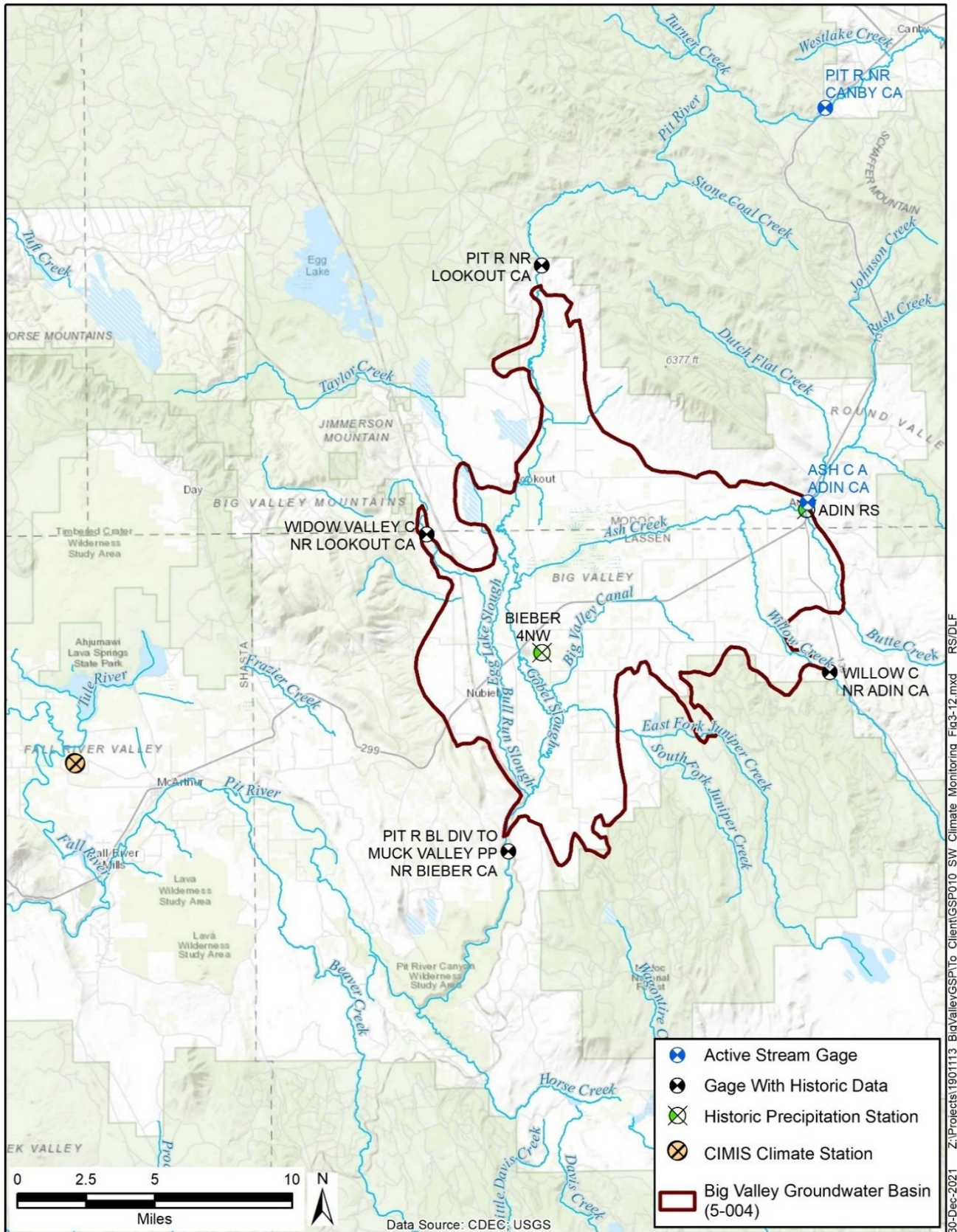
Streamflow gages have historically been constructed and monitored within the BVGB, but active, maintained streamflow gages for streams in BVGB are limited. For the Pit River, the closest active gage that monitors stage and streamflow is located at Canby, 20 miles upstream of Big Valley. Flow on Ash Creek was measured at a gage in Adin from 1981 to 1999 and was reactivated in Fall 2019 to provide stream stage data at 15-minute intervals. There is a gage where the Pit River exits the Basin in the south at the diversion for the Muck Valley Hydro Power Plant. Stream gages are shown on **Figure 3-12**.

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Diversions

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Two watermasters, described below, measure diversions in the BVGB. Those surface-water rights holders who divert more than 10 AFY whose rights are not measured by a watermaster must measure and report their diversions to the State Water Board.



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Figure 3-12 Historical Surface-water and Climate Monitoring Network

884 Diversions from the Pit River are detailed in water rights Decree #6395. In 2006, the BVWUA
 885 petitioned the Modoc Superior Court who granted permission to separate from the costly state
 886 watermaster service. A private watermaster service is now contracted by the BVWUA to
 887 administer/distribute allocated 2nd priority rights in conjunction with state watermaster guidelines during
 888 the irrigation season (April 1 through September 30) each year as a neutral 3rd party. The watermaster
 889 service measures diversions every two weeks and reports the data to each water rights holder. At the end
 890 of the irrigation season, the watermaster sends each member a yearly use report. The water rights holder
 891 is responsible to submit their reports to the State Water Board. Currently there are five Pit River water
 892 rights holders that do not participate in the BVWUA watermaster service. (Hutchinson 2021)

893 Ash Creek water rights are governed by Decree 3670 and Willow Creek by Decree 1237. Ash Creek and
 894 Willow Creek are within the Ash Creek Watermaster Service Area (WMSA). The WMSA also includes
 895 Butte and Rush Creeks and is under the jurisdiction of the Modoc County Watermaster. The
 896 Watermaster files the annual reports to DWR and Modoc County Superior Court. (Modoc County
 897 Watermaster 2021)

898 **3.5.1.3 Climate Monitoring**

899 The National Oceanic and Atmospheric Administration (NOAA) has two stations located in the Basin:
 900 Bieber 4 NW and Adin RS. Neither station is active, thus they only provide historical data. Annual
 901 precipitation at the Bieber station is shown for 1985 to 1995 in **Table 3-6**.

902 **Table 3-6 Annual Precipitation at Bieber from 1985 to 1995**

Water Year	Precipitation at Station ID: BBR (inches)
1985	14.1
1986	25.4
1987	11.6
1988	10.9
1989	20.2
1990	16.1
1991	16.5
1992	10.4
1993	28.2
1994	16.3
1995	31.8
Minimum	10.4
Maximum	31.8
Average	18.3

Source: DWR 2021b

903 The closest California Irrigation Management Information System (CIMIS) station, number 43, is in
 904 McArthur, CA, and measures several climatic factors that allow a calculation of daily reference
 905 evapotranspiration for the area. This station is approximately 10 miles southwest of the western

boundary of the Basin. **Table 3-7** provides a summary of average monthly rainfall, temperature and reference evapotranspiration (ET_o) for the Basin, and **Figure 3-13** shows annual rainfall for 1984 through 2018. The bar graph along the bottom shows annual precipitation, and the line graph on top shows the cumulative departure from average. The cumulative departure graph indicates when there are dry periods (downward slope of the line), wet periods (upward slope of the line), and average periods (flat slope of the line). Each time the line graph crosses the dashed line indicates that an average set of years has occurred. A set of average years has occurred between 1983-1997, 1997 to 2010, and 2010 to 2019. The locations of all climate monitoring stations are shown on **Figure 3-12**. Climate monitoring is a data gap that could be filled with a CIMIS station located in the Basin.

Table 3-7 Monthly Climate Data from CIMIS Station in McArthur (1984-2018)

Month	Average Rainfall (inches)	Average ET _o (inches)	Average Daily Temperature (°F)
October	1.4	3.02	49.5
November	2.3	1.21	38.2
December	2.9	0.75	32.1
January	2.5	0.89	32.5
February	2.6	1.57	36.8
March	2.4	3.01	42.4
April	1.8	4.39	48.2
May	1.6	5.93	55.1
June	0.7	7.24	62.8
July	0.2	8.17	69.1
August	0.2	7.18	66.1
September	0.4	5.02	59.5
Monthly Average	1.6	4.03	49.4
Average Water Year	18.8	48.3	49.4
Source: DWR 2020c			

3.5.1.4 Subsidence Monitoring

Subsidence monitoring is available in the BVGB at a single continuous global positioning satellite station (P347) on the south side of Adin. P347 began operation in September 2007 and provides daily readings. The five monitoring well clusters constructed in 2019-2020 were surveyed and a benchmark established at each site. These sites can be re-surveyed in the future to determine changes in ground elevation at those points if needed. The surveyor's report is included as **Appendix 3A**.

In addition, DWR has provided data processed from InSAR collected by the European Space Agency. The InSAR data currently available provides vertical displacement information between January 2015 and September 2019. InSAR is a promising, cost-effective technique, and DWR will likely provide additional data and information going forward.

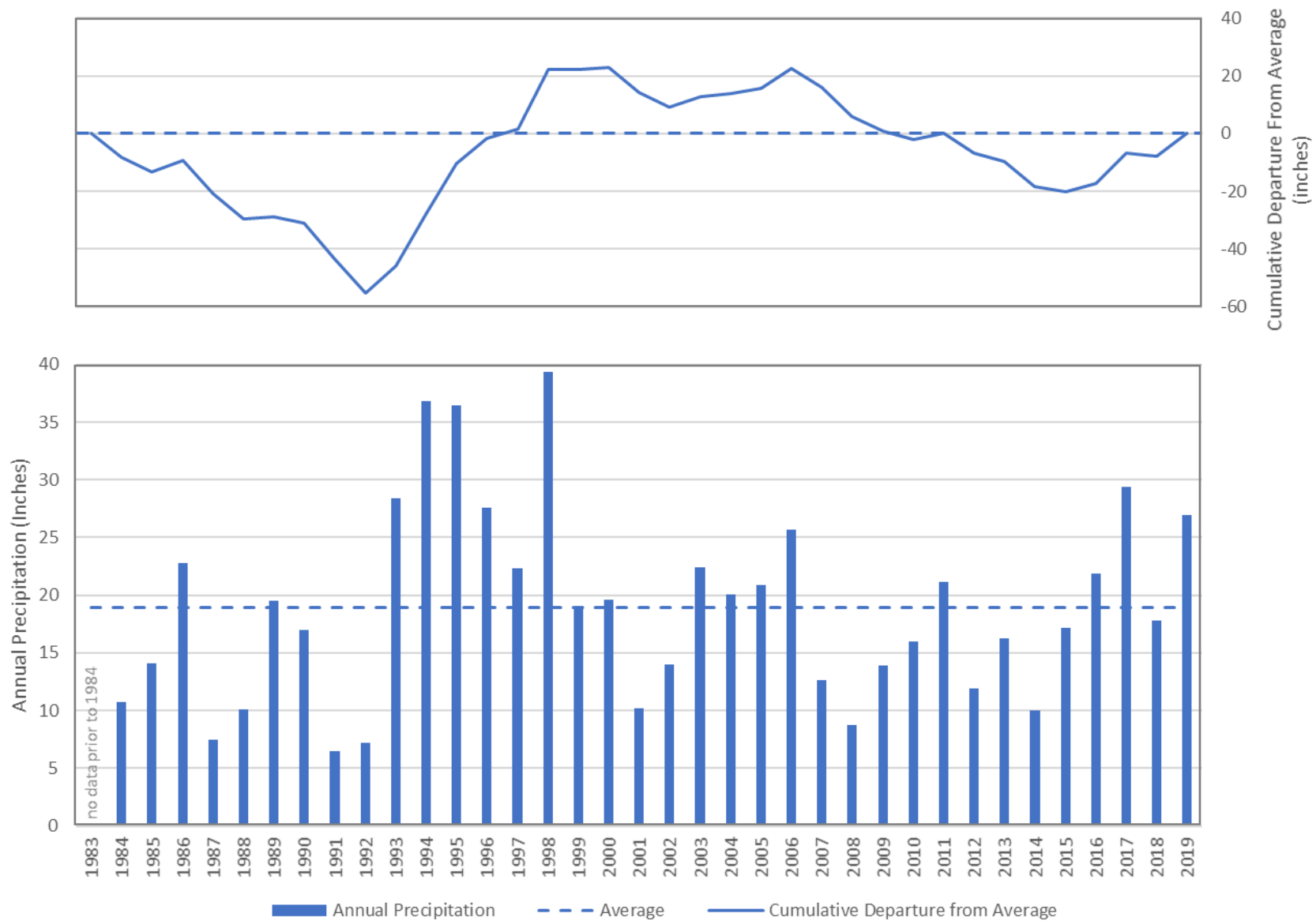


Figure 3-13 Annual Precipitation at the McArthur CIMIS Station

3.5.2 Water Management Plans

Two water management plans exist that cover the BVGB: the Lassen County Groundwater Management Plan (LCGMP) and the Upper Pit River IRWMP.

Lassen County Groundwater Management Plan

The LCGMP was completed in 2007 and covers all groundwater basins in Lassen County, including the Lassen County portion of the BVGB. The goal of the LCGMP is to, "...maintain or enhance groundwater quantity and quality, thereby providing a sustainable, high-quality supply for agricultural, environmental and urban use..." (Brown and Caldwell 2007). The LCGMP achieves this through the implementation of Basin Management Objectives¹⁷ (BMOs), which establish key wells for monitoring groundwater levels and define "action levels," which, when exceeded, activate stakeholder engagement to determine actions to remedy the exceedance. Action levels are similar to minimum thresholds in SGMA. A BMO ordinance was passed by Lassen County in 2011 and codified in Chapter 17.02 of the Lassen County Code.

Upper Pit River Watershed IRWMP

The Upper Pit IRWMP was adopted by the RWMG in 2013. Twenty-five regional entities were involved in the plan development, which included water user groups, federal, state and county agencies, tribal groups, and conservation groups. The management of the IRWMP has now transferred to North Cal-Neva who has been working to update the IRWMP. The goal of the IRWMP is to:

...maintain or improve water quality within the watershed; maintain availability of water for irrigation demands and ecological needs (both ground and surface water); sustain/improve aquatic, riparian and wetland communities; sustain and improve upland vegetation and wildlife communities; control & prevent the spread of invasive noxious weeds; strengthen community watershed stewardship; reduce river and stream channel erosion and restore channel morphology; support community sustainability by strengthening natural-resource-based economies; support and encourage better coordination of data, collection, sharing and reporting in the watershed; improve domestic drinking water supply efficiency/reliability; address the water-related needs of disadvantaged communities; conserve energy, address the effects of climate variability and reduce greenhouse gas emissions. (NECWA 2017)

The Upper Pit IRWMP contains the entire Watershed above Burney and extends past Alturas to the northeast (see **Figure 3-3**) and includes the entire BVGB. This GSP has been identified as a "Project" in the IRWMP.

¹⁷ Codified as Chapter 17.02 of Lassen County Code.

3.5.3 Groundwater Regulatory Programs

The Basin is located within the jurisdiction of the Regional Water Quality Control Board (RWQCB) Region 5 (R5) and subject to a Basin Plan, which is required by the CWC (§13240) and supported by the federal Clean Water Act. The Basin Plan for the Sacramento River Basin and the San Joaquin River Basin was first adopted by the RWQCB-R5 in 1975. The current version of the Basin Plan was adopted in 2018. The Porter-Cologne Water Quality Control Act requires that basin plans address beneficial uses, water quality objectives, and a program of implementation for achieving water quality objectives. Water Quality Objectives for both groundwater (drinking water and irrigation) and surface water are provided in Chapter 3 of the Basin Plan (State Water Board, 2020c).

Lassen County Water Well Ordinance

Lassen County adopted a water well ordinance in 1988 to provide for the construction, repair, modification, and destruction of wells in such a manner that the groundwater of Lassen County aquifers will not be contaminated or polluted. The ordinance ensures that water obtained from wells will be suitable for beneficial use and will not jeopardize the health, safety, or welfare of the people of Lassen County. The ordinance includes requirements for permits, fees, appeals, standards and specifications, inspection, log of the well (lithology and casing), abandonment, stop work, enforcement, and violations and well disinfection. Lassen County Environmental Health Department is responsible for the code enforcement related to wells.

In 1999, Lassen County adopted an ordinance requiring a permit for export of groundwater outside the county (Lassen County Code Chapter 17.01).

Modoc County Water Well Requirements

Modoc County Environmental Health Department established its requirements for the permitting of work on water wells in 1990, based on the requirements of the CWC (§13750.5). The fee structure was last revised in 2018. Modoc County also has an ordinance prohibiting the extraction of groundwater for use outside of the groundwater basin from which it was extracted (Modoc County Code Chapter 20.04).

California DWR Well Standards

DWR is responsible for setting the minimum standards for the construction, alteration, and destruction of wells in California to protect groundwater quality, as allowed by CWC §13700 to §13806. DWR began this effort in 1949 and has published several versions of standards in Bulletin 74, and are working on an update that has yet to be released. Current requirements are provided in Bulletin 74-81, Water Well Standards: state of California and in Bulletin 74-90 (Supplement) (DWR 2021c). Cities, counties, and water agencies have regulatory authority over wells and can adopt local well ordinances that meet or exceed the state standards. Lassen and Modoc Counties are the well permitting agencies for their respective portions of the Basin.

Title 22 Drinking Water Program

The DDW was established in 2014 when the regulatory responsibilities were transferred from the California Department of Public Health. DDW regulates public water systems that provide, "...water for human consumption through pipes or other constructed conveyances that have 15 or more service

connections or regularly serves at least 25 individuals daily at least 60 days out of the year,” as defined by the Health and Safety Code (§116275(h)). DDW further defines public water systems as:

- Community: Serves at least 15 service connections used by year-round residents or regularly serves 25-year-round residents. LCWD #1 is a community system that provides groundwater in Bieber.
- Non-Transient Non-Community: Serves at least the same 25 non-residential individuals during 6 months of the year. The State Water Board classifies the Adin Ranger Station and the Intermountain Conservation Camp as systems in this category which serve groundwater.
- Transient Non-Community: Regularly serves at least 25 non-residential individuals (transient) during 60 or more days per year. There is no system of this category in the BVGB.

Private domestic wells, industrial wells, and irrigation wells are not regulated by the DDW.

The State Water Board-DDW enforces the monitoring requirements established in Title 22 of the California Code of Regulations for public water system wells and all the data collected must be reported to the DDW. Title 22 designates the regulatory limits (e.g., MCLs) for various constituents, including naturally occurring inorganic chemicals and metals and general characteristics and sets limits for man-made contaminants, including volatile and non-volatile organic compounds, pesticides, herbicides, disinfection byproducts, and other parameters.

3.5.4 Incorporation Into GSP

Information in these and other various and numerous programs have been incorporated into this GSP and used during the preparation of Sustainability Management Criteria (minimum thresholds, measurable objectives, interim milestones) and have been considered during development of Projects and Management Actions.

3.5.5 Limits to Operational Flexibility

While some of the existing management programs and ordinances may have the potential to affect operational flexibility, they are not likely to be a factor in the Basin. For example, runoff and stormwater quality is of high quality and would not constrain recharge options. Similarly, groundwater export limitations by Lassen County and Modoc County would be considered for any decisions in the Basin.

3.6 Conjunctive Use Programs

Formally established conjunctive use programs are not currently operating within the Basin.

3.7 Land Use Plans

The following sections provide a general description of the land-use plans and how implementation may affect groundwater. Section 3.2 – Jurisdictional Areas, describes the jurisdictional areas within the BVGB and many of these entities have developed land-use plans for their respective jurisdictions. This

1034 includes the general plans (GPs) for Modoc County and Lassen County and the Modoc National Forest
1035 Land and Resource Management Plan.

1036 **3.7.1 Modoc County General Plan**

1037 The 1988 Modoc County GP was developed to meet a state requirement and to serve as the
1038 “constitution” for the community development and use of land. The GP discusses the mandatory
1039 elements of a GP, including land use, housing, circulation (transportation), conservation and open space,
1040 noise and safety, as well as economic development and an action program in the county. The GP was
1041 intended to serve as a guide for growth and change in Modoc County. Under the Conservation Element,
1042 Modoc County recognizes the importance of “use-capacity” for groundwater, among other issues, and
1043 the minimization of “adverse resource-use,” such as “groundwater mining.” The Water Resources
1044 section advocates the “wise and prudent” management of groundwater resources to support a sustainable
1045 economy as well as maintaining adequate supplies for domestic wells for rural subdivisions.
1046 Groundwater quality was recognized as good to excellent within the county’s basins.

1047 Policy items from the Modoc GP related to groundwater include:

- 1048 • Cooperate with responsible agencies and organizations to solve water quality problems
- 1049 • Work with the agricultural community to resolve any groundwater overdraft problems
- 1050 • Require adequate domestic water supply for all rural subdivisions

1051 The action program included several general statements for water, including:

- 1052 • Initiate a cooperative effort among state and local agencies and special districts to explore
1053 appropriate actions necessary to resolve long-term water supply and quality problems in the
1054 counties
- 1055 • Require as a part of the review of any subdivision approval a demonstration to the
1056 satisfaction of the county that the following conditions exist for every lot in the proposed
1057 development:
 - 1058 ○ An adequate domestic water supply
 - 1059 ○ Suitable soil depth, slope, and surface acreage capable of supporting an approved sewage
1060 disposal system

1061 In 2018, a GP amendment was adopted to update the housing element section.

1062 **3.7.2 Lassen County General Plan**

1063 The Lassen County GP 2000 was adopted in 1999 by the Lassen County Board of Supervisors
1064 (Resolution 99-060) to address the requirements of California Government Code Section 65300 et seq
1065 and related provisions of California law pertaining to GPs. The GP reflects the concerns and efforts of
1066 the County to efficiently and equitably address a wide range of development issues which confront
1067 residents, property owners, and business operators. Many of these issues also challenge organizations
1068 and agencies concerned with the management of land and resources and the provisions of community
1069 services within Lassen County.

1070 The goals of the GP are to:

- 1071 • Protect the rural character and culture of Lassen County life
- 1072 • Maintain economic viability for existing industries such as agriculture, timber, and mining
- 1073 • Promote new compatible industries to provide a broader economic base
- 1074 • Create livable communities through carefully planned development which efficiently utilize
- 1075 natural resources and provide amenities for residents
- 1076 • Maintain and enhance natural wildlife communities and recreational opportunities
- 1077 • Sustain the beauty and open space around use in this effort

1078 The GP addresses the mandatory elements (land use, circulation, housing, conservation, open space,
1079 noise, and safety) *via* several GP documents and alternate element titles. The 1999 GP elements include
1080 land use, natural resources (conservation), agriculture, wildlife, open space, circulation, and safety.
1081 Separate documents were produced for housing, noise, and energy. The land-use element designates the
1082 proposed general distribution and intensity of uses of the land, serves as the central framework for the
1083 entire GP, and correlates all land-use issues into a set of coherent development policies. The GP land-
1084 use map from 1999, shown on **Figure 3-14**, shows Intensive Agriculture as the dominant land use within
1085 the Big Valley area, along with scattered population (small) centers. Otherwise, Extensive Agriculture is
1086 the dominant land use.

1087 Groundwater is addressed in several elements, including agriculture, land use, and natural resources.
1088 The GP identified the BVGB as a ‘major ground water basin’ due to the operation of wells at over
1089 100 gallons per minute (gpm). Moreover, the GP expressed concern about water transfers and their
1090 impact on local water needs and environmental impacts due to the possibility of water marketeers either
1091 pumping groundwater from the BVGB into the Pit River and selling it to downstream water districts or
1092 municipalities or using groundwater to augment summer flow through the Delta. The GP recognized that
1093 safe yield is dependent on recharge and that overdraft pumping would increase operating costs due to a
1094 greater pumping lift. The GP also recognized that overdraft pumping could result in subsidence and
1095 water quality degradation. In addition, the GP referred to 1980s legislation that authorized the formation
1096 of water districts in Lassen County to manage and regulate the use of groundwater resources and to the
1097 1959 Lassen-Modoc County Flood Control and Water Conservation District, as discussed above. The
1098 SGMA process established the requirements for a GSP in the BVGB and creation of the two GSAs. The
1099 land-use element identified several issues related to groundwater, including public services where
1100 62 percent of rural, unincorporated housing units relied on individual (domestic) wells for their water.

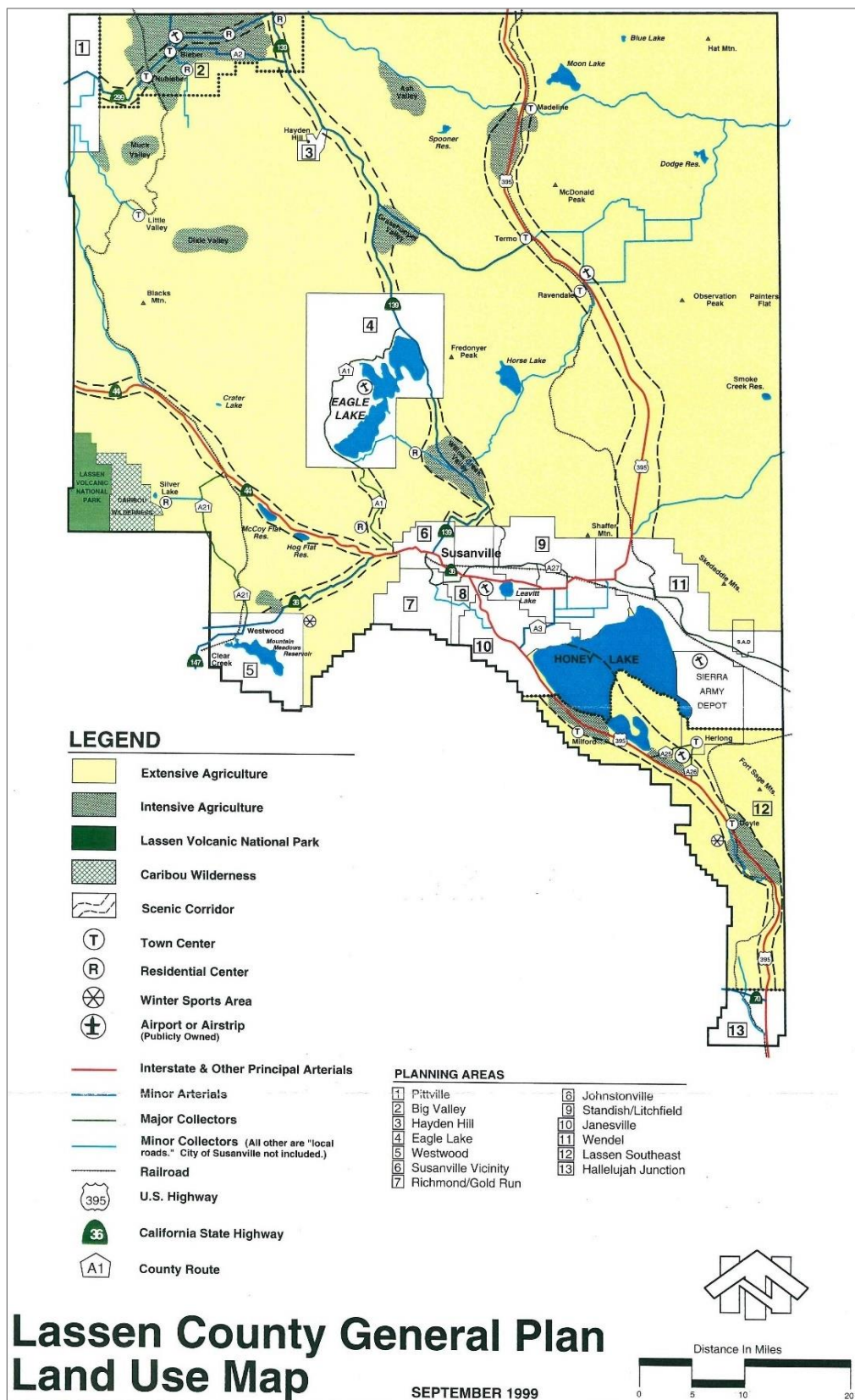


Figure 3-14 Lassen County General Plan Land Use Map

1103 Another issue included open space and the managed production of resources, which includes areas for
1104 recharge of groundwater, among others. The GP referred to the 1972 Open Space Plan, which required
1105 that residential sewage disposal systems would not contaminate groundwater supplies. The agriculture
1106 element identified an issue with incompatible land uses where agricultural pumping lowers the
1107 groundwater level and impacts the use of domestic wells. The wildlife element recognized that changes
1108 in groundwater storage could impact wet meadow ecosystems and threaten fish and wildlife species.
1109 Groundwater is included in policies under the water resources section of the Natural Resources (NR) and
1110 Open Space (OS) Elements, as listed below:

- 1111 • NR15 POLICY: Lassen County advocates the cooperation of state and federal agencies,
1112 including the State Water Board and its regional boards, in considering programs and actions
1113 to protect the quality of ground water and surface-water resources.
- 1114 • NR17 POLICY: Lassen County supports measures to protect and ensure the integrity of
1115 water supplies and is opposed to proposals for the exportation of ground water and surface
1116 waters from ground water basins and aquifers located in Lassen County (in whole or part) to
1117 areas outside those basins.
 - 1118 ○ Implementation Measure:
1119 NR-H: Lassen County will maintain ground water ordinances and other forms of
1120 regulatory authority to protect the integrity of water supplies in the county and regulate
1121 the exportation of water from ground water basins and aquifers in the county to areas
1122 outside those basins.
- 1123 • NR19 POLICY: Lassen County supports control of water resources at the local level,
1124 including the formation of local ground water management districts to appropriately manage
1125 and protect the long-term viability of ground water resources in the interest of county
1126 residents and the county's resources.
- 1127 • OS27 POLICY: Lassen County recognizes that its surface and ground water resources are
1128 especially valuable resources which deserve and need appropriate measures to protect their
1129 quality and quantity.
- 1130 • OS28 POLICY: Lassen County shall, in conjunction with the Water Quality Control Board,
1131 adopt specific resource policies and development restrictions to protect specified water
1132 resources (e.g., Eagle Lake, Honey Lake, special recharge areas, etc.) and to support the
1133 protection of those resources from development or other damage which may diminish or
1134 destroy their resource value.
 - 1135 ○ Implementation Measure:
1136 OS-N: When warranted, Lassen County shall consider special restrictions to
1137 development in and around recharge areas of domestic water sources and other special
1138 water resource areas to prevent or reduce possible adverse impacts to the quality or
1139 quantity of water resources.

1140 **3.7.3 Modoc National Forest Land and Resource Management Plan**

1141 Modoc National Forest lies in the mountain areas surrounding Big Valley to the south and northeast. A
1142 small portion of the National Forest extends into the Basin boundary in the south as shown in **Figure 3-2**.

1143 The U.S. Forest Service developed their Land and Resource Management Plan in 1991 to, "...guide
1144 natural resource management activities and establish management standards and guidelines." Regarding
1145 water resources, the Modoc National Forest Land and Resource Management Plan seeks to "maintain and
1146 improve the quality of surface water" through the implementation of Best Management Practices (BMPs)
1147 among other goals. The plan is available on the Modoc National Forest website (USFS 1991).

1148 **3.7.4 GSP Implementation Effects on Existing Land Use**

1149 The implementation of this GSP is not expected to affect existing designation of land use.

1150 **3.7.5 GSP Implementation Effects on Water Supply**

1151 The implementation of this GSP is not expected to influence water supply. Prior to the development of
1152 this GSP, the counties had established several policies and ordinances for the management of water and
1153 land use in the BVGB. This GSP will incorporate the previous work and will establish sustainable
1154 management criteria to continue the successful use of the groundwater resources during the SGMA
1155 implementation period and beyond.

1156 **3.7.6 Well Permitting**

1157 Lassen and Modoc counties both require a permit to install a well. The Lassen County Municipal Code
1158 (§7.28.030) states that, "...no person, firm, corporation, governmental agency or any other legal entity
1159 shall, within the unincorporated area of Lassen County, construct, repair, modify or destroy any well
1160 unless a written permit has first been obtained from the health officer of the county." Further, Modoc
1161 County Code (§13.12.020) states that, "...No person shall dig, bore, drill, deepen, modify, repair or
1162 destroy a water well ... without first applying for and receiving a permit..."

1163 **3.7.7 Land Use Plans Outside of the Basin**

1164 Areas inside and outside the Basin are subject to the Lassen and Modoc County General Plans or the
1165 Modoc National Forest Land Resource and Management Plan. Other land-use plans by organizations
1166 such as the BLM also exist in the watershed.

1167 **3.8 Management Areas**

1168 SGMA allows for the Basin to be delineated into management areas which:

1169 "...may be defined by natural or jurisdictional boundaries, and may be
1170 based on differences in water use sector, water source type, geology, or
1171 aquifer characteristics. Management areas may have different minimum
1172 thresholds and measurable objectives than the basin at large and may be
1173 monitored to a different level. However, GSAs in the basin must provide
1174 descriptions of why those differences are appropriate for the management
1175 area, relative to the rest of the basin." (DWR 2017)

1176 It should be noted that minimum thresholds and measurable objectives can vary throughout the Basin
 1177 even without established management areas. The GSAs have not defined management areas within the
 1178 BVGB.

1179 **3.9 Additional GSP Elements, if Applicable**

1180 The plan elements from CWC Section 10727.4 require GSPs to address numerous components listed in
 1181 **Table 3-8.** The table lists the agency or department with whom the GSA will coordinate or where it is
 1182 addressed in the GSP.

1183 **Table 3-8 Plan Elements from CWC Section 10727.4**

Element of Section 10727.4	Approach
(a) Control of saline water intrusion	Not applicable
(b) Wellhead protection areas and recharge areas	To be coordinated with county environmental health departments
(c) Migration of contaminated groundwater	Coordinated with RWQCB
(d) A well abandonment and well destruction program	To be coordinated with county environmental health departments
(e) Replenishment of groundwater extractions	Chapter 9, Projects and Management Actions
(f) Activities implementing, opportunities for and removing impediments to, conjunctive use or underground storage	Chapter 9, Projects and Management Actions
(g) Well construction policies	To be coordinated with county environmental health departments
(h) Measures addressing groundwater contamination cleanup, groundwater recharge, in-lieu use, diversions to storage, conservation, water recycling, conveyance, and extraction projects	Coordinated with RWQCB and in Chapter 9, Projects and Management Actions
(i) Efficient water management practices, as defined in Section 10902, for the delivery of water and water conservation methods to improve the efficiency of water use	To be coordinated with county farm advisors
(j) Efforts to develop relationships with state and federal regulatory agencies	Chapter 8, Plan Implementation
(k) Processes to review land-use plans and efforts to coordinate with land-use planning agencies to assess activities that potentially create risks to groundwater quality or quantity	To be coordinated with appropriate county departments.
(l) Impacts on groundwater-dependent ecosystems	Chapter 5, Groundwater Conditions

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4. Hydrogeologic Conceptual Model §354.14

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A hydrogeologic conceptual model (HCM) is a description of the physical characteristics of a groundwater basin related to the hydrology and geology, which defines the principal aquifer based on the best available information. The HCM provides the context for the water budget (Chapter 6), sustainable management criteria (Chapter 7), and monitoring network (Chapter 8).

1190

This chapter presents the HCM for the BVGB and was developed by GEI Consultants Inc. (GEI) for the Lassen and Modoc GSAs. The content of this HCM is defined by the regulations of SGMA – Chapter 1.5, Article 5, Subarticle 2: 354.14.

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Groundwater characteristics and dynamics in the Basin are variable. Located in a sparsely-populated area, the amount of existing data and literature to support this HCM is limited, with the most thorough studies being conducted prior to the 1980s. This HCM provides some limited new data and analyses that further the understanding. With that said, there are many data gaps in the HCM that have been identified in this chapter. The HCM presents best available information and expert opinion to form the basis for descriptions of elements of this GSP: basin boundary, confining conditions, definable bottom, nature of flows near or across faults, soil permeability, and recharge potential. Significant uncertainty exists in this HCM, and stakeholders have expressed concern about the possible regulatory repercussions associated with making decisions using incomplete and/or uncertain information, particularly as the relevance of the information changes under evolving regulatory frameworks.

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Recommendations and options for prioritizing and addressing the data gaps are part of this document.

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The stakeholders in the disadvantaged communities of the BVGB have limited financial means to

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address data gaps, so the data gaps presented at the end of this chapter are contingent on outside funding.

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4.1 Basin Setting

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BVGB is located in Lassen and Modoc counties in northeastern California, 50 miles north-northwest of Susanville and 70 miles east-northeast of Redding (road distances are greater). Most of BVGB is in Lassen County (72 percent) with the remainder in Modoc County. At its widest points, the BVGB is approximately 20 miles long (north-south) in the vicinity of the Pit River and 15 miles wide (east-west) south of ACWA. The Basin has an irregular shape totaling about 144 square miles or 92,057 acres. (DWR 2004) The topography of BVGB is relatively flat within the central area with increasing elevations along the perimeter, particularly in the eastern portions where Willow and Ash Creeks enter the Basin. Ground surface elevations range from about 4,100 feet above mean sea level (msl) near the south end of BVGB to over 4,500 feet msl at the eastern edge of the Basin. In the north-central portion of the Basin, two buttes protrude from the valley (Pilot Butte and Roberts Butte). The Pit River enters the BVGB at an elevation of 4,150 feet msl and leaves the Basin at 4,100 feet msl over the course of about 30 river miles, giving the Pit River a gradient of less than 2 feet per mile. By contrast, the Pit River above and below Big Valley has a gradient over 50 feet per mile. This low gradient in the Basin

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1220 results in a meandering river morphology and widespread flooding during large storm events. Ash Creek
1221 enters the Basin at Adin at an elevation of 4,200 feet msl, eventually joining the Pit River when flows
1222 are sufficient to make it past Big Swamp. **Figure 4-1** shows the ground topography for the BVGB.

1223 Portions of eight topographic maps (7.5-minute) cover the BVGB area and are named as follows
1224 (north-south, west-east):

1225	Donica Mountain	Halls Canyon	
1226	Lookout	Big Swamp	Adin
1227	Bieber	Hog Valley	Letterbox Hill
1228			

1229 **4.2 Regional Geology and Structure**

1230 The regional geology is depicted on the Alturas Sheet (CGS 1958), a 1:250,000 scale map with an
1231 excerpt shown on **Figure 4-2**. The BVGB is in the central area of the Modoc Plateau geomorphic
1232 province. According to the California Geological Survey (CGS 2002), the Modoc Plateau is, "...a
1233 volcanic table land" broken into blocks by north-south faults. The Basin is underlain by a thick sequence
1234 of lava flows and tuffs. The volcanic material is variable in composition as described below, is Miocene
1235 to Holocene age,¹⁸ and erupted into sediment-filled basins between the block-faulted mountain ranges
1236 (Norris and Webb 1990).

1237 According to MacDonald (1966), the Modoc Plateau is transitional between two geomorphic provinces:
1238 block faulting of the Basin and Range to the east and volcanism of the Cascade Range to the west. This
1239 transition can be observed on **Figure 4-2** with the numerous faults trending north-northwest surrounding
1240 Big Valley and the most recent center of volcanism (indicated by the numerous cinders [asterisks] centered
1241 around Medicine Lake, with several eruptions about 1000 years before present) about 30 miles northwest
1242 of Big Valley. Moreover, the historical volcanism and tectonics occurred concurrently, which disrupted the
1243 drainage from the province and resulted in the formation of numerous lakes, including an ancestral lake in
1244 Big Valley. Volcanic material was deposited as lava flows, ignimbrites (hot ash flows), subaerial and
1245 water-laid layers of ash (cooler), and mudflows combined with sedimentary material, although thick
1246 sections of rock can be either entirely sedimentary or volcanic. The composition of the lava flows is
1247 primarily basalt¹⁹ and basaltic andesite²⁰, while pyroclastic²¹ ash deposits are rhyolitic²² composition.

¹⁸ Miocene is 23 million to 5.3 million years ago; Holocene is 12,000 years ago to present.

¹⁹ Basalt is an extrusive (volcanic) rock with relatively low silica content and high iron and magnesium content.

²⁰ Andesite is an extrusive rock with intermediate silica content and intermediate iron and magnesium content.

²¹ Pyroclastic means formed from volcanic eruptions, typically not from lava flows, but from material (clasts) ejected from the eruption such as ash, blocks, or "bombs."

²² Rhyolitic rocks are extrusive with relatively high silica content and low iron and magnesium. Rhyolites are the volcanic equivalent of granite.

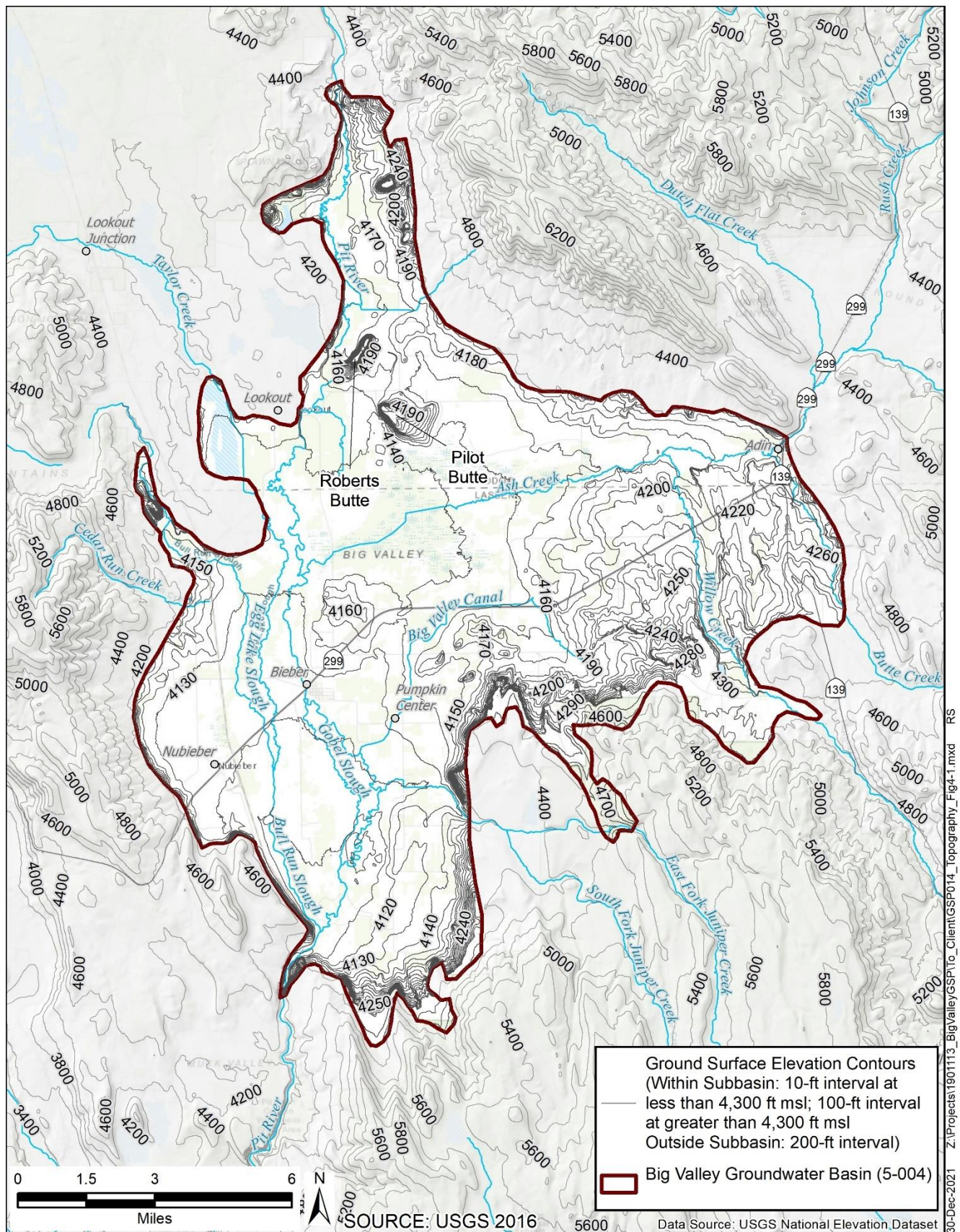


Figure 4-1 Topography

4.2.1 Lateral Basin Boundaries

The CGS (1958) geology map (**Figure 4-2**) was used by DWR to draw the BVGB boundary. That 63-year-old map has proven to be inaccurate in many places, and more recent, more accurate geologic maps are available (DWR 1963, GeothermEx 1975). The lateral boundaries of BVGB are described by DWR (2004) as, "...bounded to the north and south by Pleistocene and Pliocene basalt and Tertiary pyroclastic rocks of the Turner Creek Formation, to the west by Tertiary rocks of the Big Valley Mountain volcanic series, and to the east by the Turner Creek Formation." In general, the boundary drawn by DWR was intended to define the contact between the valley alluvial deposits and the surrounding volcanic rocks. Because this boundary was drawn using a regional-scale map from 1958 that was drawn with the surface expression of geologic units, a basin boundary modification at a future date would be more precise and would include the aquifer materials which extend outside of the current boundary. This future modification could include consideration of the "upland recharge areas" described by DWR (1963).

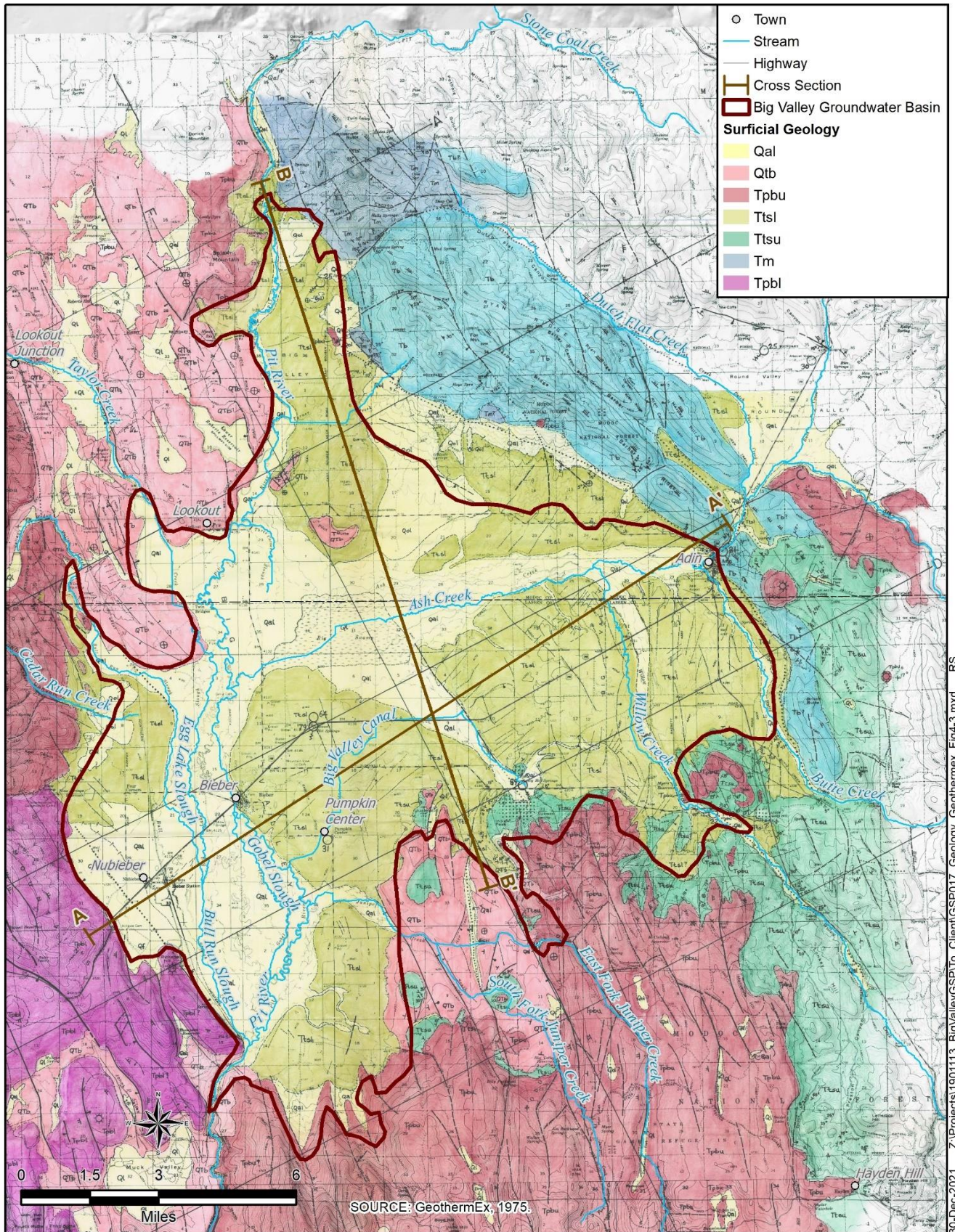
Additionally, the Basin boundary is inaccurate in the southeastern portion of the Basin where two fingers extend into the uplands area. The narrower of the two fingers extends too far into the upland elevations and intersects with East Fork Juniper Creek which doesn't drain into the finger, as shown in **Figure 4-1**. East Fork Juniper Creek naturally flows to the west and is confluent with the Pit River south of Pumpkin Center. A more thorough mapping of the elevations and geologic contacts in the upper area of East Fork Juniper Creek would help to refine the boundary between alluvium and upland volcanics as some areas are clearly not underlain by alluvial deposits.

In the northeastern portion of the Basin, the boundary curves around the base of the Barber Ridge and Fox Mountain. The CGS contact between the alluvium and volcanics here is well below the change in slope of the mountain range. More recent mapping (GeothermEx 1975) extends alluvium 1.5 miles further upslope as shown on **Figure 4-3**. This 1975 mapping also shows other locations along the current basin boundary that should be modified, including the aforementioned narrow finger at East Fork Juniper Creek.

4.3 Local Geology

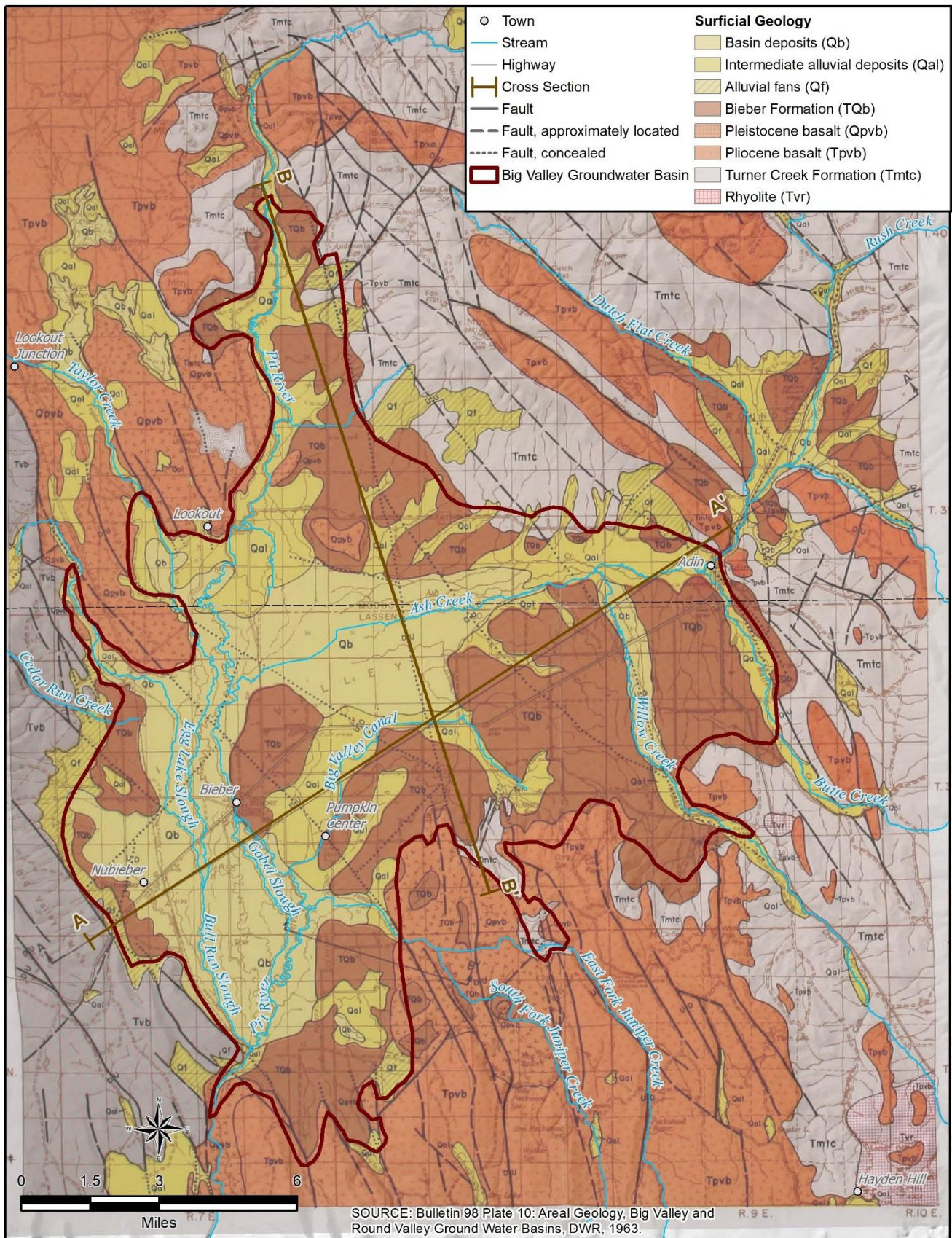
Several geologic maps were available at a more detailed scale than the CGS (1958) map. Two of them had accompanying studies that more thoroughly described the geology. Although relatively old studies, they both provide useful information. However, they differ slightly on some details, particularly the surface geology. Further refinement of their contacts may be necessary. The two maps are shown on **Figure 4-3** and **Figure 4-4**.

The two different reports were written for different purposes, with DWR (1963) being developed as a general investigation of the potential groundwater resources, and GeothermEx (1975) as a specific investigation of potential hydrothermal groundwater resources. All reviewed sources agree that the BVGB is surrounded by mountain blocks of volcanic rocks of somewhat variable composition, but primarily basalt. Although these mountains are outside of the groundwater basin, they may be underlain by alluvial formations. The mountains capture and accumulate precipitation, which produces runoff that flows into BVGB. Moreover, DWR (1963) stated that these mountains serve as "upland recharge areas"



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Figure 4-3 GeothermEx 1975 Local Geologic Map



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Figure 4-4 DWR 1963 Local Geologic Map

and provide subsurface recharge to the BVGB. These recharge areas suggested by DWR are shown in red shading on **Figure 4-5** and correlate with Pliocene to Pleistocene²³ basalts (Tpbv and Qpbv). These units are mapped by DWR (1963) outside the Basin to the northwest and southeast, as well as along the crests of Barber and Ryan Ridges to the northeast of Big Valley.²⁴ GeothermEx (1975) generally concurs with this mapping, except for the areas along Barber and Ryan Ridges, which they map as a much older unit (Miocene), corroborated by a radiometric age date measured at 13.8 million years. This distinction is important because an older unit is more likely to underlie the Basin sediments and is less likely to be hydraulically connected to the BVGB. At the northwestern end of Barber Ridge, GeothermEx mapped the oldest unit in the BVGB area (Tm) of andesitic composition. This unit contains the site of the Shaw Pit quarry.

4.4 Principal Aquifer

4.4.1 Formation Names

The Pliocene-Pleistocene²³ age Bieber Formation (TQb) is the main formation of aquifer material defined within BVGB, and DWR (1963) estimates that it ranges in thickness from a thin veneer to over 1,000 feet. It meets the ground surface around the perimeter of the Basin, especially on the southeast side (DWR 1963). The formation was deposited in a lacustrine (lake) environment and is comprised of unconsolidated to semi-consolidated layers of interbedded clay, silt, sand, gravel, and diatomite²⁵. Layers of black sand and white sand (pumiceous) were identified as highly permeable but discontinuous and mostly thin. GeothermEx (1975) did not embrace the DWR name and identified this formation as an assemblage of tuffaceous, diatomaceous lacustrine, and fluvial sediments (Ttsu, Ttsl). Both investigations identified the formation in the same overall location based on a comparison of the two geologic maps, but the GeothermEx map provides more detail and resolution than the DWR map. For the purposes of the GSP, the name Bieber Formation will be used.

Recent Holocene²⁶ deposits (labeled with Q) were mapped within the center of the Basin and along drainage courses from the upland areas and are identified by DWR (1963) as alluvial fans (Qf), intermediate alluvium (Qal) and Basin deposits (Qb). The composition of these unconsolidated deposits varies from irregular layers of gravel, sand and silt with clay to poorly sorted silt and sand with minor clay and gravel (Qal) to interbedded silt, clay and “organic muck” (Qb). The latter two deposits occur in poorly drained, low-lying areas where alkali²⁷ could accumulate. The thickness of these sediments is estimated to be less than 150 feet. GeothermEx (1975) identified these deposits as older valley fill (Qol), lake and swamp deposits (Ql), fan deposits (Qf) and undifferentiated alluvium (Qal). All these recent deposits are aquifer material²⁸ and are part of the Big Valley principal aquifer. There is discrepancy

²³ 5.3 million years to 12 thousand years ago.

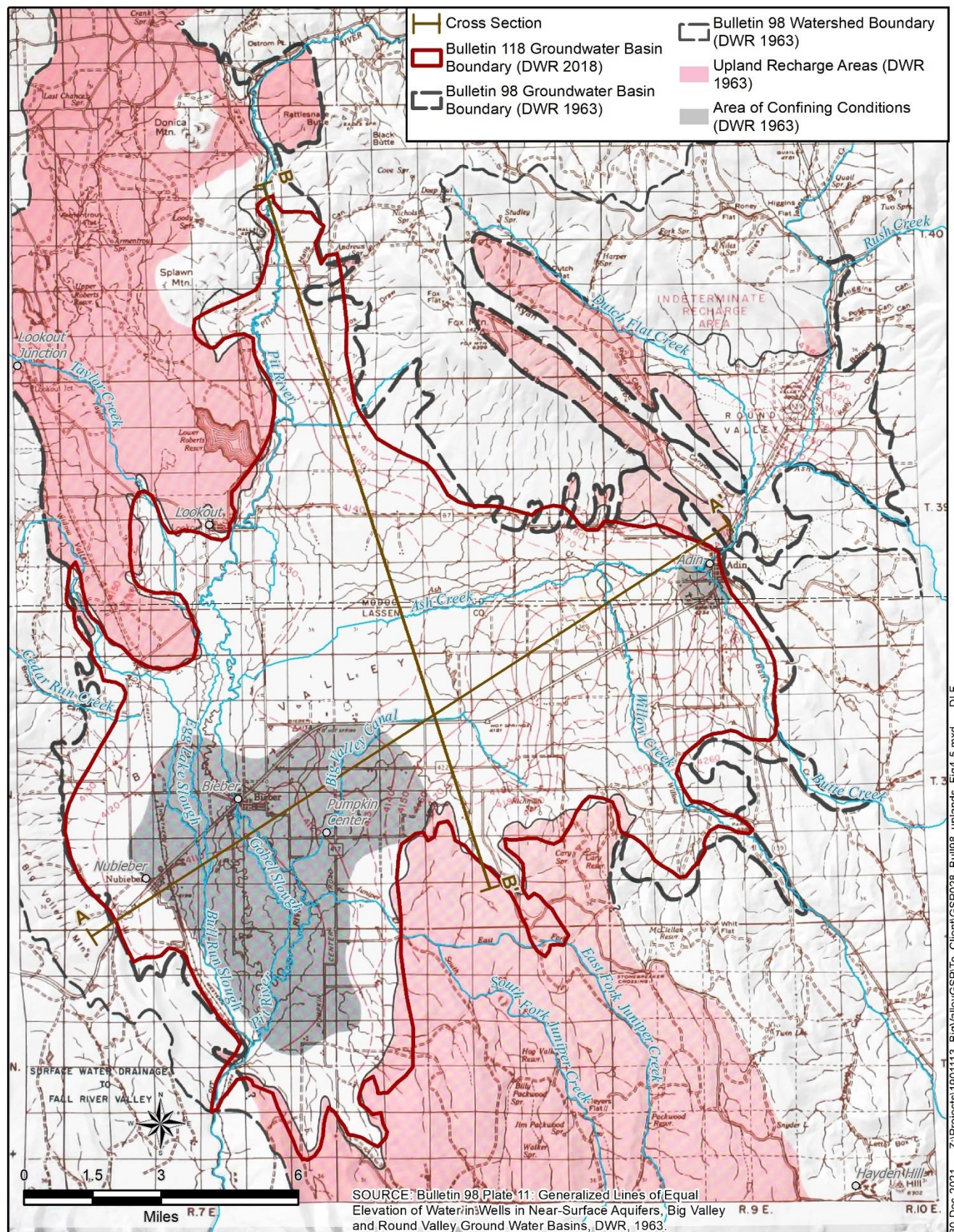
²⁴ The GSAs specifically requested a basin boundary modification to include these upland recharge areas within the Basin boundary. The request was denied by DWR as not being sufficiently substantiated. (*See Appendix 1A*)

²⁵ Diatomite is a fine-grained sedimentary rock made primarily of silica, and is formed from the deposition of diatoms, which are microscopic creatures with shells made from silica.

²⁶ Recent geologic period from 12 thousand years old to present.

²⁷ Alkali means relatively high in alkali and alkali earth metals (primarily sodium, potassium, calcium, and magnesium) and generally results in a high pH (greater than 7 or 8).

²⁸ Meaning they contain porous material with recoverable water.



1329 between the two maps in the northeastern portion of the Basin, where GeothermEx extends the alluvial
1330 sediments much further upslope toward Barber Ridge and Fox Mountain as discussed in Section 4.3 –
1331 Local Geology.

1332 The principal aquifer consists of the Bieber Formation (TQb and recent deposits (Qal, Qg, Qb)). While
1333 DWR (1963) delineates an “area of confining conditions” in the southwest area of the Basin on **Figure**
1334 4-5, the data to support the confinement and the definition of a broad-scale, well-defined aquitard²⁹ is
1335 not currently available.

1336 As described herein, aquifer conditions vary greatly throughout the Basin. However, clearly defined,
1337 widespread distinct aquifer units have not been identified, and with the data currently available all the
1338 water bearing units in the Basin are defined as a single principal aquifer for this GSP.

1339 **4.4.2 Geologic Profiles**

1340 **Figure 4-6** and **Figure 4-7** show cross-sections across Big Valley. The locations of the cross-sections
1341 are shown on **Figure 4-3**, **Figure 4-4** and **Figure 4-5**. The locations of these sections were drawn to be
1342 similar to those drawn by DWR (1963) and GeothermEx (1975) and characterize the aquifers in two
1343 directions (southwest-northeast and northwest-southeast). The sections show the lithology of numerous
1344 wells across the Basin. Very little geological correlation could be made across each section which is
1345 likely to be related to the concurrent block faulting and volcanic and alluvial depositional input from
1346 various highland areas flowing radially into Big Valley. These complex structural and depositional
1347 variables result in great stratigraphic variation over short distances. The pertinent information from
1348 cross-sections presented by DWR (1963) and GeothermEx (1975) are shown on the sections.

1349 **4.4.3 Definable Bottom**

1350 The SGMA and DWR GSP regulations do not provide clear guidance for what constitutes a “definable
1351 bottom” of a basin. However, DWR (2016a) Bulletin 118 Interim Update describe the “physical bottom”
1352 as where the porous sediments contact the underlying bedrock and the “effective bottom” as the depth
1353 below which water could be unusable because it is brackish or saline.

1354 The “physical bottom” of BVGB is difficult to define because few borings have been drilled deeper than
1355 1200 feet and the compositions of the alluvial and bedrock formations are similar (derived from active
1356 volcanism), with contacts that are gradational. Also, some of the lavas most likely flowed into Big
1357 Valley forming lava lenses that are now interlayered with permeable aquifer sediments. Moreover, the
1358 base of the aquifer system is likely variable across BVGB due to the concurrent volcanism and
1359 horst/graben faulting of the bedrock.

1360 The deepest lithologic information in the Basin is derived from two test borings by DWR to depths of
1361 1843 and 1231 feet and from two geothermal test wells near Bieber to depths of 2125 and 7000 feet. The
1362 7000-foot well is east of Bieber, but only has lithologic descriptions to a depth of 4100 feet, including
1363 descriptions of aquifer-type materials (sands) throughout. The other three deep lithologies give similar
1364 indication of aquifer material to their total depth.

²⁹ Layer of low permeability that prevents significant flow, except at very slow rates.

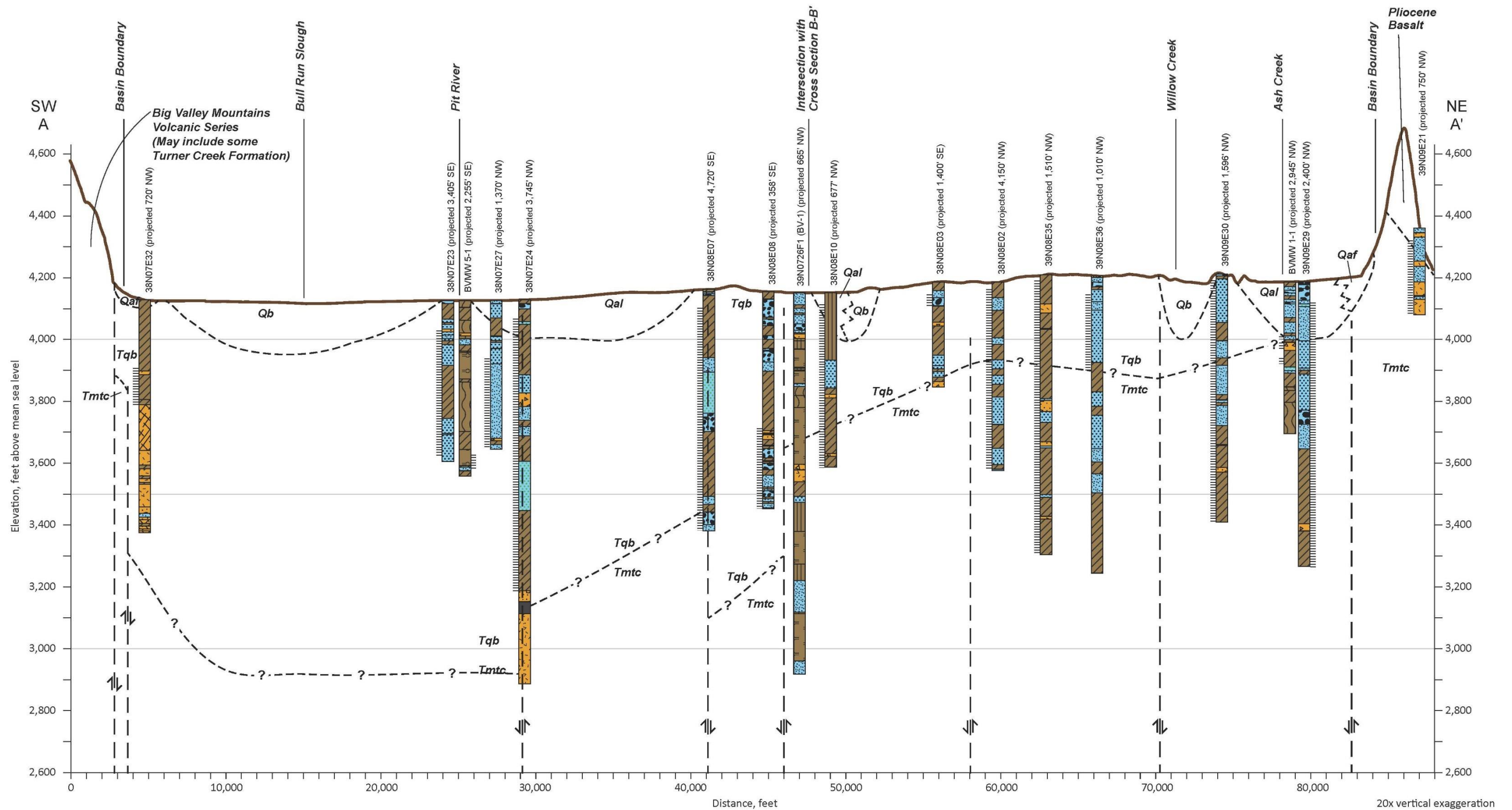


Figure 4-6 Geologic Cross Section A-A'

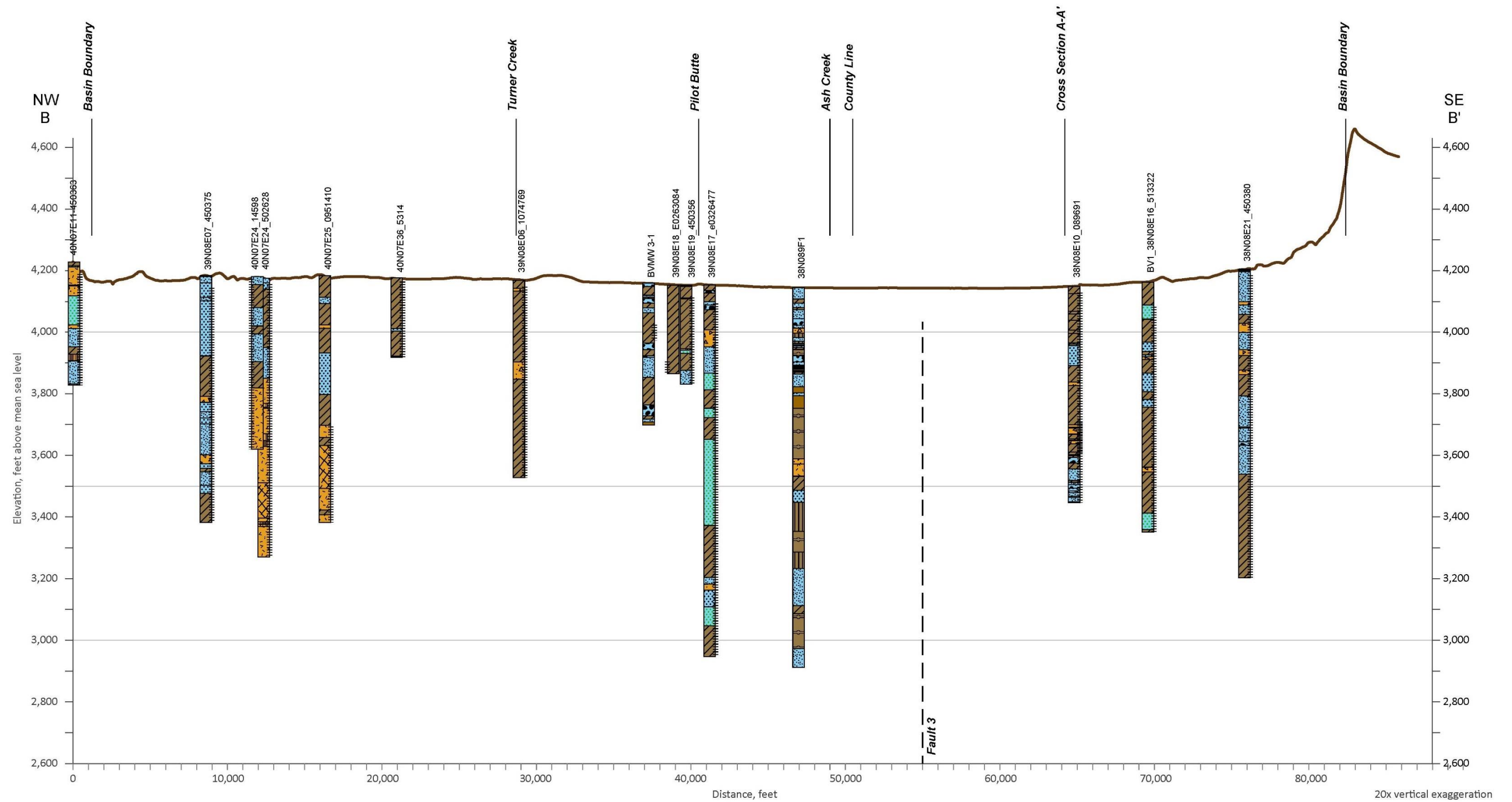


Figure 4-7 Geologic Cross Section B-B'

1370 The two geothermal wells also had temperature logs and some water quality. Water temperatures
 1371 increased to over 100°F at depths of about 2000 to 3000 feet. One of them located near the Bieber
 1372 School had water quality samples collected from the 1665- to 2000-foot interval and indicated water
 1373 quality higher in total dissolved solids (632 milligrams per liter) than is present in shallower portions of
 1374 the Basin.

1375 The information from these two wells indicated that temperature and water quality concerns increase
 1376 with depth, but a clear delineation of where water becomes unusable cannot be determined with the data
 1377 available. With limited scientific evidence to clearly define a physical or effective bottom of the aquifer,
 1378 an approach to define a practical bottom is being used to satisfy the GSP Regulations which require the
 1379 aquifer bottom to be defined (§ 354.14(a)(1)), as described below.

1380 The approach for defining the practical bottom is to ensure that all known water wells are included
 1381 within the aquifer. DWR’s well log inventory shows that over 600 wells have been installed in the
 1382 BVGB. Although DWR’s well log inventory does not completely and precisely assess the total number
 1383 or status of the wells (e.g. abandoned), it is the only readily-available data. The well inventory has been
 1384 identified as a data gap within this GSP. Wells in this inventory with known depths are summarized in
 1385 **Table 4-1**. The only borings drilled deeper than 1,200 feet are the two DWR test borings and two
 1386 geothermal wells discussed previously.

1387 **Table 4-1 Well Depths in DWR Inventory**

Depth Interval (ft bgs)	Deepest Well per Section ^a		Count of All Wells
< 200	10%		41%
200 – 400	16%	43%	25%
400 – 600	27%		17%
600 – 800	28%	42%	12%
800 – 1000	14%		4%
1000 – 1200	4%		1%
> 1200 ^b	1%		< 1%
Notes: ^a Section is a 1 mile by 1 mile square. There are 134 sections in the BVGB ^b Test borings: BV-1 and BV-2 were drilled deeper than 1200 feet			

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1389 For this GSP, the “practical bottom” of the aquifer is set at 1200 feet but may extend to 4,100 or deeper.
 1390 This delineation of 1200 feet is consistent with DWR’s approach, established over 50 years ago, which
 1391 declared a practical bottom of 1000 feet. A depth of 1200 feet encompasses the levels where
 1392 groundwater can be accessed and monitored for beneficial use but does not preclude drilling and
 1393 pumping from greater depths.

4.4.4 Structural Properties with Potential to Restrict Groundwater Flow

Faults can sometimes affect flow, but sufficient evidence has not been gathered and analyzed to determine whether any of the faults in Big Valley restrict or facilitate flow. The mountains around BVGB are heavily faulted, with older basalt units more faulted than younger basalt units.

Most of the faults trend to the north/northwest with some perpendicular faulting oriented northeasterly. **Figure 4-8a** is an excerpt of the regional fault map by the California Geological Survey (2010). Faults on the western side of BVGB are shown to be Quaternary in age, while faults on the eastern side are pre-Quaternary (older than 2.6 million years). Note that numerous faults to the west of BVGB were identified as late Quaternary to Holocene-age faults (displacement during the last 700,000 years or within the last 12 thousand years, respectively).

Some of the faults extend across the Basin, concealed beneath the alluvial materials. Two hot springs are located in the Basin near these faults. DWR (1963) acknowledged the potential restriction of groundwater flow by faults but did not provide specific information. However, such fault impacts on groundwater flow cannot be determined with certainty at this time with the available groundwater level data, given the limited number and the wide spacing of wells, and the absence of a pumping test to verify restricting conditions.

4.4.5 Physical Properties and Hydraulic Characteristics

The physical properties of a groundwater system are typically defined by the hydraulic conductivity,³⁰ transmissivity,³¹ and storativity³² of the aquifer. The preferred method of defining hydraulic characteristics is a pumping test with pumping rates and water levels monitored (either in the pumping well or preferably a nearby monitoring well) throughout the test. Such pumping tests were performed after the construction of five sets of monitoring wells (MWs) in late 2019 and early 2020.

The tests were performed by pumping each 2.5-inch-diameter MW for 1 hour at a rate of 8 gpm while measuring water level drawdown in the pumping well. A well efficiency³³ of 70 percent was assumed, and the length of the well screen was used as a proxy for the aquifer thickness (b). **Table 4-2** shows the results of the Theis³⁴ solution that best matched the drawdown curve at each well. Storativity (S) ranged from highly confined (3.0×10^{-6} at BVMW 3-1) to unconfined (1.5×10^{-1} at BVMW 4-1).

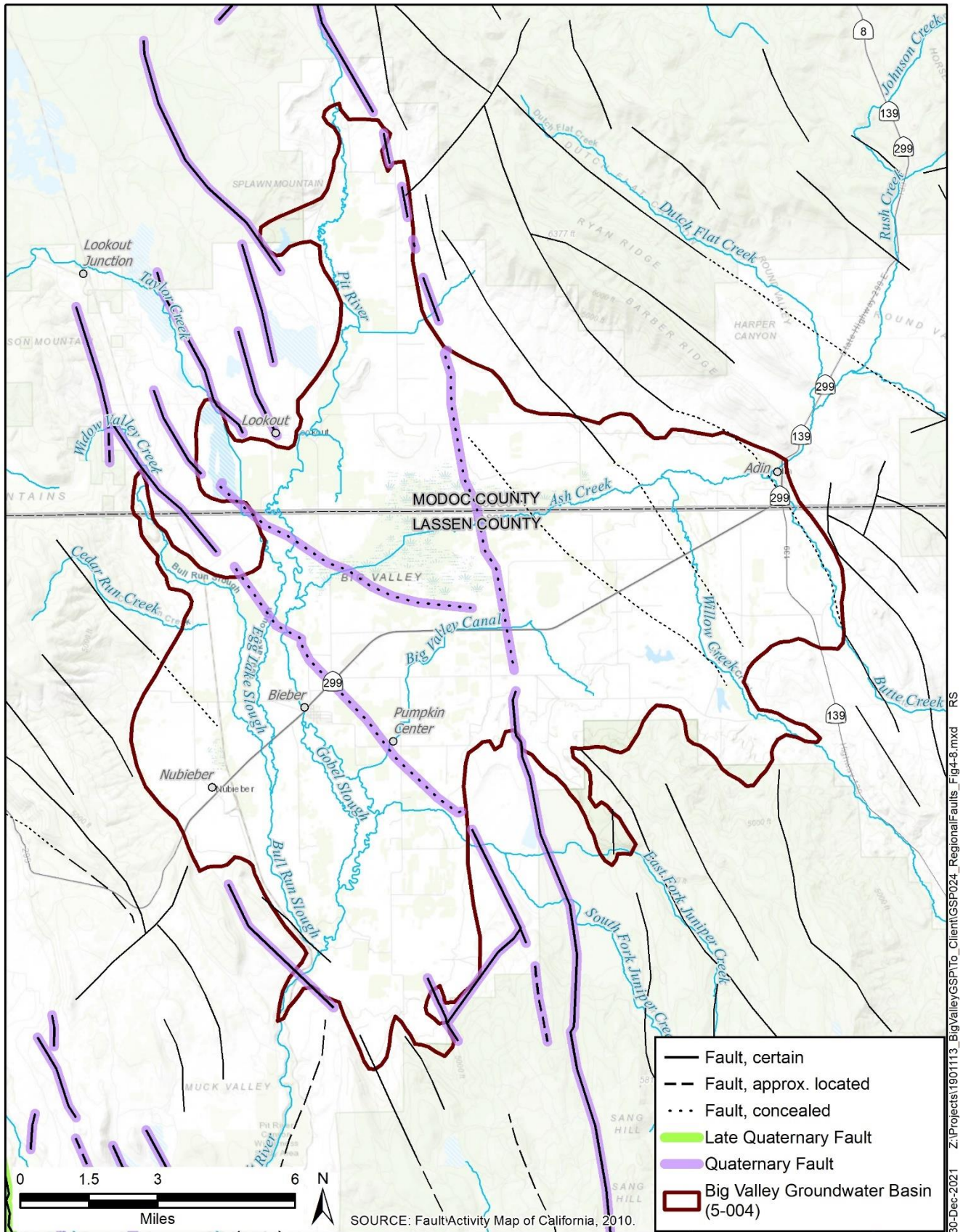
³⁰ Hydraulic conductivity (K) is defined as the volume of water that will move in a unit of time under a unit hydraulic gradient through a unit area. It is a measure of how easily water moves through a material and is usually given in gallons per day per square foot (gpd/ft²) or feet per day (ft/d).

³¹ Transmissivity (T) is the product of K and aquifer thickness (b) and is a measure of how easily water moves through a thickness of aquifer. It is usually expressed in units of gallons per day per foot of aquifer (gpd/ft) or square feet per day (ft²/day).

³² Storativity (S, also called storage coefficient) is defined as the volume of water that an aquifer releases from or takes into storage per unit surface area per unit change in groundwater elevation. High values of S are indicative of unconfined or water table aquifers, while low values indicate confined (pressurized) aquifers. S does not have units.

³³ A pumping well will experience more groundwater level drawdown than a nearby non-pumping well due to inefficiency in the movement of groundwater from the aquifer into the well. The predicted drawdown divided by the actual drawdown is well efficiency.

³⁴ Theis is a mathematical solution to estimate K, T, and S and is based on pumping rate and the resultant rate of groundwater level drawdown (Theis, 1935).



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Figure 4-8 Local Faults

1423 **Table 4-2 Aquifer Test Results**

Parameter	Units	BVMW 1-1	BVMW 2-1	BVMW 3-1	BVMW 4-1	BVMW 5-1
Well depth	ft	265.5	250.5	185.5	425	540
Thickness ^a (b)	ft	50	40	50	30	50
Flow (Q)	gpm	8	8	8	8	8
Drawdown after 1 hour	ft	4.3	16.0	27.5	2.0	3.0
Transmissivity (T)	gpd/ft	3000	750	700	4200	4500
Storativity (S)	unitless	1.5x10 ⁻³	1.0 x10 ⁻³	3.0x10 ⁻⁶	1.0 x10 ⁻¹	2.0 x10 ⁻³
Hydraulic Conductivity (K)	ft/d	8	3	2	19	12
^a Assumed to be the length of the screen interval Source: GEI 2021						

1424

1425 Hydraulic conductivity (K) ranged from 2 feet per day (ft/d) to 19 ft/d, which is consistent with silty
 1426 sand and clean, fine sand. The K values may range higher since pumping tests in larger wells with larger
 1427 pumps for longer periods of time tend to give higher T and K values. The results of these five pumping
 1428 tests are documented further in **Appendix 4A**. More thorough assessment of Basin aquifer
 1429 characteristics is needed and is identified as a data gap.

1430 Specific yield (SY) is another important aquifer characteristic, as it defines the fraction of the aquifer
 1431 that contains recoverable water and therefore governs the volume of groundwater stored in the Basin.
 1432 Reclamation (1979) discussed the SY in Big Valley and postulated that it varies with depth, at 7 percent
 1433 for the first 100 ft bgs, 6 percent for the 100 to 200 ft bgs and 5 percent from 200 to 1000 ft bgs.
 1434 However, Reclamation doesn't give any supporting evidence for these percentages. SY in the
 1435 Sacramento Valley has been estimated to vary between 5 to 10 percent (DWR 1978). Since Big Valley
 1436 aquifer materials were primarily deposited in a lacustrine environment (as opposed to Sacramento
 1437 Valley which has a higher percentage of riverine deposits), Big Valley's SY is likely on the lower end at
 1438 5 percent. This conservative percentage was used in the original GSP for all depth intervals in this GSP
 1439 and for calculations related to the total storage and change in storage.

1440 For the revised GSP, West Yost reexamined the assumptions for SY by reviewing lithologic descriptions
 1441 from well completion reports for select wells within the Basin. SYs were calculated in the upper 150 feet
 1442 using twelve of the monitoring network's well completion reports by assigning SYs based on lithologic
 1443 descriptions (Johnson, 1967; **Figure 4-9**). Following estimation of SYs by depth, a weighted average was
 1444 calculated for the upper 150 feet of the borehole, or the approximate maximum depth that groundwater
 1445 levels have reached within the basin. The average specific yield for each borehole were used to interpolate
 1446 a SY "surface" (or the change in SY) across the Basin. Average estimated SYs ranged from approximately
 1447 3 to 16 percent in the upper 150 feet across the Basin and averaging 6.85 percent.

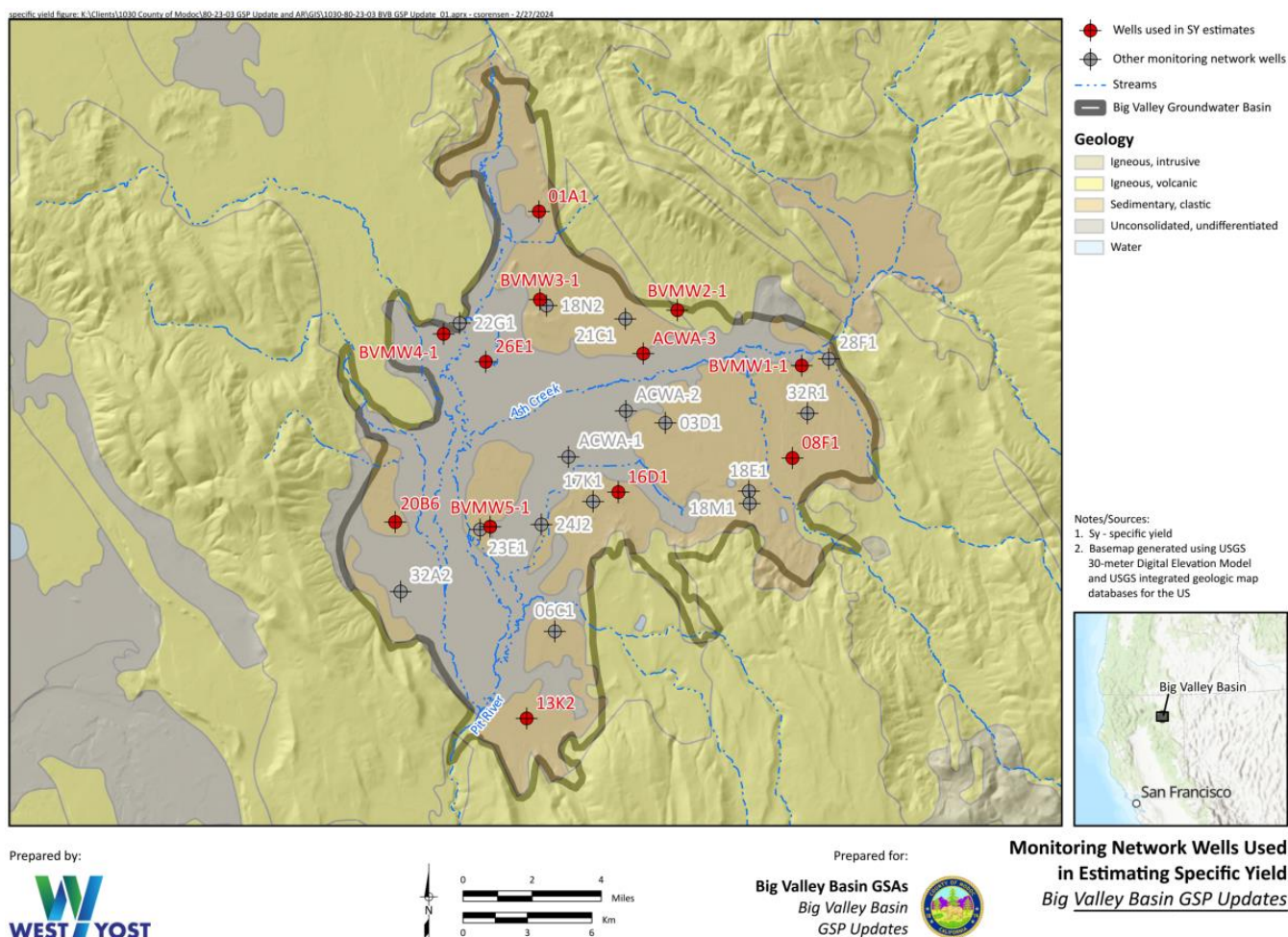


Figure 4-9 Monitoring Network Wells Used in Estimating Specific Yield

4.5 Soils

Information on soils within the BVGB were obtained from the Soil Survey Geographic Database (SSURGO) of the NRCS. The SSURGO data includes two categories of information relevant to the GSP: taxonomic soil orders and hydrologic soil groups. Taxonomic data include general characteristics of a soil and the processes of formation, while hydrologic data relate to the soil's ability to transmit water under saturated conditions and is an important consideration for hydrology, runoff, and groundwater recharge. The following section describes the soils of BVGB.

4.5.1 Taxonomic Soil Orders

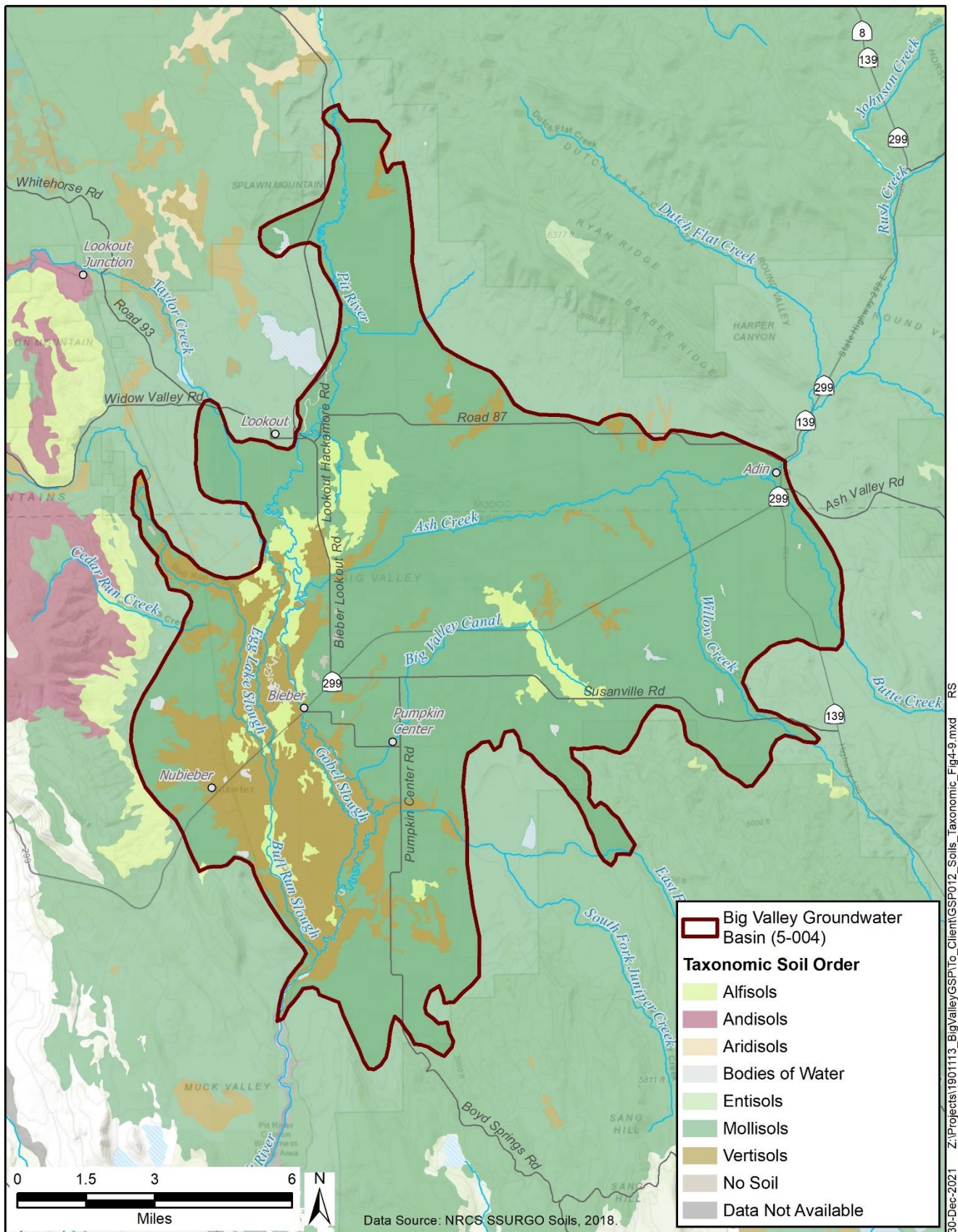
Of the 12 established taxonomic soil orders, three were found within the BVGB, as listed below, and their distributions are presented in **Figure 4-10**. Descriptions below were taken from the Illustrated Guide to Soil Taxonomy (NRCS, 2015):

- Alfisol – Naturally fertile soils with high base saturation and a clay-enriched subsoil horizon. Alfisols develop from a wide range of parent materials and occur under broad environmental conditions, ranging from tropical to boreal. The movement of clay and other weathering products

from the upper layers of the soil and their subsequent accumulation in the subsoil are important processes. The soil-forming processes are in relative balance. As a result, nutrient bases (such as calcium, magnesium, and potassium) are supplied to the soil through weathering, and the leaching process is not sufficiently intense to remove them from the soil before plants can use and recycle them.

- Mollisol – Very dark-colored, naturally very fertile soils of grasslands. Mollisols develop predominantly from grasslands in temperate regions at mid-latitudes and result from deep inputs of organic matter and nutrients from decaying roots, especially the short, mid, and tall grasses common to prairie and steppe areas. Mollisols have high contents of base nutrients throughout their profile due to mostly non-acid parent materials in environments (subhumid to semiarid) where the soil was not subject to intense leaching of nutrients.
- Vertisol – Very clayey soils that shrink and crack when dry and expand when wet. Vertisols are dominated by clay minerals (smectites) and tend to be very sticky and plastic when wet and very firm and hard when dry. Vertisols are commonly very dark in color and distinct soil horizons are often difficult to discern due to the deep mixing (churning) that results from the shrink-swell cycles. Vertisols form over a variety of parent materials, most of which are neutral or calcareous, over a wide range of climatic environments, but all Vertisols require seasonal drying.

Mollisols are the most prominent soil order within the BVGB occupying nearly 78 percent of the total area. Vertisols occupy over 16 percent and are found mostly on the southwestern side of BVGB within the floodplain of the Pit River. Small patches of Vertisols are scattered in the remainder of the Basin. Alfisols occupy over 5 percent of the Basin and are found mostly on the west side of the Basin and along Hot Spring Slough in the south-central portion of the Basin.



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Figure 4-10 Taxonomic Soils Classifications

4.5.2 Hydrologic Soil Groups

The NRCS Hydrologic Soils Group (HSG) classifications provide an indication of soil infiltration potential and ability to transmit water under saturated conditions, based on hydraulic conductivities of shallow, surficial soils. **Figure 4-11** shows the distribution of the hydrologic soil groups, where higher conductivities (greater infiltration) are labeled as Group A and lowest conductivities (lower infiltration) as Group D. As defined by the NRCS (2012), the four HSGs are:

- Hydrologic Group A – “Soils in this group have low runoff potential when thoroughly wet. Water is transmitted freely through the soil. Group A soils typically have less than 10% clay and more than 90% sand or gravel and have gravel or sand textures.” Group A soils have the highest conductivity values (greater than 5.67 inches per hour [in/hr]) and therefore a high infiltration rate.
- Hydrologic Group B – “Soils in this group have moderately low runoff potential when thoroughly wet. Water transmission is unimpeded. Group B soils typically have between 10 and 20% clay and 50 to 90% sand and have loamy sand or sandy loam textures.” Group B soils have a wide range of conductivity values (1.42 in/hr to 5.67 in/hr), and a moderate infiltration rate.
- Hydrologic Group C – “Soils in this group have moderately high runoff potential when thoroughly wet. Water transmission through the soil is somewhat restricted. Group C soils typically have between 20 and 40% clay and less than 50% sand and have loam, silt loam, sandy clay loam, clay loam and silty clay loam textures.” Group C soils have a relatively low range of conductivity values (0.14 to 1.42 in/hr), and a slow infiltration rate.
- Hydrologic Group D – “Soils in this group have high runoff potential when thoroughly wet. Water movement through the soil is restricted or very restricted. Group D soils typically have greater than 40% clay, less than 50% sand and have clayey textures. In some areas, [Group D soils] also have high shrink-swell potential.” Group D soils have conductivity values less than 0.14 in/hr, a very slow infiltration rate.

A dual hydrologic group (C/D) is assigned to an area to characterize runoff potential under drained and undrained conditions, where the first letter represents drained conditions, and the second letter applies to undrained conditions.

According to this HSG dataset, BVGB does not show high infiltration rates (Group A) and only a tiny area (<0.1%) of Group B soil (moderate infiltration) are present, located on the western edge of the Basin at the top of Bull Run Slough near Kramer Reservoir. The remainder of the Basin is shown with hydrologic soils Groups C and D, slow to very slow infiltration rates (Group C at 30% and Group D at 58% of Basin area). Most of the ACWA is underlain by the dual hydrologic group C/D (11% of Basin area) and due to the wetland nature of this area contains primarily undrained soils corresponding to the very slow infiltration rates.

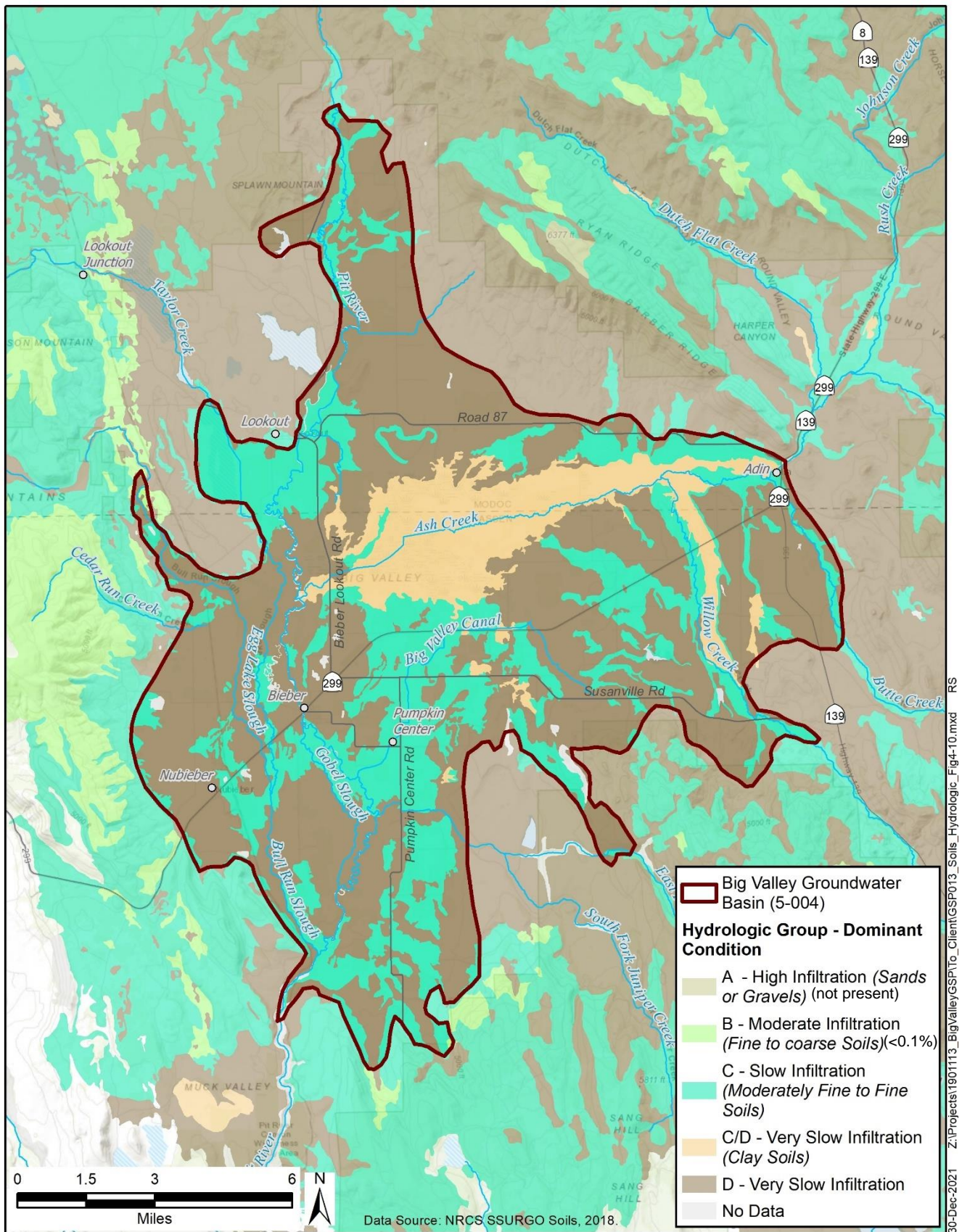


Figure 4-11 Hydrologic Soils Group Classifications

1527 It should be noted that the NRCS develops these maps using a variety of information including remote
1528 sensing and some limited field data collection and does not always capture variations that may occur on
1529 a small scale. Historical experience from landowners and additional field data could identify areas of
1530 better infiltration. These soils groups do not necessarily preclude vertical movement of water and, while
1531 recharge may be slower than desired, recharge is still possible. Additionally, Group C and D soils may
1532 have slow infiltration rates due to shallow hardpan, and groundwater recharge could potentially be
1533 enhanced if this hardpan can be disrupted. Soil permeability has been identified as a data gap,
1534 particularly at the small scale.

1535 **4.5.3 Soil Agricultural Groundwater Banking Index**

1536 The University of California at Davis has established the Soil Agricultural Groundwater Banking Index
1537 (SAGBI) using data within the SSURGO database, which gives a rating of suitability of the soils for
1538 groundwater recharge. This index expands on the HSG to include topography, chemical limitations, and
1539 soil surface condition. This effort has resulted in a mapping tool that illustrates six SAGBI classes
1540 (excellent-very poor) and has been completed for much of the state. This mapping tool is only available
1541 for the Modoc County portion of BVGB as shown on **Figure 4-12**, and the index varies mostly between
1542 moderately poor to very poor. Small areas of moderately good are present along the Pit River as it enters
1543 BVGB and to the west of Adin. It should be noted that the SAGBI is a large-scale, planning level tool
1544 and does not preclude local site conditions that are good for groundwater recharge.

1545 **4.6 Beneficial Uses of Principal Aquifer**

1546 Primary beneficial uses of groundwater in the BVGB include agricultural, environmental, municipal and
1547 domestic uses. A description of each is provided below.

1548 **Agricultural**

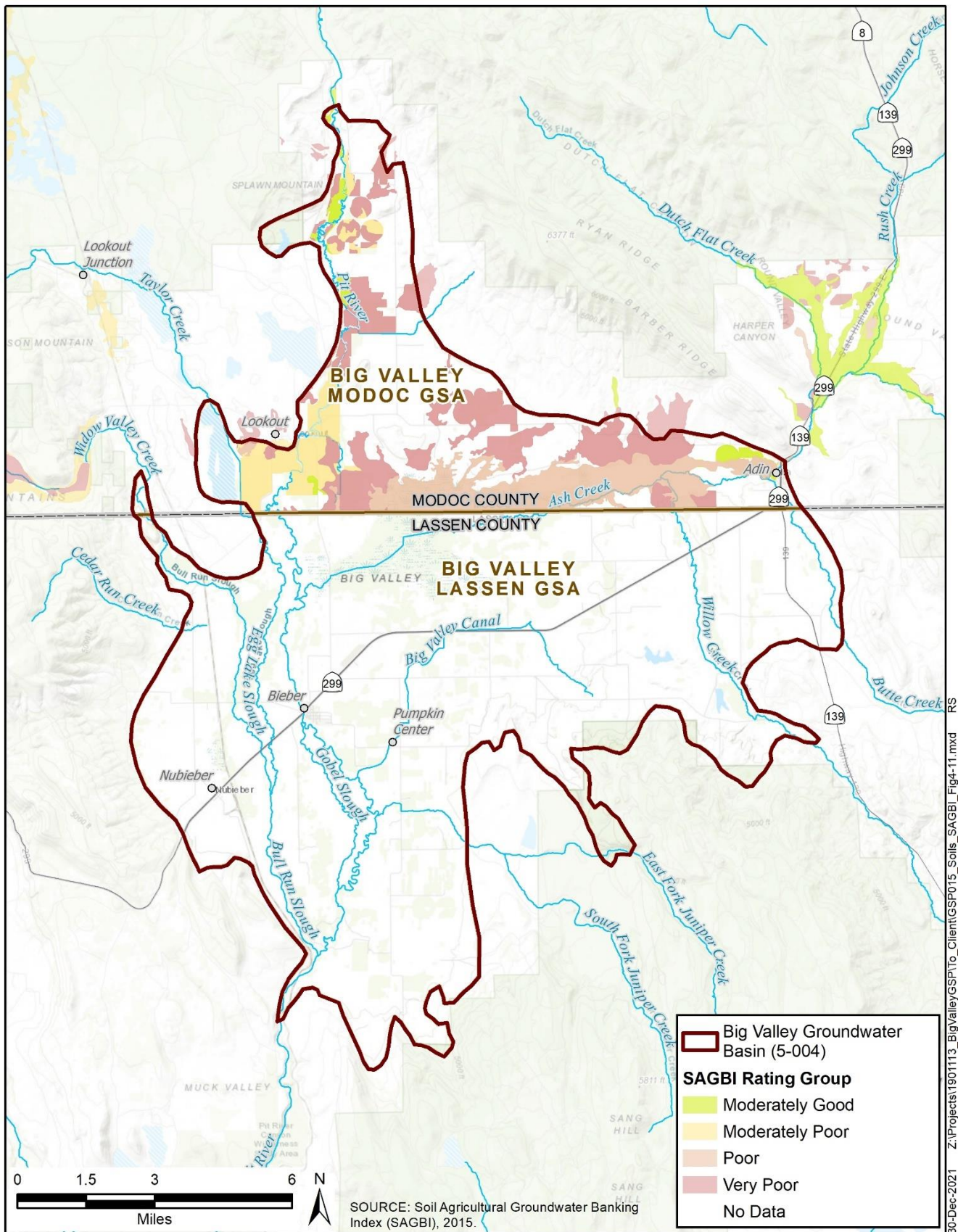
1549 Agricultural users get their supply from surface-water diversions, groundwater, or a combination of the
1550 two. **Figure 3-6** from the previous chapter illustrates DWR's estimate of the primary source being used
1551 around the Basin. The primary crops are grain and hay crops (primarily alfalfa) with some wild rice.
1552 Agricultural use provides numerous environmental benefits and the majority of wildlife habitat in the
1553 Basin. (Albaugh 2021)

1554 **Industrial**

1555 Industrial groundwater use is limited in the BVGB. According to DWR well logs, six industrial wells
1556 have been drilled, all of them near Bieber at Big Valley Lumber, which is not currently in operation.
1557 **Figure 3-5** shows some areas of industrial use, but more use is likely present throughout the Basin as
1558 agricultural users have some associated industrial needs.

1559 **Environmental**

1560 Environmental uses for wetland and riparian botanical and wildlife habitat occur within the ACWA in
1561 the center of the Basin, near the overflow channels adjacent to the Pit River in the southern portion of
1562 the Basin, and along the riparian corridors of some of the minor streams that flow into Big Valley.
1563 Additionally, private lands throughout the Basin provide for environmental uses, including those
1564 enrolled in the CRP and WRP programs discussed in Section 3.3.



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Figure 4-12 SAGBI Classifications

1567 **Municipal**

1568 The State Water Board recognizes three public water systems that use groundwater under the purview of
1569 the DDW: LCWD #1 which serves the community of Bieber, the Forest Service Station in Adin (a non-
1570 community, non-transient system), and the CAL FIRE conservation camp west of the Basin whose well
1571 is located within the Basin boundary.

1572 **Domestic**

1573 Domestic users include residents who use their own wells for household purposes. The BVGB has a
1574 population of about 1,046. With the 312 Bieber residents receiving water from municipal supply, the
1575 majority of the remaining 734 residents are domestic users.

1576 **4.7 General Water Quality**

1577 Previous reports have characterized the water quality as excellent (DWR 1963, Reclamation 1979). The
1578 central area of the Basin, where naturally occurring hot springs influence the chemistry, has elevated
1579 levels of sulfate, fluoride, boron, and arsenic (Reclamation 1979). These localized areas with higher
1580 mineral content occur near the major faults that traverse the valley. A more detailed description of water
1581 quality based on recent data is described in Section 5.4.

1582 **Figure 4-13** shows a Piper Diagram for water samples that were collected in late 2019 and early 2020,
1583 and it characterizes the relative concentrations of the major cations (Ca, Mg, Na, K) and anions (SO₄, Cl,
1584 HCO₃). The dominant cations are derived from the minerals in the aquifer and range from sodium-rich
1585 to mixed with higher amounts of calcium and magnesium, which increases the water hardness. The
1586 major anion is strongly bicarbonate, which is derived from carbon dioxide in the atmosphere and soil
1587 zone and indicates that the water is generally young in geologic terms.

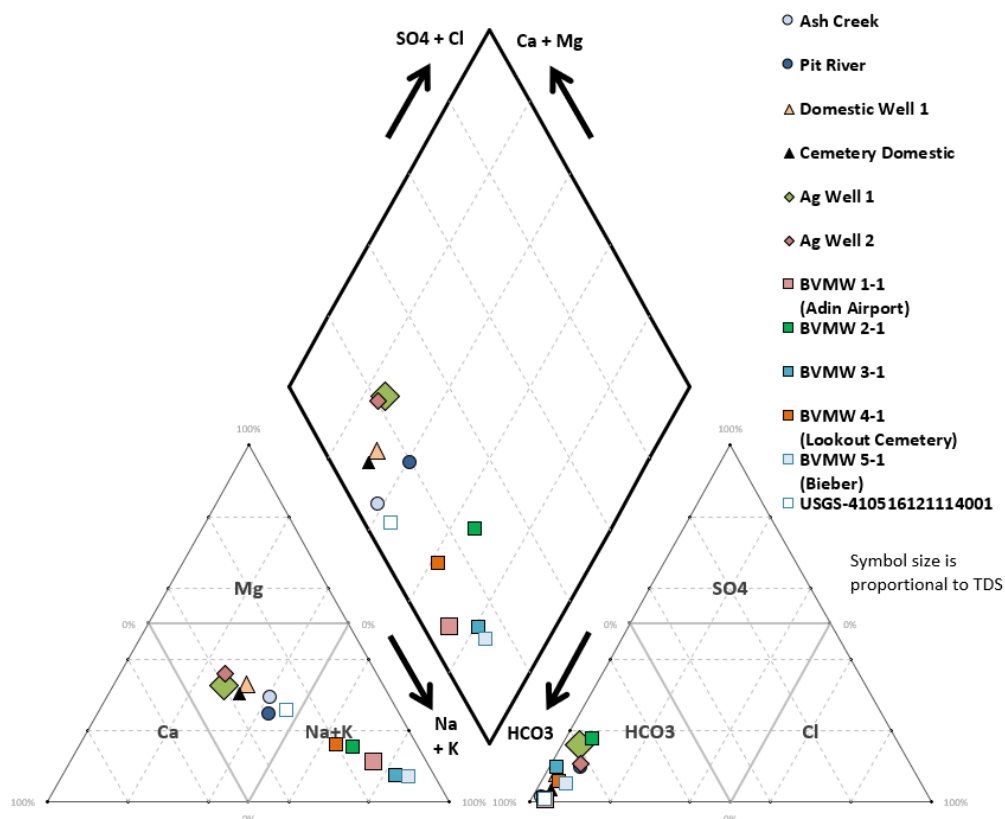


Figure 4-13 Piper Diagram showing major cations and anions

Some areas in the Basin have elevated levels of iron, manganese, and/or arsenic, all of which are naturally occurring in volcanic terrains such as Big Valley. The nature and distribution of these constituents will be discussed further in Chapter 5 – Groundwater Conditions.

4.8 Groundwater Recharge and Discharge Areas

4.8.1 Recharge

Groundwater recharge in BVGB likely occurs *via* several mechanisms discussed below.

Underflow from adjacent upland areas and other areas outside the Basin

The upland areas consist of fractured basalt flows where the precipitation infiltrates vertically through joints and fractures until it reaches underlying aquifer material and then travels horizontally into the Basin. DWR has postulated that the areas shown in pink on **Figure 4-14** provide recharge in such a way. However, other areas adjacent to the Basin could provide some recharge in a similar fashion. In addition, underflow enters the Basin where the Pit River and Ash Creek enter the Basin. A Basin boundary modification is needed to encompass other important recharge areas outside the currently defined Basin boundary.

Infiltration of precipitation on the valley floor

Some direct infiltration of rain and snow on the valley floor occurs. However, because the aquifer materials in the Basin are largely lacustrine and much of the soils have slow infiltration rates, a high

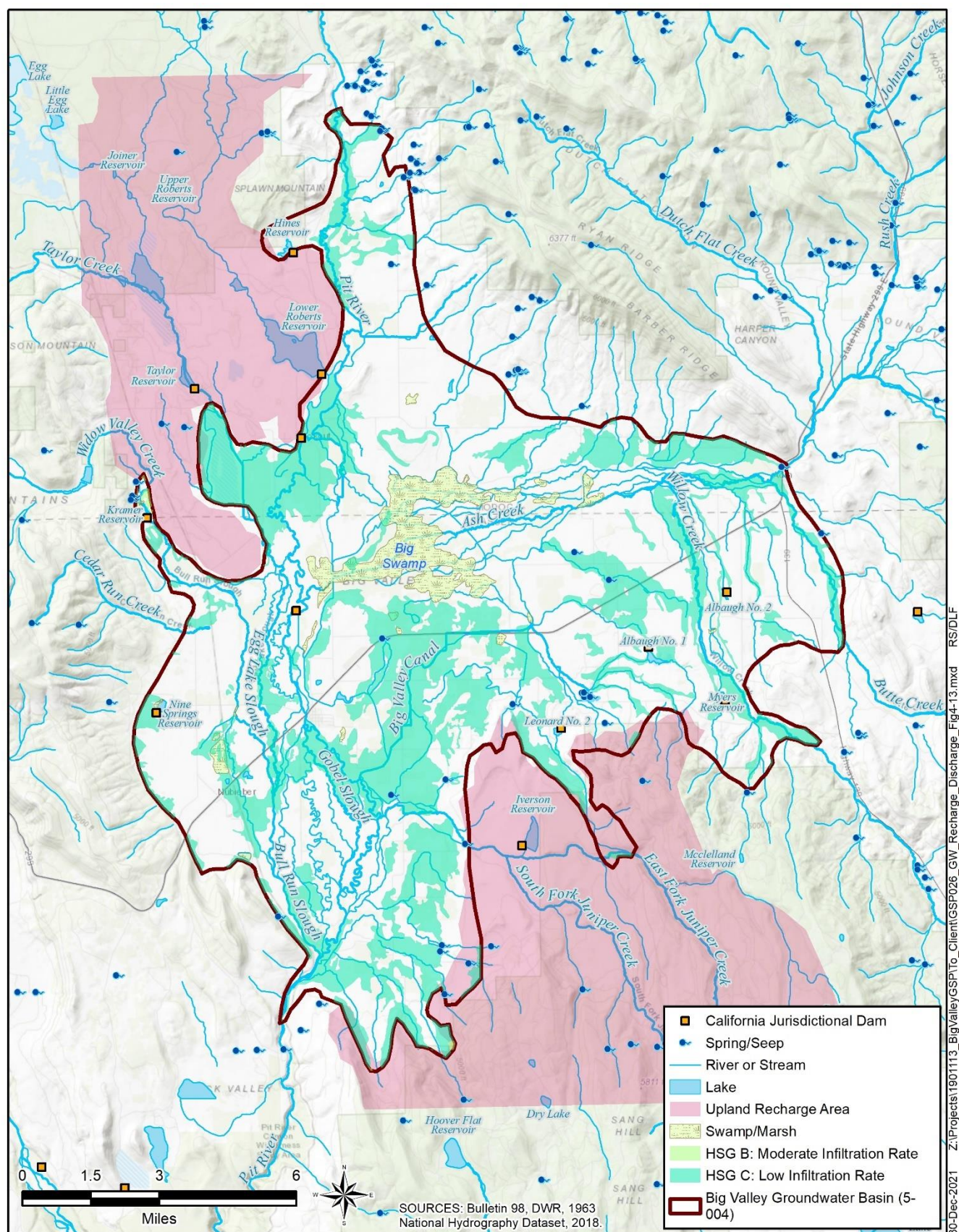
1608 proportion of the precipitation likely runs off or is evapotranspired. **Figure 4-14** shows the areas from
1609 the NRCS datasets that may have a slightly higher infiltration rate (HSG B and HSG C) than the other
1610 areas and therefore potentially more recharge.

1611 **Rivers and streams that flow through the Basin**

1612 Streams that flow through the Basin lose water to the aquifer, particularly where they enter the Basin.
1613 Aquifer materials are typically coarser on the fringes of the Basin where the stream gradient begins to
1614 flatten. In general, recharge likely occurs in the eastern portions of the Basin along Ash Creek, Butte
1615 Creek, and Willow Creek and then flows westerly through the subsurface. As Ash Creek flows to the
1616 center of the Basin and Big Swamp, the water slows and spreads out into a large marsh. The CDFW has
1617 recently enhanced this slowing and spreading of water through “pond and plug” projects which bring the
1618 water up out of the previously incised channel. Other pond and plug projects have been successfully
1619 implemented in the region. Even though the soils and aquifer materials in this portion of the Basin have
1620 slow infiltration rates, recharge is likely to occur from Big Swamp because of the long period of time
1621 that the shallow soils remain wet and saturated. Support from the public has been received at outreach
1622 meetings to conduct more pond and plug projects within and near the Basin.

1623 **Deep percolation of irrigation water**

1624 Depending on the irrigation method, particularly flood irrigation, deep percolation of irrigation water
1625 into the aquifer occurs. Flood irrigation is an active practice in the Basin and provides valuable recharge.



4.8.2 Discharge

Historically, flow out of the groundwater aquifer (and out of the Basin) most likely occurred at the southern portion of the Basin where the aquifer discharged to the Pit River. DWR (1963) indicates that artesian³⁵ conditions occurred in this southwestern area. The gaining river³⁶ then transported the water out of the Basin. However, based on currently documented water levels, this area is no longer artesian and likely hasn't been a gaining stream for decades. There are numerous springs throughout the Basin shown on **Figure 4-14** where groundwater is discharged, including several hot springs in the center of the Basin. Evapotranspiration may also be a significant discharge mechanism.

4.9 Surface-Water Bodies

Figure 4-14 shows the numerous small streams that enter the Basin and flow towards the center where they connect with the two major streams: Pit River and Ash Creek. The figure also shows the many small ponds and several reservoirs that are in and around the perimeter of the Basin. The dams that are within the jurisdiction of the DWR Division of Safety of Dams are shown. While many of these impoundments are located outside of Basin boundaries, they represent supplies that hydrologically flow to/through the Basin. The reservoirs provide options for the timing of release of those waters, rather than importing supplies from sources external to the Basin.

4.10 Imported Water Supplies

BVGB users do not import surface water into the Basin because all surface water used in the Basin originates in the watershed of the Pit River or the watershed of a local BVGB stream.

4.11 Data Gaps in the Hydrogeologic Conceptual Model

As discussed in the introduction, hydrogeology has inherent uncertainties due to sparse data and in the case of Big Valley, a limited number of detailed studies on the groundwater resources in the Basin. Identified below are some of the uncertainties associated with the hydrogeology in the Basin. In some instances, this uncertainty can be reduced while other uncertainties will remain. The filling of the data gaps below is contingent on the needs that arise as the GSP is developed and implemented and the level of available outside funding.

Basin Boundary

The current, inaccurate Basin boundary was drawn by DWR with a regional scale map (CGS 1958) and was not drawn with as much precision as subsequent geologic maps. Additionally, the “uplands” areas outside the Basin boundary are postulated to be recharge areas interconnected to the Basin, which is contrary to DWR’s definition of a lateral Basin boundary as being “...features that significantly impede groundwater flow” (DWR 2016c). Further refinement of the Basin boundary is desired and necessary, particularly in the areas of “upland recharge” mapped by DWR, the fingers in the southeastern portion of the Basin, and in the northeastern portion of the Basin below Barber Ridge and Fox Mountain.

³⁵ Artesian aquifers are under pressure and wells screened in them flow at the surface.

³⁶ Gaining rivers are where groundwater flows toward the river and contributes to surface-water flow.

1662 **Confining Conditions**

1663 Confining conditions probably exist throughout much of the Basin. Often, the confinement is simply a
1664 result of depth and the fact that horizontal hydraulic conductivities are 10 times (or more) greater than
1665 vertical conductivities. However, in the southwest portion of the Basin, DWR (1963) documented an
1666 area of confined groundwater conditions. It is unknown whether that confinement is due to a single,
1667 coherent aquitard or is just a result of depth. In addition, aquifer characteristics in the various areas of
1668 the Basin are not thoroughly understood as discussed in Section 4.4.5, and an assessment is needed on
1669 how aquifer characteristics vary throughout the Basin in shallow and deep portions of the aquifer.

1670 **Definable Bottom**

1671 This HCM has used the “practical” depth of 1,200 feet as the definable bottom. If stakeholders seek to
1672 develop groundwater deeper than this depth, newly constructed wells will demonstrate that the “physical
1673 bottom” and the base of fresh water (“effective bottom”) extend deeper.

1674 **Faults as Barriers to Flow**

1675 It is unknown if the faults which traverse the Basin are barriers to flow. Groundwater contours indicate
1676 that there is east-to-west flow, but this flow is uncertain due to a mapped fault between the two areas.
1677 This uncertainty could be reduced by conducting a pumping test with observation well(s) on the other
1678 side of the fault.

1679 **Soil Permeability**

1680 The NRCS mapping of soils indicates primarily low- to very-low-permeability soils throughout the
1681 Basin. However, there is some variation of permeabilities indicated by the maps, which are drawn at a
1682 large scale with limited field verification. Further field investigation of soils and permeability tests could
1683 help identify more permeable areas where groundwater recharge could be enhanced.

1684 **Recharge**

1685 The recharge sources below have been identified, but the rate and amount of recharge is unknown. In the
1686 water budget (*see* Chapter 6 – Water Budget), the amount of recharge is roughly estimated. Below are
1687 the data gaps related to recharge.

- 1688 • Effect of Ash Creek on recharge (including Big Swamp)
- 1689 • Effect of Pit River on recharge (including overflow channels)
- 1690 • Effect of smaller streams on recharge (including Willow Creek)
- 1691 • Amount of recharge from direct precipitation
- 1692 • Amount of recharge from deep percolation of applied water
- 1693 • Amount of recharge from upland recharge areas
- 1694 • Amount of recharge from seepage of ditches, canals, and reservoirs

1695

5. Groundwater Conditions §354.16

1696 This chapter presents available information on groundwater conditions for the BVGB developed by GEI
1697 for the Lassen County and Modoc County GSAs. This chapter provides some of the information needed
1698 for the development of the monitoring network and the sustainable management criteria of this GSP.
1699 The content of this chapter is defined by the regulations of SGMA (Chapter 1.5, Article 5,
1700 Subarticle 2: 354.16). GEI Professional Geologists provided the content of this chapter and will affix
1701 their professional stamps (as required by the regulations) certifying that it was developed under their
1702 supervision once the chapter is finalized into the GSP.

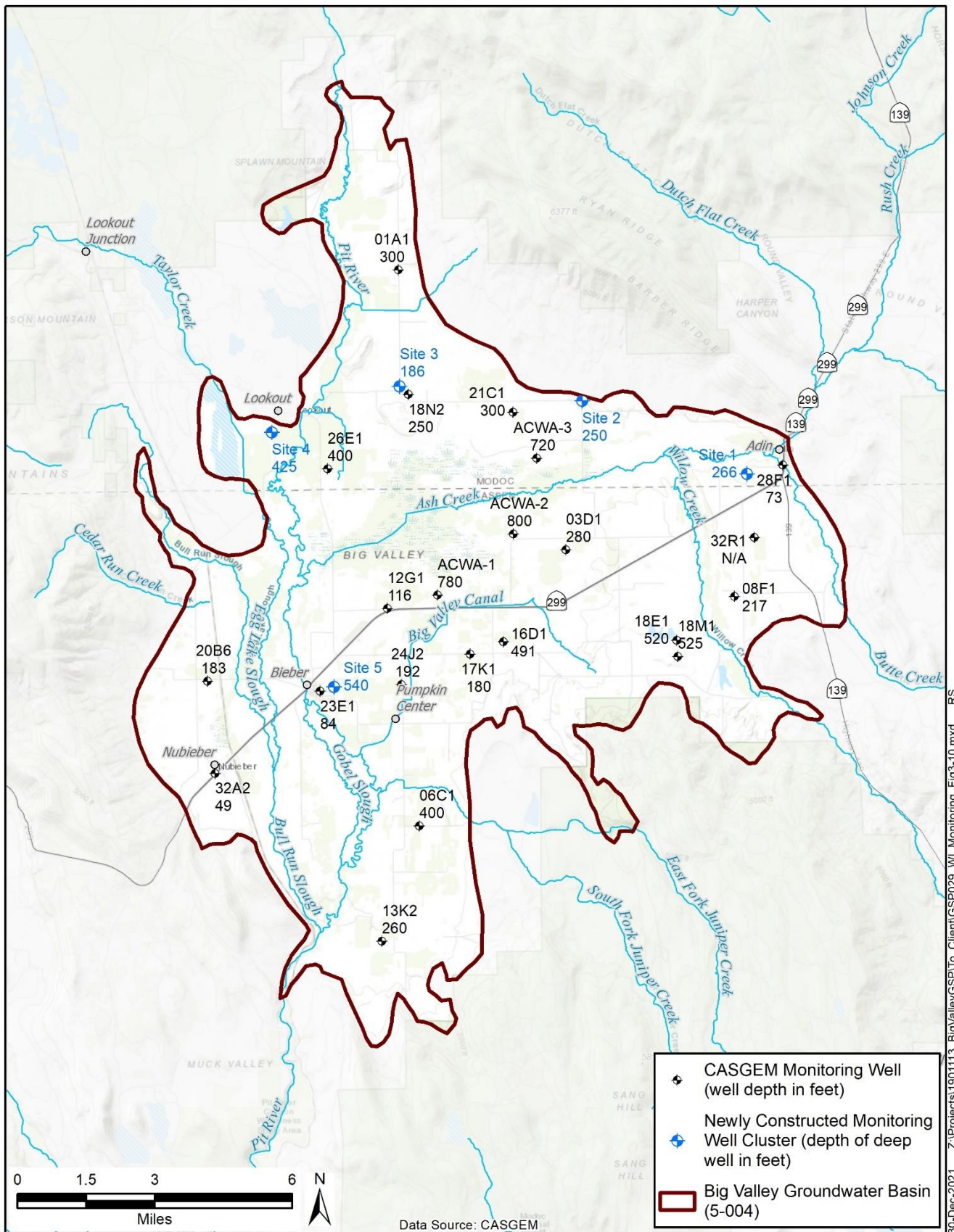
1703

5.1 Groundwater Elevations

1704 Historical groundwater elevations are available from a total of 22 wells in Big Valley, six located in
1705 Modoc County and 16 in Lassen County as shown on **Figure 5-1** and listed in **Table 5-1**. Twenty of the
1706 wells are part of Lassen and Modoc counties' monitoring network, which was approved by the counties
1707 in 2011, in compliance with the CASGEM program. DWR staff measure water levels in these wells
1708 twice annually (spring and fall) on behalf of the counties. Some measurements from wells are missing,
1709 which is typically a result of access issues to the wells site, or occasionally a well owner who has
1710 removed their well from the monitoring program. These wells may or may not be used as part of the
1711 GSP monitoring network, which will be addressed in Chapter 8 – Monitoring Networks.

1712 The first water level measurements in the BVGB began in the late 1950s at two wells near Bieber
1713 (17K1) and Nubieber (32A2). Regular monitoring of these two wells began in the mid-1960s and
1714 monitoring began in most of the other wells during the late 1970s or early 1980s. Three wells located on
1715 the ACWA were added to the CASGEM networks in 2016. Of the 22 historically monitored wells, one
1716 well (12G1) has not been monitored since 1992 and one well (06C1) has no measurements since 2015.
1717 Construction details are not available for one well (32R1) and could benefit from a 'downhole' video
1718 inspection of the well casing to determine the depth interval associated with the water levels.

1719 In addition to these 22 wells, five well clusters were constructed in late 2019 and early 2020 to support the
1720 GSP. Their locations are also shown on **Figure 5-1**. Each cluster consists of a deep well (200-500 feet) and
1721 three shallow wells (60-100 feet). These wells were drilled to explore the geology, with the deep well
1722 giving water level information for the main portion of the aquifer at that location. The three shallow wells
1723 are screened shallow to determine the direction and magnitude of flow in the shallow subsurface and
1724 potentially to give an indication if groundwater interacts with surface water and possibly the location of
1725 groundwater recharge. Limited water level information is available from these five clusters.



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Figure 5-1 Water Level Monitoring

Table 5-1 Historical Water Level Monitoring Wells

Well Name	State Well Number	CASGEM ID	County	Well Use	Well Depth (feet bgs)	Ground Elevation (feet msl)	Reference Point Elevation (feet msl)	Period of Record Start Year	Period of Record End Year	Number of Measurements	Minimum Groundwater Elevation (feet msl)	Maximum Groundwater Elevation (feet msl)
18E1	38N09E18E001M	411356N1209900W001	Lassen	Irrigation	520	4248.40	4249.50	1981	2019	73	4198.20	4234.10
23E1	38N07E23E001M	411207N1211395W001	Lassen	Residential	84	4123.40	4123.40	1979	2020	81	4070.40	4109.10
260	39N07E26E001M	411911N1211354W001	Modoc	Irrigation	400	4133.40	4135.00	1979	2020	79	4088.90	4131.30
01A1	39N07E01A001M	412539N1211050W001	Modoc	Stockwatering	300	4183.40	4184.40	1979	2020	81	4035.40	4163.90
03D1	38N08E03D001M	411647N1210358W001	Lassen	Irrigation	280	4163.40	4163.40	1982	2020	71	4076.60	4148.60
06C1	37N08E06C001M	410777N1210986W001	Lassen	Irrigation	400	4133.40	4133.90	1982	2016	69	4066.20	4126.80
08F1	38N09E08F001M	411493N1209656W001	Lassen	Other	217	4253.40	4255.40	1979	2020	83	4167.90	4229.50
12G1	38N07E12G001M	411467N1211110W001	Lassen	Residential	116	4143.38	4144.38	1979	1993	28	4130.98	4138.68
13K2	37N07E13K002M	410413N1211147W001	Lassen	Irrigation	260	4127.40	4127.90	1982	2018	70	4061.90	4109.70
16D1	38N08E16D001M	411359N1210625W001	Lassen	Irrigation	491	4171.40	4171.60	1982	2020	74	4078.73	4162.40
17K1	38N08E17K001M	411320N1210766W001	Lassen	Residential	180	4153.30	4154.30	1957	2020	146	4115.08	4150.00
18M1	38N09E18M001M	411305N1209896W001	Lassen	Irrigation	525	4288.40	4288.90	1981	2020	74	4192.30	4232.70
18N2	39N08E18N002M	412144N1211013W001	Modoc	Residential	250	4163.40	4164.40	1979	2020	80	4136.60	4160.20
20B6	38N07E20B006M	411242N1211866W001	Lassen	Residential	183	4126.30	4127.30	1979	2019	80	4076.94	4116.60
21C1	39N08E21C001M	412086N1210574W001	Modoc	Irrigation	300	4161.40	4161.70	1979	2020	79	4082.10	4148.50
24J2	38N07E24J002M	411228N1211054W001	Lassen	Irrigation	192	4138.40	4139.40	1979	2019	77	4056.70	4137.70
28F1	39N09E28F001M	411907N1209447W001	Modoc	Residential	73	4206.60	4207.10	1982	2020	76	4194.57	4202.10
32A2	38N07E32A002M	410950N1211839W001	Lassen	Other	49	4118.80	4119.50	1959	2020	133	4106.70	4118.80
32R1	39N09E32R001M	411649N1209569W001	Lassen	Irrigation	unknown	4243.40	4243.60	1981	2020	64	4161.20	4205.50
ACWA-1	38N08E07A001M	411508N1210900W001	Lassen	Irrigation	780	4142.00	4142.75	2016	2020	8	4039.15	4126.35
ACWA-2	39N08E33P002M	411699N1210579W001	Lassen	Irrigation	800	4153.00	4153.20	2016	2020	8	4126.40	4139.35
ACWA-3	39N08E28A001M	411938N1210478W001	Modoc	Irrigation	720	4159.00	4159.83	2016	2020	7	4136.23	4150.58
Notes: bgs = below ground surface msl = above mean sea level source: https://sgma.water.ca.gov/webgis/?appid=SGMADataviewer												

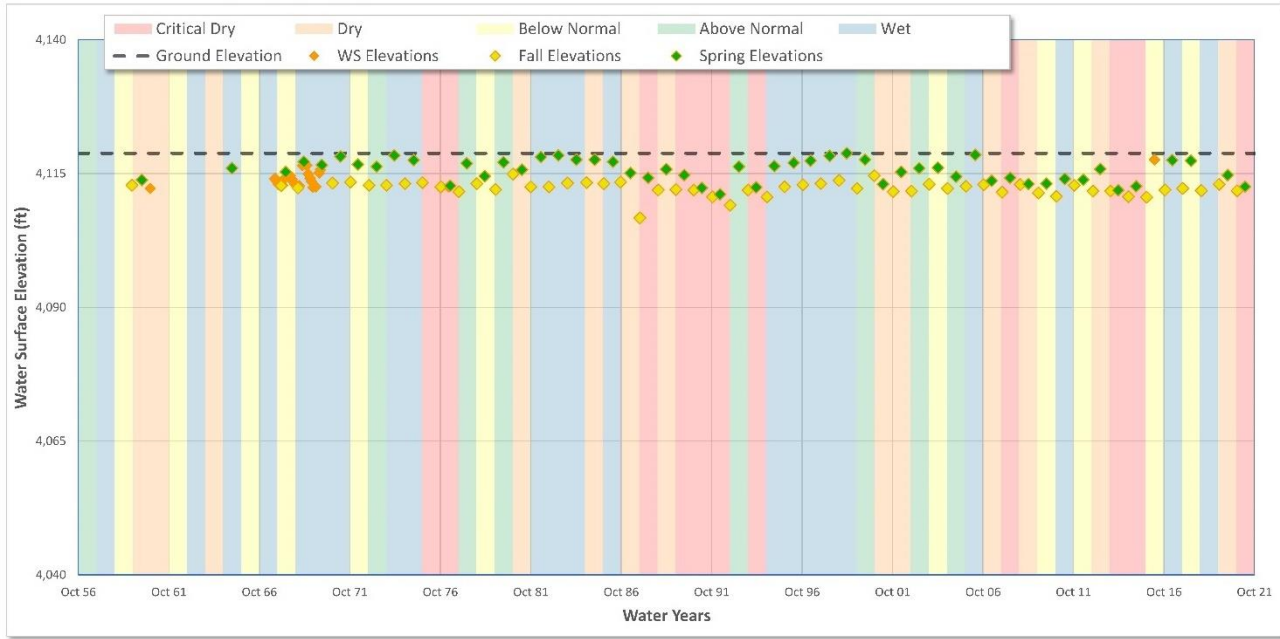
1730 **5.1.1 Groundwater Level Trends**

1731 **Figure 5-2** and **Figure 5-3** show hydrographs for the two wells with the longest monitoring records
1732 along with background colors representing the Water Year (WY) type: wet, below normal, above
1733 normal, dry, and critical dry. These WY types are developed from the Sacramento River Index (SRI),
1734 which is calculated from annual runoff of the Sacramento River Watershed, of which the Pit River is a
1735 tributary. The SRI (no units) has varied between 3.1 and 15.3 (average: 8.1) over its 115-year history
1736 (1906-2020) and is divided into the five WY categories. For 1983 to 2018, the average SRI is 7.9.

1737
1738 **Figure 5-2 Hydrograph of Well 17K1**



1739
1740 **Figure 5-3 Hydrograph of Well 32A2**



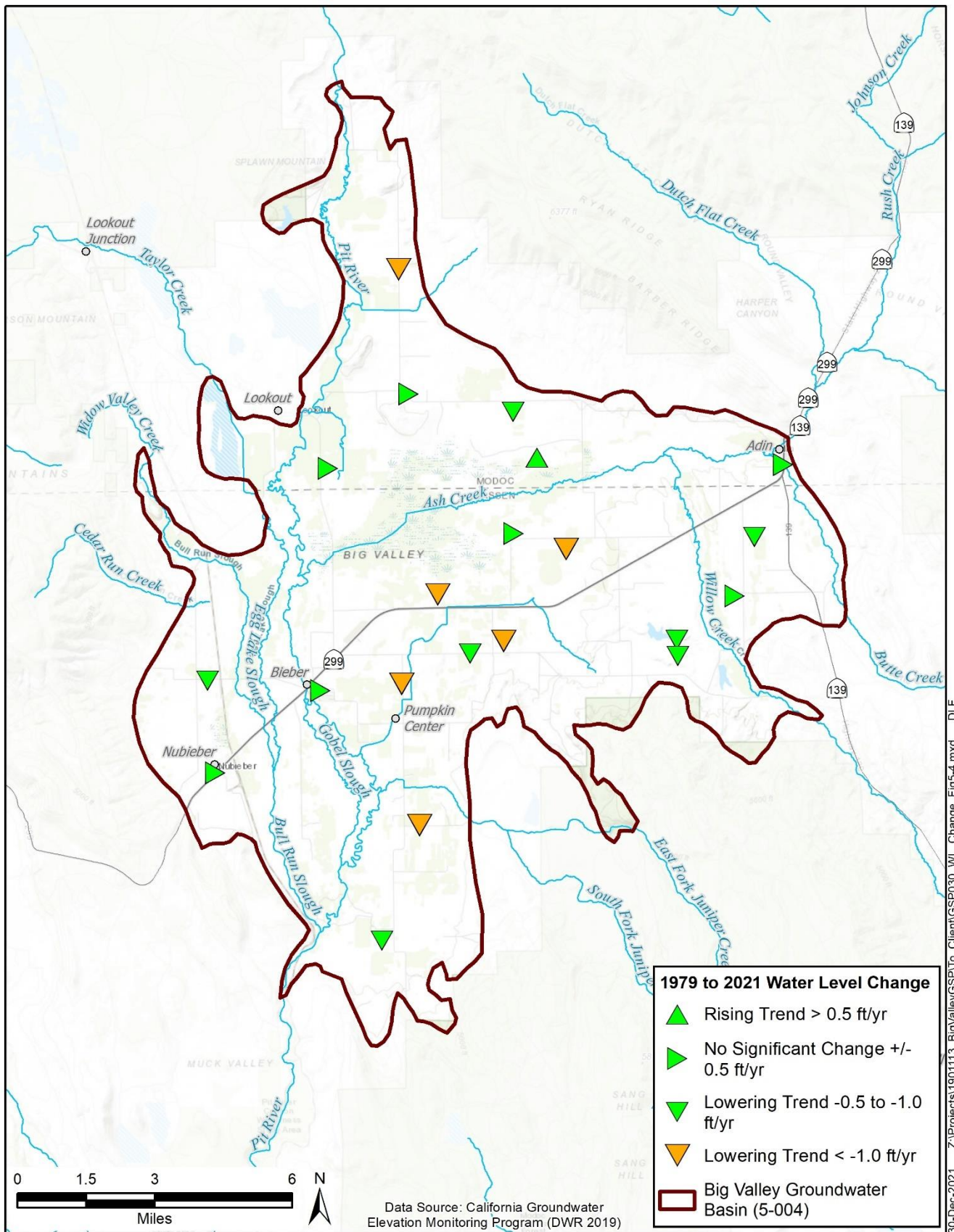
1741 The water level record for these two wells illustrates that some areas of the Basin have experienced little
1742 to no change in water levels, while other areas have fluctuated and declined during the last 20 years.
1743 Declines during the drought period of the late 1980s and early 1990s were offset by recovery during the
1744 wet period of the late 1990s. Water levels in some wells have declined during the sustained dry period
1745 that has occurred since 2000. Hydrographs for all 22 wells are presented in **Appendix 5A**. On each of
1746 these hydrographs, an orange trend line is shown, which is determined from a line of best fit for the
1747 spring water level measurements between WY 1979 and 2021. The average water level change during
1748 that period, in feet per year, is also shown. Sixteen wells show relatively stable (less than -1.0 foot per
1749 year [ft/yr] of decline) or rising water levels, and six wells show declining water from -1.0 ft/yr to -
1750 3.1 ft/yr. The locations of these water level changes are shown graphically on **Figure 5-4**, with the stable
1751 or rising water levels shown in green, and areas with declines more than -1.0 ft/yr in orange.

1752 **5.1.2 Vertical Groundwater Gradients**

1753 Vertical hydraulic gradients are apparent when groundwater levels in wells screened deep in the aquifer
1754 differ from water levels measured shallow in the aquifer at the same general location. Significant
1755 vertical gradients can indicate that the deep portion of the aquifer is separate from the shallow (e.g., by a
1756 very low permeability clay layer) and/or that pumping in one of the aquifers has occurred and the
1757 vertical flow between the aquifers is in progress of stabilizing. Chapter 4 – Hydrogeologic Conceptual
1758 Model defines a single principal aquifer in the BVGB. However, vertical gradients likely exist, and the
1759 five recently constructed well clusters will have data to describe these gradients once sufficient water
1760 level data are available from those wells. The locations of the clusters are shown on **Figure 5-1**.

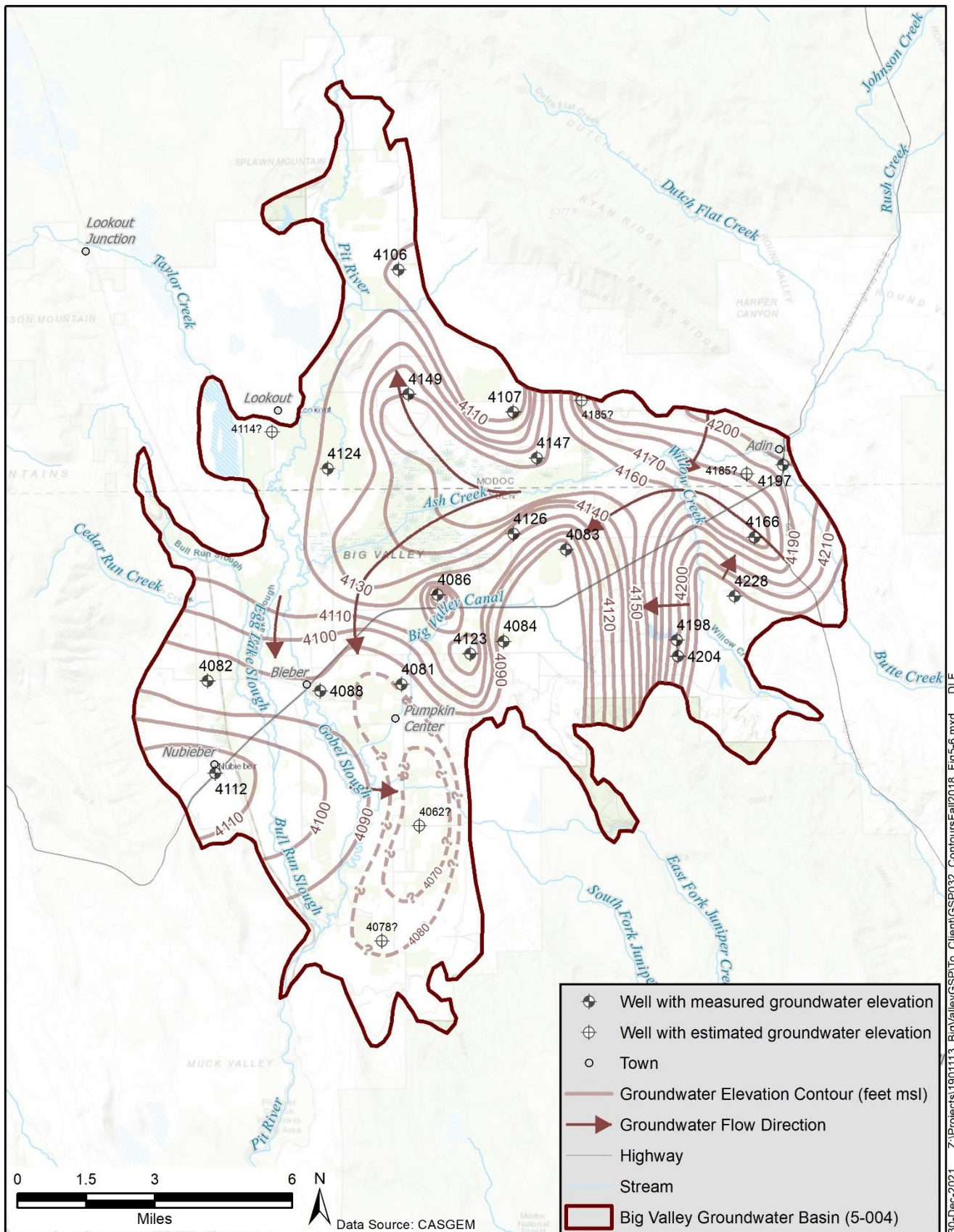
1761 **5.1.3 Groundwater Contours**

1762 Spring and fall 2018 water level measurements from the 21 active CASGEM wells were used to
1763 illustrate current groundwater conditions. The 2018 data was used to illustrate current conditions
1764 because there were several wells without data for 2019 or 2020. **Figure 5-5** and **Figure 5-6** show the
1765 2018 seasonal high and seasonal low groundwater elevation contours, respectively, which were
1766 interpolated from the locations of the 21 active wells. Each contour line shows equal groundwater
1767 elevation. Groundwater flows from higher elevations to lower elevations, perpendicular to the contour
1768 lines. The direction of flow is emphasized on the figures in certain areas with arrows. In general,
1769 groundwater is highest in the east, where Ash, Willow and Butte Creeks enter the Basin. The general
1770 flow of water is to the west and south. The contours do indicate, however, northerly flow from the lower
1771 reaches of Ash Creek. In the southern portions of the BVGB, groundwater flows toward the east.



30-Dec-2021 Z:\Projects\1901113_BigValleyGSP\To_Client\GSP030_WL_Change_Fig5-4.mxd DLF

Figure 5-4 Average Water Level Change Since 1979 Using Spring Measurements



30-Dec-2021 Z:\Projects\1901113_BigValleyGSP\To_Client\GSP032_ContoursFall2018_Fig5-6.mxd DLF

Figure 5-6 Groundwater Elevation Contours and Flow Direction Fall 2018

5.2 Change in Storage

To determine the annual and seasonal change in groundwater storage, groundwater elevation contoured surfaces³⁷ were developed for spring and fall for each year between 1983 and 2018. These surfaces are included in **Appendix 5B**. The amount of groundwater in storage for each set of contours was calculated using software which subtracted the groundwater surface elevation from the ground surface elevation (using a digital elevation model) at each grid cell (pixel) and calculated the average depth to water (DTW) for the entire Basin. The average spring DTW was then subtracted from the previous year's average spring DTW, multiplied by the area of the Basin, and then multiplied by 6.85-percent average specific yield³⁸ to calculate the annual spring-to-spring change in storage.

The average depth to groundwater and average specific yield capture the spatial variability in groundwater elevations and unconfined storage throughout the Basin. To confirm the calculations based on basin-wide averages, the spring 2022 and spring 2023 change in storage was also calculated using the groundwater elevation and specific yield surfaces contoured over the entire Basin. Annual differences were calculated on a cell-by-cell basis. The two methods yielded changes in storage within 50 AF of one another (9,683 AF for the average method and 9,729 AF for the cell-by-cell method). The average method (average values for depth to water and specific yield) was deemed appropriate for calculating annual changes in storage.

Figure 5-7 shows the cumulative change in storage from 1983 to 2023 in relation to the SRI. The highest SRI occurred in 1983 and the fourth lowest SRI occurred in 2015. Moreover, this 36-year period also include five of the lowest ten SRIs and five of the highest ten SRIs, which demonstrates the high degree of variability in climatic conditions.

Figure 5-7 shows this information graphically, along with the annual precipitation from PRISM data in the Basin. This graph shows that groundwater storage generally declines during dry years and stays stable or increases during normal or wet years. During the early portion of the 36-year period, groundwater levels dipped, then recovered to 1983 conditions by 1999 due to six consecutive years of above-average precipitation. Since 2000, groundwater storage has generally declined by about 96,000 acre-feet (AF) (using spring measurements) which is a slight increase from the historical low of about 116,000 AF in spring 2015.

Annual groundwater use is not shown on **Figure 5-7** as required by SGMA regulations. Groundwater use will be addressed in Chapter 6 – Water Budget.

³⁷ Groundwater elevation surfaces are developed using a kriging mathematical method and the known groundwater elevations at wells throughout the Basin. Kriging predicts (interpolates) what groundwater levels are between known points. The kriging surface consists of a grid (pixels) covering the entire basin that has interpolated groundwater elevation values for each node of the grid.

³⁸ The fraction of the aquifer material that contains recoverable water. Specific yield is described in more detail in Chapter 4 – Hydrologic Conceptual Model.

Table 5-2 Change in Storage 1983-2023

Year	Average Spring Depth to Water ¹ (feet)	Change in Storage from Previous Year ² (Acre-feet)	Cumulative Change in Storage ³ (Acre-feet)	Sacramento River Index (SRI) of Water Year Types
1983	29.3	-	-	W
1984	29.4	(631)	(631)	W
1985	31.4	(12,619)	(13,250)	D
1986	31.0	2,524	(10,727)	W
1987	32.6	(10,096)	(20,822)	D
1988	34.9	(14,512)	(35,334)	C
1989	35.2	(1,893)	(37,227)	D
1990	35.6	(2,524)	(39,751)	C
1991	36.8	(7,572)	(47,323)	C
1992	38.0	(7,572)	(54,895)	C
1993	36.9	6,941	(47,954)	AN
1994	37.5	(3,786)	(51,740)	C
1995	35.3	13,881	(37,858)	W
1996	32.4	18,298	(19,560)	W
1997	31.8	3,786	(15,774)	W
1998	31.1	4,417	(11,358)	W
1999	29.5	10,096	(1,262)	W
2000	32.3	(17,667)	(18,929)	AN
2001	38.0	(35,965)	(54,895)	D
2002	39.3	(8,203)	(63,097)	D
2003	39.4	(631)	(63,728)	AN
2004	39.2	1,262	(62,466)	BN
2005	41.5	(14,512)	(76,979)	AN
2006	36.7	30,287	(46,692)	W
2007	38.8	(13,250)	(59,942)	D
2008	41.6	(17,667)	(77,610)	C
2009	42.5	(5,679)	(83,288)	D
2010	46.4	(24,608)	(107,896)	BN
2011	45.9	3,155	(104,742)	W
2012	44.9	6,310	(98,432)	BN
2013	49.3	(27,763)	(126,195)	D
2014	51.7	(15,143)	(141,338)	C
2015	54.4	(17,036)	(158,374)	C
2016	51.3	19,560	(138,814)	BN
2017	49.7	10,096	(128,719)	W
2018	50.1	(2,524)	(131,242)	BN
2019	49.5	3,619	(127,623)	W
2020	47.9	10,110	(117,514)	D
2021	49.3	(8,819)	(126,333)	C
2022	51.0	(10,321)	(136,653)	C
2023	49.4	9,683	(126,970)	AN ⁴

Note: Parentheses indicate negative numbers

¹ From water surface elevation contours - Appendix 5A

² Calculated from average depth to water, area of basin, 1,200 foot aquifer bottom, and specific yield of 6.85%

³ This is the total change in storage since the baseline, defined as Spring 1983.

⁴ Estimated

Water Year Type:

W - wet

AN - above normal year type

BN - below normal year type

D - dry year type

C - critical year type

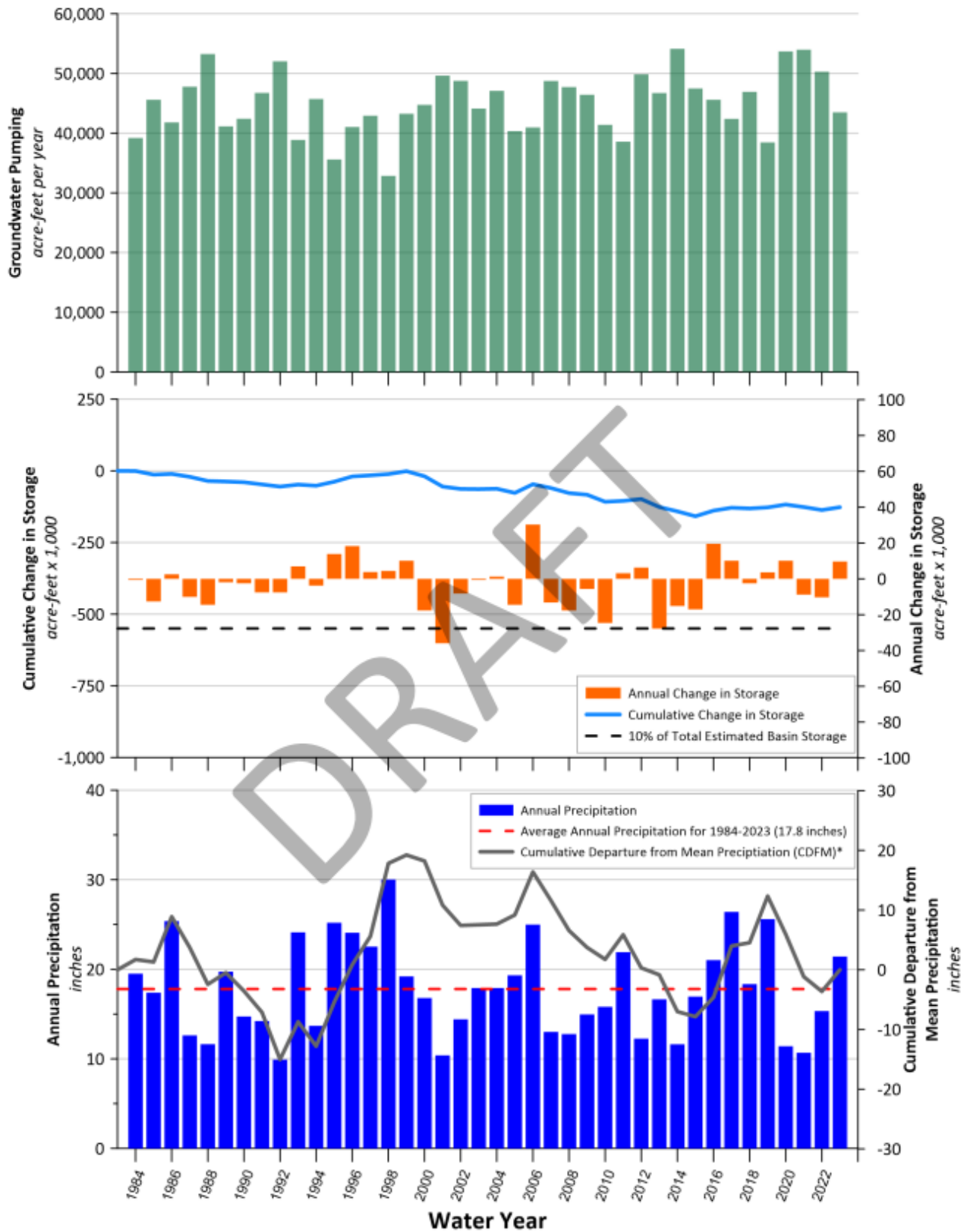


Figure 5-7 Precipitation, Pumping and Spring-to-Spring Change in Groundwater Storage

1813 **5.3 Seawater Intrusion**

1814 The BVGB is not located near the ocean, and therefore seawater intrusion is not applicable to this GSP.

1815 **5.4 Groundwater Quality Conditions**

1816 As noted in Chapter 4, previous reports have characterized the water quality in the BVGB as excellent
1817 (DWR 1963, Reclamation 1979). As described herein, recent groundwater quality samples confirm this
1818 statement. Groundwater is generally suitable for all beneficial uses and only localized contamination
1819 plumes have been identified in the BVGB. This section presents an analysis of recent groundwater
1820 quality conditions and the distribution of known groundwater contamination sites in compliance with
1821 GSP Regulation §354.16(d).

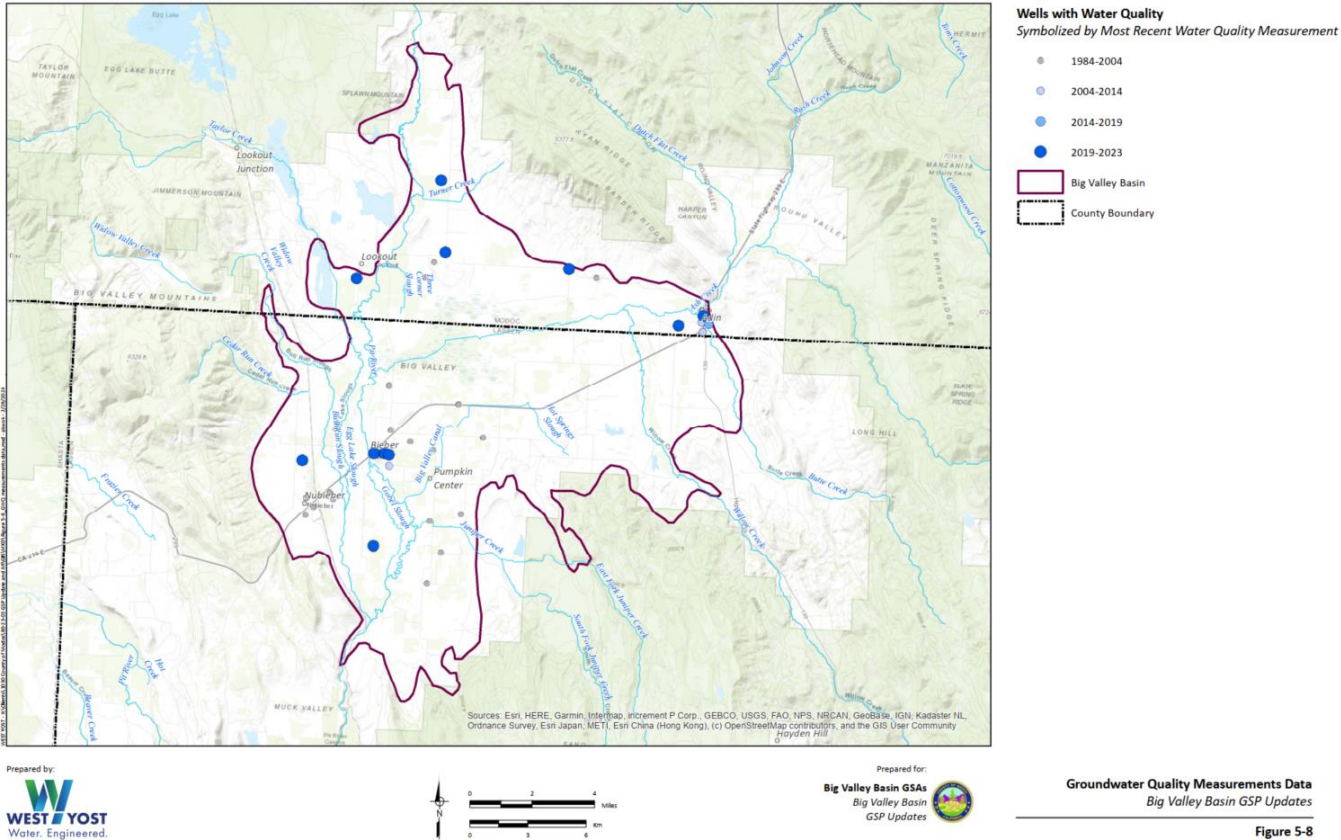
1822 In the Basin, groundwater quality data are available from production and monitoring wells. Groundwater
1823 quality samples from municipal production wells are collected by well owners and reported to the State
1824 as required by the California Code of Regulations for drinking water. Groundwater quality samples from
1825 monitoring wells in the Basin are collected by public entities and private companies and their
1826 consultants to characterize point-source contamination for which they potentially responsible.

1827 More recent conditions were analyzed using a statistical approach applied to available data from the
1828 GAMA Groundwater Information System [GAMA GIS] (State Water Board 2020a). The GAMA GIS
1829 data provides the most comprehensive, readily available water quality dataset and contains results from
1830 numerous programs, including:

- 1831 • Division of Drinking Water (public supply systems)
- 1832 • Department of Pesticide Regulation
- 1833 • Department of Water Resources (historical ambient monitoring)
- 1834 • Environmental Monitoring Wells (regulated facilities and cleanup sites)
- 1835 • U.S. Geological Survey (USGS) GAMA program
- 1836 USGS National Water Information System data

1837 **Figure 5-8** shows the location of wells with water quality data symbolized by the most recent water
1838 quality measurement.

1839



1840

1841

1842

Figure 5-8 Groundwater Quality Measurements in Big Valley Basin

1843 **5.4.1 Comparison of Groundwater Quality with Regulatory Standards**

1844 The concentration of naturally occurring constituents varies throughout the BVGB. Previous reports
1845 have noted the potential elevated concentrations of arsenic, boron, fluoride, iron, manganese, and sulfate
1846 (DWR 1963, Reclamation 1979). All of these constituents are naturally occurring, and in these historical
1847 reports, they indicate that most of these constituents are associated with localized thermal waters found
1848 near hot springs in the center of the Basin.

1849 Water quality results in these datasets go back to the 1950s. Because conditions can change as
1850 groundwater is used over time, data prior to the WY 1983 were eliminated from the statistical analysis of
1851 the data. WY 1983 was chosen because the bulk of the historical water level wells (**Figure 5-1**) came
1852 online by 1983. Data from the Environmental Monitoring Wells programs were also eliminated since
1853 water quality issues associated with these regulated sites are typically highly localized, often are associated
1854 with isolated, perched groundwater, and are already regulated. The nature and location of groundwater
1855 contamination sites are discussed in Section 5.4.2. – Groundwater Contamination Sites and Plumes.

1856 **Table 5-3** shows the statistical evaluation of the filtered GAMA water quality data along with the water
1857 quality results obtained from the five well clusters constructed to support the GSP. The constituents
1858 selected to assess the suitability in the Basin are based on thresholds for different beneficial uses. For
1859 domestic and municipal uses, the inorganic constituents that are regulated under state drinking water
1860 standards are shown. Boron and sodium are also shown because elevated concentrations can affect the
1861 suitability of the water for agricultural uses. The suitability threshold concentration for each constituent
1862 is shown, using either the MCL or agricultural threshold, whichever was lower. Iron and manganese
1863 were evaluated for both drinking water and agricultural thresholds. It is assumed that water suitable for
1864 domestic, municipal, and agricultural purposes would also be suitable for environmental and industrial
1865 beneficial uses.

Table 5-3 Water Quality Statistics – 1983 - 2020

Constituent Name	Suitability Threshold Concentration	Suitability Threshold Type	Total # of Meas	min	max	# Meas Above Threshold	% of Meas Above Threshold	# Wells With Meas	# Wells with Average Above Threshold	% of Wells with Average Above Threshold	# Wells with Most Recent Meas Above Threshold	% of Wells with Most Recent Meas Above Threshold	Comment
Aluminum	200	DW1	41	0	552	2	5%	18	1	6%	0	0%	Low concern due to only two threshold exceedances and zero recent measurements above MCL
Antimony	6	DW1	45	0	36	1	2%	20	1	5%	0	0%	Low concern due to only one threshold exceedance and zero recent measurements above MCL
Arsenic	10	DW1	53	0	12	4	8%	23	3	13%	3	13%	
Barium	1000	DW1	49	0	600	0	0%	23	0	0%	0	0%	
Beryllium	4	DW1	48	0	1	0	0%	23	0	0%	0	0%	
Cadmium	5	DW1	49	0	1	0	0%	23	0	0%	0	0%	
Chromium (Total)	50	DW1	36	0	20	0	0%	13	0	0%	0	0%	
Chromium (Hexavalent)	10	DW1*	13	0.05	3.29	0	0%	13	0	0%	0	0%	
Copper	1300	DW1	34	0	190	0	0%	21	0	0%	0	0%	
Fluoride	2000	DW1	42	0	500	0	0%	16	0	0%	0	0%	
Lead	15	DW1	28	0	6.2	0	0%	16	0	0%	0	0%	
Mercury	2	DW1	44	0	1	0	0%	19	0	0%	0	0%	
Nickel	100	DW1	46	0	10	0	0%	20	0	0%	0	0%	
Nitrate (as N)	10000	DW1	151	0	4610	0	0%	24	0	0%	0	0%	
Nitrite	1000	DW1	62	0	930	0	0%	20	0	0%	0	0%	
Nitrate + Nitrite (as N)	10000	DW1	2	40	2250	0	0%	2	0	0%	0	0%	
Selenium	50	DW1	49	0	5	0	0%	23	0	0%	0	0%	
Thallium	2	DW1	46	0	1	0	0%	20	0	0%	0	0%	
Chloride	250000	DW2	66	1400	79000	0	0%	43	0	0%	0	0%	
Iron	300	DW2	50	0	11900	26	52%	21	8	38%	9	43%	Low human health concern due to being a secondary MCL for aesthetics
Iron	5000	AG	50	0	11900	2	4%	21	2	10%	2	10%	
Manganese	50	DW2	45	0	807	28	62%	21	12	57%	11	52%	Low human health concern due to being a secondary MCL for aesthetics
Manganese	200	AG	45	0	807	22	49%	21	7	33%	7	33%	
Silver	100	DW2	36	0	20	0	0%	19	0	0%	0	0%	
Specific Conductance	900	DW2	66	125	1220	3	5%	42	1	2%	1	2%	
Sulfate	250000	DW2	60	500	1143000	1	2%	40	0	0%	0	0%	Low concern due to only one threshold exceedance and zero recent measurements above MCL
Total Dissolved Solids (TDS)	500000	DW2	57	131000	492000	0	0%	39	0	0%	0	0%	
Zinc	5000	DW2	34	0	500	0	0%	20	0	0%	0	0%	
Boron	700	AG	40	0	100	0	0%	34	0	0%	0	0%	
Sodium	69000	AG	33	11600	69000	0	0%	21	0	0%	0	0%	

Sources:

GAMA Groundwater Information System, accessed June 5, 2020 (SWRCB 2020)

University of California Cooperative Extension Farm Advisor (UCCE 2020)

Notes:

GAMA data was filtered to remove all measurements before Oct 1, 1982 and all GeoTracker cleanup sites

Constituents listed are all inorganic naturally occurring elements and compounds that have a SWRCB drinking water maximum contaminant limit (MCL), plus Boron, which has a threshold for agricultural use.

All measurements in micrograms per liter, except specific conductance which is measured in microsiemens per centimeter.

Green indicates less than 1%

Yellow indicates between 1% and 10%

Red indicates greater than 10%

Threshold Types:

DW1: Primary drinking water MCL

DW2: Secondary drinking water MCL (for aesthetics such as taste, color, and odor)

AG: Agricultural threshold based on guidelines by the Food and Agricultural Organization of the United Nations (Ayers and Westcot 1985)

* Hexavalent chromium was regulated under a primary drinking water MCL until the MCL was invalidated in 2017. The SWRCB is working to re-establish the MCL.

1868 Table 5-4 is similar to Table 5-3; however, it shows data for the last 20 years only (2004 to 2023).

1869 **Table 5-4 Water Quality Statistics – 2004 to 2023**

Constituent Name	Units	Suitability Threshold Concentration	Suitability Threshold Type	Total # of Measurements (2004-2023)	Minimum (2004-2023)	Maximum (2004-2023)	# Measured Above Threshold (2004-2023)	% of Measured Above Threshold (2004-2023)	# Wells With Measurements (2004-2023)	# Wells with Average Above Threshold (2004-2023)
Aluminum	UG/L	200	DW1	23	2.7	88	0	0%	18	0
Antimony	UG/L	6	DW1	21	0.0	6	0	0%	16	0
Arsenic	UG/L	10	DW1	24	1.6	12	2	8%	18	2
Barium	UG/L	1000	DW1	26	0.5	100	0	0%	18	0
Beryllium	UG/L	4	DW1	23	0.0	1	0	0%	18	0
Boron	UG/L	700	AG	19	11.0	100	0	0%	17	0
Cadmium	UG/L	5	DW1	26	0.0	1	0	0%	18	0
Chloride	UG/L	250000	DW1	20	2200.0	32900	0	0%	16	0
Chromium (Hexavalent)	UG/L	10	DW1*	13	0.1	3	0	0%	13	0
Chromium (Total)	UG/L	50	DW1	14	0.1	10	0	0%	9	0
Copper	UG/L	1300	DW1	22	0.7	52	0	0%	16	0
Fluoride	UG/L	2000	DW1	18	0.1	350	0	0%	11	9
Iron	UG/L	300	DW2	36	6.0	11900	28	78%	16	9
Iron	UG/L	5000	AG	36	6.0	11900	2	6%	16	0
Lead	UG/L	15	DW1	9	0.3	5	0	0%	6	0
Manganese	UG/L	50	DW2	37	0.3	540	31	84%	16	10
Manganese	UG/L	200	AG	37	0.3	540	24	65%	16	0
Mercury	UG/L	2	DW1	22	0.1	1	0	0%	14	0
Nickel	UG/L	100	DW1	19	0.5	10	0	0%	14	0
Nitrate (as N)	UG/L	10000	DW1	104	40.0	3850	0	0%	22	0
Nitrate + Nitrite (as N)	UG/L	10000	DW1	6	40.0	2250	0	0%	6	0
Nitrite	UG/L	1000	DW1	38	0.1	400	0	0%	14	0
Selenium	UG/L	50	DW1	26	0.0	5	0	0%	18	0
Silver	UG/L	100	DW2	17	0.0	10	0	0%	10	0
Sodium	UG/L	69000	AG	21	12100.0	69000	0	0%	16	0
Specific Conductance	UMHOS/CM	900	DW2	24	206.0	611	0	0%	16	0
Sulfate	UG/L	250000	DW2	21	770.0	48100	0	0%	16	0
Thallium	UG/L	2	DW1	21	0.0	1	0	0%	16	0
Total Dissolved Solids	UG/L	500000	DW2	20	169000.0	479000	0	0%	16	0
Zinc	UG/L	5000	DW2	20	6.9	320	0	0%	14	0
Cells highlighted in red represent constituents with at least one well with exceedances.										
Sources:										
GAMA Groundwater Information System, accessed December 27, 2023 (SWRCB 2023)										
University of California Cooperative Extension Farm Advisor (UCCE 2020)										
Big Valley Monitoring Well Construction Report (GEI 2021)										
Water Quality Sampling Results Fall 2019 (Big Valley Basin)										
Notes:										
GAMA data was filtered to remove all Geotracker cleanup sites										
Constituents listed are all inorganic naturally occurring elements and compounds that have a SWRCB drinking water maximum contaminant level (MCL, plus Boron, which has a threshold for agricultural use.										
All measurements in micrograms per liter, except specific conductance which is measured in microsiemens per centimeter.										
Green indicates less than 1%										
Yellow indicates between 1% and 10%										
Red indicates greater than 10%										
Threshold Types:										
DW1: Primary drinking water MCL										
DW2: Secondary drinking water MCL (for aesthetics such as taste, color and odor)										
AG: Agricultural threshold based on guidelines by the Food and Agricultural Organization of the United Nations (Ayers and Westcott 1985)										
* Hexavalent Chromium was regulated under a primary drinking water MCL until the MCL was invalidated in 2017. The SWRCB is working to re-establish the MCL.										

1870

1871 **Table 5-3 and Table 5-4** show that most constituents have not had concentrations measured above their
 1872 corresponding threshold. Tables 5-3 and 5-4 show that the main constituents of concern in the Basin are

1873 iron and manganese, and to a lesser extent arsenic, based on the percentages of wells exceeding the
1874 applicable thresholds.

1875 According to the State Water Resources Control Board “Groundwater Quality Consideration for High
1876 and Medium Priority Basins” dated November 22, 2022, the GSP should consider a constituent as a
1877 constituent of concern if a constituent exceeded the suitability threshold in untreated water of three or
1878 more of domestic, irrigation/industrial, municipal and/or water supply wells. Based on this screening
1879 criteria, the following constituents are described in further detail below:

- 1880 • Iron
- 1881 • Manganese

1882 Sulfate, aluminum, and antimony only had one or two detections above their threshold, and none of
1883 these values were recent so these constituents were not investigated further.

1884 In addition to Arsenic (As), iron (Fe), and manganese (Mn), the section below also describes:

- 1885 • Arsenic
- 1886 • Nitrate (as N), hereafter referred to as nitrate
- 1887 • Specific conductance (SC) and total dissolved solids (TDS)
- 1888 • PFOS

1889 With the exception of PFOS, all these constituents are naturally occurring. Arsenic is included in the
1890 discussion due to the exceedances observed during the longer time period (see Table 5-3a), nitrate and
1891 TDS are included in the discussion due to the prevalence as groundwater contaminants in California, and
1892 PFOS are included due to a recent finding by the State that a small area within the Basin is at high water
1893 quality risk due to PFOS (see additional details below).

1894 **Arsenic, Iron and Manganese**

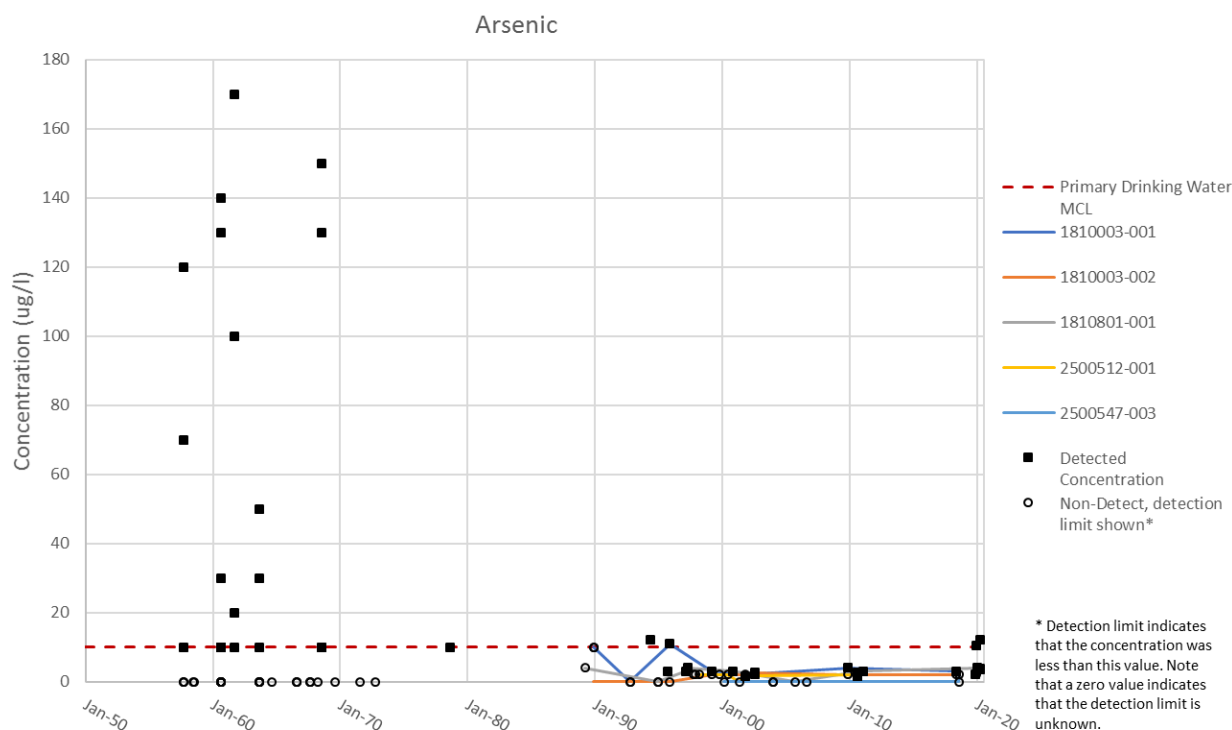
1895 In the last 20 years Fe, and Mn show elevated concentrations in over 10 percent of the wells. In the last
1896 40 years, As show elevated concentrations in about 13 percent of the wells. Although iron and
1897 manganese are regulated under secondary drinking water standards (for aesthetics such as color, taste,
1898 and odor) but are not of concern for human health as drinking water³⁹, these constituents were still
1899 chosen for further investigation because they also have multiple detections above the agricultural
1900 suitability threshold (Ayers and Westcot 1985). **Figures 5-9** through **Figure 5-11** show the trends over

³⁹ Although there is currently no primary MCL for manganese, the SWRCB has proposed a notification level for manganese. Per the SWRCB “Manganese is an essential nutrient and enzyme cofactor that is naturally present in many foods and available as a dietary supplement, but despite its nutritional benefits, adverse health effects can be caused by over-exposure. There is evidence that demonstrates that exposure to manganese at high levels can pose a neurotoxic risk. Young children can be particularly susceptible to adverse effects from manganese exposure because they absorb and retain more manganese than adults.” The proposed notification level at this time is 20 ug/L.

1901 time. Wells with single measurements are shown as dots, where wells that had multiple measurements
 1902 are shown as lines.

1903 Key findings from Figure 5-9 include:

- 1904
- Based on wells with more than one sample in recent years (wells shown with lines connecting the samples), Arsenic concentrations are below the MCL since 2000, and have no trends.
- 1905
- 1906
- The two recent arsenic samples were at or just above (10.5 and 12 ug/L, respectively) of the MCL. These wells are located close to the basin boundary, where there may be more direct impact from the volcanic rocks.
- 1907
- 1908



1909
 1910 **Figure 5-9 Arsenic Trends**

1911 Key findings from Figure 5-10 include:

- 1912
- Iron concentrations are generally below the agricultural suitability threshold (Ayers and Westcot, 1985), and some are above the secondary MCL.
- 1913
- 1914
- The two recent elevated iron measurements were obtained from the monitoring wells constructed in support of the GSP These values appear to be outliers. Additional sampling should be conducted after verifying the wells are adequately developed and purged.
- 1915
- 1916
- 1917
- Based on wells with more than one sample in recent years, there are no trends observed in iron concentrations within the Basin.
- 1918

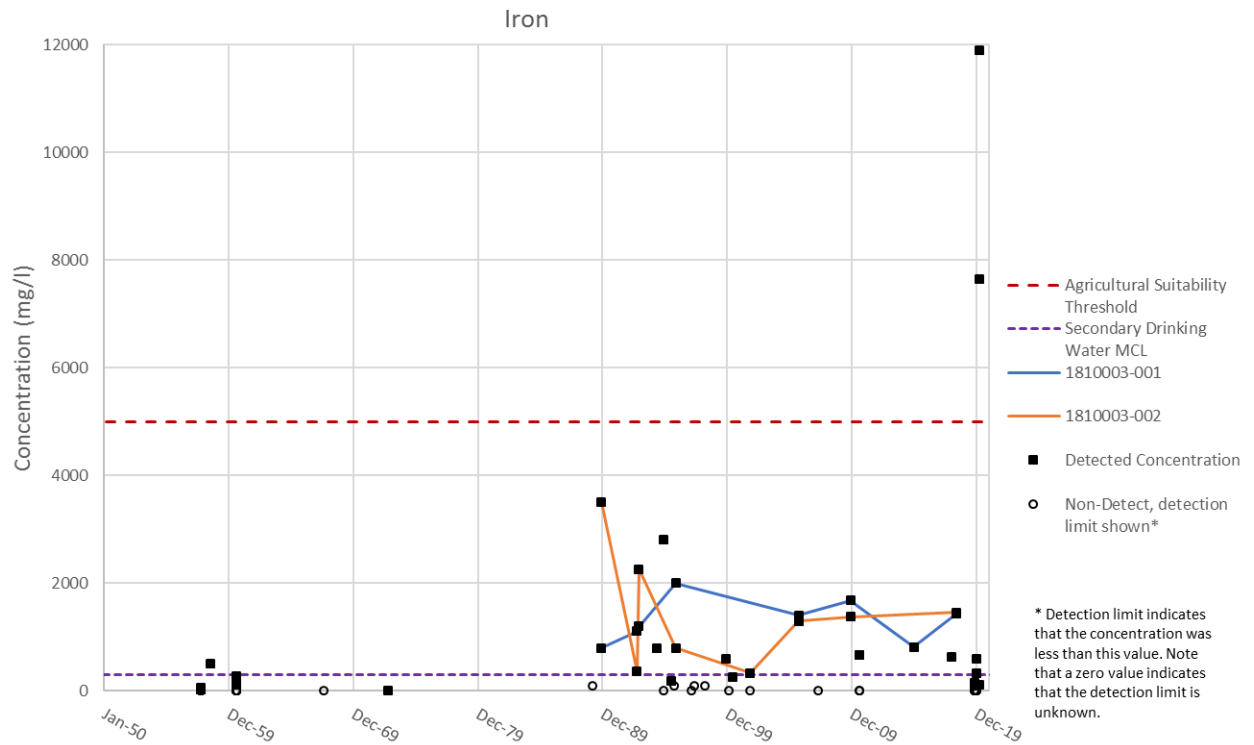


Figure 5-10 Iron Trends

Key findings from Figure 5-11 include:

- Based on wells with more than one sample in recent years, there are no trends observed in manganese concentrations within the Basin, and their concentrations are greater than the agricultural threshold and secondary MCL.

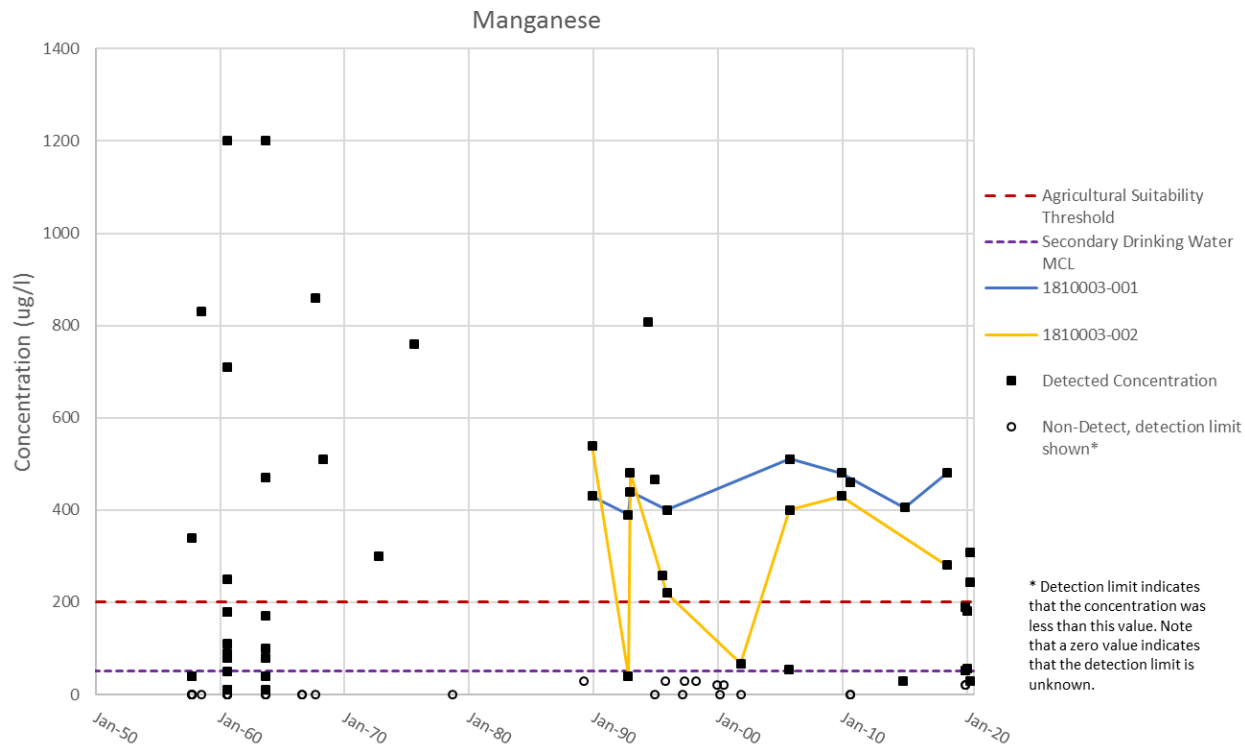


Figure 5-11 Manganese Trends

Similar to other Basins, arsenic, iron and manganese are naturally occurring constituents and their elevated concentrations cannot be controlled by the GSAs. A description of how project management actions may impact the concentrations of these constituents is described in Section 9.

Nitrate (as N)

As described earlier, most of the farmed land in the Basin utilizes low-impact farming, employing no-till methods to grow nitrogen-fixing crops which require little to no fertilizer or pesticide application. However, nitrate (as N) is included in this discussion due to concerns over its potential impacts in Ash Creek Wildlife Area. In this area, there is a concern that decomposition of organic matter could result in nitrate (as N) impacts to groundwater. Additionally, a concern was raised over discharge of domestic wastewater, which could result in nitrate (as N) impacts to groundwater.

Nitrate (as N) has been analyzed in groundwater throughout the Basin from 1952 through 2023 and was detected above its MCL of 10 mg/L in less than 1 percent of samples. Nitrate was not detected above the MCL within the last 30 years, with the last reported detection above the MCL in 1978. **Figure 5-12** shows detections of nitrate in groundwater samples between 2013 and 2023. Based on **Figure 5-12**, nitrate concentrations within the Big Valley Basin in the last ten years are all below 5 mg/L, which is half of the MCL. Review of all historical data suggests that all reported concentrations of nitrate (as N) detected in groundwater are below the MCL throughout the Basin from 1978 to 2023. These results are consistent with the current understanding of land uses in the Basin and the limited use of fertilizers. Decomposition of organic matter and the discharge of domestic wastewater do not appear to cause nitrate (as N) impacts to groundwater.

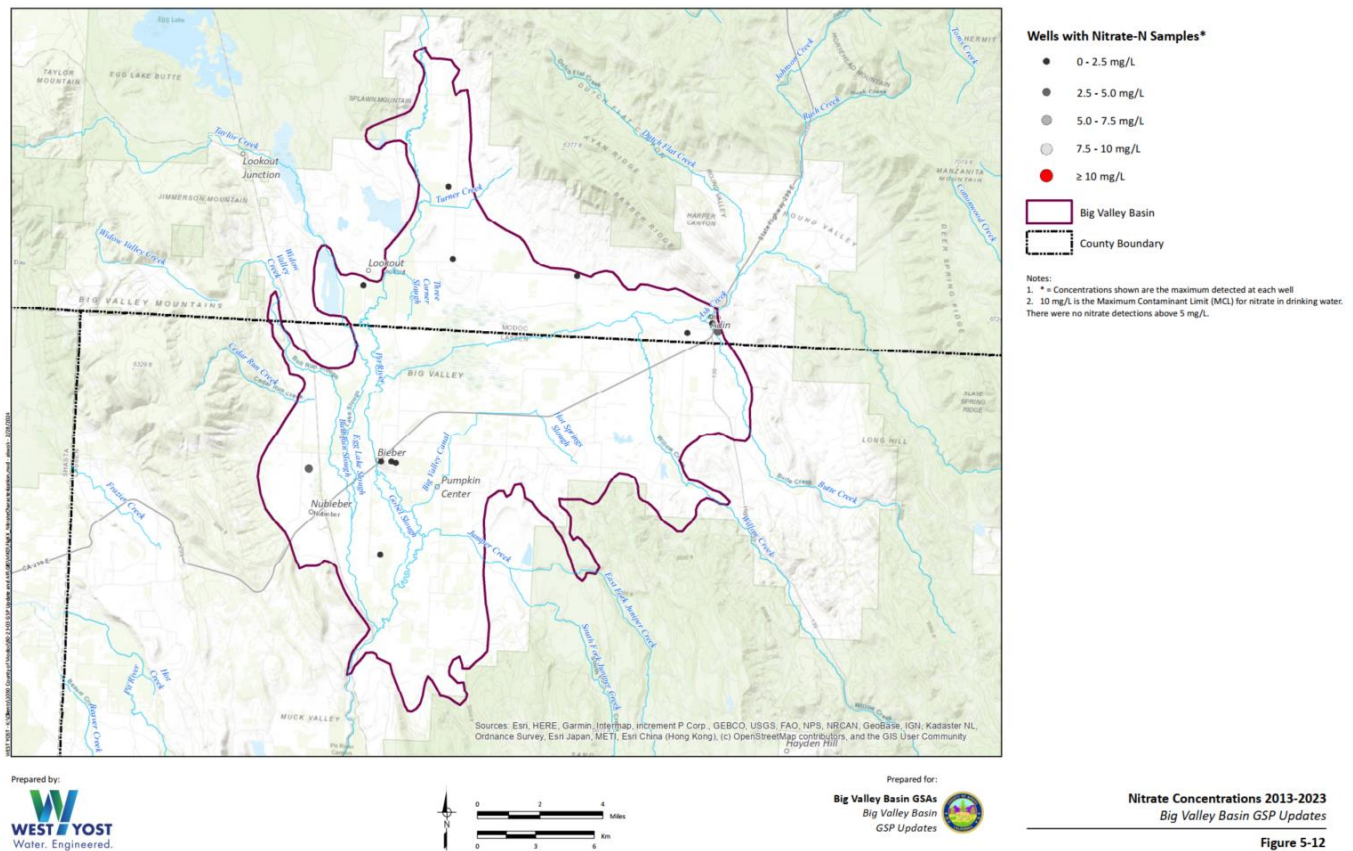
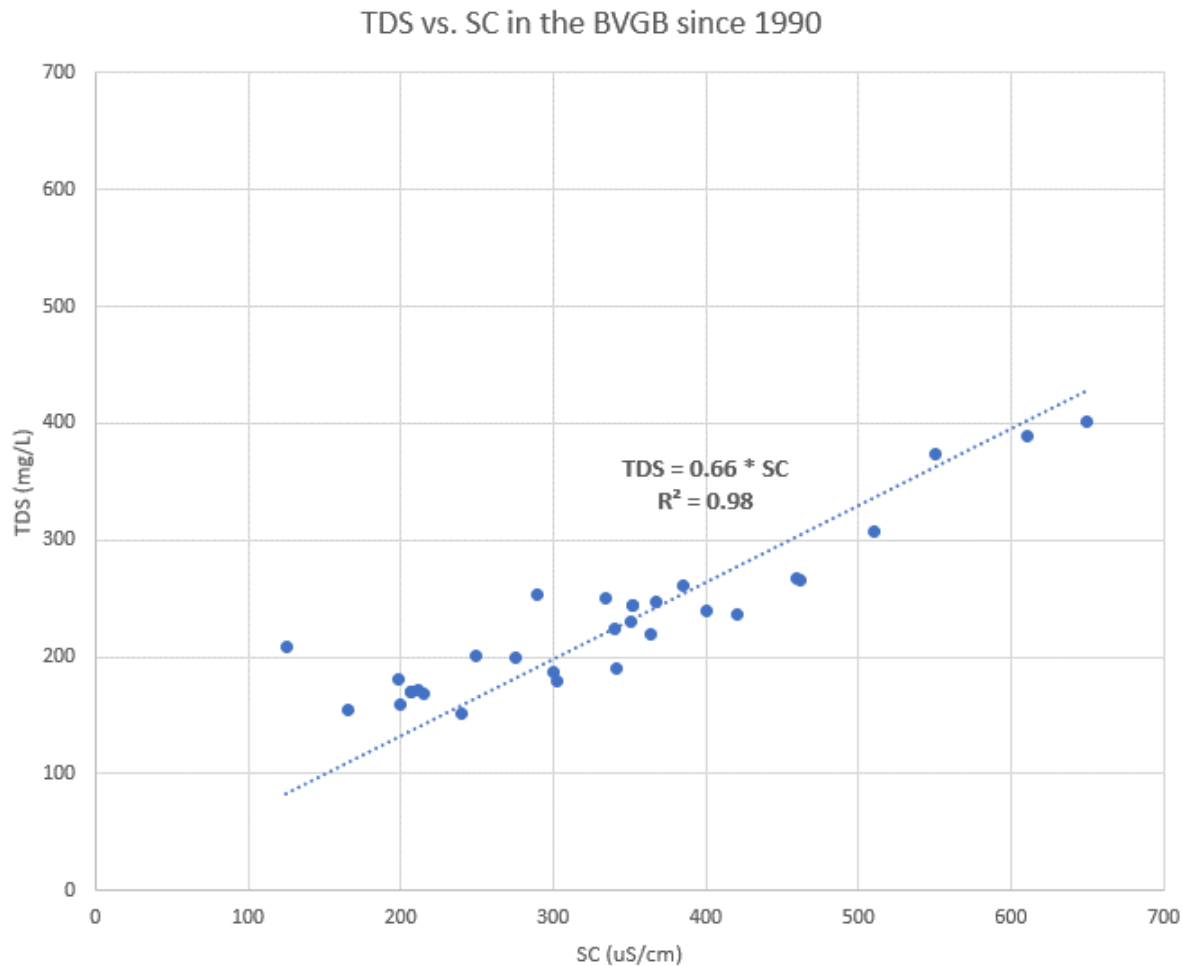


Figure 5-12 Nitrate Concentration 2013-2023

Specific Conductance and Total Dissolved Solids

Specific conductance (SC) is a measure of the water's ability to conduct electricity. TDS is a measure of the total amount of dissolved materials (e.g., salts) in water. For groundwater in the Basin, a linear relationship exists between TDS and SC (Rusydi, A., 2018); therefore, SC is an appropriate and cost-effective proxy to determine the salinity trends in the Basin. SC and TDS are included in this discussion due to the impacts TDS can have on agricultural productivity. **Figure 5-13** shows the concurrent TDS and SC measurements taken at wells in the Basin since 1990. This figure shows the linear relationship between TDS and SC, where TDS (mg/L) is approximately 0.66 times the SC (microsiemens per centimeter [$\mu\text{S}/\text{cm}$]). This ratio falls within the normal range of natural waters (Marandi et al., 2013). The coefficient of determination (R-squared) of the data is 0.98, indicating a strong correlation between TDS and SC in the Basin.



1960

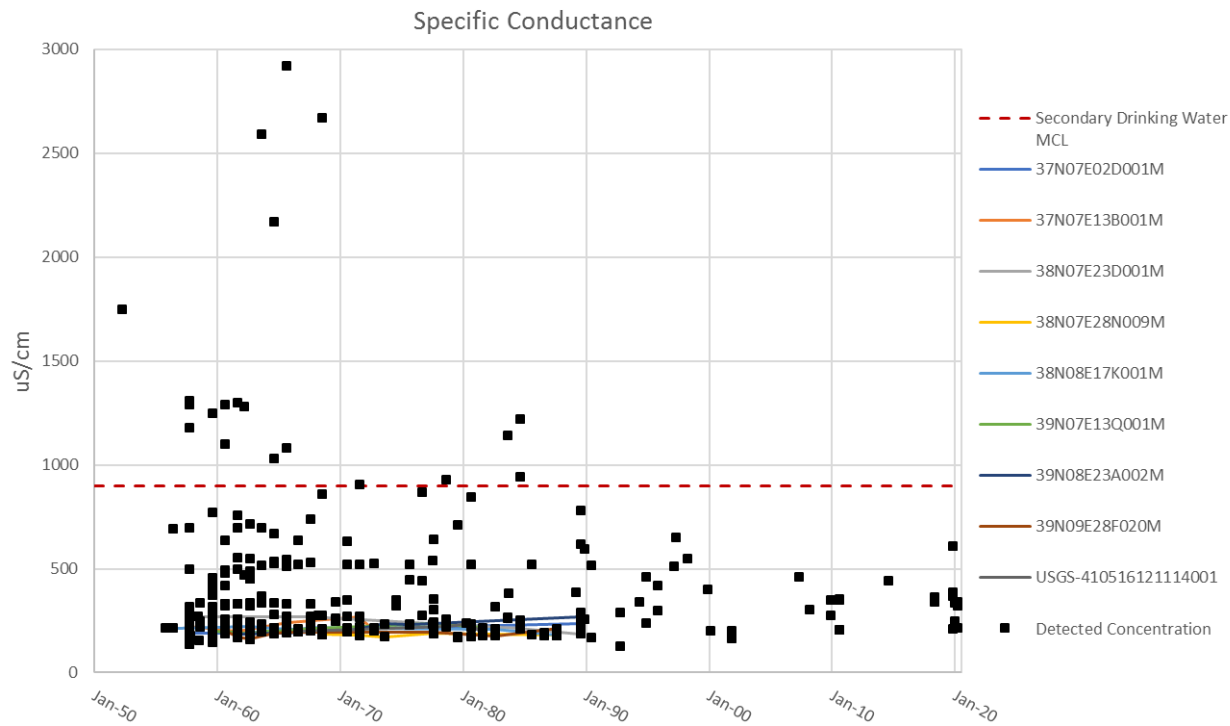
1961 **Figure 5-13 TDS vs. SC in the BVGB since 1990**

1962 Figure 5-14 Specific Conductance Trends **Figure 5-14** and **Figure 5-15** show historical trends of SC
 1963 and TDS, respectively. Wells with single measurements are shown as dots, where wells that had
 1964 multiple measurements are shown as lines. These figures indicate that the number of wells with highly
 1965 elevated concentrations of SC and TDS may have decreased over the last 40 years. **Figure 5-16** and
 1966 **Figure 5-17** show the distribution of SC and TDS concentrations around the Basin. These data show
 1967 that SC and TDS concentrations are generally low across the basin and that wells with sufficient
 1968 historical data do not suggest that there are increasing trends in either constituent.

1969 **Figure 5-18** shows the distribution of TDS concentration around the Basin from 2013 to 2023. Figure 5-
 1970 18 shows that since 2013, TDS concentrations have been less than 400 mg/L, except for one well, which
 1971 had an observed concentration of 479 mg/L in March 2020.

1972
1973
1974

Figure 5-14 Specific Conductance Trends



1975
1976

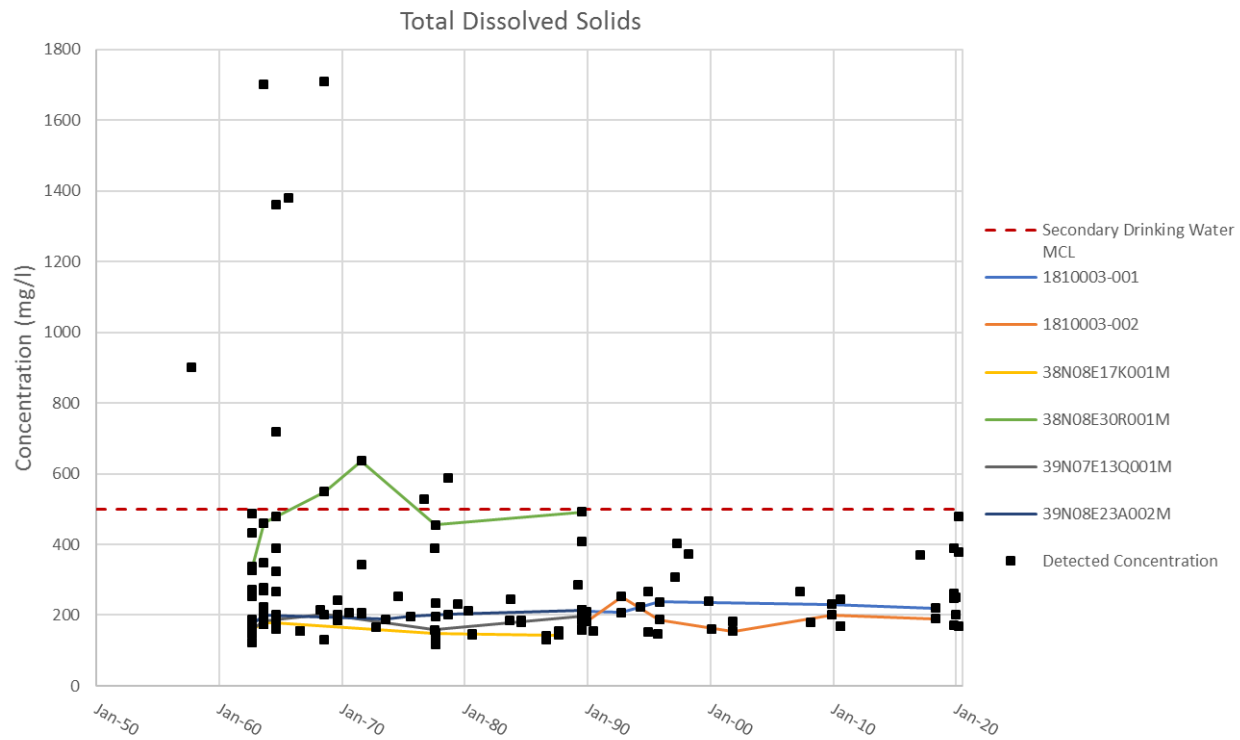
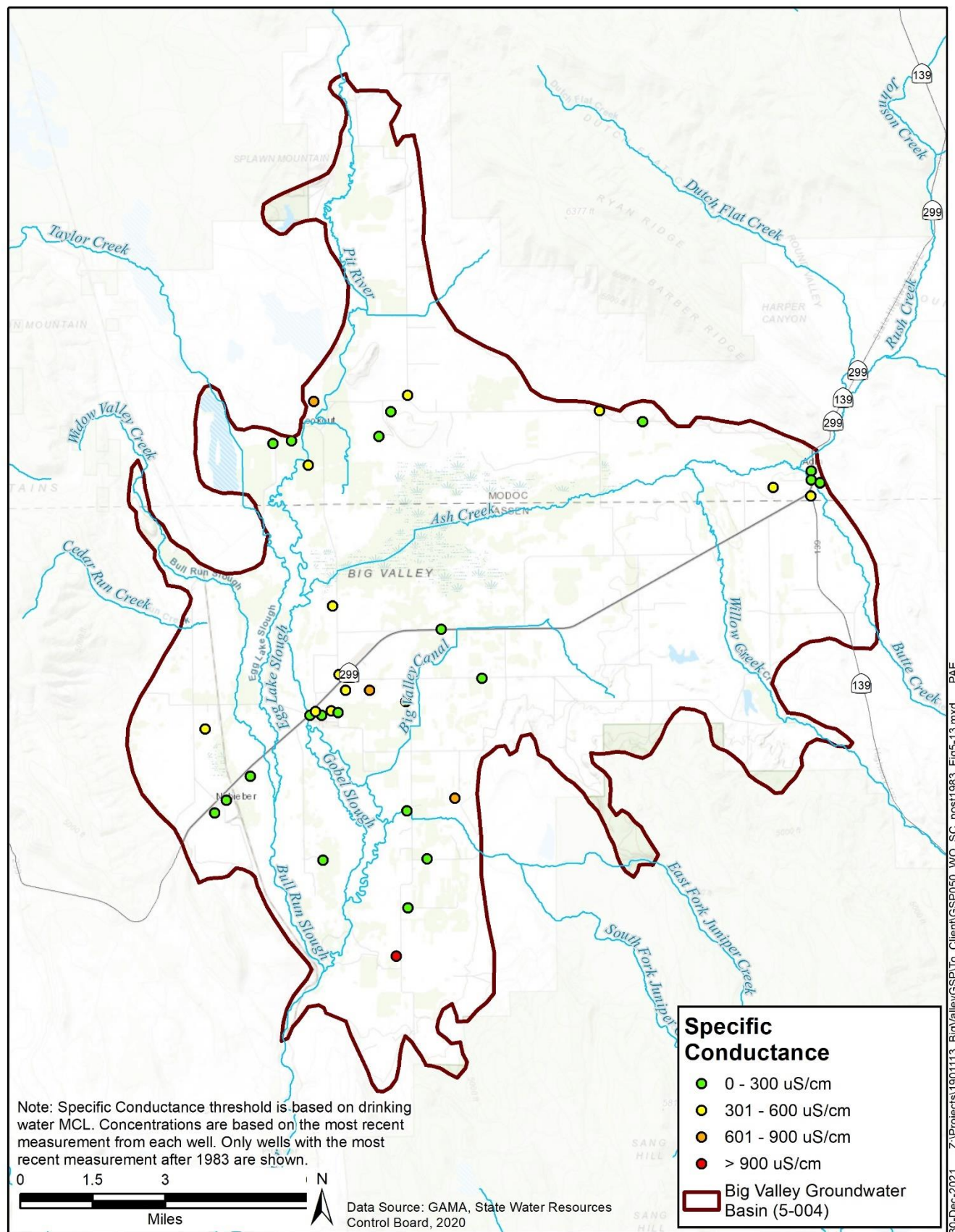


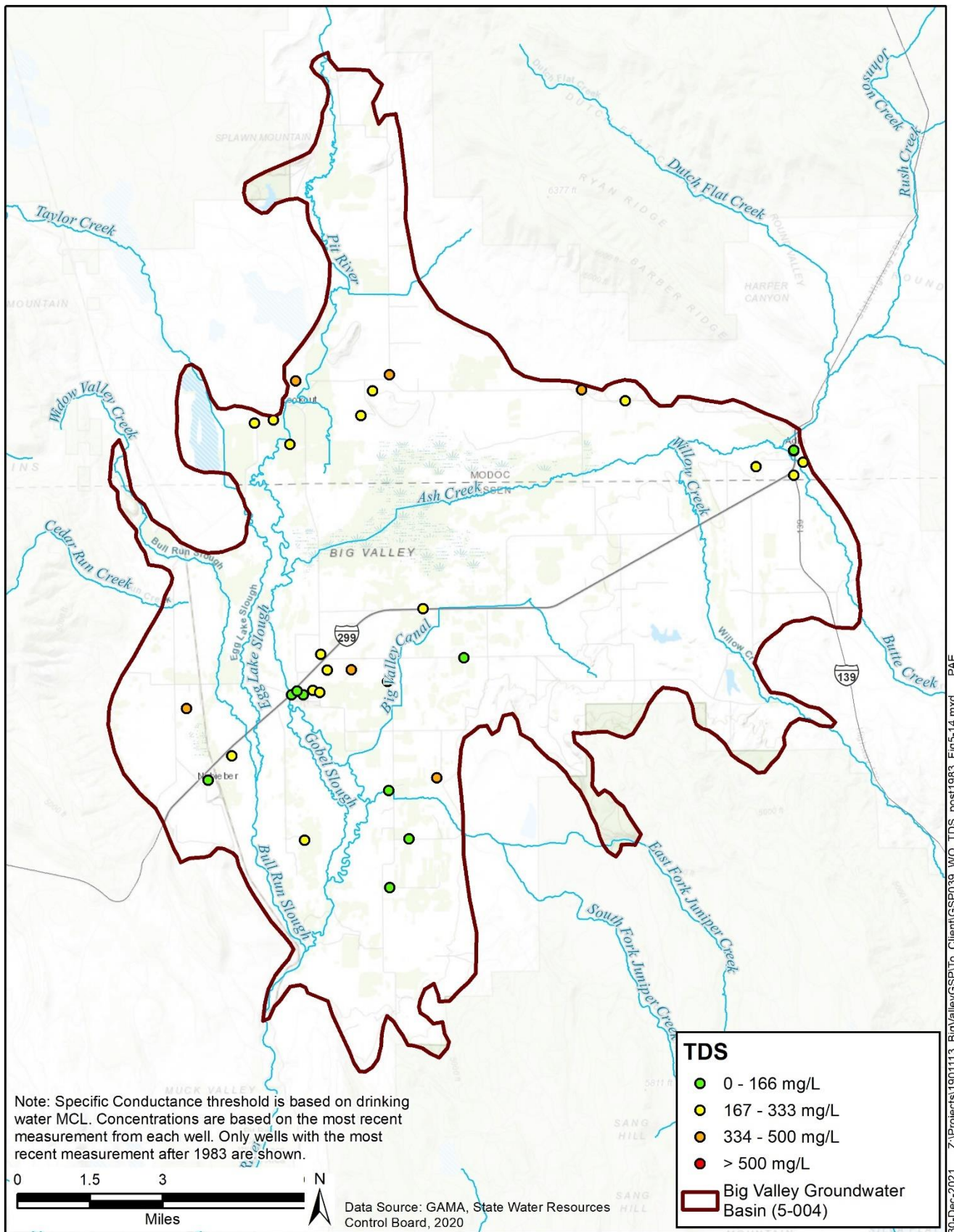
Figure 5-15 TDS Trends

1977
1978



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Figure 5-16 Distribution of Specific Conductance



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Figure 5-17 Distribution of TDS Concentrations

1981

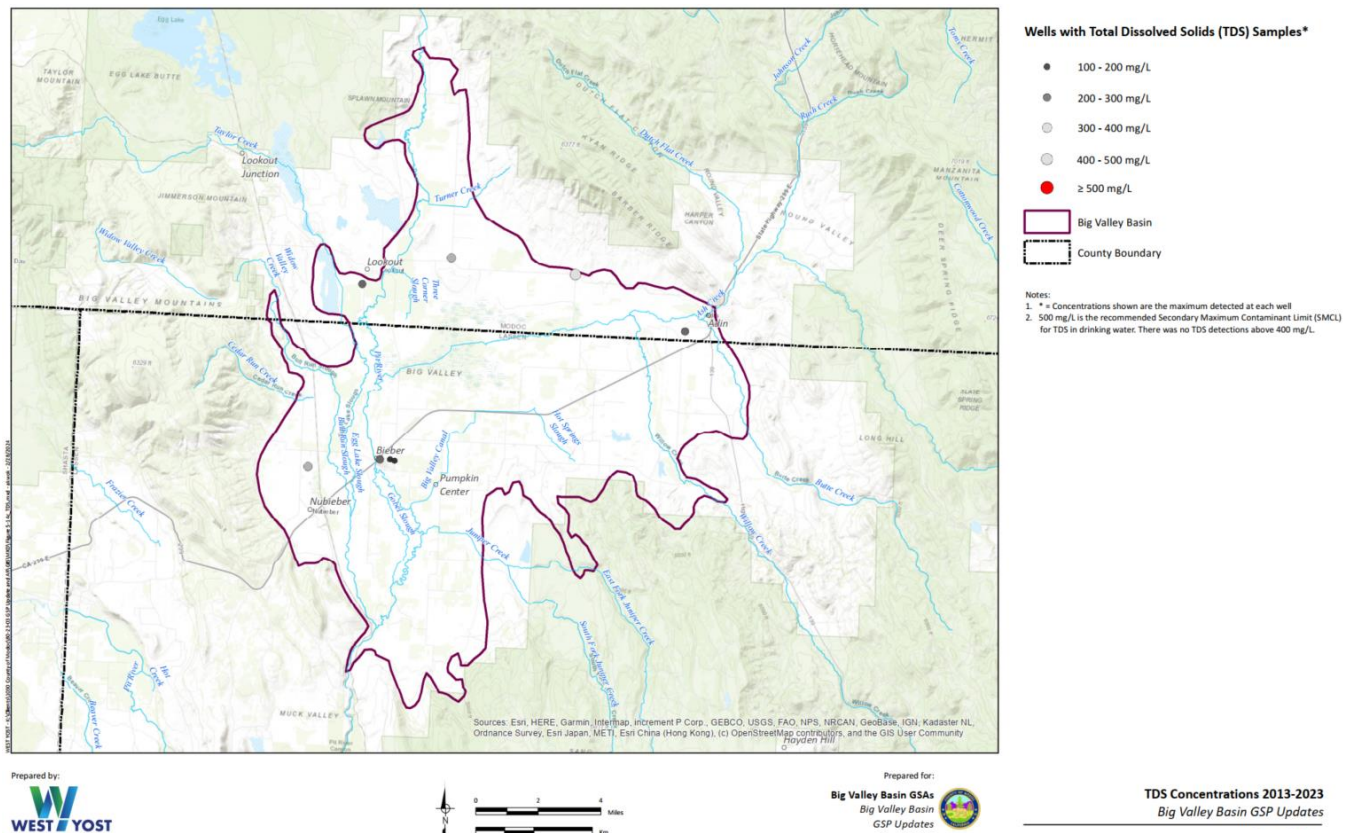


Figure 5-18 TDS Concentration 2013-2023

Perfluorooctanesulfonic Acid (PFOS)

LCWD #1 conducted nine rounds of sampling for several per- and polyfluoroalkyl substances (PFAS) between 2019 and 2022. PFOS, one of the more prevalent PFAS compounds, was detected above the notification level of 6.5 nanograms per liter (ng/L) in both wells (Well 01 and Well 02). The PFOS results exceeding the notification level were as follows:

- 6.9 ng/L in one sample collected on December 12, 2019 from Well 01
- 86 ng/L in one sample on December 12, 2019 from Well 02

The State Water Board assigned the area around these wells as high water quality risk in its 2024 assessment of water quality risks for domestic wells and state small water systems (State Water Board, 2024). However, no PFAS were not detected above the laboratory reporting or method detection limits or were below the notification levels for samples collected before and after these samples. Based on the detection of PFOS in a single sample event, and ubiquitousness of PFAS in commonly used products, the results above the notification level are likely the result of PFOS inadvertently introduced during sample collection, transport or analysis.

1998 **5.4.2 Groundwater Contamination Sites and Plumes**

1999 To determine the location of potential groundwater contamination sites and plumes, the State Water
2000 Board's GeoTracker website was consulted. GeoTracker catalogs known groundwater contamination
2001 sites and waste disposal sites (State Water Board 2020b). A search of GeoTracker identified ten sites
2002 where groundwater could potentially be contaminated. These sites are in the vicinity of Bieber and
2003 Nubieber as listed in **Table 5-5** and shown on **Figure 5-19**. The sites include leaking underground
2004 storage tanks (LUSTs), cleanup program sites, and a land disposal site. Half of the sites are open and
2005 subject to ongoing regulatory requirements. The contaminants are listed in **Table 5-5**, which also gives a
2006 summary of the case history.

2007 Most of the contaminants originated at LUST sites are leaking petroleum hydrocarbons, which are light
2008 non-aqueous phase liquids (LNAPLs). LNAPLs are less dense than water and their solubility is quite
2009 low, meaning that if they reach groundwater, they float on top and generally do not migrate into the
2010 deeper portions of the aquifer. Moreover, many of the constituents can be degraded by naturally
2011 occurring bacteria in soil and groundwater so the hydrocarbons do not migrate far from the LUST sites.
2012 However, MTBE,⁴⁰ TBA,⁴¹ and fuel oxygenates are more soluble in water. Two LUST sites and the
2013 landfill site are subject to long-term monitoring while a fourth site is ready for case closure.

2014 The Bieber Landfill is subject to ongoing semi-annual monitoring of groundwater levels and
2015 groundwater quality at four shallow wells. This monitoring is required by the RWQCB
2016 (Order No. R5-2007-0175) after the formal closure of the landfill in the early 2000s. Trace
2017 concentrations of several organic constituents⁴² have been detected at MW-1, the closest downgradient
2018 well to the site, but rarely at the other three wells. Higher concentrations of inorganic constituents (e.g.,
2019 TDS, SC, others) are also present at MW-1. During 2019, the landfill was also required to analyze
2020 groundwater samples from MW-1, MW-2, and MW-4 for per/polyfluoroalkyl substances (PFAS), which
2021 are an emerging group of contaminants that are being studied for their effect on human health and may
2022 be subject to very low regulatory criteria (parts per trillion). Fifteen of 28 PFASs were detected at MW-
2023 1, and nine of 28 PFASs were detected at MW-4 (none at MW-2). The State Water Board/RWQCB
2024 evaluation of these data is still pending.

⁴⁰ Methyl tert-butyl ether (MTBE) is a fuel additive that was used starting in 1979 and was banned in California after 2002. MTBE is sparingly soluble in water and has a primary MCL of 13 ug/l for human health and a secondary MCL of 5 ug/l for aesthetics.

⁴¹ tert-Butyl alcohol (TBA) is also a fuel additive and is used to produce MTBE. TBA does not have a drinking water MCL in California.

⁴² 1,1-dichloroethane, 1,4-dichlorobenzene, cis-1,2-dichloroethylene, benzene, chlorobenzene, MTBE, 2,4,5-trichlorophenoxyacetic acid

2025

Table 5-5 Known Potential Groundwater Contamination Sites in the BVGB

GeoTracker ID	Latitude	Longitude	Case Type	Status	Last Regulatory Activity	Case Begin Date	Potential Contaminants of Concern	Site Summary
T10000003882	41.12050	-121.14605	LUST Cleanup Site	Open - Assessment & Interim Remedial Action	04/16/20	10/17/11	Benzene, Diesel, Ethylbenzene, Total Petroleum Hydrocarbons (TPH), Xylene	The case was opened following an unauthorized release from an UST(s). Tank removal and further site assessment, including installation of 8 monitoring wells, led to remedial actions. Periodic groundwater monitoring started in October 2013 and has been ongoing through March 2020.
T0603593601	41.13230	-121.13070	LUST Cleanup Site	Open - Remediation	07/29/20	03/22/00	Gasoline	Active gas station with groundwater impacts. Full-scale remediation via groundwater extraction and treatment began in September 2013 and was shut down in April 2017 because it was determined that it was no longer an effective remedy to treat soil and groundwater. At the time of system shutdown, the influent MTBE concentration was 5,650 micrograms per liter which exceeds the Low-Threat Closure Policy criteria. Additionally, high levels of TPHg and sheen/free product are present. A soil vapor extraction system operated for a limited time in 2016/2017 but was not effective. In April 2018, it was determined that active remediation is not a cost-effective path to closure given low permeability of site soils. Staff suggested incorporating institutional controls (IC) and risk-based cleanup objectives instead of active remediation of soil and groundwater. The IC approach was dependent on the submittal of several documents related to soil management, deed restriction, risk modeling and annual groundwater sampling. This information has not been provided, and the RWQCB sent an Order for this information.
T0603500006	41.12241	-121.14128	LUST Cleanup Site	Completed - Case Closed	01/04/00	06/28/99	Diesel	A 2000-gallon UST was removed, and limited contaminated soil was present in the excavation. Petroleum hydrocarbons were not found in the uppermost groundwater. These findings led to the closure of the case.
L10005078943	41.12941	-121.14169	Land Disposal Site	Open - Closed facility with Monitoring*	06/26/20	06/30/08	Higher levels of Inorganic constituents, organic chemicals (synthetic), per/polyfluoroalkyl substances	Disposal activities at Bieber Landfill occurred from the early 1950s until 1994. The landfill was closed during the early 2000s. While active, the site received residential, commercial, and industrial non-hazardous solid waste. Formerly an unlined burn dump, the site was converted to cut-and-cover landfill operation in 1974. Landfill refuse is estimated to occupy less than 13 acres of the 20-acre site. Wastes are estimated to be approximately 10-15 feet thick. The Class III landfill was closed in accordance with Title 27 of the California Code of Regulations. A transfer station was established at the site for the transportation of waste to another landfill. Groundwater levels and quality are monitored twice per year at 4 wells.
T0603500003	41.12124	-121.14061	LUST Cleanup Site	Completed - Case Closed	09/13/94	07/31/91	Heating Oil / Fuel Oil	A 1000-gallon UST was removed, and contaminated soil was present beneath the tank, which led to installation of nine soil borings and three monitoring wells. Contaminated soil was removed but an adjacent building limited the extent of the excavation so contaminated soil remains under the building. Hydrocarbons were initially found in 1 well but not in subsequent sampling. The RWQCB concurred with a request to close the investigation.
T10000003101	41.13151	-121.13658	Cleanup Program Site	Open - Assessment & Interim Remedial Action	07/22/20	04/03/07	Benzene, Toluene, Xylene, MTBE / TBA / Other Fuel Oxygenates, Gasoline, Other Petroleum	A diesel leak was found in association with an industrial chipper. Corrective action included excavation of diesel-impacted soil, removing contaminated water and groundwater monitoring. Results of soil and groundwater sampling indicate low concentrations of TPHg and BTEX and that there is no offsite migration. Staff have determined that the case is ready for closure, pending decommissioning of the site monitoring wells.
SL0603581829	41.09251	-121.17904	Cleanup Program Site	Completed - Case Closed	09/01/05	01/08/05	Petroleum - Diesel fuels, Petroleum - Other	Contaminated soil excavated and transported to Forward Landfill for disposal. Contaminated groundwater (7,000 gallons) extracted with vacuum truck for disposal.
T0603500002	41.12188	-121.13546	LUST Cleanup Site	Completed - Case Closed	07/17/06	10/20/86	Gasoline / diesel	Three USTs were removed, and contaminated soil was present beneath the tank, which led to installation of nine monitoring wells and three remediation wells. Natural attenuation of the hydrocarbon impact was acceptable to the RWQCB due to the limited, well-defined extent of the impact and the limited and declining impact to groundwater. The RWQCB concurred with a request to close the site.
T0603500004	41.12134	-121.13547	LUST Cleanup Site	Completed - Case Closed	03/12/99	06/12/97	Diesel	A 5000-gallon UST was removed and very low levels of petroleum hydrocarbons were detected in the soil, which was allowed to be spread onsite and the case was closed.
T10000002713	41.11993	-121.14271	Cleanup Program Site	Open - Site Assessment	12/30/16	03/10/10	Other Petroleum	The site is an old bulk plant which was built in the 1930s and handled gasoline and diesel. During a routine inspection in March 2010, evidence of petroleum spills were identified at the loading dock area. A follow-up inspection was conducted in April 2010. The ASTs and loading dock were removed but additional contamination was noted under the removed structures. Furthermore, a shallow excavation contained standing water with a sheen. Due to the potential impacts to shallow groundwater, the Regional Water Board became the lead agency in December 2010. Additional information was requested in December 2016. A response is not evident.

*This terminology indicates that the landfill is closed (no new material being disposed), but the site is open with regard to ongoing groundwater monitoring.

Source: GeoTracker (State Water Board 2020b)

MTBE = Methyl tert-butyl ether; TBA = tert-Butyl alcohol

2026
2027
2028

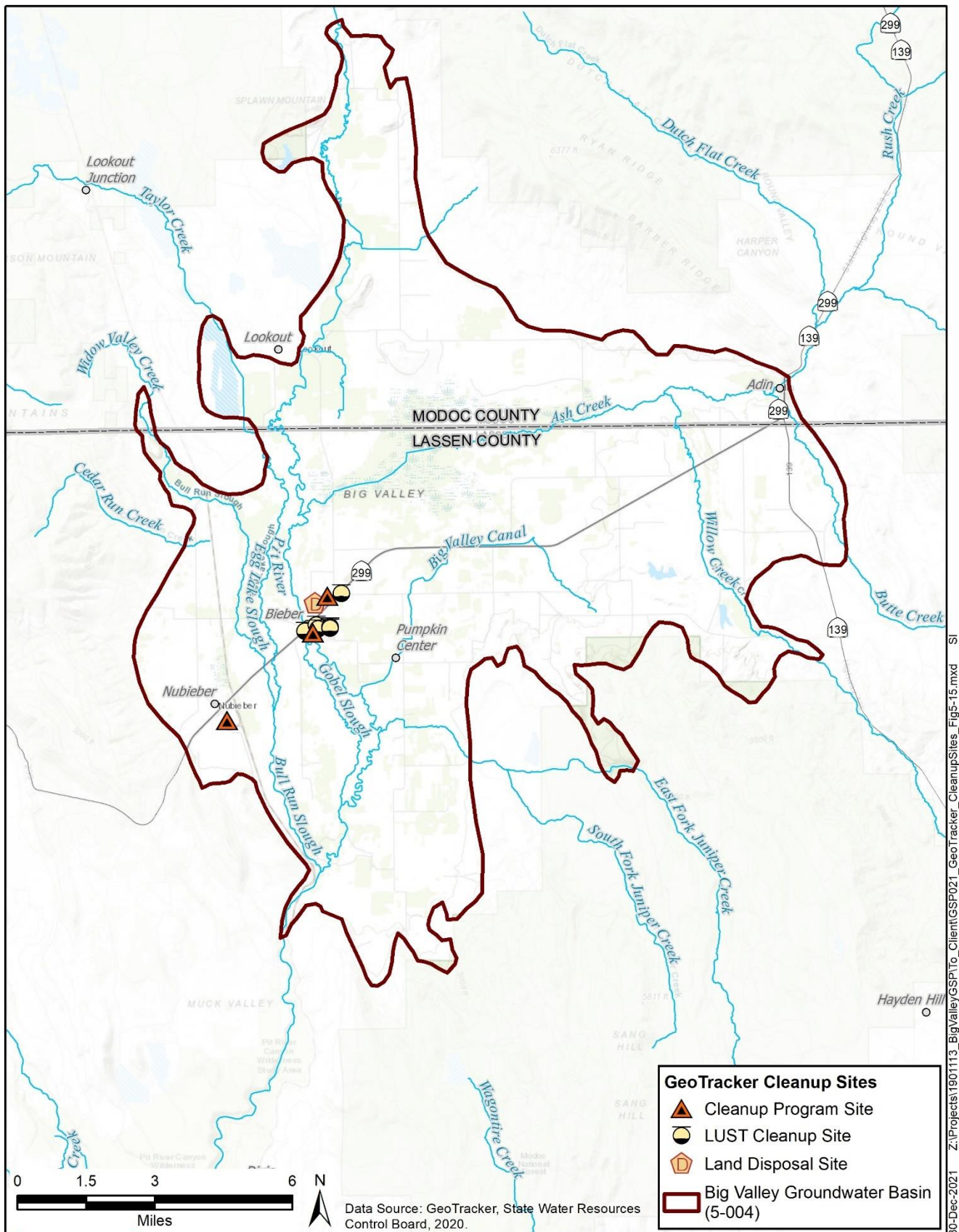


Figure 5-19 Location of Known Potential Groundwater Contamination Sites

5.5 Subsidence

Vertical displacement of the land surface (subsidence) is comprised of two components: 1) elastic displacement which fluctuates according to various cycles (daily, seasonally, and annually) due to temporary changes in hydrostatic pressure (e.g., atmospheric pressure and changes in groundwater levels) and 2) inelastic displacement or permanent subsidence which can occur from a variety of natural and human-caused phenomena. Lowering of groundwater levels can cause prolonged and/or extreme decrease in the hydrostatic pressure of the aquifer. This decrease in pressure can allow the aquifer to compress, primarily within fine-grained beds (clays). Inelastic subsidence cannot be restored after the hydrostatic pressure increases. Other causes of inelastic subsidence include natural geologic processes (e.g., faulting) and the oxidation of organic rich (peat) soils as well as human activities such as mining and grading of land surfaces.

Subsidence can be measured by a variety of methods, including:

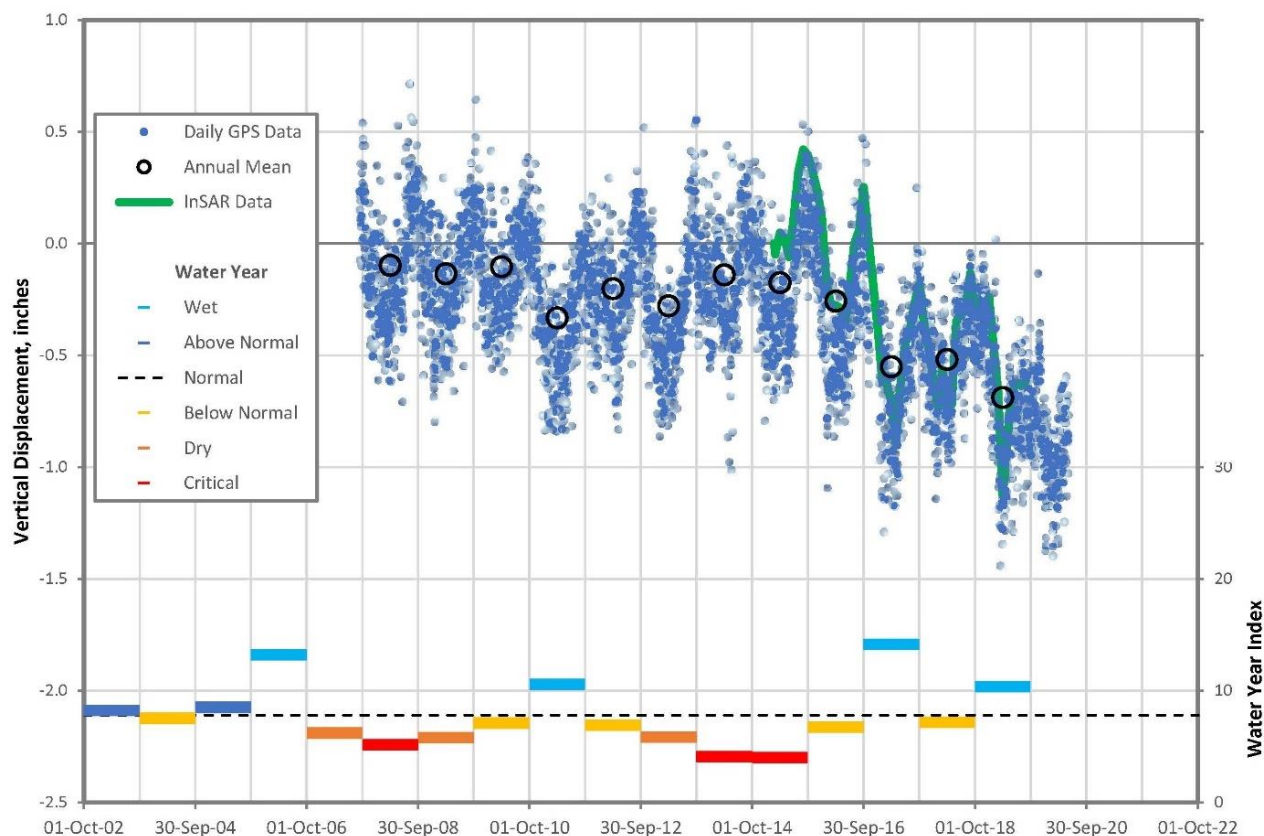
- Regular measurements of any vertical space between the ground surface and the concrete pad surrounding a well. If space is present and increasing over time, subsidence may be occurring at that location. If a space is not present, subsidence may not be occurring, or the well is not deep enough to show that subsidence is occurring because the well and ground are subsiding together.
- Terrestrial (ground-based) surveys of paved roads and benchmarks.
- Global Positioning Survey (GPS) of benchmarks. GPS uses a constellation of satellites to measure the 3-dimensional position of a benchmark. The longer the time that the GPS is left to collect measurements, the higher the precision. Big Valley has one continuously operating GPS (CGPS) station near Adin.
- Monitoring of specially constructed “extensometer” wells. There are no extensometers in the BVGB.
- Use of InSAR, which is microwave-based satellite technology that has been used to evaluate ground surface elevation and deformation since the early 1990s. InSAR can document changes in ground elevation between successive passes of the satellite. Between 2015 and 2019, InSAR was used to evaluate subsidence throughout California, including Big Valley.

Subsidence was recognized as an important consideration in the 2007 LCGMP (Brown and Caldwell 2007) but was not identified as an issue for Big Valley specifically. The analysis in the LCGMP was based on indirect observations (groundwater levels) and anecdotal information. This section presents additional data that has become available since the development of the LCGMP.

5.5.1 Continuous GPS Station P347

A CGPS station (P347) was installed at the CalTrans yard near Adin in September 2007. The station is part of the Plate Boundary Observatory, which is measuring 3-dimensional changes in the Earth surface due to the movement of tectonic plates (e.g., Pacific and North American plates).

2067 **Figure 5-20** is a plot of the vertical displacement at P347 and shows a slight decline (0.6 inch) over the
 2068 first 11 years of operation, based on the annual mean values (large black open circles). Daily values
 2069 (blue dots) show substantial variation, as much as an inch, but more typically only 0.1 inch on average.
 2070 This scattering of daily values around the annual mean provides an indication of the elastic nature of the
 2071 displacement. The overall decline of 0.6 inch is an indication of inelastic displacement has occurred over
 2072 an 11-year period, which equates to a rate of -0.05 inch per year at this location near Adin.



2073
 2074 **Figure 5-20 Vertical Displacement at CGPS P347**

2075 5.5.2 Interferometric Synthetic Aperture Radar

2076 **Figure 5-21** is a map of InSAR data made available by DWR for the 4.3-year period between June 2015
 2077 and September 2019. The majority of Big Valley was addressed by this InSAR survey, although the
 2078 survey excludes some areas (shown in white on **Figure 5-21**), including much of the Big Swamp
 2079 (ACWA), areas along the Pit River near Lookout, and areas south of Bieber. The accuracy of this type
 2080 of InSAR data in California has been calculated at 18mm (0.7 inches) at a 95% confidence level (Towill
 2081 2021). Most of the survey shows downward displacement between 0 and -1 inch throughout Big Valley.
 2082 This small displacement is close to the level of accuracy of the data, but if true is likely due to natural
 2083 geologic activities due to its widespread nature.

2084 Two localized areas of subsidence exceeding -1.5 inches are apparent from this data, one in the east-
 2085 central portion of the Basin north of Highway 299 and one in the southern portion of the Basin between
 2086 the Pit River and Bull Run Slough. Maximum downward displacement in the Basin is -3.3 inches, over

2087 the 4.3-year period. Some of the downward displacement in the Basin may be due to laser leveling of
2088 fields, particularly for production of wild rice.

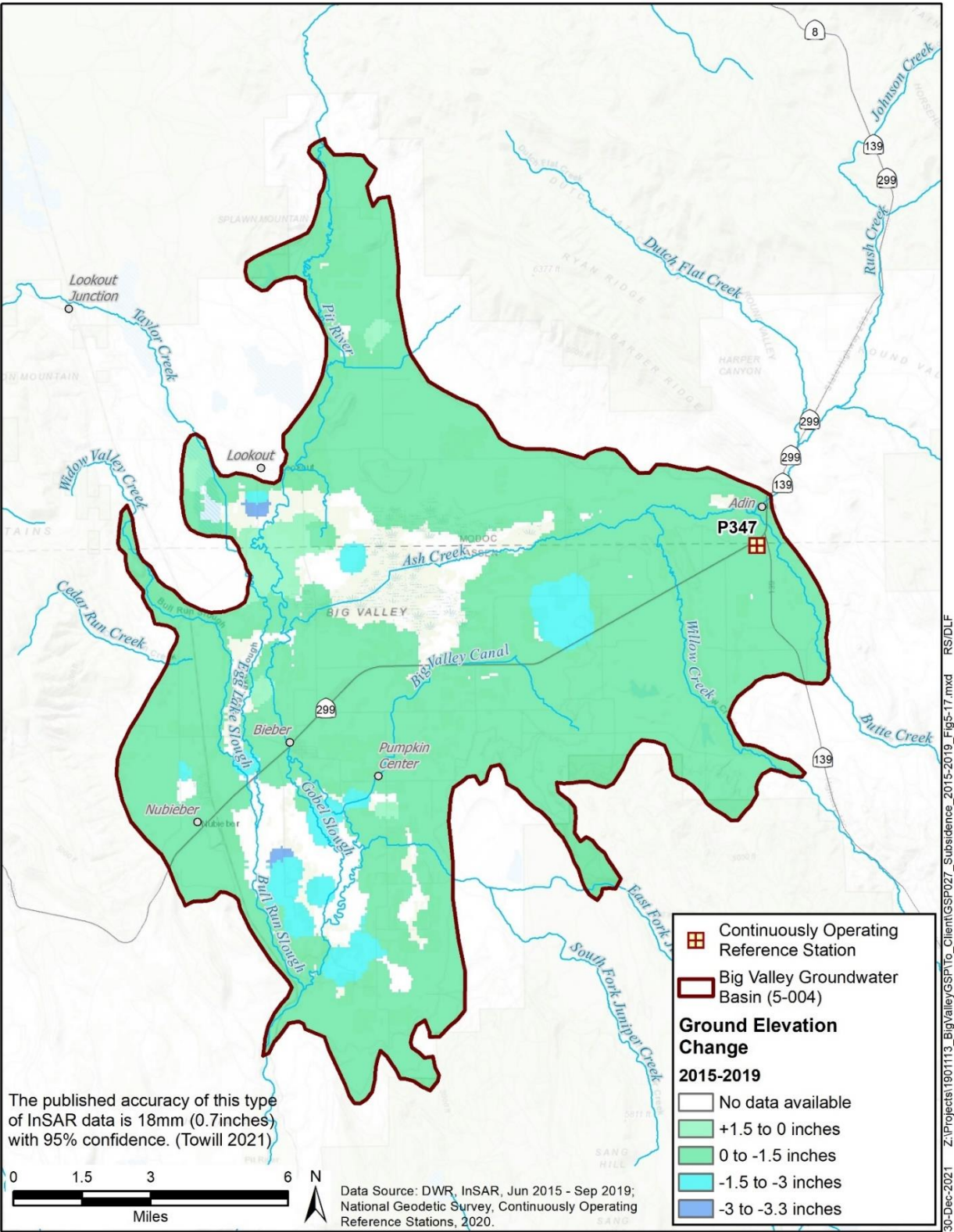


Figure 5-21 InSAR Change in Ground Elevation 2015 to 2019

2091 **5.6 Interconnected Surface Water**

2092 Interconnected surface water refers to surface water that is “hydraulically connected at any point by a
2093 continuous saturated zone to the underlying aquifer and the overlying surface water is not completely
2094 depleted” (DWR 2016c). For the principal aquifer to be interconnected to surface-water streams,
2095 groundwater levels need to be near ground surface. As a first determination of where surface water *may*
2096 be interconnected, **Figure 5-22** shows the major⁴³ streams in the Basin which have groundwater levels
2097 near ground surface, with a depth to water of less than 15 feet based on spring 2015 groundwater
2098 contours. These areas *may* have the potential to be interconnected with surface water.

2099 Interconnected streams can be gaining (groundwater flowing toward the stream) or losing (groundwater
2100 flowing away from the stream). Preliminary data from the shallow monitoring well clusters⁴⁴ give an
2101 indication the direction of shallow groundwater flow adjacent to streams in two locations in the Basin as
2102 shown by the black arrows on **Figure 5-22**.

2103 Section §354.16(f) of the regulations require an estimate of the “quantity and timing of depletions of
2104 [interconnected surface water] systems, utilizing...best available information.” The existence and
2105 quantity cannot be determined with any reasonable level of accuracy using empirical data, so the best
2106 available information is presented in Chapter 6 – Water Budget. The timing of depletions also cannot be
2107 determined with existing data.

2108 **5.7 Groundwater-Dependent Ecosystems**

2109 SGMA requires GSPs to identify groundwater-dependent ecosystems (GDEs) but does not explicitly
2110 state the requirements that warrant a GDE designation. SGMA defines a GDE as “ecological
2111 communities or species that depend on groundwater emerging from aquifers or on groundwater
2112 occurring near the ground surface” (DWR 2016c). GDEs are considered a beneficial use of groundwater.

2113 The most comprehensive and readily accessible data to identify GDEs is referred to as the NCCAG⁴⁵
2114 dataset. Upon inspection of the data,⁴⁶ many inaccuracies were noted. The abstract of the dataset
2115 documentation reads:

2116 The Natural Communities dataset is a compilation of 48 publicly available
2117 State and federal agency datasets that map vegetation, wetlands, springs,
2118 and seeps in California. A working group comprised of DWR, the California
2119 Department of Fish and Wildlife (CDFW), and The Nature Conservancy
2120 (TNC) reviewed the compiled dataset and conducted a screening process to
2121 exclude vegetation and wetland types less likely to be associated with

⁴³ Named streams from the National Hydrography Dataset [NHD] (USGS 2020a)

⁴⁴ The clusters are sets of three wells drilled in close proximity to each other for the purpose of determining shallow groundwater flow direction and gradient. At the time of writing this draft chapter, 2 clusters have enough data to determine flow direction; one cluster near Adin and one cluster near Lookout. **Appendix 5C** contains data collected at the two clusters and their flow directions.

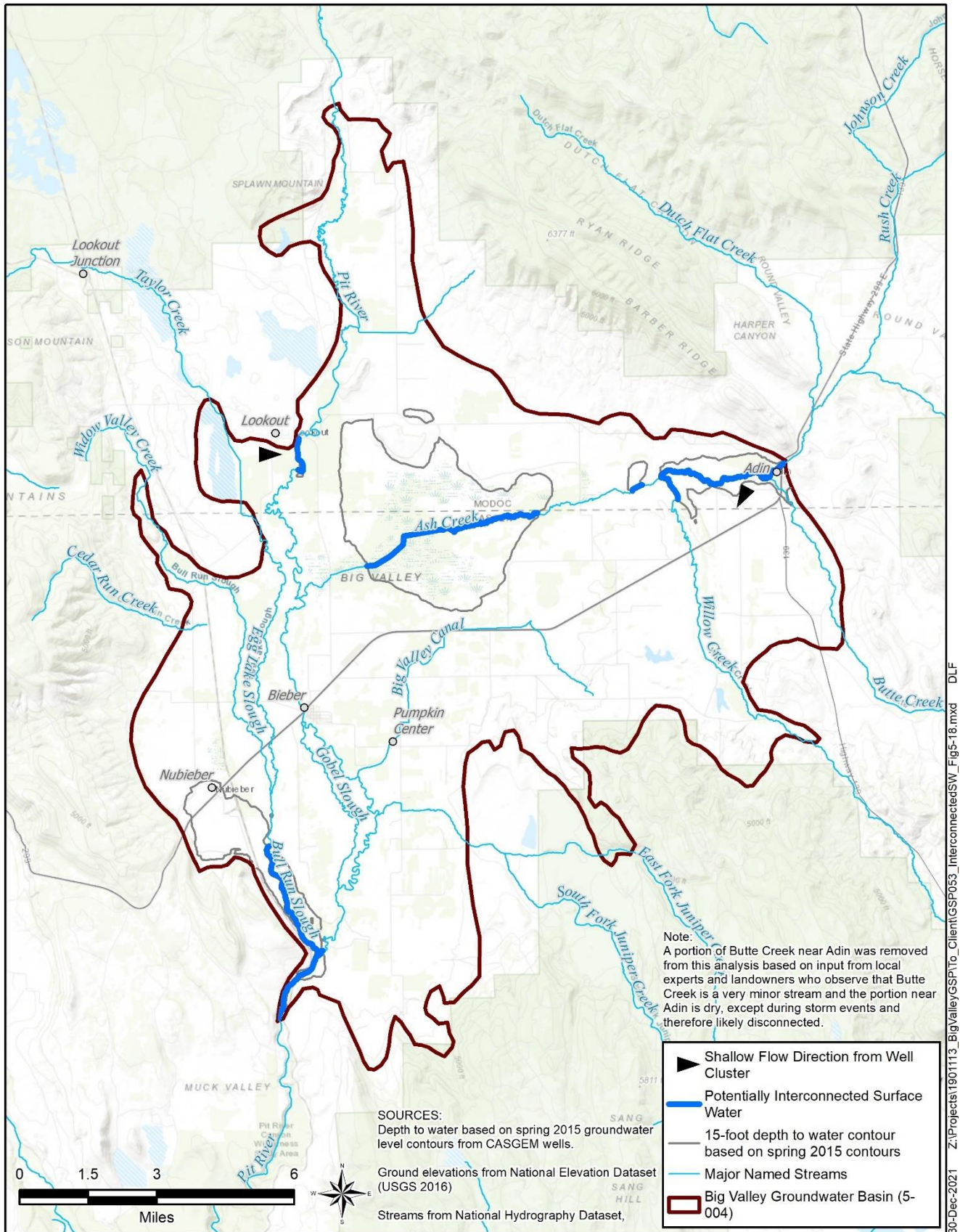
⁴⁵ Natural communities commonly associated with groundwater

⁴⁶ By local landowners and local experts familiar with the Basin and its ecological communities.

2122 groundwater and retain types commonly associated with groundwater,
2123 based on criteria described in Klausmeyer et al. (2018).

2124 Two habitat classes are included in the Natural Communities dataset:
2125 (1) wetland features commonly associated with the surface expression of
2126 groundwater under natural, unmodified conditions; and (2) vegetation types
2127 commonly associated with the sub-surface presence of groundwater
2128 (phreatophytes).

2129 The data included in the Natural Communities dataset do not represent
2130 DWRs determination of a GDE. However, the Natural Communities dataset
2131 can be used by GSAs as a starting point when approaching the task of
2132 identifying GDEs within a groundwater basin. (DWR 2018a)



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2133
2134

Figure 2-22 Potentially Interconnected Surface Water

2135 The NCCAG geospatial data (DWR 2018a) is separated into two categories: wetlands and vegetation,
2136 respectively.

2137 The Wetlands area is subdivided into two primary habitats present in Big Valley: palustrine⁴⁷ and
2138 riverine.⁴⁸ Palustrine is the dominant habitat at 96 percent of the total wetland area, while riverine is
2139 present at four percent and occurs along river courses. Sixteen springs account for a very small area.
2140 Most of the springs are in Lassen County (13), although numerous springs are located outside the
2141 BVGB boundary.

2142 The Vegetation area is subdivided into two primary habitats, based on the plant species. Wet Meadows
2143 was the largest primary habitat at 59 percent of the vegetation area, but there was no dominant species.
2144 Willow was the second largest habitat at 41 percent of the vegetation area.

2145 For the NCCAG areas to be designated as actual GDEs, the groundwater level needs to be close enough
2146 to the ground surface that it would support the vegetation. For determining potential GDEs, fall 2015⁴⁹
2147 depth to water is used, because mid-summer months are the critical limiting factor for plant
2148 communities. Furthermore, if groundwater moisture isn't available later in the summer, then the
2149 groundwater dependent communities don't have an advantage over communities that are typically not
2150 associated with groundwater, such as sagebrush, juniper, and bunchgrass (Lile 2021).

2151 The depth to water that could potentially be accessed by GDEs depends on the rooting depth of the
2152 vegetation. An assessment of native plants in the BVGB found that maximum rooting depths of species
2153 present is 10 feet as shown in **Table 5-6**. Access to groundwater by plant roots extends above the water
2154 table because the groundwater is drawn upward to fill soil pores, and this zone is known as the capillary
2155 fringe. The thickness of the capillary fringe extends upward several feet, depending on the soil type.

2156 **Table 5-6 Big Valley Common Plant Species Rooting Depths**

Species	Rooting Depth
Carex spp.	Up to 5 feet
Alfalfa	9 feet
Aspen	10 feet and less
Willow	2-10 feet
Elderberry	10 feet and less
Saltgrass	2 feet
Sources: CNPS 2020, TNC 2020, Snell 2020	

2157

2158 As a conservative estimate, a capillary fringe of 10 feet is used. In order for plants to access the water
2159 and thrive, not just barely touch, there needs to be significant overlap (of several feet) between the
2160 rooting depth and the capillary fringe (Lile 2021). Furthermore, while roots may extend to a deep level,

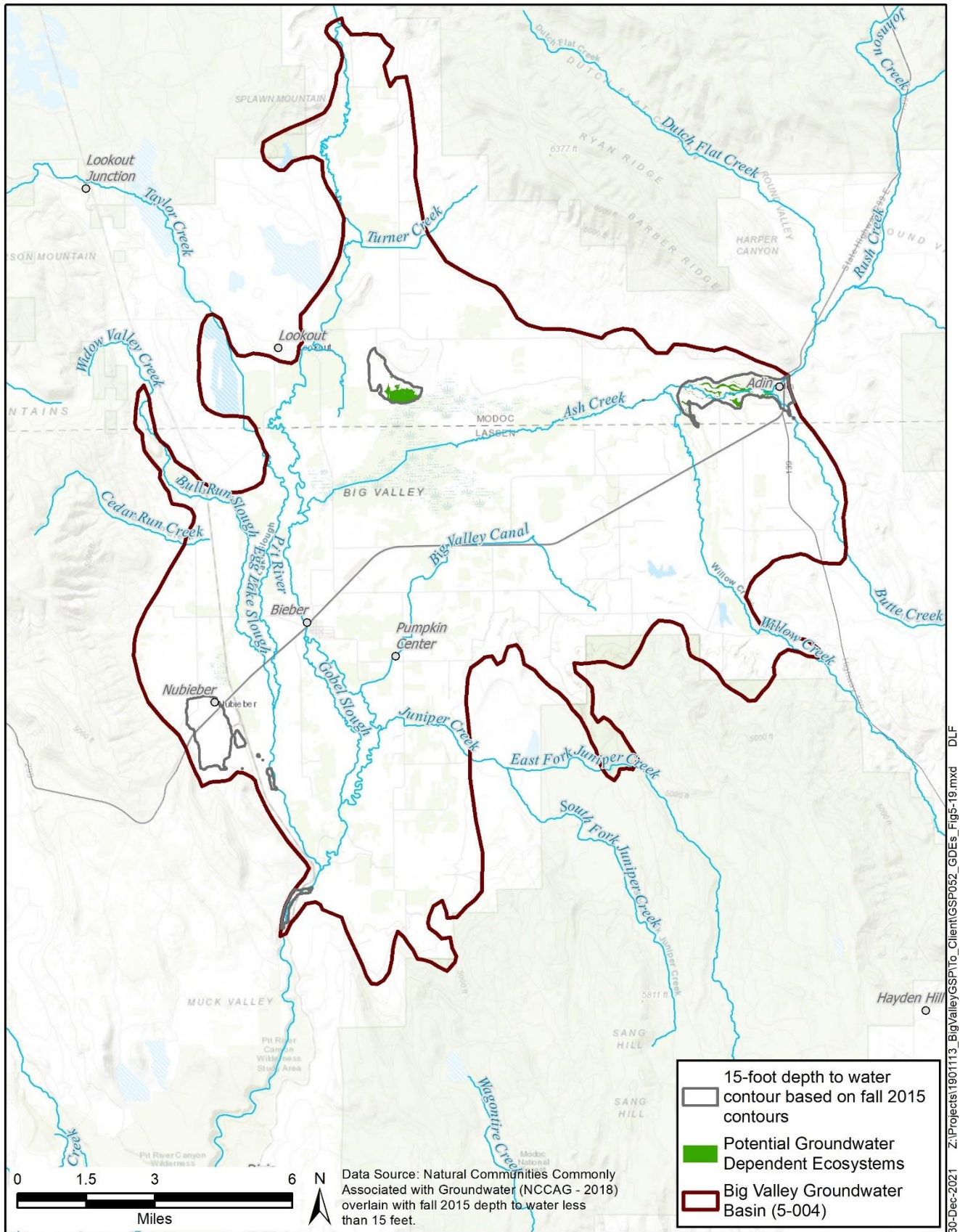
⁴⁷ Palustrine are freshwater wetlands, such as marshes, swamps and bogs, not associated with flowing water (Cowardin et al. 2013).

⁴⁸ Riverine are freshwater wetlands located in or near a flowing stream (Cowardin et al. 2013).

⁴⁹ 2015 is used because it is the baseline for SGMA.

2161 documentation of maximum depth to water for some of the deep-rooting species in **Table 5-6** to thrive is
2162 on the order of 2-3 meters (6-9 feet) (Pezeshki and Shields 2006, Springer et. al. 1999). Therefore, as a
2163 conservative estimate for the purposes of delineating GDEs, only those areas in the NCCAG datasets
2164 that are in areas with fall 2015 groundwater less than 15 feet are classified as potential GDEs.

2165 **Figure 5-23** shows the area with potential GDEs, which is a preliminary assessment and needs to be
2166 ground-truthed. Moreover, the data are inaccurate in many places.



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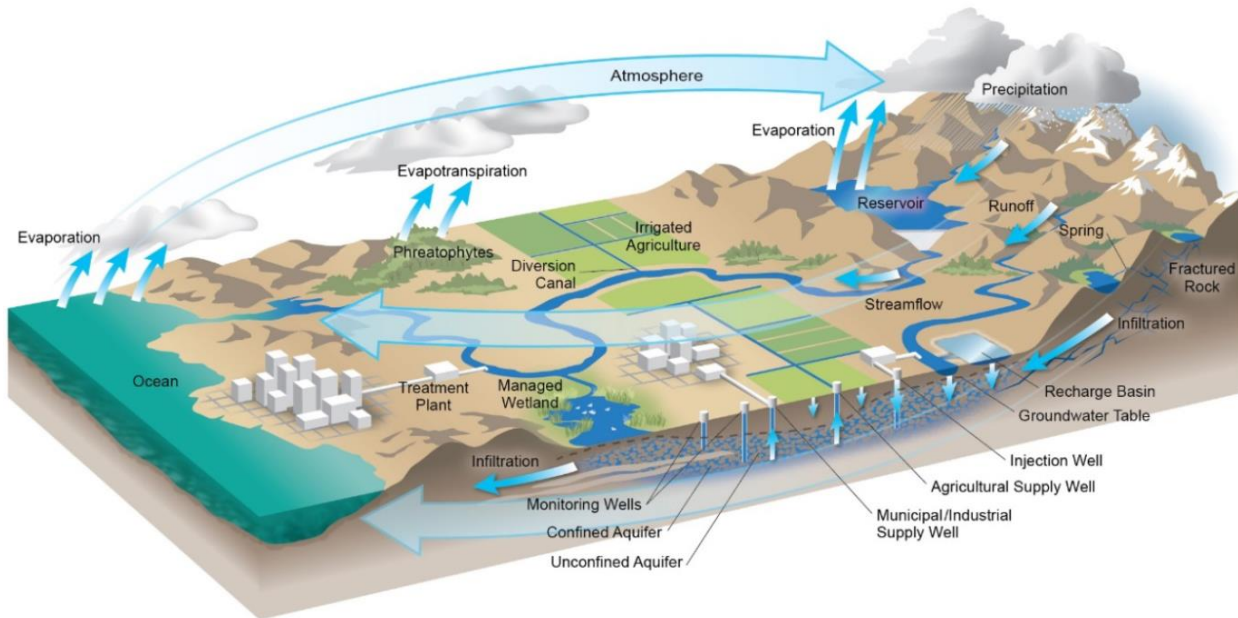
Figure 5-23 Potential Groundwater-Dependent Ecosystems

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6. Water Budget § 354.18

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The hydrologic cycle describes how water is moved on the earth among the oceans, atmosphere, land, surface-water bodies, and groundwater bodies. **Figure 6-1** is a depiction of the hydrologic cycle.



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Figure 6-1 Hydrologic Cycle

A water budget accounts for the movement of water among the four major systems in Big Valley: atmospheric, land surface, surface water, and groundwater. The BVGB consists of the latter three systems (land surface, surface water, and groundwater) as shown by the black outline on **Figure 6-2**. This figure shows the exchange between the systems and identifies the specific components of the water budget. The systems and the flow arrows are color coded. Inflows to the BVGB are shown with blue arrows, and outflows from the BVGB are shown with orange arrows. Flows between the systems are shown with green arrows, and flows within a system are shown in purple. The land system, surface-water system, and groundwater system are green, blue, and brown respectively.

Like a checking account, a water budget helps the GSA and stakeholders better understand the deposits and withdrawals and identify what conditions result in positive and negative balances. It should be noted that the development of a water budget is required by the GSP regulations, but the regulations don't require actions based directly on the water budget. Actions are only required based on outcomes related to the six sustainability indicators: groundwater levels, groundwater storage, water quality, subsidence, seawater intrusion, and surface-water depletions. Therefore, a water budget should be viewed as a tool to develop a common understanding of the Basin and a basis for making decisions to achieve sustainability and avoid undesirable results with the sustainability indicators.

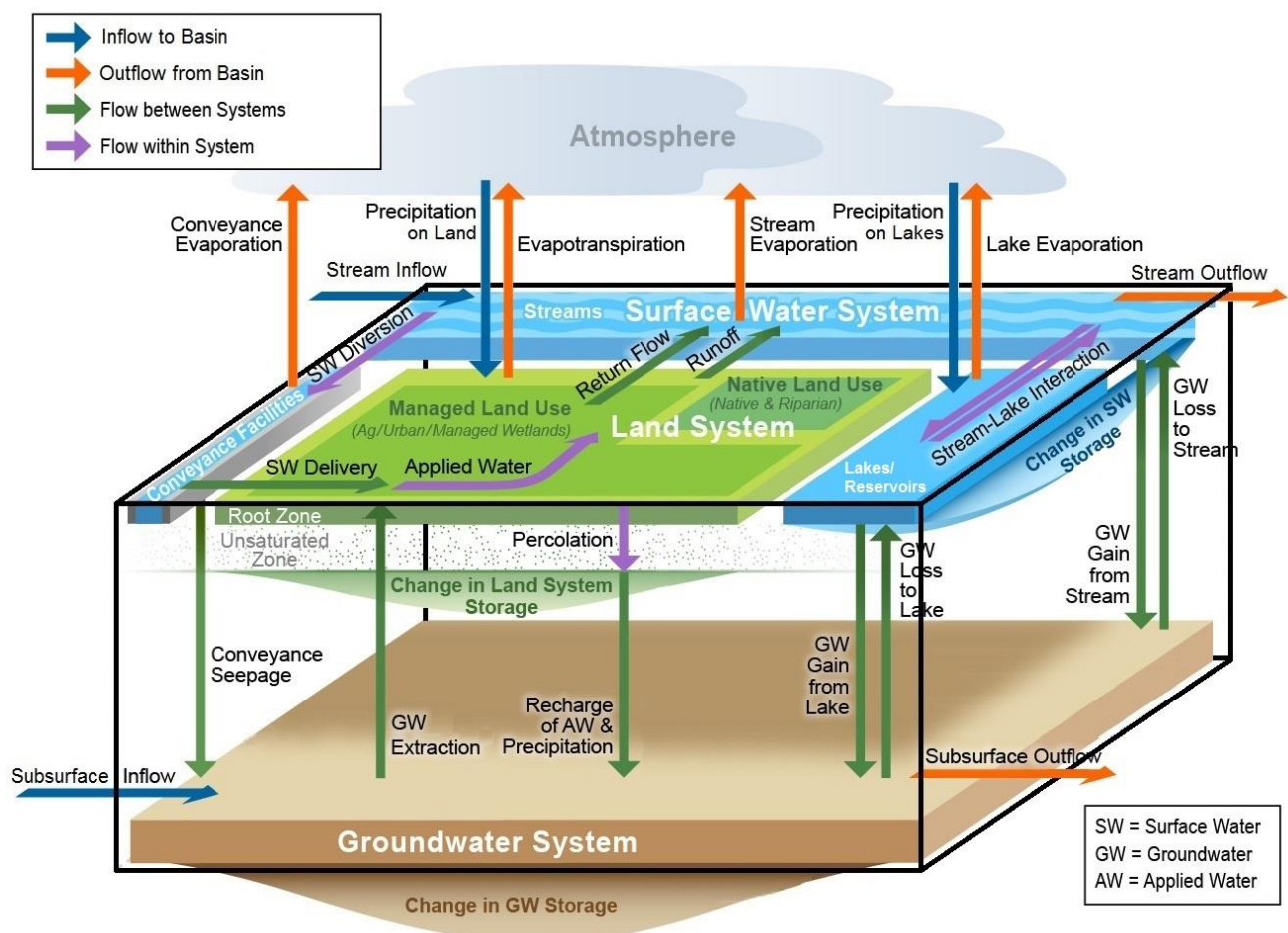


Figure 6-2 Water Budget Components and Systems
6.1 Water Budget Data Sources

Each component shown in **Figure 6-2** was estimated using readily available data and assembled into a budget spreadsheet. Many groundwater basins in California utilize a numerical groundwater model, such as MODFLOW⁵⁰ or IWF⁵¹, to calculate the water budget. These models require a specialized hydrogeologist to run them, and the methodology by which the water budget is calculated is not readily apparent to the lay person. For the BVGB, a non-modeling (spreadsheet) approach was used so that future iterations of the water budget could be performed by a wider range of hydrology professionals (potentially reducing future GSP implementation costs) and so that the calculations of the specific components could be understood by a broader range of people.

In concept, each component is quantified precisely and accurately, and the resultant budget is balanced. In practice, most of the components can only be roughly estimated and in many cases not at all. Therefore, much of the work to balance the water budget is adjusting some of the unknown or roughly-estimated parameters within acceptable ranges until the budget is balanced and all components are deemed reasonable.

⁵⁰ Modular Finite-Difference Groundwater Flow model, developed by USGS.

⁵¹ Integrated Water Flow Model, developed by DWR.

As such, the water budget calculations presented herein are not unique, and the precision of the component estimates are within an order of magnitude. Estimation of nearly all components involves assumptions and, with more Basin-specific data, the accuracy and precision of many of the components are improved. Additional and improved data will result in a budget that more closely reflects the Basin conditions and allows the GSAs to make more informed decisions to sustainably maintain groundwater resources. **Appendix 6A** show the components of the water budget, their data source(s), assumptions, and relative level of precision.

Major data sources include the PRISM⁵² model (NACSE 2020) for precipitation, CIMIS (DWR 2020c) for evapotranspiration data, the National Water Information System (USGS 2020b) for surface-water flows, and DWR land-use surveys (DWR 2020d).

6.2 Historical Water Budget

The historical water budget presented in this section covers 1984 to 2018. This period was chosen because it represents an average set of climatic conditions. **Figure 6-3** shows the annual precipitation and year type for the period. The criteria for year types were critical dry below 70 percent of average precipitation, dry between 70 and 85 percent of average precipitation, normal between 85 and 115 percent of average precipitation and wet years greater than 115 percent of average precipitation.

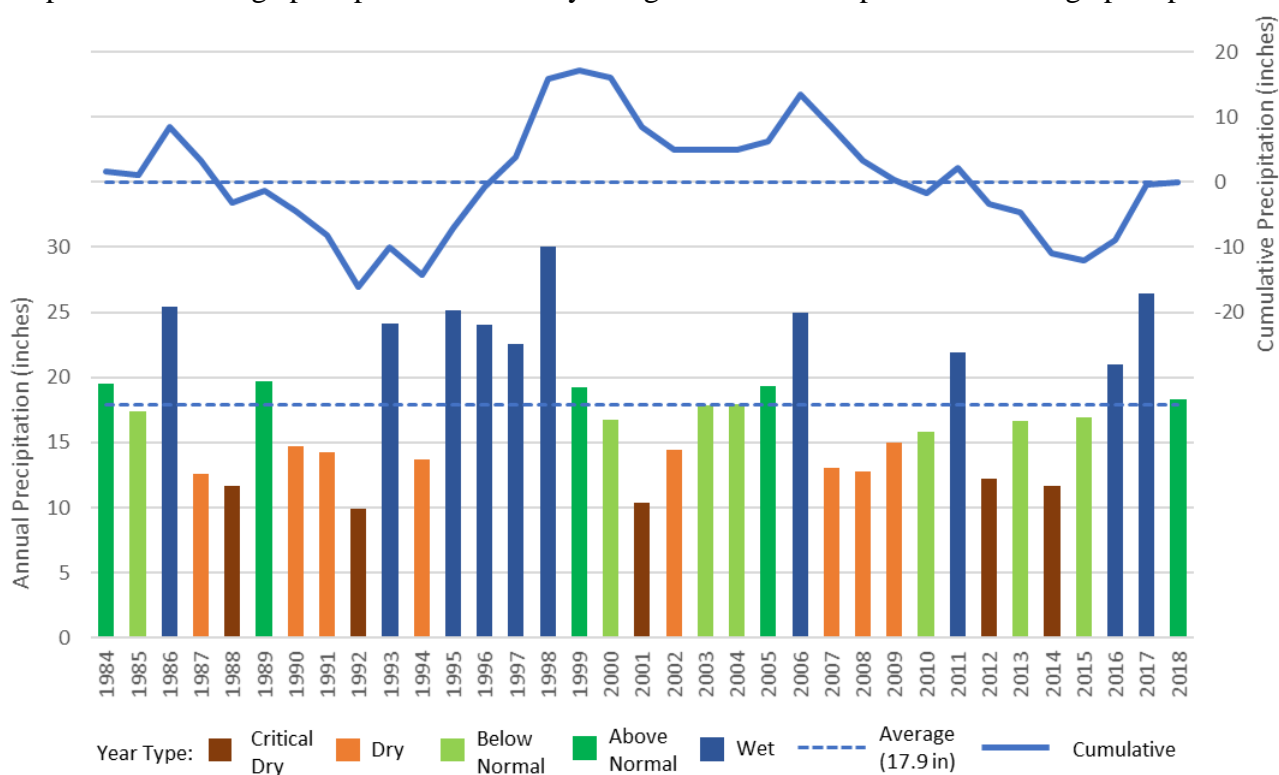


Figure 6-3 Annual and Cumulative Precipitation and Water Year Types 1984 to 2018

⁵² PRISM stands for Parameter-elevation Regression on Independent Slopes Model and is provided by the Northwest Alliance for Computational Science and Engineering from Oregon State University. This model provides location-specific, historical precipitation values on monthly and annual time scales. Precipitation was evaluated at Bieber.

The budget was developed using this precipitation and other climate data (evapotranspiration) along with stream flow to estimate the inflows (credits) and outflows (debits) to the total BVGB. The budget was balanced by assuming that the land and surface-water systems remain nearly in balance from year to year and allowing the groundwater system to vary. **Figure 6-4** shows the average annual values for the overall water budget. The detailed water budget for each year is included in **Appendix 6B**. **Appendix 6C** shows graphically how the water budget varies over time.

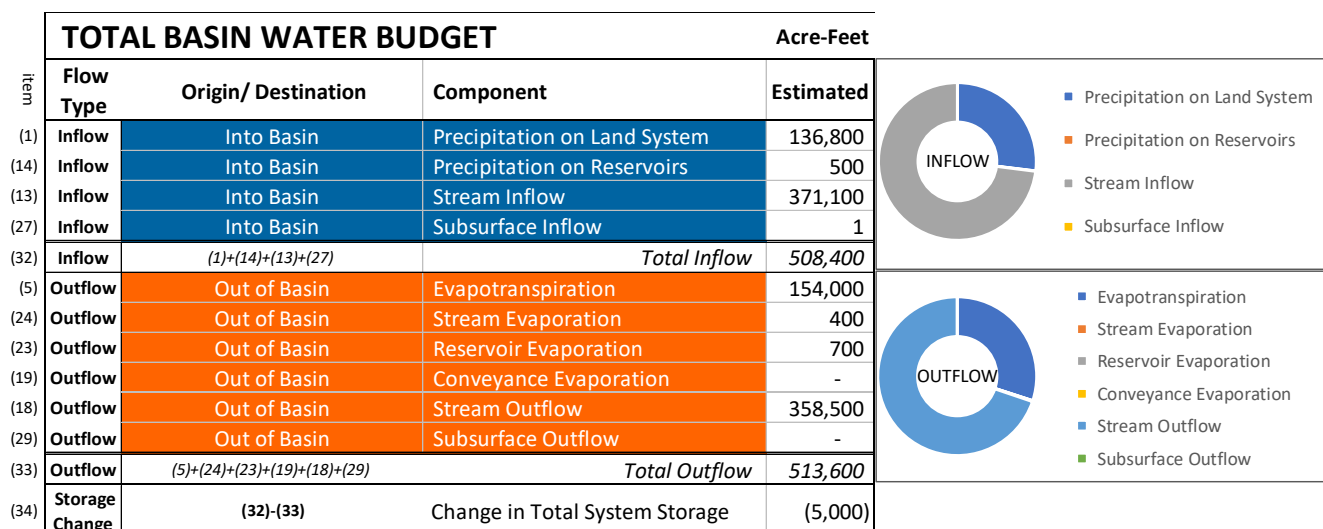


Figure 6-4 Average Total Basin Water Budget 1984-2018 (Historical)⁵³

The evapotranspiration value was calculated using land-use data (crop and wetland acreages) from DWR for 2014, and land use was assumed to be constant throughout the water budget period.

Using the evapotranspiration for irrigated lands, the amount of irrigation from surface water and groundwater was determined using 85 percent irrigation efficiency (NRCS 2020) and a respective 35 to 65 percent split between surface water and groundwater. This surface water – groundwater split was determined from input received from local landowners, an assessment of surface-water rights (areas without surface-water rights were assumed to use 100 percent groundwater), well drilling records (areas without wells drilled were assumed to use 100 percent surface water), and an assessment of aerial imagery to see if water source could be determined. For the evapotranspiration associated with the ACWA, the ecosystem largely relies on surface water and very shallow subsurface⁵⁴ water. This surface-water delivery⁵⁵ was enhanced by implementation of a “pond and plug” project in 2012 to keep the water table higher and broader throughout ACWA. The ACWA also has three wells that extract groundwater from the deeper aquifers which is applied in portions of the habitat during dry months (fall). These areas with groundwater use are indicated by the light blue areas within ACWA. Based on the limited area and time groundwater is used to support the habitat, 98 percent of the evapotranspiration for ACWA is estimated to come from surface water and two percent from groundwater. **Figure 3-6** shows the lands with applied water and their water source based on this assessment.

⁵³ To re-emphasize, these are rough estimates and better and more accurate data are needed.

⁵⁴ Within about the top 10 feet that plant roots can access.

⁵⁵ For the purposes of the water budget, water from Ash Creek is considered “delivered” to the wetland areas.

2250 Stakeholders have noted that despite the efforts to improve estimates of water source and some input
2251 from local residents, **Figure 3-6** still contains significant inaccuracies and further refinement of this
2252 dataset is needed.

2253 The average annual water budgets for the three systems (land, surface water, and groundwater) are
2254 shown on **Figure 6-5**, **Figure 6-6**, and **Figure 6-7**. The detailed water budget for each year is included
2255 in **Appendix 6B**. **Appendix 6C** shows graphically how the system water budgets vary over time.

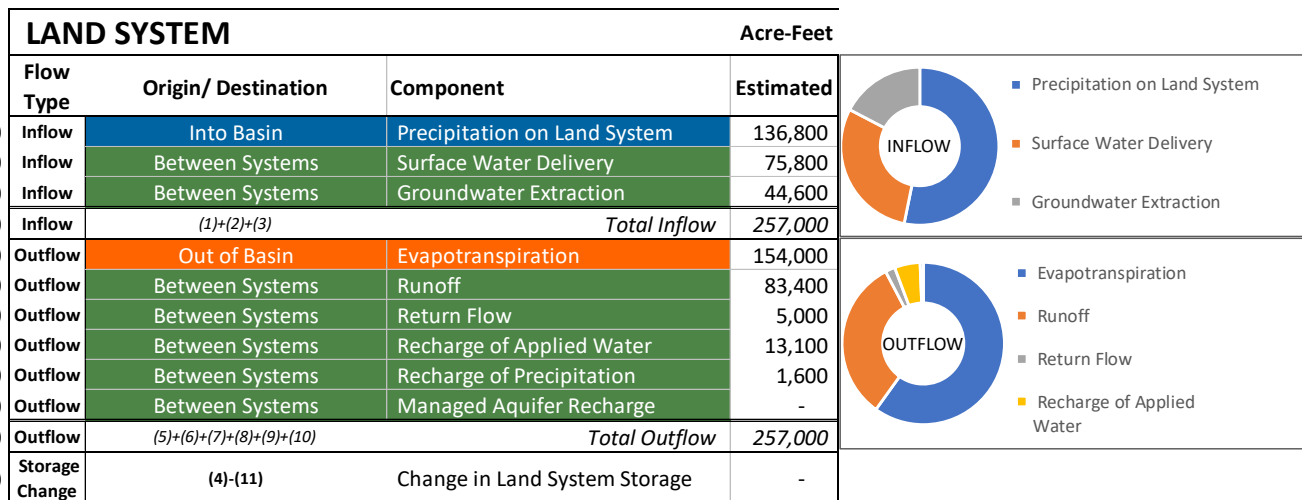


Figure 6-5 Average Land System Water Budget 1984-2018 (Historical)

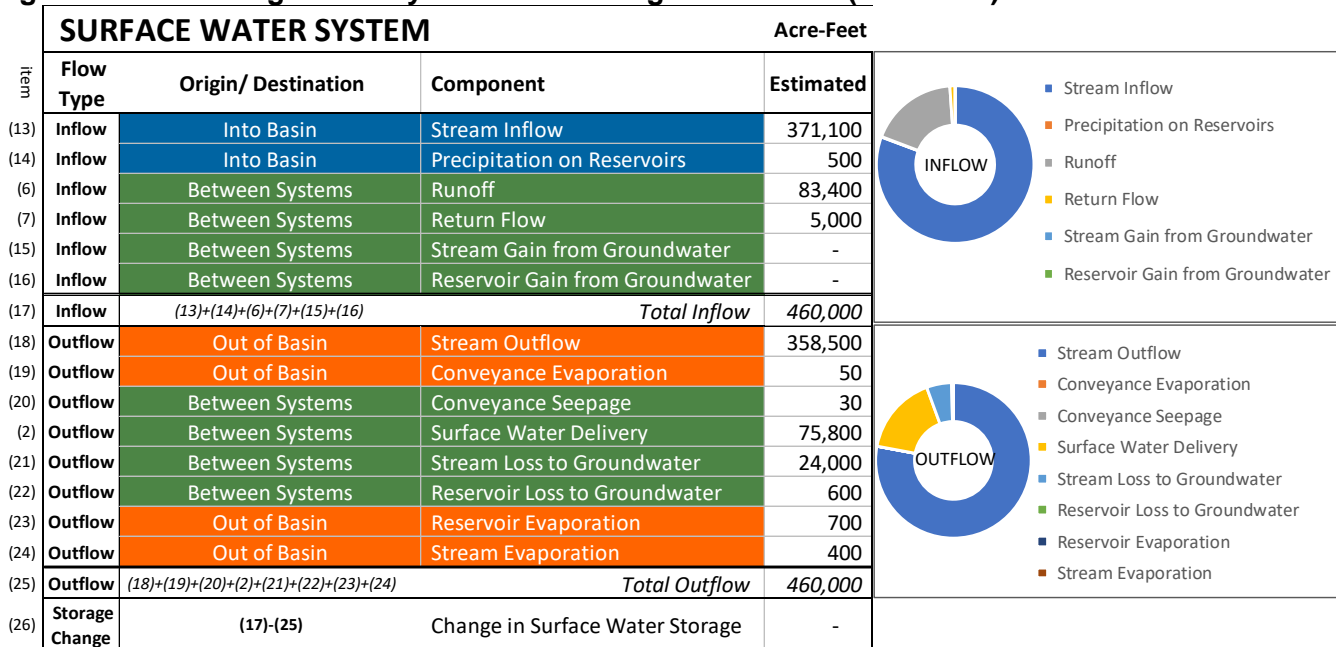


Figure 6-6 Average Surface-Water System Water Budget 1984-2018 (Historical)

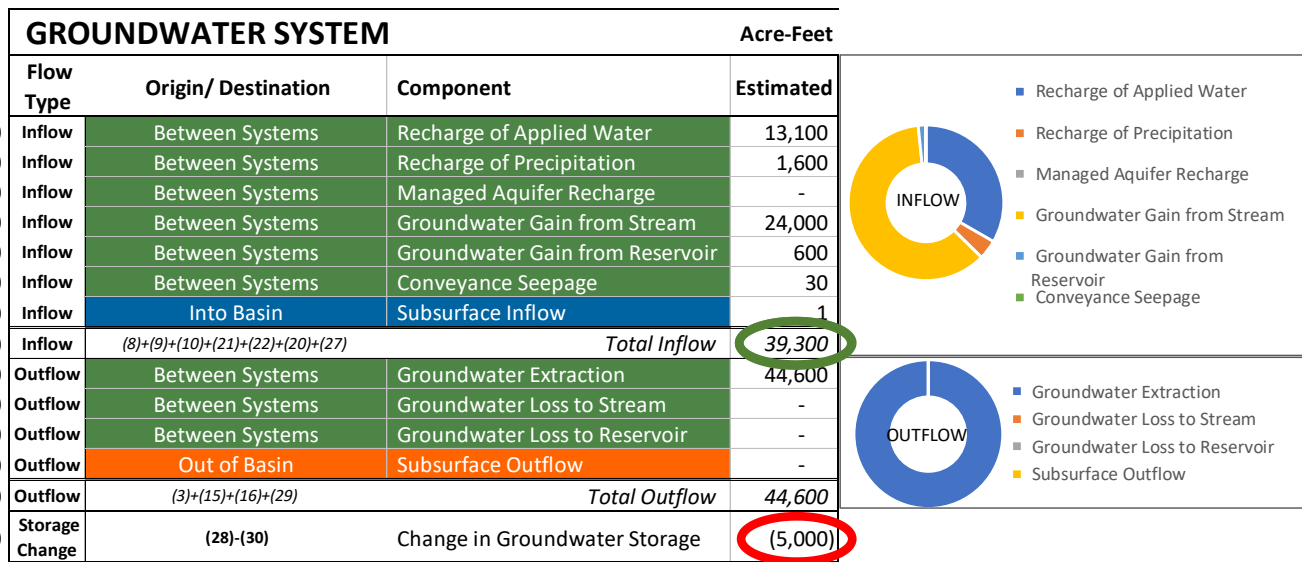


Figure 6-7 Average Groundwater System Water Budget 1984 to 2018 (Historical)

With the land system and surface-water system assumed to be in balance, the groundwater system varies and reflects the change in water stored in the Basin. This change in storage is shown in **Figure 6-8** and is analogous to the change in storage presented in Chapter 5 – Groundwater Conditions, which used groundwater contours to calculate the change. These two approaches show similar trends, but the magnitude of the changes differs slightly, with the groundwater contours showing a maximum cumulative overdraft (2015) of about 158,000 AF and the water budget indicating about 183,000 AF. Furthermore, the water budget indicates two periods when the cumulative change in storage is positive (approximately 1984 to 1999 and 1995 to 2002), whereas the groundwater levels do not indicate any periods of a positive change in cumulative storage since 1983. These differences suggest that the water budget overestimates the fluctuations in groundwater storage and overestimates the decline in groundwater storage over the historical period.

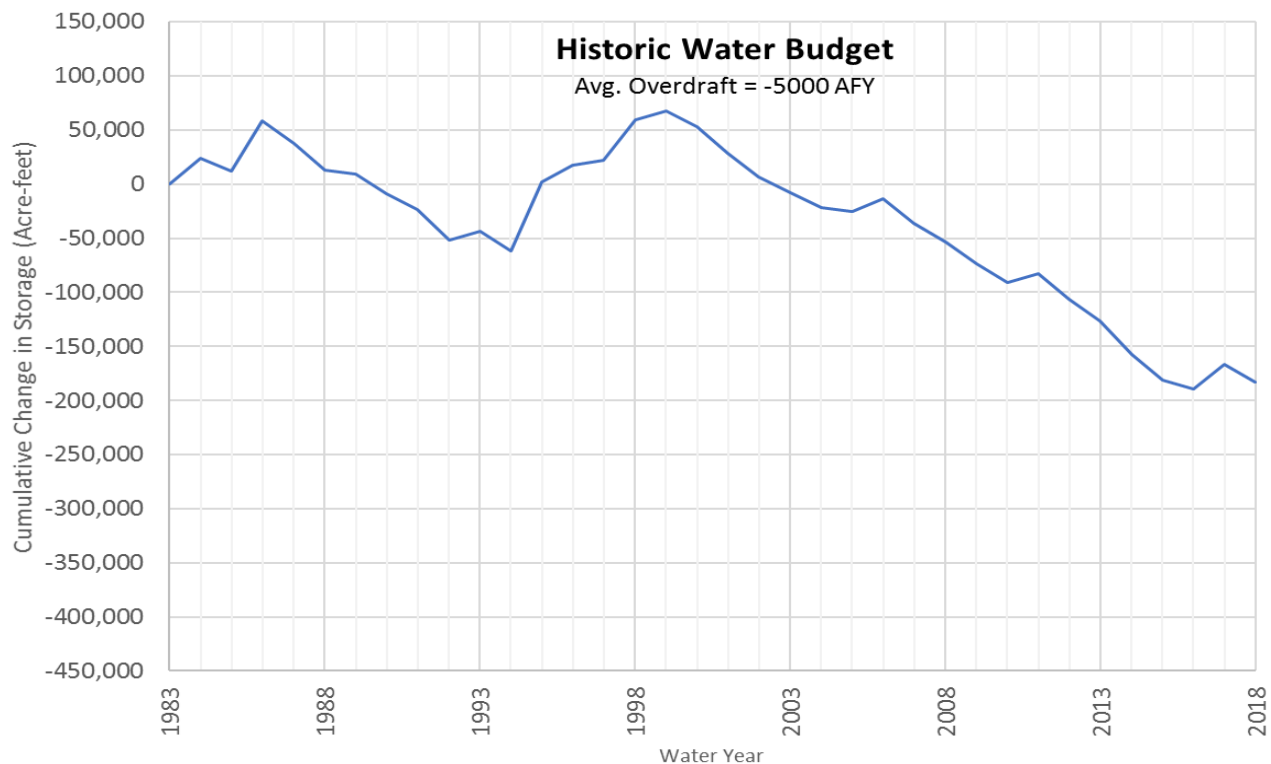


Figure 6-8 Cumulative Groundwater Change in Storage 1984 to 2018 (Historical)

The GSP regulations require an estimate of the sustainable yield⁵⁶ for the Basin (§354.18(b)(7)). This requirement is interpreted as the average annual inflow to the groundwater system, which for the 34-year period of the historical water budget is approximately 39,300 AF, as indicated on item 28 of **Figure 6-7** (circled in green) for the groundwater system. The estimate of annual average groundwater use is approximately 44,600 AFY.

The regulations also require a quantification of overdraft⁵⁷ (§354.18(b)(5)). For the water budget period of 1984 to 2018, overdraft is estimated at approximately 5,000 AFY, shown as the average annual groundwater system change in storage, circled in red on **Figure 6-7** (item 31).

6.3 Current Water Budget

The current water budget is demonstrated by estimating future water budget holding current conditions, land use and water use. The projection described in section 6.4.1 below holds these values constant and therefore represents both the current and projected.

⁵⁶ The state defines sustainable yield as “the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result.” (CWC §10721(w))

⁵⁷ DWR defines overdraft as “the condition of a groundwater basin or Subbasin in which the amount of water withdrawn by pumping exceeds the amount of water that recharges the basin over a period of years, during which the water supply conditions approximate average conditions.” (DWR 2016b)

6.4 Projected Water Budget

As required by the GSP Regulations, the projected water budget is developed using at least 50 years of historical climate data (precipitation, evapotranspiration, and streamflow) along with estimates of future land and water use. The climate data from 1962 to 2011 was used as an estimate of future climate baseline conditions.

6.4.1 Projection Baseline

The baseline projected water budget uses the most recent estimates of population and land use and keeps them constant. **Figure 6-9** shows the average annual future water budget. Long-term overdraft is projected to be about 2,000 AFY, which is less than the overdraft for the historical water budget because it uses a longer, wetter time-period for its projections. **Figure 6-10** shows the projected cumulative change in groundwater storage.

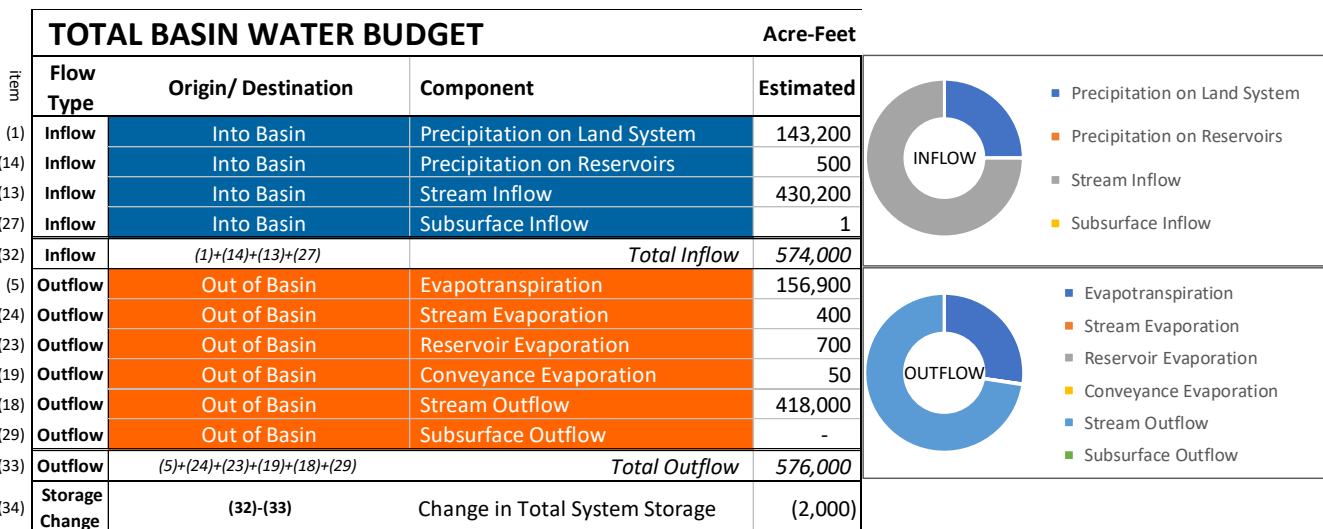


Figure 6-9 Average Projected Total Basin Water Budget 2019-2068 (Future Baseline)

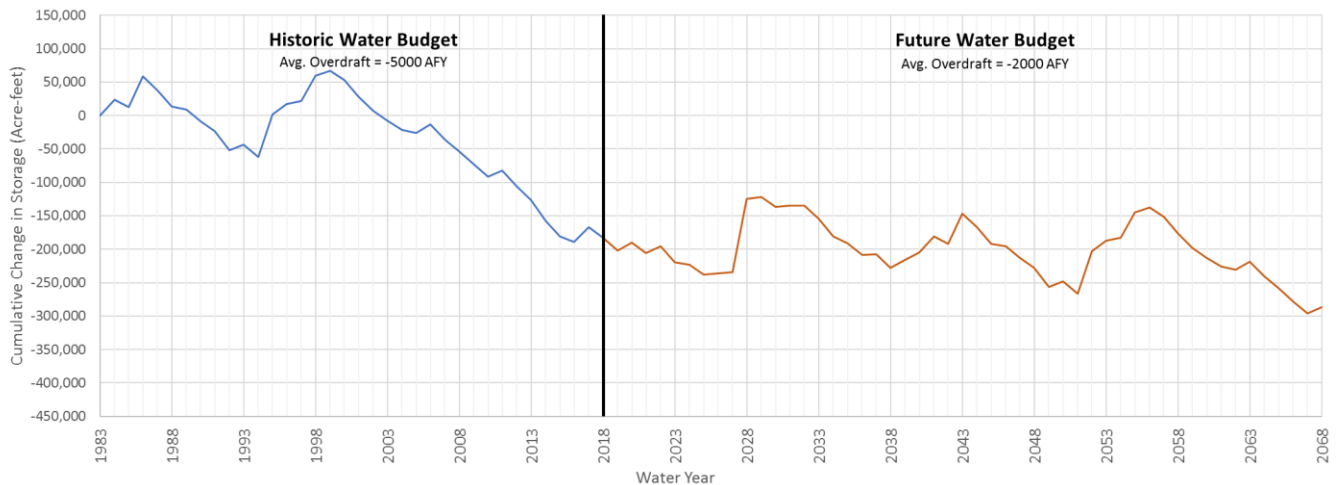
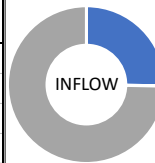


Figure 6-10 Cumulative Groundwater Change in Storage 1984 to 2068 (Future Baseline)
6.4.2 Projection with Climate Change

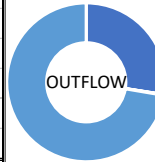
The SGMA regulations require an analysis of future conditions based on a potential change in climate. DWR provides location-specific, monthly change factors for precipitation, evapotranspiration, and streamflow based on climate change models which estimates the how climactic parameters are expected to change over historical conditions by 2070. While there is variability in the climate change models, they indicate that the future climate in Big Valley will be wetter and warmer, resulting in more precipitation and more of that precipitation falling in the form of rain rather than snow. The change factors were applied to the baseline water budget and are shown on **Figure 6-11** and **Figure 6-12**. Land use was assumed to be constant, with conditions the same as DWR’s 2014 land-use survey. Future conditions with climate change projections indicate that the Basin may be nearly in balance, with overdraft of only about 1,000 AFY.

The estimated reduction in overdraft due to climate change (from 2,000 AFY to 1,000 AFY) reflects the assumptions that more precipitation and streamflow will result in more recharge to the BVGB, and this additional recharge will offset the increased ET expected with warmer temperatures. The consequences of these assumptions to the water budget calculations are that (1) change factors were applied over an entire month and (2) the percentage of stream flow resulting in recharge was assumed to be constant. Given that precipitation events (storms) are expected to be more variable in the future with climate change, assuming a constant proportion of recharge from streamflow may not be appropriate. The GSAs plan to address this limitation in future water budget updates, as discussed in Chapter 9 – Projects and Management Actions.

TOTAL BASIN WATER BUDGET				Acre-Feet
Flow Type	Origin/ Destination	Component	Estimated	
(1) Inflow	Into Basin	Precipitation on Land System	152,200	
(14) Inflow	Into Basin	Precipitation on Reservoirs	600	
(13) Inflow	Into Basin	Stream Inflow	450,400	
(27) Inflow	Into Basin	Subsurface Inflow	-	
(32) Inflow	(1)+(14)+(13)+(27)	Total Inflow	603,000	
(5) Outflow	Out of Basin	Evapotranspiration	165,800	
(24) Outflow	Out of Basin	Stream Evaporation	400	
(23) Outflow	Out of Basin	Reservoir Evaporation	800	
(19) Outflow	Out of Basin	Conveyance Evaporation	-	
(18) Outflow	Out of Basin	Stream Outflow	436,700	
(29) Outflow	Out of Basin	Subsurface Outflow	-	
(33) Outflow	(5)+(24)+(23)+(19)+(18)+(29)	Total Outflow	604,000	
(34) Storage Change	(32)-(33)	Change in Total System Storage	(1,000)	



- Precipitation on Land System
- Precipitation on Reservoirs
- Stream Inflow
- Subsurface Inflow



- Evapotranspiration
- Stream Evaporation
- Reservoir Evaporation
- Conveyance Evaporation
- Stream Outflow
- Subsurface Outflow

Figure 6-11 Average Projected Total Basin Water Budget 2019-2068 (Future with Climate Change)

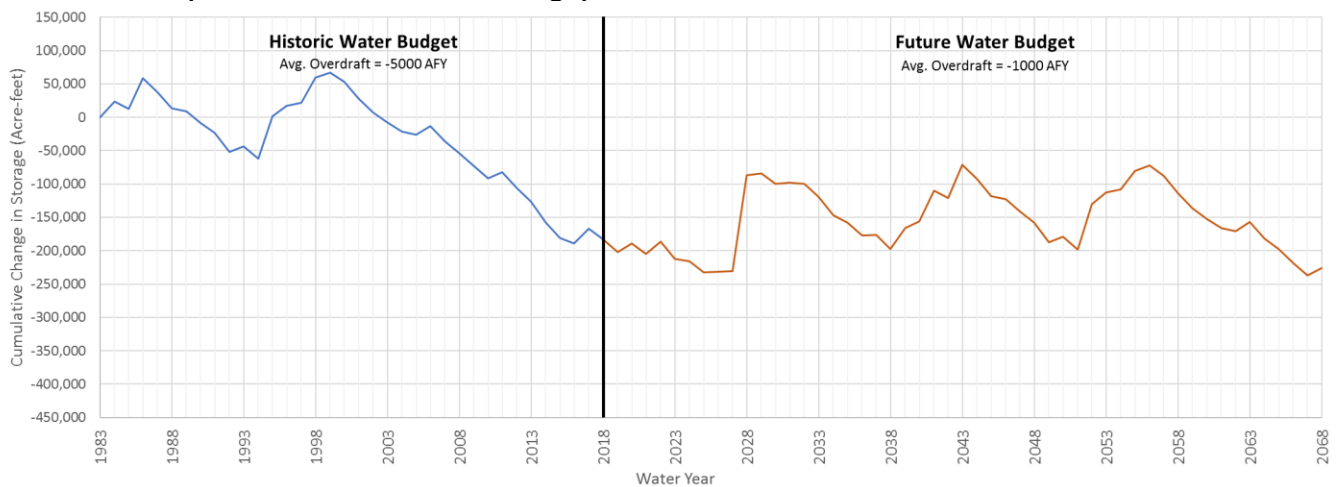


Figure 6-12 Cumulative Groundwater Change in Storage 1984 to 2068 (Future with Climate Change)

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7. Sustainable Management Criteria § 354.20

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This chapter describes criteria and conditions that constitute sustainable groundwater management for the BVGB, also known as Sustainable Management Criteria (or SMC). Below are descriptions of key terms used in the GSP Regulations and described in this chapter:

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- **Sustainability goal:** This is a qualitative, narrative description of the GSP’s objective and desired conditions for the BVGB and how these conditions will be achieved. The Regulations require that the goal should, “culminate in the absence of undesirable results within 20 years” (§ 354.22).

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- **Undesirable result:** This is a description of the condition(s) that constitute “significant and unreasonable” effects (results) for each of the 6 sustainability indicators:

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- Chronic lowering of *groundwater levels*
- Reduction in *groundwater storage*
- *Seawater intrusion* – Not applicable to BVGB
- Degraded *water quality*
- Land *subsidence*
- Depletion of *interconnected surface water*

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- **Minimum threshold (MT):** Numeric values that define when conditions have become undesirable (“significant and unreasonable”). Minimum thresholds are established for representative monitoring sites. Undesirable results are defined by minimum threshold exceedance(s) and define when the Basin conditions are unsustainable (i.e., out of compliance with SGMA).

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- **Measurable objective (MO):** Numeric values that reflect the desired groundwater conditions at a particular monitoring site. MOs must be set for the same monitoring sites as the MTs and are not subject to enforcement.

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- **Interim milestones (IMs):** Numeric values for every 5 years between the GSP adoption and sustainability (20 years, 2042) that indicate how the Basin will reach the MO (if levels are below the MO). IMs are optional criteria and not subject to enforcement.

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Figure 7-1 shows the relationship of the MT, MO, and IMs. In addition to these regulatory requirements, some GSAs in other basins have developed “action levels,” applicable when levels are above the MT but below the MO, for each well to indicate where and when to focus projects and management actions. This GSP also has action levels that are described in this chapter.

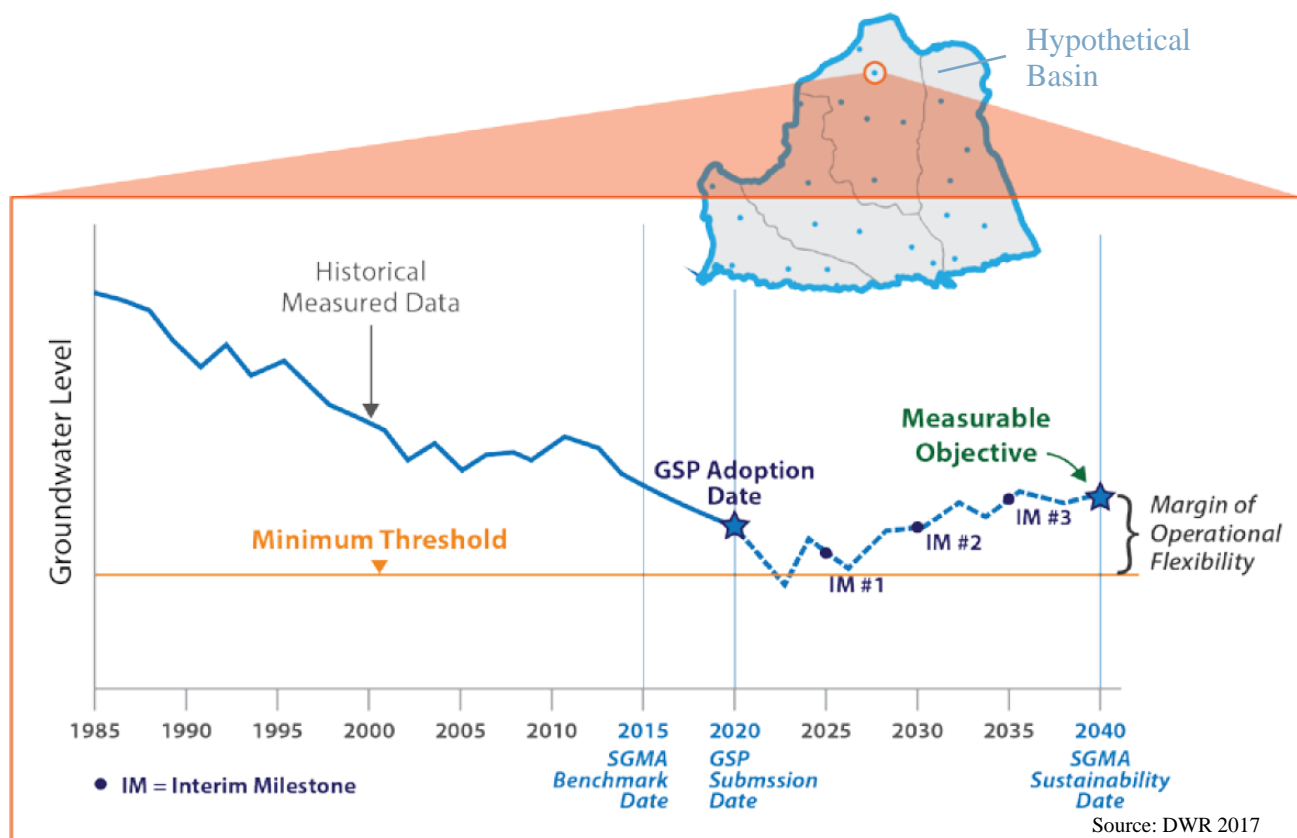


Figure 7-1 Relationship among the MTs, MOs, and IMs for a hypothetical basin

7.1 Process for Establishing SMCs

The SMCs detailed in this chapter were developed by the GSAs through consultation with the BVAC. The sustainability goal was developed by an ad hoc committee and presented to the larger BVAC, GSA staff, and the public for review and comment. The BVAC also formed ad hoc committees for each sustainability indicator and evaluated the data and information presented in Chapters 1-6. In consultation with GSA staff, each committee determined whether significant and unreasonable effects for each sustainability indicator have occurred historically and the likelihood of significant and unreasonable effects occurring in the future. The sections below reflect the guidance given to the GSAs and consultants by the ad hoc committees.

7.2 Sustainability Goal

The sustainability goal was presented in Chapter 1 and is reiterated here:

The sustainability goal for the Big Valley Groundwater Basin is to maintain a locally governed, economically feasible, sustainable groundwater basin and surrounding watershed for existing and future legal beneficial uses with a concentration on agriculture. Sustainable management will be conducted in context with the unique culture of the basin, character of the community, quality of life of the Big Valley residents, and the vested right of agricultural pursuits through the continued use of groundwater and surface water.

7.3 Undesirable Results

Undesirable results must be described for each Sustainability Indicator. To comply with §354.26 of the Regulations, the narrative for each applicable indicator includes:

- *Description* of the “significant and unreasonable” conditions that are undesirable
- Potential *causes* of the undesirable results
- *Criteria* used to define when and where the effects are undesirable
- Potential *effects* on the beneficial uses and users of groundwater, on land uses, and on property interests

Sustainability indicators that have not experienced undesirable results and are unlikely to do so in the future describe the justification for non-applicability of that Sustainability Indicator.

7.3.1 Groundwater Levels

For this section, it is necessary to understand that it is natural (and expected) that groundwater levels will rise and fall during a particular year and over the course of many years. Chapters 4 through 6 describe the nature of groundwater levels throughout the Basin and how levels have changed over time. These chapters conclude that many areas of the Basin have seen no significant change. Other areas saw a lowering of levels in the late 1980s and early 1990s, recovery during the wet period of the late 1990s and lowering water levels since 2000. Groundwater usage has only seen minor increases since 2000, therefore the declines are more related to climatic conditions than to a lack of stewardship of the resource. As illustrated in **Figure 5-4**, water levels in 12 wells have shown stable (less than one foot of change) or rising water levels. Nine wells have shown declining trends, with only three of those wells declining by more than two feet per year.

This context is given both to set the stage for discussion of undesirable results and to illustrate that water levels overall have not declined significantly. This re-emphasizes the point raised in Section 1.3 that the GSAs believe the Basin should be ranked as low priority. As mentioned previously, the GSAs also believe its ranking of medium priority is due in large part to the DWR’s scoring of all basins with water level declines with a fixed number of points rather than considering the severity of declines. Big Valley has seen only minor declines in comparison to the widespread decline of hundreds of feet experienced elsewhere in the state. The Basin has demonstrated that it can recover during wet climatic cycles (e.g., late 1990s) as shown in **Figure 5-7**. There have not been widespread reports of issues or concerns regarding groundwater levels from the residents of the Basin (whether agricultural producers or domestic users or others). The GSAs contend that Big Valley’s medium priority ranking is based on unscientific concerns raised by DWR based on isolated wells that experienced limited decline during a below-average climatic cycle.

Therefore, undesirable results have not occurred in the past and the measurable objective established in this section is set at the fall 2015 groundwater level for each well in the monitoring network (*see* Chapter 8 – Monitoring Networks). Fall 2015 is a recent measurement based on a wide distribution of wells and is generally the lowest groundwater level throughout the period of record. Since these levels are economically feasible for agricultural, community, domestic, and natural/wildlife uses, this level is a reasonable proxy for the desired conditions.

2418 **Description**

2419 This section describes undesirable results for groundwater levels by defining significant and
2420 unreasonable impacts on beneficial uses. To define the significant and unreasonable impacts to
2421 groundwater levels, the GSAs and the BVAC gathered extensive public input in meetings with
2422 landowners, other community members, tribal members, and local and state agencies (including CalFire,
2423 the CDFW, and the United States Forest Service) to identify potential undesirable results regarding
2424 groundwater levels. Undesirable results identified included (1) depletion of supply leading to agriculture
2425 becoming economically unviable, (2) agricultural, domestic, and public wells going dry, experiencing
2426 reduced capacity, requiring lowering of pumps, or requiring deeper well installations, and (3) adverse
2427 impacts to wildlife and recreational activities.

2428 As described in Section 1.1 and emphasized in the Sustainability Goal, agricultural production is of
2429 paramount importance due to its economic, cultural, and environmental benefits. Therefore, the
2430 undesirable results related to agriculture were substantially considered in the development of the
2431 definition of undesirable results.

2432 Consistent with the Sustainability Goal, undesirable results for the chronic lowering of groundwater levels
2433 are defined at the level where the depletion of supply results in significant and undesirable reductions in
2434 the long-term viability of agriculture, community, domestic, and natural/wildlife uses.

2435 **Causes**

2436 Potential causes resulting in the chronic lowering of groundwater levels include reductions in recharge
2437 or increases in pumping.

2438 Recharge to the basin includes rainfall, surface water that infiltrates the basin, and applied water for
2439 agriculture. Acute changes in climate conditions (e.g., short-term dry periods) that include less surface
2440 water and/or precipitation can lead to declines in groundwater levels. Lower-than-average precipitation
2441 and snowpack since 1999 has resulted in declining groundwater levels in some parts of the Basin. A
2442 similar period of declining groundwater levels occurred in the late 1980s through the middle of the
2443 1990s. In the late 1990s, several years in a row of above-average precipitation caused groundwater
2444 levels to fully recover. Longer-term changes to weather or climate patterns could result in more
2445 consistent lowering of groundwater levels in the absence of other changes. In addition, if irrigation
2446 efficiency were to increase, this could result in less recharge to the basin; however, this impact may be
2447 offset by reduced groundwater demand.

2448 Increased pumping for agriculture or other uses could also cause the chronic lowering of groundwater
2449 levels. Increased pumping could occur due to reduced surface water available for diversions or the State
2450 Water Board curtailing surface water rights for water rights holders in the basin. However, increased
2451 groundwater demands are unlikely to be a major cause of lowering groundwater levels in the future, as
2452 land uses are not expected to change significantly, and any water rights curtailments or reduced surface
2453 water availability is expected to be temporary.

2454 Future wet periods, enhanced recharge, increased storage, and addressing data gaps will likely cause
2455 groundwater levels to experience a similar recovery and maintain balance within the Basin.

2456 **Criteria**

2457 **Operationally, undesirable results for groundwater levels would occur when at least one third of**
2458 **representative monitoring wells fall below their MT for three consecutive years.** The MT for each
2459 well is set at 50 feet below the reference groundwater level. For most wells, the reference groundwater
2460 level is from Spring 2015; however, if the well was completed after 2015, the reference groundwater
2461 level is the Spring 2022 groundwater level. Spring 2022 groundwater levels are generally higher than
2462 Spring 2015 groundwater levels; therefore, the use of Spring 2022 groundwater levels to calculate the
2463 MT for newer wells is conservative. The BVAC ad hoc committees developed these definitions and the
2464 MT considering agricultural users and domestic users, two of the primary uses and users that may be
2465 affected by potential groundwater level declines. The spatial and temporal coverage of the undesirable
2466 results (i.e., at least one third of wells and three consecutive years) was defined to (1) acknowledge the
2467 uncertainty in groundwater level data; (2) mitigate the potential influence of nearby pumping wells, and
2468 (3) allow for time to characterize the impacts and develop plans to address them.

2469 First, the BVAC ad hoc committees considered the potential impacts of groundwater level declines on
2470 the agricultural users. For agricultural pursuits to be viable, growers need an adequate margin of
2471 operational flexibility (see **Figure 7-1**) so that crops can be irrigated even during dry years. Through
2472 discussions in BVAC ad hoc committee meetings among committee members, a local well driller
2473 (Conner, 2021) and the Lassen County Farm Advisor (Lile, 2021), the committee members determined
2474 the depth at which groundwater pumping becomes economically unfeasible for agricultural use is about
2475 140 feet below 2015 groundwater levels. This is based on the following assumptions:

- 2476 • The profit margin on a typical alfalfa farm is estimated at less than \$25 per ton assuming an
2477 average yield of 5 tons per acre (Wilson et al 2020). Small increases in input costs, such as
2478 electricity required for pumping at greater depths, can render hay production uneconomical.
- 2479 • Based on recent basin conditions, local hay yields, operating costs, and current hay prices, the
2480 BVAC ad hoc committees determined that hay production would become uneconomical if
2481 groundwater level declines increased the cost to pump groundwater by about \$30 per acre-foot.
- 2482 • Appendix 7A documents the information used to convert this volumetric cost to a decline in
2483 groundwater levels. The increase in horsepower required to pump from a well approaching
2484 140 feet below 2015 groundwater levels would result in an increased cost of \$15 per acre-foot of
2485 water using Surprise Valley Electric (SVE) rates and \$30 per acre foot using Pacific Gas and
2486 Electric (PG&E) rates (Conner, 2021). SVE and PG&E are two of the predominant energy
2487 suppliers in the region. If these costs are converted to a cost per ton of produced grass hay
2488 (assuming about 2.3 acre-feet per ton of hay), the increased cost of water level decline to the MT
2489 translates to about \$6.50 per ton using SVE power and \$13 per ton with PG&E power based on
2490 2021 costs.

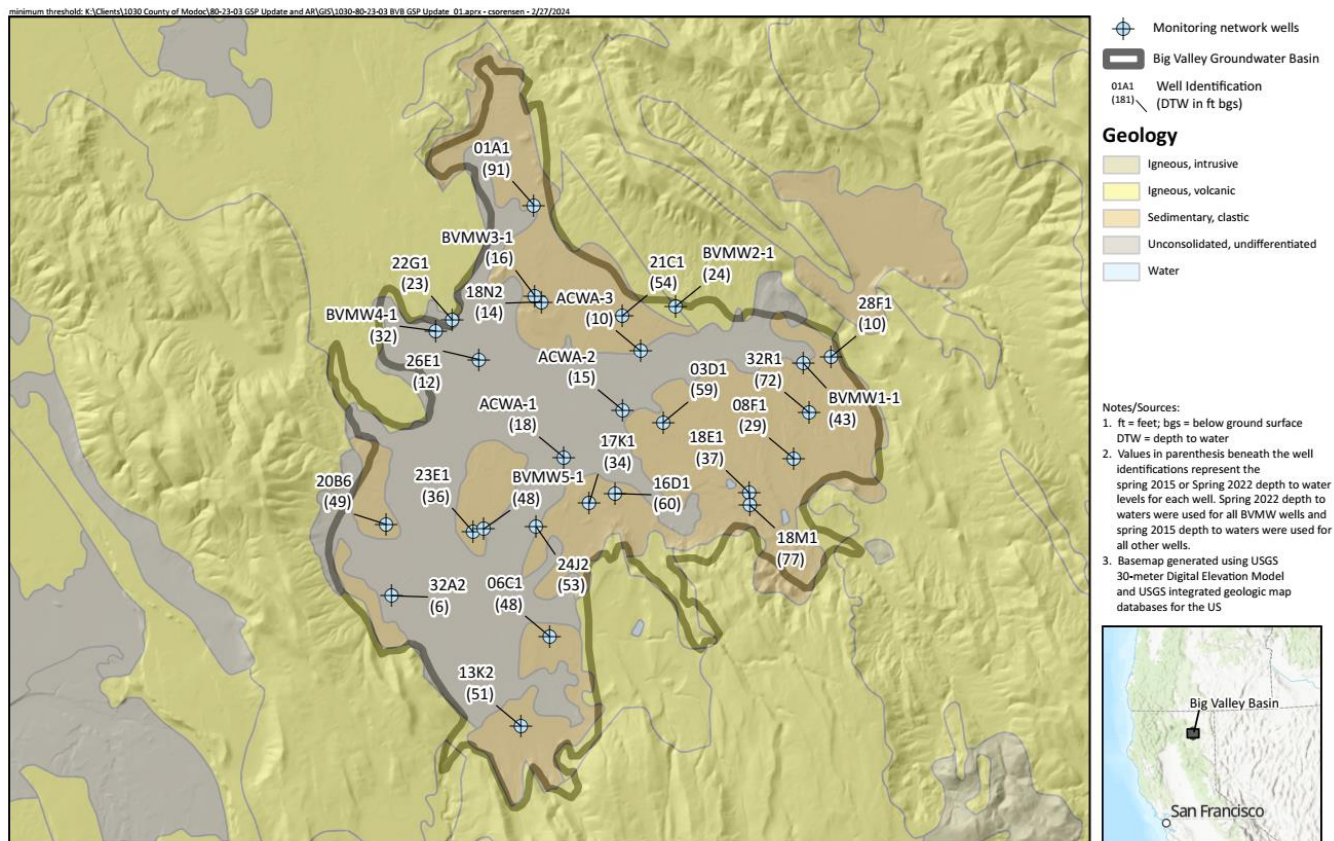
2491 Second, the BVAC ad hoc committee considered the impact of groundwater level declines on domestic
2492 and public supply wells. Data on domestic wells are limited; however, the DWR's well completion
2493 report database is the best available dataset to understand the magnitude of impact of lowering
2494 groundwater levels on domestic wells. To analyze the impact of groundwater level declines on domestic
2495 wells, the following analysis was completed:

1. A groundwater level surface was developed based on the reference groundwater levels at representative monitoring wells across the basin. Figure 7-2 shows the map of the representative monitoring wells with the reference depth-to-water (either Spring 2015 or Spring 2022).
2. Based on this groundwater level surface, each DWR well log was assigned a reference groundwater level. Figure 7-3 shows the density of domestic wells across the basin. Domestic well density is not evenly distributed throughout the Basin, but representative wells are located near the areas of highest domestic well density. Many of the domestic well logs do not have precise locations in the database and are in the center of the Public Land Survey System (PLSS) section. Wells that were placed in the center of the PLSS sections that fall outside of the basin boundary were not included in the analysis. By using the groundwater level surface to develop reference groundwater levels for which domestic well impacts can be quantified, this analysis assumes a direct relationship between the groundwater levels at the representative monitoring wells and domestic wells.
3. For each well in the database, it is assumed that a well would be unable to pump if the groundwater level were less than 20 feet above the total constructed well depth. Most wells in the database lack screen intervals or other information that would help refine this estimate.
4. It is assumed that all wells that were constructed prior to 1978 are inactive. Evaluating the domestic wells relative to the groundwater level surface resulted in several wells that would be unable to pump at that level, all of which were constructed in 1977 or prior. 1976-1977 was a period of significant statewide drought, which probably resulted in the replacement of these older wells. Given that there are no reports of dry wells based on discussions with the local well driller and the state's Dry Well Reporting System, this is a defensible assumption to filter the well dataset to a more realistic sample.

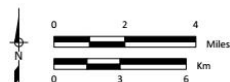
Figure 7-4 is an exceedance chart that shows the results of the analysis described above. For each well type, it shows the percentage of wells that would be unable to pump at that depth below the reference groundwater levels. At 50 feet below the reference groundwater levels, shown as the black dotted line, about 8 percent of all wells would be unable to pump, including about 14 percent of domestic wells (15 wells).

Figure 7-5 shows a breakdown of the proportion and number of wells in each category that would be unable to pump at the MT. No public or industrial wells are projected to be unable to pump, 2 percent (3 wells) of irrigation wells are projected to be unable to pump, and 14 percent (15 wells) of domestic wells are projected to be unable to pump at the MT. **Figure 7-6** shows the spatial distribution of domestic wells that would be unable to pump at the MT. Five of the impacted wells are near Bieber, which has a public supply system (Lassen County Water District) that could potentially work with the well mitigation program to provide temporary or long-term relief to impacted well owners in the area.

The DWR well completion report database has several known errors and inconsistencies, and it is not clear whether all wells are active. As part of the well mitigation program outlined in Section 9, the GSAs will develop a system for voluntary well registration and inventory that will allow the GSAs to update and refine the discussion of undesirable results and potentially revise the MTs in future GSP updates.



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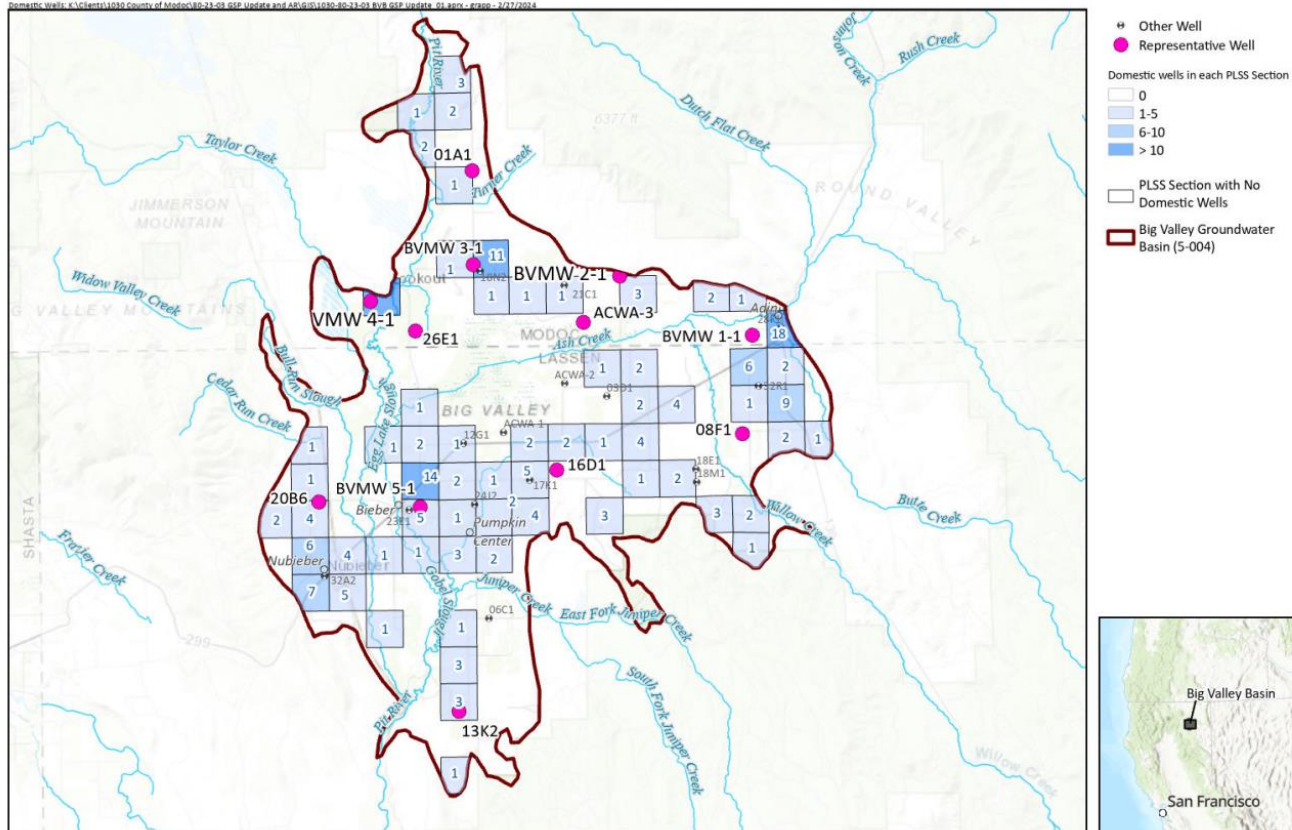
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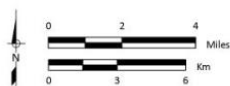
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Figure 7-2

Spring 2015 or 2022 Water Levels at Representative Wells



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Domestic Wells in
DWR Well Log Database
Big Valley Basin GSP Updates
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Figure 7-3 Domestic Wells in DWR Well Log Database

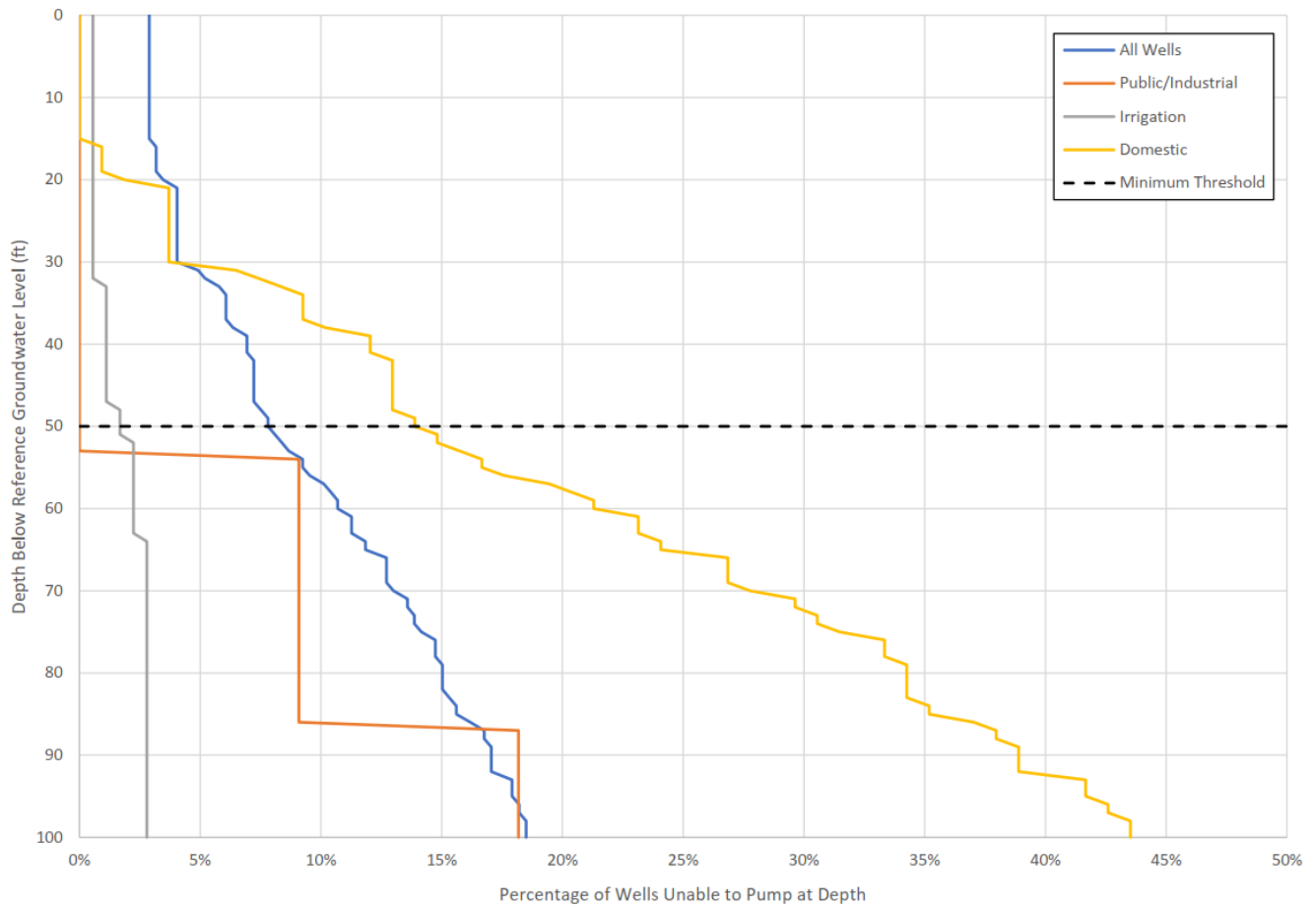


Figure 7-4 Estimated Well Performance at Various Depths Below Reference Groundwater Level

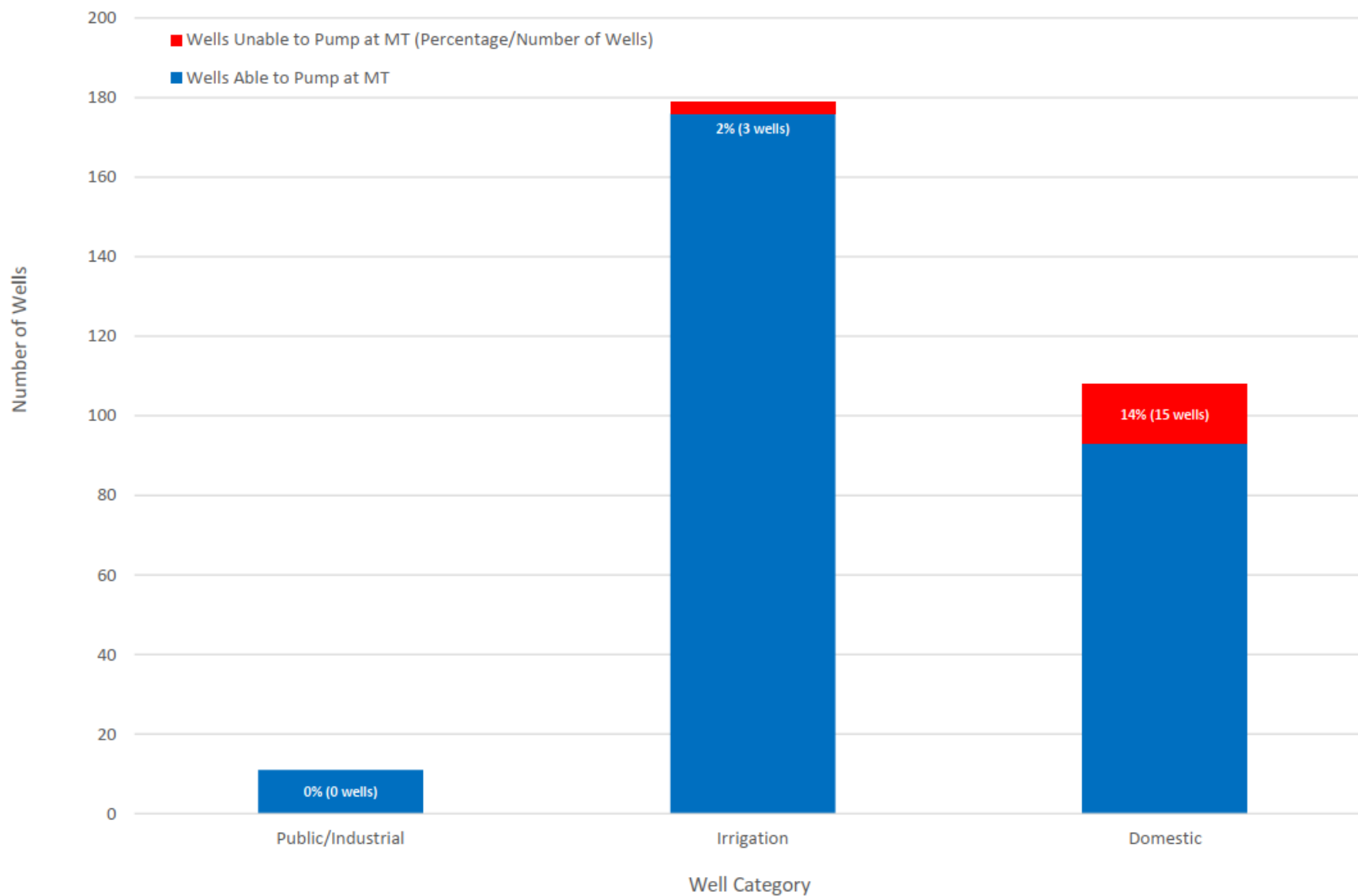
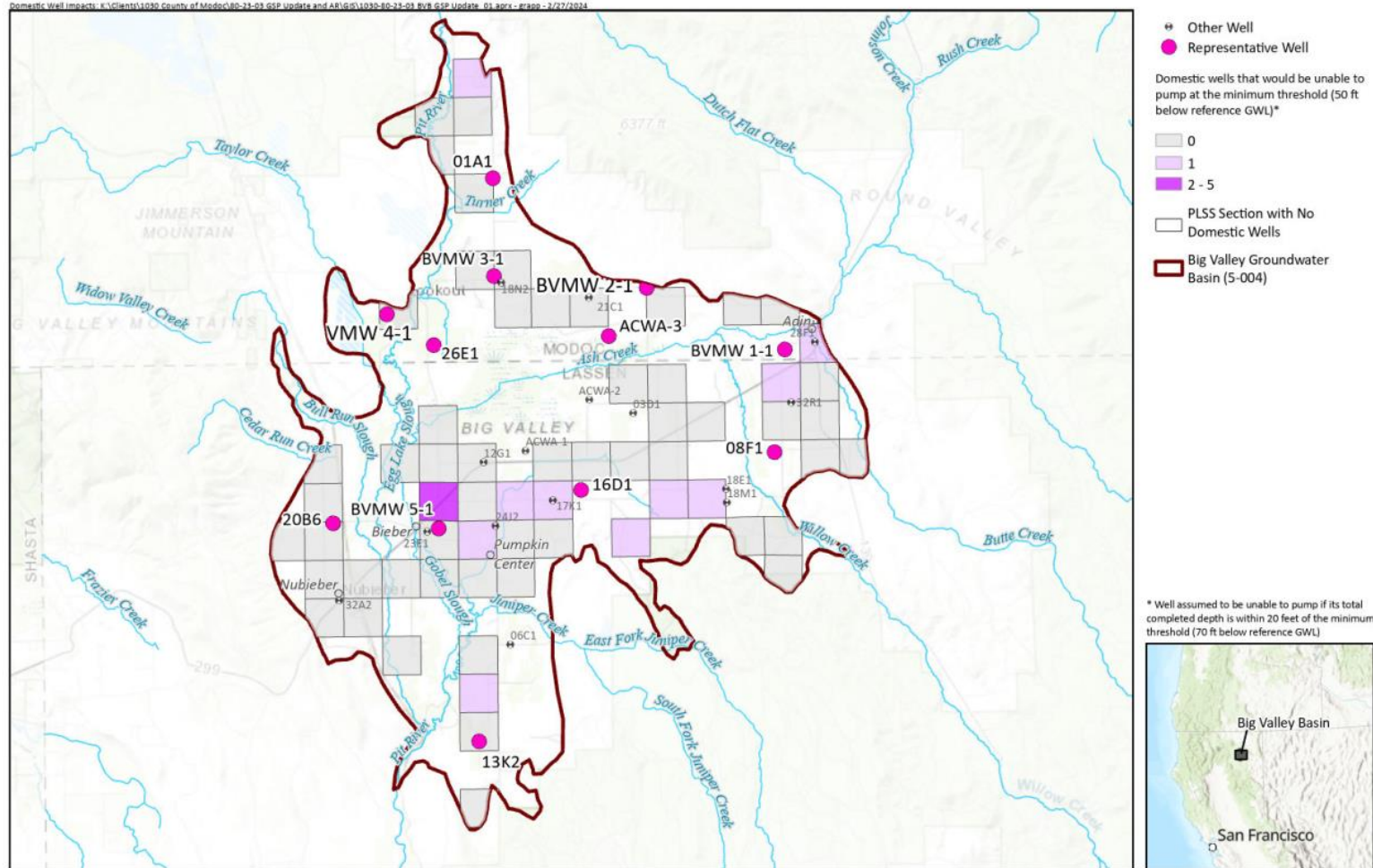


Figure 7-5 Estimated Well Performance at Minimum Threshold (50 feet below Reference Groundwater Level) in the Big Valley Groundwater Basin based on DWR Well Logs



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**Domestic Wells Impacted
at Minimum Threshold**
Big Valley Basin GSP Updates
Draft Figure 7-6

Figure 7-6 Domestic Wells Impacted at Minimum Threshold

2547 **Effects**

2548 As discussed above, if groundwater levels were to fall below the minimum threshold, pumping costs
2549 would increase potentially rendering agricultural pursuits unviable. Without agriculture, the unique
2550 culture, character of the community, and quality of life for Big Valley residents would be drastically
2551 changed. Reductions in agriculture would also affect wildlife who use irrigated lands as habitat,
2552 breeding grounds, and feeding grounds.

2553 It is also acknowledged that utilizing the margin of operational flexibility by agriculture could have
2554 impacts on users of surface water if it is determined to be interconnected. This potentially includes
2555 groundwater-dependent ecosystems and surface-water rights holders. Discussion of this effect is
2556 included in Section 7.3.6 – Interconnected Surface Water.

2557 Low water levels could cause domestic wells to go dry, requiring deepening, redrilling, or developing a
2558 new water source. However, the long-term costs of agriculture becoming unviable causing reduced
2559 property values and tax revenue outweigh the short-term costs of investing in deeper wells or alternative
2560 water supplies. The potential effect could be offset by a shallow well mitigation program, which would
2561 apply to wells that have gone dry because water levels have fallen below the measurable objective. A
2562 framework for addressing the impacts of the chronic lowering of groundwater levels on domestic wells
2563 is described in Section 9 – Projects and Management Actions.

2564 **7.3.2 Groundwater Storage**

2565 The discussion and analysis regarding groundwater levels is directly related to groundwater storage. The
2566 groundwater levels for the fall 2015 measurement for each of the wells in the monitoring network (*see*
2567 Chapter 8 – Monitoring Network) is established as the measurable objective for groundwater storage
2568 (identical to the groundwater level measurable objective). The measurable objective is established at this
2569 level for storage using the same reasons discussed in Section 7.3.1 – Groundwater Levels. In summary,
2570 through public outreach, coordination with the BVAC and analysis of available data, the GSAs have
2571 determined that groundwater storage has not reached significant and unreasonable levels historically.
2572 Like the groundwater levels minimum threshold, the minimum threshold for groundwater storage is the
2573 same as for groundwater levels. The minimum threshold is set at this level for the same reasons
2574 discussed in Section 7.3.1 – Groundwater Levels.

2575 Chapter 5 contains estimates of groundwater storage from 1983 to 2018 using groundwater contours
2576 from each year and an assumption that the definable bottom of the groundwater basin is 1,200 feet bgs.
2577 During this period, storage has fluctuated between a high of about 5,390,000 AF in fall 1983 (and 1999)
2578 to a low of 5,214,000 AF in fall 2015.

2579 **Description**

2580 Like groundwater levels, significant and unreasonable reduction in groundwater storage is defined as a
2581 level at which the energy cost to lift the groundwater exceeds the economic value of the water for
2582 agriculture or when a significant number of domestic wells are affected.

2583 **Justification of Groundwater Elevations as a Proxy**

2584 Again, the use of groundwater elevations as a substitute metric for groundwater storage is appropriate
2585 because change in storage is directly correlated to changes in groundwater elevation.

2586 **Causes**

2587 Long-term sustainability of groundwater is achieved when pumping and recharge are measured and
2588 balanced over multiple wet and dry cycles. When the groundwater pumping exceeds recharge,
2589 groundwater levels may decline. Similarly, when recharge exceeds pumping, groundwater levels may
2590 rise. Lower-than-average precipitation and snowpack over the last 20 years have resulted in declining
2591 groundwater levels in some parts of the Basin. A similar period of declining water levels occurred in the
2592 late 1980s through the middle of the 1990s. In the late 1990s, several years in a row of above-average
2593 precipitation caused groundwater levels to fully recover. Future wet periods, enhanced recharge,
2594 increased storage, and addressing data gaps will likely cause groundwater storage to experience a similar
2595 recovery and maintain balance within the Basin.

2596 **Criteria**

2597 As said, the measurable objective and the minimum threshold for groundwater levels and groundwater
2598 storage are the same. The monitoring network described in Chapter 8 – Monitoring Networks is also the
2599 same for both groundwater levels and storage. As such, the GSAs will use the voluntary and
2600 discretionary protocol described in the groundwater level section and the well mitigation program
2601 described in Section 9 as a technique to improve management of groundwater when groundwater storage
2602 is below the measurable objective but above the minimum threshold.

2603 **Effects**

2604 Please *refer to* the “Effects” discussion in the groundwater levels section of this chapter, as the content
2605 in both sections is the same.

2606 **7.3.3 Seawater Intrusion**

2607 §354.26(d) of the GSP Regulations states that “An agency that is able to demonstrate that Undesirable
2608 Results related to one or more sustainability indicators are not present and are not likely to occur in a basin
2609 shall not be required to establish criteria for undesirable results related to those sustainability indicators.”

2610 The BVGB is not located near an ocean and ground surface elevations are over 4000 feet above msl.
2611 Seawater intrusion is not present and is not likely to occur. Therefore, SMCs are not required for
2612 seawater intrusion as per §354.26(d) cited above.

2613 **7.3.4 Water Quality**

2614 As described in Chapter 5 – Groundwater Conditions, the groundwater quality conditions in the Basin
2615 are overall excellent (DWR 1963, Reclamation 1979). While the water quality is considered excellent in
2616 the Basin, water quality is an important issue to both agricultural and domestic users within the Basin

2617 and they are working in coordination to maintain excellent water quality. The multitude of programs
2618 which regulate water quality is listed in Section 3.5.

2619 In addition, Big Valley residents are voluntarily coordinating and participating in activities that will
2620 ensure continued excellent quality water in the Basin (see Section 9). Over the last 15 years, landowners
2621 have drilled stock watering wells as part of the EQIP program to protect water quality in streams. In
2622 2018, the Upper Pit River Watershed IRWMP 2017 Update was completed. This document conducted a
2623 thorough analysis of the entire Pit River Watershed and found no water quality issues within the BVGB.
2624 Agricultural users are also proactively managing water quality *via* partnerships with agencies such as the
2625 NRCS to implement on-site programs which are designed to protect water quality as detailed in Chapter
2626 9 – Projects and Management Actions. As described in Section 1.1 – Introduction, agricultural users
2627 primarily grow low-impact crops with no-till methods and little application of fertilizer or pesticides.
2628 Domestic water users are also assisting in maintaining good water quality within the Basin through
2629 community action. Through the civic process, Big Valley residents were engaged in the development of
2630 the Modoc and Lassen County ordinances to deter unlicensed outdoor marijuana growers and the
2631 unpermitted use of pesticides and rodenticides, which may make their way into the groundwater and
2632 surface water. The domestic water users are also actively seeking to assist in code enforcement and
2633 reduce the amount of harmful debris within the Big Valley communities that may cause water quality
2634 issues. Public outreach through the offices of Public Health, Environmental Health, and the Regional
2635 Recycling Group Recycle Used Oil and Filter Campaign will assist in maintaining excellent water
2636 quality. These outreach efforts are further discussed in Chapter 9 – Projects and Management Actions.
2637 The definition of undesirable results, measurable objectives, and minimum thresholds for water quality
2638 are described below.

2639 **Description**

2640 Consistent with the guidance provided in §354.28(b)(4) of the GSP Regulations related to groundwater
2641 quality, undesirable results for degraded water quality are defined as when the degradation of quality
2642 results in significant and undesirable impacts to the long-term viability of agriculture, community and
2643 domestic uses, and natural and wildlife uses in the Basin.

2644 **Causes**

2645 Earlier sections of the GSP have described the low-impact land uses across the Basin and describe the
2646 reasoning that significant changes are unlikely to occur in the future. Although highly improbable, there
2647 are several potential causes of future degradation of groundwater quality in the Basin, including:

- 2648 • Point-source chemical contamination from unregulated waste discharge (e.g., wastewater, septic,
2649 industry) or leaking fuel storage tanks
- 2650 • In the unlikely event that agricultural practices shift toward more fertilizer-intensive practices
2651 than currently exists, there would be a potential for nutrient accumulation in groundwater.
- 2652 • Declining groundwater levels that result in the mobilization of constituents of concern and
2653 increased concentrations of these constituents in groundwater

- Groundwater pumping or projects resulting in the mobilization of constituents of concern and/or groundwater contaminant plumes

These causes are unlikely to occur given the low-impact land uses in the Basin, the short growing season, the controlled nature of the current groundwater contaminant plumes, and the agricultural and domestic users' robust effort to conduct conservation.

Criteria

In identifying the constituents of concern for which the GSAs would develop SMCs, the GSAs considered the following:

- Feedback from stakeholders on water quality concerns, including the groups identified in Section 7.3.1 – Groundwater Levels.
- Historical groundwater quality in the Basin and recent trends (see Chapter 5) compared to water quality objectives.
- Role of other agencies in managing constituents of concern.

The GSAs concluded that SMCs should be developed for TDS and nitrate due to their nexus to the sustainability goal, the definition of undesirable results regarding groundwater quality, and the ability of the GSAs to measurably impact TDS and nitrate via PMAs. The GSAs chose not to develop SMCs for constituents of concern that are found and managed via other regulatory programs (e.g., DTSC, DDW). However, the GSAs will continue to coordinate with relevant regulatory agencies and water users to ensure that beneficial uses and users are protected.

The GSAs also chose not to develop SMCs for other naturally occurring constituents of concern. The most recent available data on water quality in the Basin indicate that most constituents which have recent exceedances of primary or secondary MCLs (i.e., arsenic, iron, and manganese) are naturally occurring. These constituents are driven primarily by natural processes and local hydrogeologic conditions, and the GSAs cannot control them through groundwater management processes. Therefore, the GSAs do not propose any criteria related to naturally occurring constituents.

Following the state's drinking water standards, the maximum thresholds for TDS and nitrate are set at their respective MCLs: 500 mg/L for TDS (secondary MCL) and 10 mg/L for nitrate (primary MCL). MOs for TDS and nitrate are the current quality, which is about 300 mg/L for TDS and less than 1 mg/L for nitrate. MOs are developed for each monitoring well.

The maximum threshold is defined as three or more wells with a TDS⁵⁸ and/or nitrate measurements that are above the MCL for three consecutive years. This occurrence would indicate changed conditions that

⁵⁸ SC will be used as a proxy for TDS. Chapter 5.4 demonstrates a strong correlation between TDS and SC in Basin groundwater, indicating that TDS is approximately 0.66 times the SC in the Basin. Therefore, the maximum threshold of TDS equals about 760 µS/cm of SC. The MO for TDS equates to about 450 µS/cm of SC.

2685 would require management actions to address. The monitoring programs associated with these criteria
2686 are defined in Section 8.2.2.

2687 **Effects**

2688 If groundwater quality were to degrade to or beyond the MTs for TDS and nitrate, undesirable results
2689 would occur for all beneficial uses and users to varying degrees. These impacts include:

- 2690 • Agricultural uses: Increases in TDS of water used to irrigate crops could reduce water uptake in
2691 crops and increase crop toxicity, leading to reduced crop yields and damaged crops. Furthermore,
2692 the accumulation of TDS in soils over time can render land unsuitable for crop irrigation.
- 2693 • Municipal water users: For municipal water users in the Basin that rely on supply wells for
2694 drinking water, degraded groundwater quality could cause service interruptions and increased
2695 costs due to the need for additional treatment to meet water quality standards.
- 2696 • Domestic users: Degraded groundwater quality in domestic wells could result in health impacts
2697 for users. Domestic users could incur increased costs in response to degraded groundwater
2698 quality due to a need to modify wells, add well-head treatment, or find alternative water supplies.
2699 In addition, degraded groundwater quality could impact property values, as wells are typically
2700 sampled during property transactions.
- 2701 • Natural and wildlife uses: Degraded groundwater quality could impact the viability of the
2702 habitats and ecosystems that rely on groundwater and those who rely on these for recreation.

2703 **7.3.5 Land Subsidence**

2704 As detailed in Section 5.5, little-to-no measurable subsidence is occurring in the Basin. Furthermore,
2705 causes of micro-subsidence identified by the InSAR data presented in Section 5.5 are likely due to either
2706 agricultural land leveling operations or natural geologic activity. The specific identified areas of
2707 subsidence are considered acceptable and necessary agricultural operations to promote efficient
2708 irrigation. Similar situations may occur throughout the Basin and will be investigated if identified
2709 through InSAR. As detailed in Chapter 5, very minor areas of land subsidence have been observed in the
2710 Basin by the Continuous Global Positioning System site near Adin (CGPS P347, -0.6 inch over
2711 11 years) and by the InSAR data provided by DWR (maximum of -3.3 inches over 4 years). The cause
2712 of these downward displacements has not been determined conclusively, but due to the widespread
2713 nature is likely natural and unavoidable due to the movement of Tectonic plates.

2714 Given the lack of significant subsidence and the fact that some subsidence is acceptable to stakeholders
2715 in the absence of impacts on infrastructure (roadways, railroads, conveyance canals, and wells among
2716 others), no undesirable results have occurred and none are likely to occur. Therefore, per §354.26(d),
2717 SMCs were not established for subsidence. At the five-year updates of this GSP, data from GPS P347
2718 and InSAR data provided by DWR will be assessed for notable subsidence trends that can be correlated
2719 with groundwater pumping. SMCs and undesirable results for subsidence will be established at the five-
2720 year update only if trends indicate significant and unreasonable subsidence is likely to occur in the
2721 subsequent 5 years.

7.3.6 Interconnected Surface Water

The rivers and streams of the Basin are an important and vital resource for all interested parties. The agricultural industry has an extensive history of surface-water use in the Basin and has operated for over a century. Many of the surface-water rights on farms and ranches are pre-1914 water rights. All surface water flowing in the Basin during irrigation season is fully allocated. For all interested parties, there is need for better tracking of surface-water allocations.

Section 5.6 presents the available information related to interconnected surface water. It is nearly impossible to quantify surface-water depletion impact based on flow alone, even in an area where there is good data, such as pumping quantity, deep aquifer groundwater elevation, precipitation, and surface flow. Many of these criteria are current data gaps in the Basin, particularly the variation in precipitation and flow across the Basin. Uncertainty in the amount of surface water entering the Basin and the unpredictability of weather patterns has already been established and will continue to be a barrier. Pumping data in the Basin is also a data gap as there is no current monitoring system which annually measures the amount of water pumped. The connection between upland recharge areas and the unique volcanic geologic features surrounding the Basin are mostly unknown and make understanding the connectivity of surface and groundwater very difficult, if not impossible.

Furthermore, the number of wells located next to streams and the river in the Basin are not quantified. While Chapter 5 – Groundwater Conditions details the streams in Big Valley which *may* be interconnected by a “...continuous saturated zone to the underlying aquifer and the overlying surface water...” (DWR 2016c), there is currently no evidence to support interconnected surface water. Therefore, there is a lack of evidence for interconnection of streams. **Figure 5-22** overlays the general direction(s) of groundwater flow around the Basin in relation to the major streams. Also shown is the general direction of flow determined from the newly constructed well clusters near Adin and Lookout. The remaining clusters were constructed later and do not yet have a sufficient period of data to determine flow directions with certainty. The newly constructed monitoring wells will continue to gather data on whether there is any evidence of interconnected surface water.

Chapter 4 – Hydrogeological Conceptual Model identified data gaps related to the effect of Ash Creek, Pit River, and smaller streams on recharge. These data gaps may partially be filled once adequate data from the five monitoring well clusters are collected. Scientific research related to groundwater and surface water will improve over time. As this science is made available, the GSAs will work to locate funding for improved data depending on available staffing and financial resources.

SMCs were not established for interconnected surface water because there is insufficient evidence to determine that Undesirable Results are present or likely to occur. At the five-year updates of this GSP, data from newly established well clusters, new and historical stream gages, and the monitoring network detailed in Chapter 9 – Projects and Management Actions will be assessed to determine if undesirable trends are occurring in the principal aquifer. At the five-year update, SMCs will be considered only if the trends indicate that undesirable results are likely to occur in the subsequent 5 years.

2759 **7.4 Management Areas**

2760 Management areas are not being established for this GSP. As the GSAs address data gaps and improve
2761 their understanding of the basin, the GSAs may consider developing management areas in a future update.

2762 8. Monitoring Networks § 354.34

2763 8.1 Monitoring Objectives

2764 This chapter describes the monitoring networks necessary to implement the BVGB GSP. The
2765 monitoring objectives under this GSP are twofold:

- 2766 • to characterize groundwater and related conditions to evaluate the Basin’s short-term, seasonal,
2767 and long-term trends related to the six sustainability indicators, and
- 2768 • to provide the information necessary for annual reports, including water levels and updates to the
2769 water budget.⁵⁹

2770 The sections below describe the different types of monitoring required to meet the above objectives,
2771 including groundwater levels, groundwater quality, subsidence, streamflow, climate, and land use. Each
2772 type of monitoring relies on existing programs not governed by the GSAs and therefore the monitoring
2773 networks described in this chapter are subject to change if the outside agencies modify or discontinue
2774 their monitoring. The monitoring networks will generally be adjusted to the availability of data collected
2775 and provided by the outside agencies.

2776 8.2 Monitoring Network

2777 8.2.1 Groundwater Levels

2778 Monitoring of groundwater levels is necessary to meet several needs based on the above stated
2779 objectives of the monitoring networks, including:

- 2780 • Representative monitoring for groundwater levels
- 2781 • The groundwater contours required for annual reports
- 2782 • Shallow groundwater monitoring to help define potential interconnection of groundwater
2783 aquifers with surface-water bodies

2784 **Table 8-1** lists existing wells that have been used for groundwater monitoring and includes the newly-
2785 constructed, dedicated monitoring wells. The table indicates which wells are used for each of the three
2786 groundwater level monitoring networks. A more detailed table with elements required under §352.4(c) is
2787 included in **Appendix 8A**. Further details for each well and water level hydrographs are included in
2788 **Appendix 5A**. **Appendix 8B** contains the As-Built Drawings for the dedicated monitoring wells, also
2789 required by §352.4(c). The locations of the wells are shown on **Figure 8-1**.

⁵⁹ Water levels are needed to generate hydrographs, contours, and an estimate of change in storage as required for the annual report. Also required for the annual reports are estimates of groundwater pumping, surface-water use, and total water use which can be estimated from the water budget.

Table 8-1 Big Valley Groundwater Basin Water Level Monitoring Network

Well Name	Well Use	Well Depth (feet bgs)	Screen ¹ Interval (feet bgs)	Representative Well ²	Depth to Water (feet bgs)		Groundwater Elevation (feet msl)		Contour Well	Shallow Well	Monitoring Frequency
					Measurable Objective ³	Minimum Threshold ⁴	Measurable Objective ³	Minimum Threshold ⁴			
01A1	Stockwatering	300	40 - 300	X	148	288	4035	3895	X		biannual
03D1	Irrigation	280	50 - 280						X		biannual
06C1	Irrigation	400	20 - 400						X		biannual
08F1	Other	217	26 - 217	X	32	172	4222	4082	X		biannual
12G1	Residential	116	--								biannual
13K2	Irrigation	260	20 - 260	X	66	206	4062	3922	X		biannual
16D1	Irrigation	491	100 - 491	X	93	233	4079	3939	X		biannual
17K1	Residential	180	30 - 180						X		biannual
18E1	Irrigation	520	21 - 520						X		biannual
18M1	Irrigation	525	40 - 525								biannual
18N2	Residential	250	40 - 250								biannual
20B6	Residential	183	41 - 183	X	41	181	4085	3945	X		biannual
21C1	Irrigation	300	30 - 300						X		biannual
22G1	Residential	260	115 - 260								biannual
23E1	Residential	84	28 - 84								biannual
24J2	Irrigation	192	1 - 192						X		biannual
26E1	Irrigation	400	20 - 400	X	20	160	4114	3974	X	X	biannual
28F1	Residential	73	--								biannual
32A2	Other	49	--						X		biannual
32R1	Irrigation	--	--						X		biannual
ACWA-1	Irrigation	780	60 - 780						X		biannual
ACWA-2	Irrigation	800	50 - 800						X		biannual
ACWA-3	Irrigation	720	60 - 720	X	23	163	4136	3996	X	X	biannual
BVMW 1-1	Observation	265	175 - 265	X	53	193	4162	4022	X		continuous ⁵
BVMW 1-2	Observation	52	32 - 52 ⁶							X	continuous ⁵
BVMW 1-3	Observation	50	30 - 50 ⁶							X	continuous ⁵
BVMW 1-4	Observation	49	29 - 49 ⁶							X	continuous ⁵
BVMW 2-1	Observation	250	210 - 250	X	22	162	4194	4054	X		continuous ⁵
BVMW 2-2	Observation	70	50 - 70 ⁶							X	continuous ⁵
BVMW 2-3	Observation	70	50 - 70 ⁶							X	continuous ⁵
BVMW 2-4	Observation	60	40 - 60 ⁶							X	continuous ⁵
BVMW 3-1	Observation	185	135 - 185	X	18	158	4146	4006	X		continuous ⁵
BVMW 3-2	Observation	40	25 - 40 ⁶							X	continuous ⁵
BVMW 3-3	Observation	50	25 - 50 ⁶							X	continuous ⁵
BVMW 3-4	Observation	50	25 - 50 ⁶							X	continuous ⁵
BVMW 4-1	Observation	425	385 - 415	X	65	205	4088	3948	X		continuous ⁵
BVMW 4-2	Observation	74	54 - 74 ⁶							X	continuous ⁵
BVMW 4-3	Observation	80	60 - 80 ⁶							X	continuous ⁵
BVMW 4-4	Observation	93	73 - 93 ⁶							X	continuous ⁵
BVMW 5-1	Observation	540	485 - 535	X	47	187	4082	3942	X		continuous ⁵
BVMW 5-2	Observation	115	65 - 115 ⁶							X	continuous ⁵
BVMW 5-3	Observation	85	65 - 85 ⁶							X	continuous ⁵
BVMW 5-4	Observation	90	70 - 90 ⁶							X	continuous ⁵

Notes:

-- = information not available

feet bgs = feet below ground surface (depth to water)

feet msl = feet above mean sea level (groundwater elevation NAVD88)

water year = October 1 to September 30

¹ For the purposes of this GSP, the terms "screen" or "perforation" encompasses any interval that allows water to enter the well from the aquifer, including casing perforations, well screens, or open hole.² Representative wells for Water Levels and Groundwater Storage³ Measurable objective is set at the Fall 2015 water level or at the lowest water level measured for wells that don't have a Fall 2015 measurement⁴ Minimum threshold is set at 140 feet below the measurable objective⁵ Continuous measurements are currently available due to the water level transducers installed in the wells. Less frequent monitoring may be appropriate in the future once the period of record of these wells is longer and interconnection of surface and groundwater is better understood.⁶ These shallow wells were constructed for this Plan at the recommendation of certified hydrogeologists.

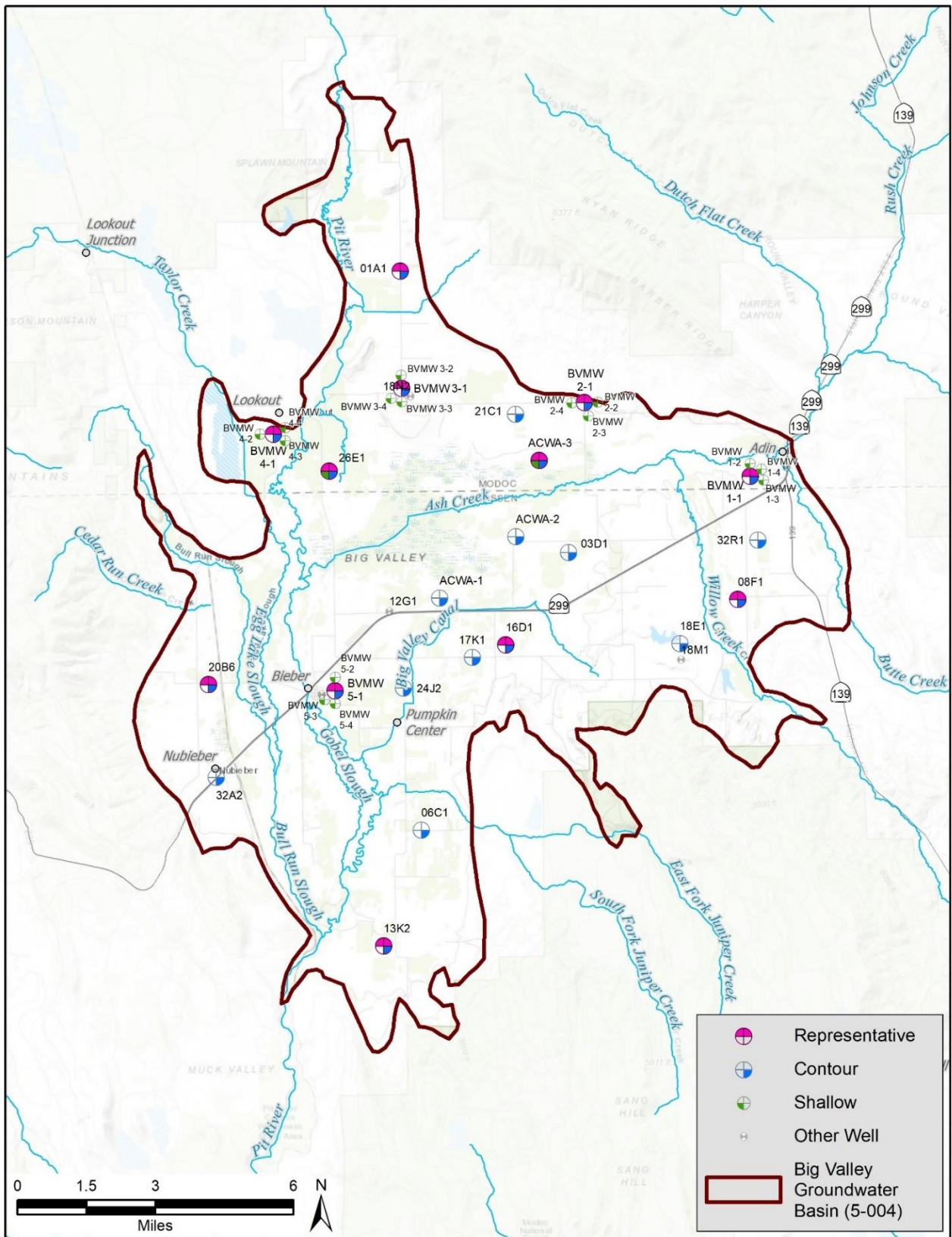


Figure 8-1 Water Level Monitoring Networks

2795 GSP Regulation §352.4 states that monitoring sites that do not conform to DWR BMPs, "...shall be
2796 identified and the nature of the divergence from [BMPs] described." DWR's BMP (DWR 2016e) states
2797 that wells should be dedicated to groundwater monitoring. In addition, §354.34 indicates that wells in
2798 the monitoring network should have "depth-discrete"⁶⁰ perforated intervals." Many of the historical wells
2799 listed in **Table 8-1** diverge from these standards and the explanation of their suitability for monitoring is
2800 described below.

2801 Previous groundwater level monitoring in the Basin has relied on existing domestic and irrigation wells
2802 that often have pumps in them used for irrigation, stock watering, or domestic uses. The intent of
2803 groundwater level monitoring is to capture static (non-pumping) water levels. However, historical
2804 monitoring is performed before and after the irrigation season: March or April for spring measurements
2805 and October for fall measurements.⁶¹ Since these measurements are taken at a time when large-scale
2806 groundwater use is typically not active, using production wells is acceptable in the absence of dedicated
2807 monitoring wells. DWR staff who monitor the wells will indicate if the well (or a nearby well) is
2808 pumping in order to be considered when assessing water level measurements.

2809 In addition to the well use considerations, most of the historical wells do not have depth-discrete screen
2810 intervals,⁶² as the typical well construction practice in the Basin has been to use long (100 feet up to
2811 800 feet) screens, perforations, or open hole below about 30 to 40 feet of blank well casing. This
2812 construction practice is designed to maximize well yield. The use of such long-screen wells is acceptable
2813 for monitoring in Big Valley because multiple principal aquifers have not been defined in the Basin and
2814 therefore these long intervals do not cross defined principal aquifers. Since most wells are constructed
2815 with this practice, water levels in these long-screen wells should be indicative of the aquifer as a whole
2816 and less likely to be affected by perched water or isolated portions of the aquifer that may not be
2817 interconnected over large areas.

2818 **8.2.1.1 Representative Groundwater Levels and Storage Monitoring** 2819 **Network**

2820 The representative monitoring network includes all wells that have been assigned sustainable
2821 management criteria (minimum thresholds and measurable objectives). DWR does not give strict
2822 guidance on the number or density of wells appropriate for representative monitoring. DWR's BMP
2823 document cites sources that recommend well densities ranging from 0.2 to 10 wells per 100 square miles
2824 (DWR 2016e). Through consultation with the BVAC, 12 wells were selected for representative
2825 monitoring of the Basin (which has an area of about 144 square miles), a density of 8.3 wells per 100
2826 square miles.

⁶⁰ "Depth-discrete" means that the screens, perforations, or open hole is relatively short (typically less than about 20 feet).

⁶¹ Local stakeholders have advocated for future measurements to occur in mid-March and late-October to ensure they are taken before and after the irrigation season.

⁶² Screens in this context includes perforated casing, well screens, or open hole, all of which allow water to flow into the well.

2827 Extensive discussion and consideration were performed by the GSAs and local stakeholders to
2828 determine an appropriate water level monitoring network. Based on the comprehensive review of the
2829 wells, the network was selected based on:

- 2830 • Spatial distribution throughout the Basin to represent agricultural pumping areas
- 2831 • Areas with a high density of domestic wells
- 2832 • An existing monitoring record (where available) to track long-term trends
- 2833 • Access for long-term future monitoring
- 2834 • Well depth (greater than the MT)
- 2835 • Wells dedicated to monitoring where available

2836 **Table 8-1** shows the MOs and MTs for the 12 representative wells. As stated in Chapter 7 – Sustainable
2837 Management Criteria, MOs are set at the fall 2015 water level. MTs are shown in **Table 8-1** to protect
2838 agricultural beneficial use.

2839 **8.2.1.2 Groundwater Contour Monitoring Network.**

2840 The GSP Regulations (§356.2) require that annual reports include groundwater contours for the previous
2841 year (spring and fall) as well as an estimate of change in groundwater storage. Historical groundwater
2842 storage changes were estimated in Chapter 5 – Groundwater Conditions, using groundwater contours
2843 contained in **Appendix 5B**. Therefore, for annual reports to be comparable to historical conditions, the
2844 wells used for groundwater contouring should be the same, or nearly the same, as those used for the
2845 historical contours. Five wells that were used in the historical contours are not included in the
2846 groundwater contour monitoring network (18M1, 18N2, 22G1, 23E1 and 28F1), because they were
2847 either replaced by a new dedicated monitoring well or there was another well close by that makes the
2848 measurement unnecessary. **Table 8-1** lists the groundwater contour monitoring network and **Figure 8-1**
2849 shows their locations.

2850 **8.2.1.3 Shallow Groundwater Monitoring Network**

2851 Chapter 5 – Groundwater Conditions discusses interconnected surface water and describes the major
2852 streams in the BVGB. As described in Chapter 7 – Sustainable Management Criteria, there is currently
2853 no conclusive evidence for interconnection of streams with the groundwater aquifer and all summer
2854 flows are 100 percent allocated based on existing surface-water rights. Therefore, measurable objectives,
2855 minimum thresholds, and a representative monitoring network for interconnected surface water have not
2856 been established. Monitoring will be assessed at the five-year update. Through consultation with the
2857 BVAC, a shallow monitoring network has been established that includes the shallow wells from each of
2858 the five monitoring well clusters. These clusters were designed to measure the magnitude and direction
2859 of shallow groundwater flow and are equipped with water level transducers that collect continuous
2860 (15-minute interval) water level measurements so that potential correlations with streamflow gages can
2861 be assessed. Well 26E1 was also added to the shallow network due to its position between the two major
2862 streams (Pit River and Ash Creek), its shallow screen depth (20 feet bgs), and its lack of a pump. Well
2863 number ACWA-3 was also selected for the shallow network due to its location on the ACWA within the

northern portion of the Ash Creek wetlands associated with Big Swamp and the possible groundwater-dependent ecosystems shown in **Figure 5-23**. **Table 8-1** lists the shallow groundwater monitoring network, and **Figure 8-1** shows the well locations.

8.2.1.4 *Monitoring Protocols and Data Reporting Standards*

Currently, DWR measures groundwater levels at 21 wells in Big Valley. The expectation of the GSAs is that DWR will also monitor levels at the dedicated monitoring wells and download the transducer data from these wells. Transducer data will be corrected for barometric fluctuations using data from two barometric probes installed at two of the clusters. Water level data will be made available on the state's SGMA Data Viewer website for use by the GSAs in their annual reports and GSP updates. DWR's water level monitoring protocols are documented in their Monitoring Protocols, Standards and Sites BMP (DWR 2016b). Portions of the BMP relevant to water levels are included in **Appendix 8C**.

8.2.1.5 *Data Gaps in the Water Level Monitoring Network*

Data gaps are identified in this section using guidelines in SGMA Regulations and BMP published by DWR on monitoring networks (DWR, 2016e). **Table 8-2** summarizes the suggested attributes of a groundwater-level monitoring network from the BMP in comparison to the current network and identifies data gaps. No data gaps exist except the area near well 06C1, shown on **Figure 8-1**.

8.2.2 Groundwater Quality

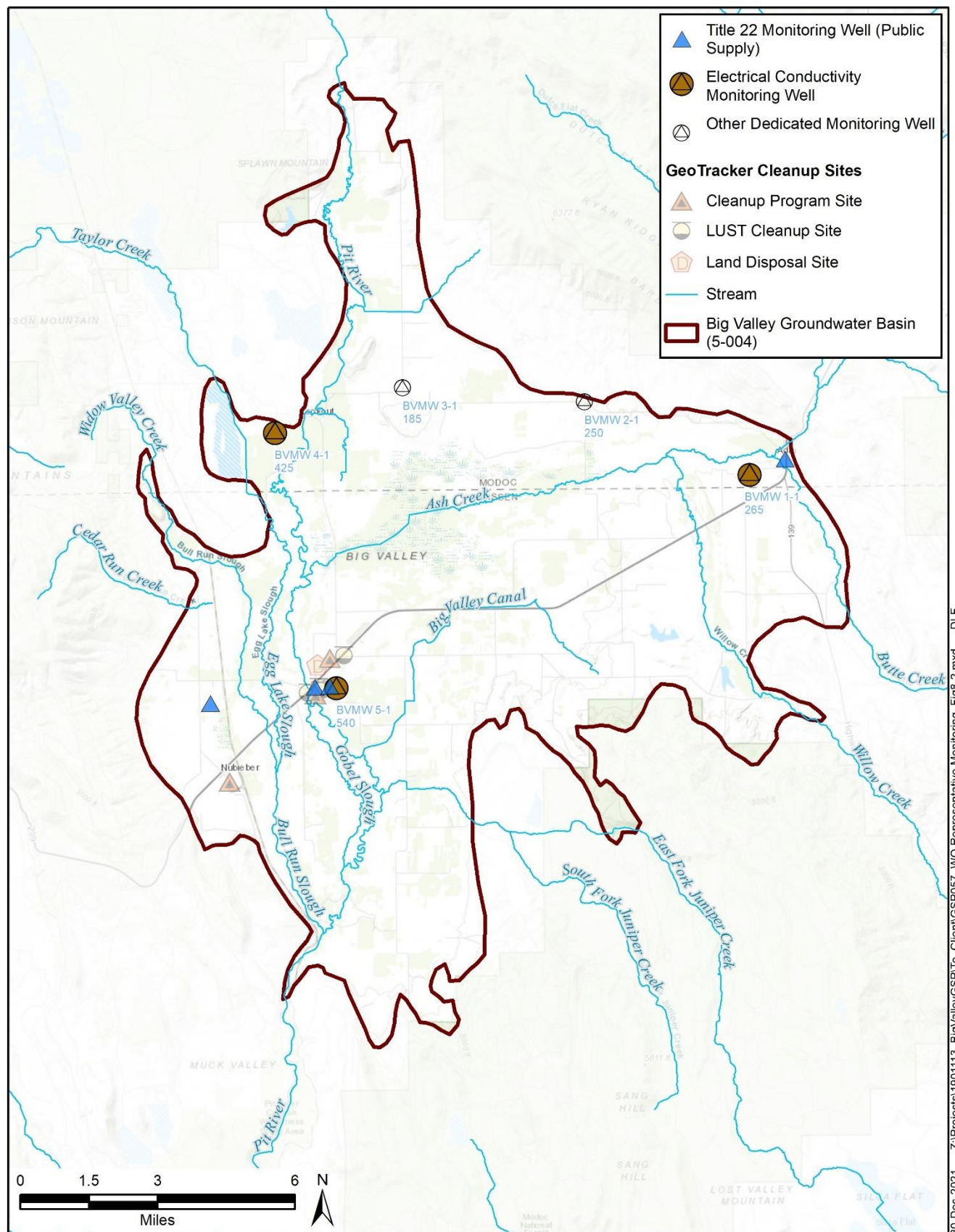
Chapter 5 describes overall water quality conditions as excellent, and the few constituents that are infrequently elevated in Big Valley are all naturally occurring. Based on the information described in Chapter 5, measurable objectives were defined for TDS and nitrate.

The GSAs will leverage water quality reported for wells regulated by the State Water Board's DDW. DDW wells are shown on **Figure 8-2** and are in Bieber and Adin, with one well in the western portion of the Basin. In addition to data from DDW, the GSAs have installed three transducers to measure electrical conductivity (EC), which is used as a proxy for TDS, at wells BVMW 1-1, 4-1, and 5-1, shown on **Figure 8-2**. These transducers increase the distribution of the monitoring network around the Basin and with increased frequency of measurement will allow the GSAs to better understand temporal trends in TDS that may not be apparent from infrequent DDW measurements. The EC transducers may be able to put anomalous⁶³ measurements from DDW into better context. **Table 8-3** lists the groundwater quality monitoring sites and their details.

⁶³ Anomalous measurements are those that are out of the norm or deviate from what would be expected. The source of the deviation from the norm should be noted and if errors are identified, the measurement(s) removed from the dataset based on professional judgment. At a minimum, anomalous measurements are marked as questionable, and the potential source(s) of the deviation documented.

Table 8-2 Summary of Best Management Practices, Groundwater Level Monitoring Well Network and Data Gaps

Best Management Practice (DWR, 2016d)	Current Monitoring Network	Data Gap
Groundwater level data will be collected from each principal aquifer in the Basin.	12 representative wells	None. There is a single principal aquifer and therefore all wells monitor the aquifer.
Groundwater level data must be sufficient to produce seasonal maps of groundwater elevations throughout the Basin that clearly identify changes in groundwater flow direction and gradient (Spatial Density).	22 contour wells	21 of the 22 proposed contour wells are currently monitored. Well 06C1 was monitored up until WY 2016. This well fills an important spatial area in the southern part of the Basin. To fill the data gap, the well could be re-activated, a new willing well owner found, or a dedicated monitoring well constructed in the area.
Groundwater levels will be collected during the middle of October and March for comparative reporting purposes, although more frequent monitoring may be required (Frequency).	All proposed monitoring network wells, except 06C1, are measured biannually, with the dedicated monitoring wells collecting continuous (15-minute) measurements	None. Current DWR monitoring occurs in March or April and in October for seasonal high (spring) and low (fall) respectively.
Data must be sufficient for mapping groundwater depressions, recharge areas, and along margins of basins where groundwater flow is known to enter or leave a basin.	Groundwater depressions are present in the east-central part of the Basin near 03D1 and in the southern portion of the Basin near Well 06D1 and Well 13K2	03D1 defines the east-central depression. To ensure adequate definition of the southern depression, well 06C1 could be re-activated, a new, willing well owner found, or a dedicated monitoring well constructed in the area.
Well density must be adequate to determine changes in storage.	22 contour wells	Filling of data gap near 06C1.
Data must be able to demonstrate the interconnectivity between shallow groundwater and surface-water bodies, where appropriate.	17 shallow wells, including 5 clusters of 3 shallow wells each	None.
Data must be able to map the effects of management actions, i.e., managed aquifer recharge.	22 contour wells and 17 shallow wells	None. Once projects and management actions are defined, monitoring specific to those projects and management actions will be identified.
Data must be able to demonstrate conditions near Basin boundaries; agencies may consider coordinating monitoring efforts with adjacent basins to provide consistent data across Basin boundaries. Agencies may consider characterization and continued impacts of internal hydraulic boundary conditions, such as faults, disconformities, or other internal boundary types.	22 contour wells and 17 shallow wells	None. There are no direct boundaries with adjacent Basins. Inflow/outflow from Basin addressed above.
Data must be able to characterize conditions and monitor adverse impacts to beneficial uses and users identified within the Basin.	12 representative wells	None



2897 **Table 8-3 Big Valley Groundwater Basin Water Quality Monitoring Network**

Well Name	SWRCB Public Source Code	DWR Site Code	Well Use	Well Depth (feet bgs)	Open Hole	Screen ¹ Interval (feet bgs)	Constituents
Bieber Town Well 1	1810003-001		Public Supply	200	yes	62 - 200	Title 22
Bieber Town Well 2	1810003-002		Public Supply	240	no	60 - 240	Title 22
Adin Ranger Station Well 3	2500547-003		Public Supply	--	--	--	Title 22
Intermountain Conservation Camp Well 1	1810801-001		Public Supply	--	--	--	Title 22
BVMW 1-1		411880N1209599W001	Observation	265	no	175 - 265	Electrical conductivity
BVMW 3-1		412029N1211587W001	Observation	185	no	135 - 185	Electrical conductivity
BVMW 5-1		411219N1211339W001	Observation	540	no	485 - 535	Electrical conductivity

Notes:

-- = information not available

feet bgs = feet below ground surface (depth to water)

¹ For the purposes of this GSP, the terms "screen" or "perforation" encompasses any interval that allows water to enter the well from the aquifer, including casing perforations, well screens, or open hole.

2898

2899 Additionally, the GSAs will implement a voluntary water quality monitoring program for nitrate and
 2900 arsenic. The GSAs understand that it is important to provide tools to domestic well users to understand
 2901 their water quality. To empower domestic well users to understand their water quality at their wells, the
 2902 GSAs will support the University of California Cooperative Extension (UCCE)/County farm advisors to
 2903 provide at-home nitrate and arsenic test strips to domestic well users in the Basin at no cost. In addition,
 2904 the UCCE/County farm advisors will provide guidance on how to administer the tests and, if desired by
 2905 and with permission from the domestic well owner, document the water quality findings to aid the GSAs
 2906 in understanding Basin water quality.

2907 It should be noted that monitoring also occurs at local restaurants/markets and at domestic wells during
 2908 land transactions. The former is reported to the counties and can be reviewed periodically as a supplement
 2909 to the public supply well data. The latter is not publicly available; however, it provides existing and future
 2910 landowners the information necessary to understand the water quality of domestic wells.

2911 **8.2.2.1 Monitoring Protocols and Data Reporting Standards**

2912 While DWR provides guidance on protocols and standards for water quality in their BMP (DWR 2016f),
 2913 these don't generally apply to the Big Valley water quality monitoring network. For the DDW wells,
 2914 monitoring protocols used by the parties responsible for collecting and analyzing samples will be relied
 2915 upon. DDW and other data regulated by the State Water Board is made available on their GAMA GIS
 2916 website. At the five-year update, the GSAs will obtain and analyze the available data. The measurements
 2917 for EC transducers are made in situ with no samples collected or analyzed in a laboratory. Monitoring
 2918 will be assessed at the 5-year update.

2919 **8.2.2.2 Data Gaps in the Water Quality Monitoring Network**

2920 **Table 8-4** summarizes the recommendations for groundwater quality monitoring from DWR's BMPs,
 2921 the current network, and data gaps. There are no data gaps in the water quality monitoring network.

2922 **8.2.3 Land Subsidence**

2923 As described in Chapter 5 - Groundwater Conditions and Chapter 7 – Sustainable Management Criteria,
 2924 no significant land subsidence has occurred in the BVGB, and no significant subsidence is likely to

2925 occur. Therefore, MOs, MTs and a representative monitoring network have not been established. This
2926 assessment was made based on a CGPS station near Adin (P347) and InSAR data provided by DWR.
2927 Future assessment of subsidence at the five-year GSP update will rely on data provided by NOAA, who
2928 operates Well P347, and updated InSAR data provided by DWR. The data will be assessed to determine
2929 if significant subsidence is occurring and the source of that subsidence.

Table 8-4 Summary of Groundwater Quality Monitoring, Best Management Practices and Data Gaps

Best Management Practices (DWR, 2016a)	Current Network	Data Gap
<p>Monitor groundwater quality data from each principal aquifer in the Basin that is currently, or may be in the future, impacted by degraded water quality.</p> <p>The spatial distribution must be adequate to map or supplement mapping of known contaminants.</p> <p>Monitoring should occur based upon professional opinion, but generally correlate to the seasonal high and low groundwater level, or more frequent as appropriate.</p>	<ul style="list-style-type: none"> • 4 public supply wells sampled per DDW standards • 3 monitoring wells with continuous EC data measured by transducers (proxy for TDS) • Voluntary nitrate and arsenic monitoring and reporting 	<p>None. Most known contaminants are located in Bieber and Nubieber. Monitoring at wells in Bieber and in BVMW 5-1 have not shown contaminants, but monitoring there would indicate if they become present.</p>
<p>Collect groundwater quality data from each principal aquifer in the Basin that is currently, or may be in the future, impacted by degraded water quality.</p> <p>Agencies should use existing water quality monitoring data to the greatest degree possible. For example, these could include ILRP, GAMA, existing RWQCB monitoring and remediation programs and drinking water source assessment programs.</p>	<ul style="list-style-type: none"> • 4 public supply wells sampled per DDW standards • 3 monitoring wells with continuous EC data measured by transducers (proxy for TDS) • Voluntary nitrate and arsenic monitoring and reporting • Other publicly available data from GAMA 	<p>None.</p>
Define the three-dimensional extent of any existing degraded water quality impact.	No degraded water quality impacts are present.	None.
Data should be sufficient for mapping movement of degraded water quality.	No degraded water quality impacts are present.	None.
Data should be sufficient to assess groundwater quality impacts to beneficial uses and users.	Voluntary nitrate and arsenic monitoring and documentation	None.
Data should be adequate to evaluate whether management activities are contributing to water quality degradation.	None at this time. Projects and management activities that are implemented will assess potential water quality impacts.	None.

2932 **8.2.3.1 Monitoring Protocols and Data Reporting Standards**

2933 Since the monitoring network relies on NOAA and DWR-provided data, the monitoring protocols and
2934 reporting standards for those organizations apply.

2935 **8.2.3.2 Data Gaps in the Subsidence Monitoring Network**

2936 Since InSAR data is contiguous across the Basin, there are no spatial data gaps. If subsidence is
2937 indicated by future InSAR datasets, there may be a need to field verify those areas to determine if field
2938 leveling has occurred or there is another reason or cause for the subsidence. Additional field validation
2939 could potentially be made by re-surveying monuments in the Basin, including those installed at the new
2940 monitoring wells.

2941 **8.2.4 Monitoring to Support Water Budget**

2942 **8.2.4.1 Streamflow and Climate**

2943 Streamflow and climate data are needed to update the water budget. Current monitoring sites are shown
2944 on **Figure 8-3**. Modoc County has been working to improve water budget estimates and is proposing to
2945 add a stream gage on the Pit River just north of the BVGB, shown on **Figure 8-3**, which will be
2946 maintained by the state. Data gaps for smaller streams, such as inflow from Roberts Reservoir, Taylor
2947 Creek and Juniper Creek are proposed to be filled by investigating SB-88 stream diversion records
2948 submitted to the State Water Board.

2949 **8.2.4.2 Land Use**

2950 Land use data is needed for updates to the water budget. Since 2014, DWR has provided land-use mapping
2951 using remote sensing processed by DWR's LandIQ mapping resource. DWR has provided these datasets
2952 for 2014, 2016, and 2018.⁶⁴ The GSAs will rely on DWR continuing to provide this land- use data to
2953 generate annual updates to the water budget. The most recent land-use data available will be used to
2954 generate the evapotranspiration estimates. Current research is being performed to develop the relationship
2955 between evapotranspiration (ET) and applied water. This research indicates that crops in this area are
2956 typically irrigated less than indicated by the assumptions made by multiplying ETo by crop coefficients.

⁶⁴ Landowners in the Basin have pointed out that these datasets are inaccurate, but they represent the best available information.

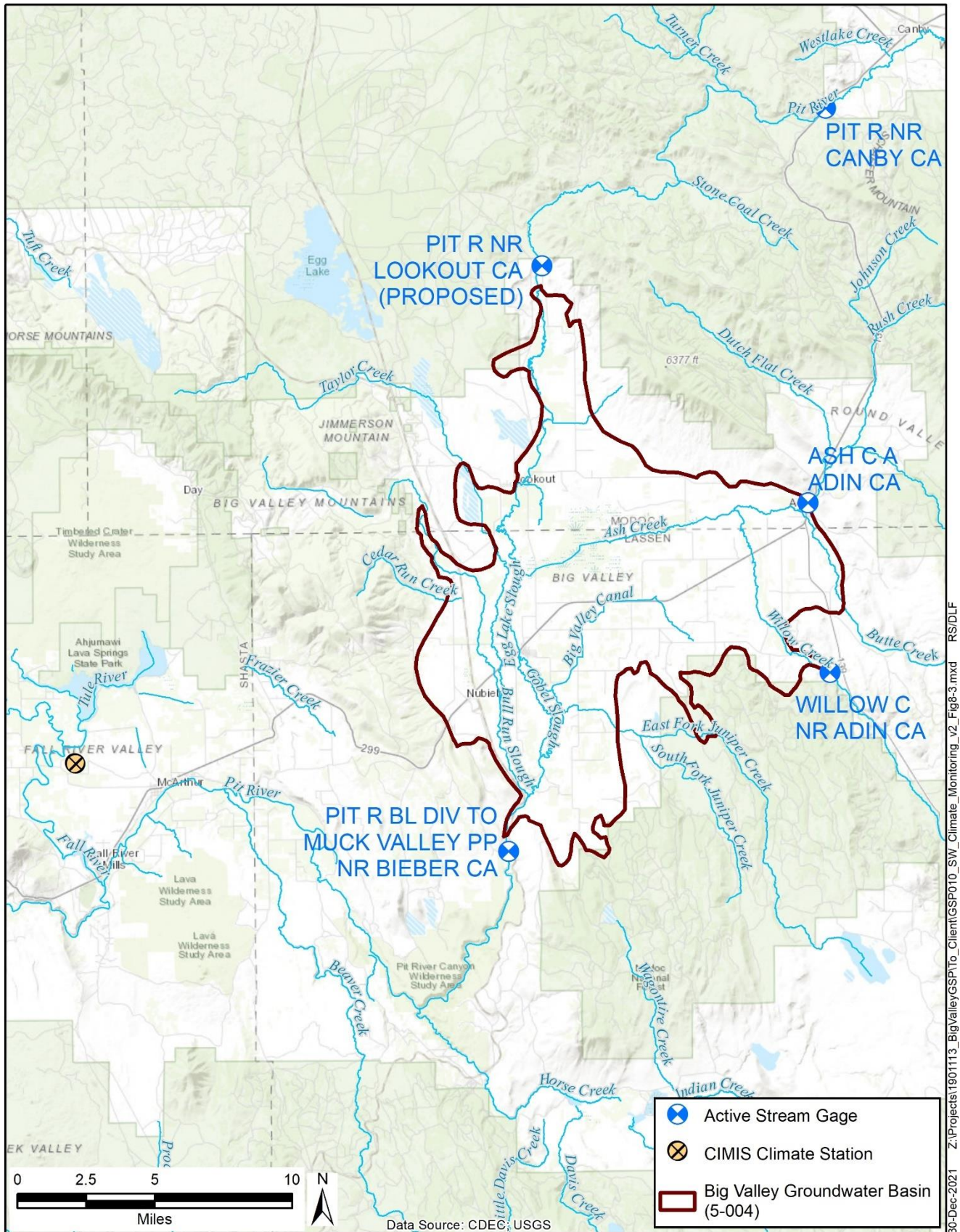


Figure 8-3 Proposed Surface-water and Climate Monitoring Network

2959

9. Projects and Management Actions §354.44

2960 Through an extensive planning and public outreach process, the GSAs have identified an array of
2961 projects and management actions (PMAs) that may be implemented to meet sustainability objectives in
2962 the BVGB. Additionally, numerous state and federal programs are available in the Basin to help meet
2963 the sustainability goals. Some of the projects can be implemented immediately, while others will take
2964 significantly more time for necessary planning and environmental review, navigation of regulatory
2965 processes, and implementation. The Big Valley Basin is relatively small, and while recharge does occur
2966 within the Basin itself, significant recharge comes from the extensive uplands surrounding the Basin.
2967 Projects will be located within the greater Big Valley watershed boundary shown in **Figure 9-1**.

2968 Although the Big Valley area is extremely rural and economically disadvantaged, and resource capacity
2969 is limited, there are several local, state, and federal agencies that can assist in project development.

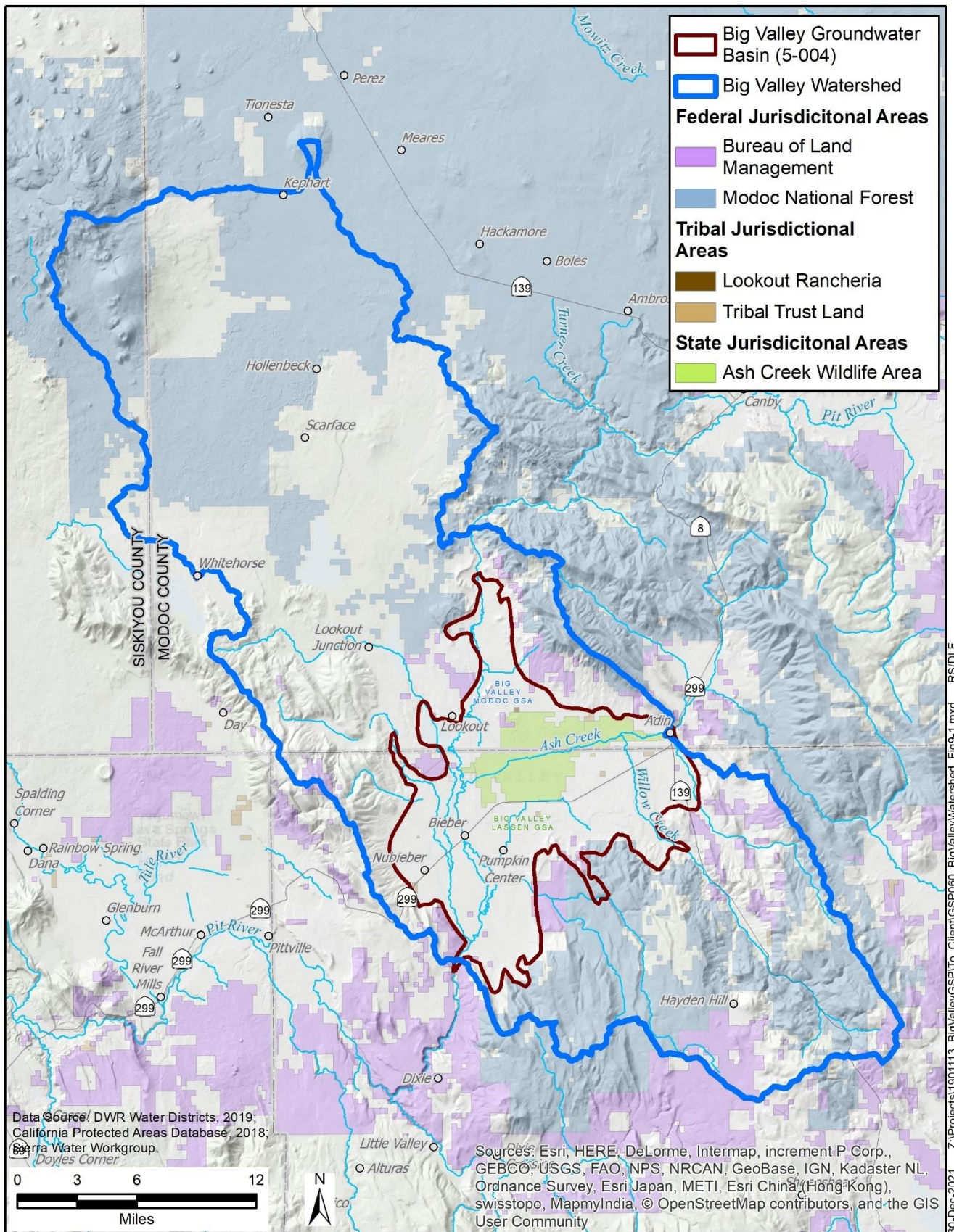
2970 Project implementation will also be impacted by funding acquisition. **Table 9-1** lists current state and
2971 local funding sources that can be targeted to support project planning and implementation. Modoc
2972 County's current SGMA Implementation Grant (acquired in 2023) is funding several of these projects
2973 and management actions.

2974 Chapter 5 demonstrates that most of the historical groundwater level changes are correlated to
2975 precipitation patterns, and the limitations and discrepancies described in the water budget (Chapter 6)
2976 demonstrate that the water budget tool tends to overestimate historical overdraft. However, the water
2977 budget tool is the best available tool currently available to project future conditions, and it indicates that
2978 future overdraft averages in the range of 1,000 to 2,000 AFY, depending on long-term climate impacts.
2979 If the Basin were to experience these conditions, then the GSAs would need to develop PMAs that
2980 would be reasonable to mitigate this overdraft.

2981 With a proactive approach to identify projects for increased recharge and conservation in the Big Valley
2982 Basin and surrounding watershed, it is envisioned that the GSAs will be successful in remaining a
2983 sustainable groundwater basin. Should sustainability not be realized, or projects not deemed feasible,
2984 additional projects and management actions will be considered and developed as appropriate.

2985 A timeline for projects can be found in **Table 9-2**. The Regulations require details about each project to
2986 satisfy CWC§354.44. Most of those details can be found in **Table 9-3**. One of the items not included in
2987 **Table 9-3** is a description of the legal authority required for each project per CWC§354.44(b)(7). The
2988 GSAs have the legal authority to coordinate and/or implement each of the projects described based on
2989 their authority under SGMA and state law. Some of these projects include aspects that will be
2990 implemented on private and public land. In those cases, permission and authority to implement the
2991 project will be obtained from the landowner.

2992 Table 9-3 also shows the expected benefits of each PMA, with an estimated volume (in AFY) where
2993 applicable. Two of the PMAs that are expected to be implemented in the shorter term (Basin Recharge
2994 Projects and Water Conservation Projects) are expected to have a cumulative benefit of around 2,800
2995 AFY once completed, which would address the expected future overdraft. Furthermore, if the PMA of
2996 Increased Surface-Water Storage Capacity (9.3) were implemented, an additional 2,000 AFY of storage
2997 would be expected. As the GSAs advance the implementation of these PMAs, they will improve their
2998 understanding of the Basin, refine the need for PMAs and the expected benefits of the PMAs, and adapt
2999 these to meet the needs of the Basin and the beneficial uses and users.



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Figure 9-1 Big Valley Watershed Boundary

3002 **Table 9-1 Available Funding Supporting Water Conservation**

Funding Program Title	Managing Agency	Description of Funding
Wetlands Reserve Program, Crop Reserve Program, Environmental Quality Improvement Program	NRCS (website)	Cost-share funding for wide array of soil, water, and wildlife conservation practices. Funding priorities developed locally.
Conservation Innovation Grants	NRCS (website)	Supports development of new tools, approaches, practices, and technologies to further conservation on private lands.
Partners for Fish and Wildlife Program	US Fish and Wildlife Service (website)	Private land meadow, forest, or rangeland restoration, conservation easement.
State Water Efficiency and Enhancement Program (SWEET)	California Dept of Food and Agriculture (CDFA) (website)	Supports implementation of water-saving irrigation systems.
Healthy Soils Program	CDFA (website)	Supporting management and conservation practices for enhancing soil health (which includes water holding capacity).
Farmer/Rancher and/or Professional + Producer grants	Western Sustainable Agriculture Research and Education (website)	Farmer-driven innovations in agricultural sustainability including profitability, stewardship, and quality of life.
Alternative Manure Management Program (AMMP) (link)	CDFA (website)	Financial assistance for non-digester manure management.
Sustainable Groundwater Management	DWR (website)	Planning and implementation grants supporting sustainable groundwater management with preference toward disadvantaged communities and economically distressed areas.
State Forest Health Program	CAL FIRE (website)	Improve forest health throughout California.
USDA for household well deepening	USDA Rural Development (website)	No interest loan up to \$11K to improve existing domestic wells.

3003

Table 9-2 Projects and Potential Implementation Timeline

No.	Category	Description	Estimated Time for Potential Implementation (years)		
			0-2	2-8	>8
1	9.1 Basin Recharge Projects	Agriculture Managed Aquifer Recharge	X	X	X
2		Drainage or Basin Recharge	X	X	X
3		Aquifer Storage and Recovery and Injection Wells			X
4	9.2 Research and Data Development	Additional Stream Gages and Flow Measurement	C		
5		Refined Water Budget and Domestic and Adin Community Supply Assessment	X	X	
7		• Voluntary Installation of Well Meters	C	X	
8		Adaptive Management	X	X	X
9		Mapping and Land Use	X	X	
10	9.3 Increased Surface-water Storage Capacity	Expanding Existing Reservoirs		X	
11		Allen Camp Dam			X
12	9.4 Improved Hydrologic Function and Upland Recharge	Forest Health / Conifer and Juniper Thinning	X	X	X
13		Stream Channel Enhancement and Meadow Restoration	X	X	X
14	9.5 Water Conservation	Irrigation Efficiency	X	X	
15		Landscaping and Domestic Water Conservation	X	X	
16		Illegal Diversions and Groundwater Uses	X	X	
17	9.6 Public Education and Outreach	Public Communication	X		
18		Information and Data Sharing	X	X	
19		Fostering Relationships	X		
20		Compiling Efforts	X	X	
21		Educational Workshops	X		
22	9.7 Domestic Well Mitigation Program	Development and implementation of a domestic well mitigation program to assist domestic water users if their wells go dry due to declining groundwater levels	X	X	X

¹ C = Completed

3006 **Table 9-3 Required Elements for Projects and Management Actions**

3007

Project	Brief description	Circumstances under which the project will be implemented	Public notification process	Permitting and regulatory process	Benefits	Schedule	Estimated cost
9.1 Basin Recharge Projects	Agricultural Managed Aquifer Recharge is the practice of using excess surface water (when available) and applying it to agricultural fields to intentionally recharge groundwater aquifers	AgMAR will be performed during winter months during high surface flows. The nature, frequency and timing of these flows will be evaluated through a Water Availability Analysis (WAA). A partial WAA analyzing data from 2000 through 2019 suggests that water would be available for diversion about 3 out of every 10 years. In addition, locations in the BVGB must be found that are suitable for AgMAR.	Notification of available water and success of this projects will be communicated at public GSA meetings. Agreements will be made between the GSAs and interested landowners.	Following completion of the WAA, an AgMAR permit for temporary surface-water diversions can be solicited from the State Water Board. Currently this permitting process can take 6-18+ months and cause significant economic burden to the applicant. An organized application for Basin-wide winter diversions by the GSAs could lessen some of the regulatory burden since they qualify for a streamlined process but a waiver of fees for extremely disadvantaged communities working to improve groundwater recharge may also be needed.	Based on the current WAA and the AgMAR research completed in the Basin, using 500 to 1,000 acres for AgMAR could yield approximately 2,600 AFY in wet years, or about 800 AFY on average. Using irrigation canals, drainage canals, and recharge basins could provide additional capacity for diversion and recharge, yielding a similar volume to AgMAR. In total, basin recharge projects could be expected to yield over 1,500 AFY.	The WAA is partially completed, and the remainder of the work will be funded through the DWR's SGM Implementation Grant. Based on the current state of the WAA, and current understanding of the permitting process potential sites for winter recharge, AgMAR could start being used at productive scale by winter of Water Year 2025 if all processes go smoothly.	The GSAs estimated a cost of \$250,000 for completion of the WAA, acquisition of a temporary permit for AgMAR, conducting recharge, and documenting the process.
9.2 Research and Data Development	Stream gages are scientific instruments used to collect streamflow and water quality data to decrease scientific uncertainty in order to inform water management decisions. Agri-Climate/CIMIS stations are helpful in monitoring for climatic factors such as temperature, humidity, wind speed, etc., and overall help refine estimates of ET in the Basin. Refining the water budget for the Basin will improve the accuracy with which management decisions are made because many of the assumptions used to generate the water budget stem from data gaps that need to be addressed, or other efforts to collect and analyze data submitted through other regulatory programs.	Research and data development will be implemented on a continuous basis, with specific approaches being adapted to the current needs and data gaps that will best facilitate adaptive management.	All research and data development progress will be shared at public GSA meetings. Data collected from gaging stations will be publicly available.	We will continue to work with DWR to ensure compliance with any relevant laws and to obtain any necessary permits related to stream gage installation and maintenance, as well as for other projects that fall under adaptive management strategies and the water budget.	Addressing data gaps would reduce the uncertainty of assumptions to govern groundwater management decisions. As more data becomes available, more accurate estimates of evapotranspiration and other water budget components will improve the understanding of the Basin.	Two stream gages and a CIMIS station have been installed to date. They will be monitored throughout GSP implementation. Adaptive management strategies are anticipated to be employed throughout the GSP development and implementation phases. Refining the water budget is a priority for the GSAs and will be completed for the five-year GSP update to inform future adaptive management.	Funding is available for the development of new gaging stations. Maintenance costs may vary, but one estimate projects the annual maintenance cost for a single gage to be around \$15,000. Funding for projects related to adaptive management and refining the water budget will be acquired as necessary and will include some of the funding provided by the DWR for the five-year GSP update through the SGM Implementation Grant. Presently, there is funding to maintain or install flow meters on private wells. More funding is likely available for similar projects, such as refining mapping and land-use designations within the Basin.

Project	Brief description	Circumstances under which the project will be implemented	Public notification process	Permitting and regulatory process	Benefits	Schedule	Estimated cost
9.3 Increased Surface-water Storage Capacity	Surface-water storage can reduce reliance on groundwater by offering an alternative water source. Currently, reservoirs like Roberts, Iverson, Silva, and BLM help manage potential overdraft. As streams and watercourses shrink during dry months, existing diversions may fall short. Expanding reservoir capacity and building new ones (like the Allen Camp Project) would store additional water from snowmelt and storms, ensuring reliable surface-water supplies.	Projects intended to increase surface-water storage will be implemented when it is economically advisable to do so and when they may help mitigate Basin overdraft.	Pursuant to environmental review, these projects will have opportunities for public comment and project documents will be made publicly available whenever appropriate. Both National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) compliance mandate opportunities for public comment.	Permitting for surface-water storage projects will be subject to NEPA and CEQA depending on whether the project sites are located on federal or state land respectively.	Increasing the capacity to store surface water by capturing runoff could reduce reliance on groundwater during summer months. Further, increasing surface-water storage would improve water security during dry years. Based on the current WAA, raising the Roberts Reservoir would allow for additional storage of up to 7,600 AF, or about 2,300 AFY.	The timeframe for largescale infrastructure projects would likely be upwards of 8 years, as the regulatory and environmental review processes generally require extensive coordination between agencies and stakeholders for planning and compliance. Feasibility studies can be initiated within the next two to three years to determine existing reservoirs that may be best suited for augmentation. The results of these feasibility studies will determine next steps.	Large infrastructure projects can be quite expensive. \$1 in May 1981 had the same buying power as \$2.97 in April 2021. A ballpark estimate of the capital costs for the Allen Camp Project in its entirety would amount to approximately \$344,041,830, with the dam and reservoir component amounting to an additional \$174,487,500. These figures assume funding may be available from the federal government in the form of loans under the Small Reclamation Projects Act of 1956. The cost associated with expanding existing reservoirs depends on the method employed. Sediment removal typically costs between “\$8,000 and \$32,000 per acre foot,” (Lund 2014) and would be done infrequently. Increasing dam height typically costs between “1,700 to \$2,700 per acre foot” (Lund 2014).
9.4 Improved Hydrologic Function and Upland Recharge	Upland forest recharge enhancement occurs in conjunction with vegetation management and forest fuels reduction by increasing snow-water content and reducing dense forest canopy and associated evapotranspiration.	Upland forest recharge will be enhanced by implementation of forest health and fuels reduction projects within the Big Valley watershed. Such projects are ongoing and in varying stages of planning and implantation. Support from GSAs and local, state, and federal partners will increase implementation rate and scope. Water availability and recharge enhancement will be realized along with fire/fuels and wildlife habitat benefits.	On federally managed lands, public notification of projects will be conducted under NEPA by the Modoc National Forest or Applegate BLM. State funded projects will follow CEQA public notification process. Opportunities on private land be communicated by GSAs, Pit Resource Conservation District , and other state and local entities.	Projects permitting will vary by land ownership. On federal lands: NEPA and applicable federal land policies. On private lands: state forestry rules are applicable and programs such as CAL FIRE's Forest Health Program will help clarify and streamline permitting processes.	Snow-water content has been shown to increase by 33% to 44% from a dense conifer canopy to an open area. Surface runoff has also been shown to respond to treatments. Recharge figures are difficult to quantify, but even a modest increase in recharge over 10% of the potential upland recharge area could result several thousand AF of water.	The initial upland forest recharge project “Wagontire Project” is scheduled for implementation in 2022 and is expected completion in a 2- to 4-year window.	Project costs vary by site, but an estimated average is from \$500 to \$650 per acre.
9.5 Water Conservation Projects	Water conservation and water use efficiency projects would primarily be adopted by growers and homeowners on their private property. Infrastructure improvements, while requiring capital outlay, are not subject to permitting or public environmental review.	Project implementation will be voluntary with cost-share incentives. Projects will be implemented on a site-by-site basis and designed for overall production and economic efficiency, along with water use savings.	Notification of opportunity to participate will be through local agricultural organizations, extension outreach meetings, and by sponsoring agencies. Broad public notification of individual projects is not required.	Projects in this category such as upgrading irrigation infrastructure, irrigation management techniques, home landscaping, etc. are generally not subject to permitting requirements.	Some practices have been shown to result in efficiency increases in the range of 10% at the field scale. Basin-wide efficiency increases of 5 to 10 percent would result in water savings of up to 2,000 AFY.	Irrigation infrastructure and water-use efficiency incentives are ongoing. UC Cooperative Extension provides extension education on irrigation management and scheduling to promote water use efficiency.	Costs vary widely. New irrigation infrastructure on a field scale can exceed \$100,000. Soil moisture meters for irrigation scheduling can be in the \$100s to \$1,000s of dollars per farm. Landscaping and homeowner water efficiency projects in the \$100s to \$1000s per home. However, public outreach and education for water conservation activities is a lower-cost action that can have immediate impact.
9.6 Education and Outreach	Education and outreach efforts can drive beneficial changes in patterns of use and protect water resources. Existing efforts employed by the GSAs include outreach about funding opportunities that support water conservation methods or to address SMCs, coordinating information sharing efforts, and facilitating informational meetings with stakeholder groups. Additionally, the GSAs may support local entities in applying for funding to address SMCs.	As an essential part of sustainability, outreach and education will be conducted throughout the development of the GSP, with many opportunities for public engagement, including the maintenance of a GSA website.	Public information is available through the SGMA sections of Modoc and Lassen Counties’ websites. Informational brochures will be distributed to interested parties to make information about the GSP more accessible.	Public engagement is important to the regulatory process of SGMA and other acts that the GSP may be subject to. However, education and outreach are an incredibly important part of meeting the sustainability goals of this GSP, especially as it relates to equity and inclusion.	Public involvement in the GSP development is crucial in attaining sustainability. Research (OECD 2015) has shown that here are many social, economic, and environmental benefits to education and outreach efforts in water management. These benefits can vary widely, but generally include increased levels of social cohesion, equity and conflict avoidance, improved water	Ongoing efforts to engage the public in outreach and education programs related to groundwater management are essential as part of the Groundwater Sustainability Plan. The anticipated timeline for outreach and education efforts is indefinite, but it is especially important throughout the planning and implementation process of the GSP.	Costs may vary depending on program type.

					use efficiency, and improved water quality.		
9.7 Domestic Well Mitigation Program	The Domestic Well Mitigation Program (Program) would allow domestic well owners to receive support if their well goes dry due to chronic lowering of groundwater. Domestic well owners would qualify if their well is unable to pump groundwater due to declining groundwater levels and are permitted within the County.	The project and its policies will be developed and implemented following GSP development and will include input from the GSAs, BVAC, and the public. The program will provide many benefits for domestic wells in the Basin and therefore the GSAs are committed to the success of the program. However, funding is currently not available for implementation and funding sources will have to be explored. Further, the program will only apply to legally established domestic well owners and only when the undesirable results occur for water levels. This program will be dependent on outside funding.	Following development of the program, information on the well mitigation program will be made available to the public through the SGMA sections of Modoc and Lassen Counties' websites.	It is unclear if this project would fall under CEQA and this will be explored during the implementation phase. Permitting requirements for this program would foreseeably take place during implementation of mitigation measures, such as well installation or expanding of water systems through the County and/or State.	The Program will help mitigate impacts due to lowering groundwater levels and provide assistance to domestic well owners to secure access to drinking water.	The schedule for this Program will include development of the policies and procedures (1-2 years), securing of funding (1-2 years), public outreach and identification of at-risk domestic wells (2-3 years), development of criteria for qualifying wells (1 year), and development of voluntary registration program for well mitigation assistance (1 year). Because some of these action items can be completed concurrently, we estimate between 2 and 10 years to complete the development of the Program.	Costs will vary depending on number of wells going dry and amount of assistance from the GSAs. Additionally, the costs are difficult to quantify due to limited well data in the Basin. If a new well is required under the Program and the cost for a new well is approximately \$50,000, then the cost of the program could be upwards of \$750,000 if the minimum threshold is reached, 15 wells go dry, and the program deems it necessary to drill new wells.

9.1 Basin Recharge Projects

Enhancing recharge to get more of the available water into the aquifer is one of the key means to attaining sustainability. Priority is given to the immediate Big Valley watershed, but additional recharge projects will be considered for surrounding upland and upstream areas of the Pit River watershed. A more detailed watershed map is provided in Chapter 3 – Plan Area. To implement off-season diversion and recharge, the GSAs will require either a temporary or standard water right diversion permit from the State Water Board. Temporary permits require a less rigorous process to determine water availability than a standard permit and can be valid for 180 days or 5 years. Both permit types require a water availability analysis (WAA) to demonstrate water availability in the context of hydrologic conditions and existing water rights; however, the WAA for a standard permit is much more rigorous than a temporary permit, and the time and resources required to develop a WAA for a standard permit would not be practical at this time given the preliminary state of recharge projects. Furthermore, the State has implemented policies to streamline the process to procure a temporary water rights permit, including direct technical assistance from the DWR.⁶⁵

A WAA for the Big Valley watershed was initiated in 2022 to help facilitate a pilot project to support the development of AgMAR in the BVGB (see 9.1.1 below). This process included the following steps to quantify the water availability in the watershed:

1. Close coordination with the State Water Board, the DWR, the California Department of Fish and Wildlife, and other relevant agencies throughout the process to ensure a correct approach to developing the WAA and supporting a temporary water rights permit application
2. Collection and evaluation of data including streamflow, water rights, reservoir conditions (i.e., Shasta Lake), and Delta conditions
3. Analysis of the data collected in Step 2 to determine the historical water available for diversion in the BVGB, pursuant to the State Water Board’s guidance and policies regarding thresholds for water availability
4. Documentation of the WAA
5. Evaluation of the applicability of obtaining a temporary water rights transfer as an alternative to obtaining a temporary water rights permit

Steps 1 through 4 were completed by January 2023. This scope of work was developed pursuant to the State Water Board’s recommendation that the GSAs pursue a temporary permit in lieu of a standard permit due to the additional time and expense required to obtain a standard permit. The documentation of the WAA is attached as Appendix 12. The water available for potential diversion was determined by applying the DWR’s “90/20 Method”⁶⁶ to historical streamflow data at two USGS gages along the Pit River upstream of the BVGB. The availability of water was further screened based on senior water rights holders, including the availability at Shasta Lake and the Delta. Based on an analysis of historical data from Water Year 2000 through 2019, water was available for diversion in 6 of the 20 years. In these

⁶⁵ [California's Water Supply Strategy Aug 2022](#)

⁶⁶ [Water Availability Analysis for Streamlined Recharge Permitting \(ca.gov\)](#)

3046 six years, the divertible volumes ranged from 1,600 to 33,600 AFY at diversion rates of 1 to over 1,000
3047 cubic feet per second (cfs). The median volume of available surface water for diversion in years when it
3048 was available is 5,200 AFY.

3049 The DWR's climate change factors indicate that future precipitation and streamflow will be greater in
3050 the future and more heavily concentrated in the winter months. This suggests that, on average, more
3051 water will be available for diversion in the future compared to historical conditions. Since the
3052 availability of water for recharge is limited by senior water rights and permitting limitations (e.g., the
3053 90/20 method), recharging excess water would not reduce water availability in other parts of the BVGB.

3054 The WAA is expected to be completed in 2024. Once the WAA is finished and a project is identified,
3055 such as the AgMAR project mentioned below, one of the GSAs can apply for a temporary diversion
3056 permit from the State Water Board. If an application were to be submitted by June or July, a temporary
3057 permit could be issued prior to the upcoming winter diversion season.⁶⁷ Therefore, the GSAs intend to
3058 conduct a pilot project as early as the beginning of Water Year 2025. The GSAs have allocated about
3059 \$250,000 of funding via the SGM Implementation Grant towards completing the WAA and obtaining a
3060 temporary permit for a groundwater recharge project, likely involving AgMAR (9.1.1). Feasibility of
3061 using existing drainage canals or recharge basins will be explored further prior to the five-year GSP
3062 update.

3063 **9.1.1 Agriculture Managed Aquifer Recharge**

3064 One approach to Basin recharge currently being considered is AgMAR, which is the intentional recharge
3065 of groundwater aquifers by spreading water over agricultural fields at times when excess surface water
3066 is available (Kocis & Dahlke, 2017, Dahlke et al. 2018). With significant surface-water irrigation and
3067 diversions already present in Big Valley, AgMAR is a viable option in the Basin. Much of the current
3068 research on AgMAR has been completed on relatively well-drained soils that are not present in Big
3069 Valley. Research on Big Valley soils with slow to very-slow infiltration rates appears to be initially
3070 promising. While recharge of groundwater may be slower in the Basin, it could still be a feasible means
3071 for deep water recharge and filling the shallow aquifer and root zone. AgMAR can be utilized for both,
3072 increasing recharge and decreasing water application of groundwater during the growing season due to a
3073 saturated soil profile. A conservative estimate suggests that 25,000 acres in Big Valley of agricultural
3074 and native vegetation lands are accessible to surface water and available for AgMAR. Priority will be
3075 given to low infiltration over very-low infiltration soils for recharge and areas addressing more critical
3076 groundwater levels.

3077 Among the perennial crops, alfalfa is considered a promising candidate for AgMAR for several reasons,
3078 and significant initial research has been completed throughout California on its feasibility (Dahlke et al.
3079 2018). Eighty to eighty-five percent of the alfalfa in California is irrigated by flood irrigation, which in
3080 turn could allow for areas where surface water can be utilized for groundwater recharge (Dahlke et al.
3081 2018). Alfalfa is widely grown in Big Valley and flood irrigation is common. Alfalfa is a nitrogen-fixing

⁶⁷ The DWR and the State Water Board have indicated that the process for the GSAs' process to obtain a temporary permit should be relatively straightforward given the progress of the WAA and the statewide emphasis on facilitating recharge of excess flows.

3082 plant that seldom receives nitrogen fertilizer, which reduces the risk of leaching excess nitrate to
3083 groundwater, one of the main concerns of AgMAR (Putnam and Lin, 2016; Walley et al., 1996). Dahlke
3084 et. al. (2018) found that winter recharge had no discernible effect on alfalfa yield (first and second
3085 cutting) and led to increased crop water availability in the deep soil profile, offsetting potential irrigation
3086 deficits during the growing season.

3087 Research currently being completed in Big Valley on the feasibility of AgMAR on perennial grass
3088 pasture and hay fields looks promising. Although soils in Big Valley have lower infiltration rates, winter
3089 recharge rates of 0.2 - 0.5 AF per acre per irrigation between March and April have shown no damage to
3090 crops. Soil infiltration rates show 2 to 3.5 inches of infiltration over a 24-hour period to be feasible.
3091 Irrigating every 7 to 10 days for six irrigations in the winter/spring would benefit 1 to 2 AF of water per
3092 acre into groundwater storage. This is the first AgMAR research completed on grass, which is a
3093 dominant perennial crop in Big Valley. Given that some forms of applied nitrogen, particularly nitrate,
3094 have a propensity for leaching, which has presented a challenge in other parts of the state, there has been
3095 some concern over nitrogen application and AgMAR. This can easily be addressed with BMPs of
3096 applying nitrogen outside of the winter recharge window. This work could also be easily applied to
3097 AgMAR feasibility on adjacent rangeland, conservation reserve program (CRP), or NRCS WRP land.

3098 The expected benefit of AgMAR depends on the availability of suitable land and surface water for
3099 diversion and recharge. Based on the WAA discussed above, the availability of surface water appears to
3100 be the controlling factor. The annual recharge benefit is estimated with the following assumptions:

- 3101 • Excess surface water is available for diversion in 3 out of 10 years at a median volume of
3102 5,200 AFY and a median availability of 10 days, based on the WAA results shown in
3103 Appendix 12.
- 3104 • If capacity exists to divert half of the available surface water, the recharge benefit in years when
3105 water is available would be about 2,600 AFY. This would require 500 to 1,000 acres of suitable
3106 land based on the infiltration rates discussed above and assuming that water will infiltrate for
3107 15 days out of the year (50 percent longer than the days of assumed diversion).
- 3108 • Therefore, the average annual recharge benefit would be about 800 AFY (5,200 AFY *
3109 30 percent water availability * 50 percent diversion capacity).

3110 An estimated 500 to 1,000 acres will be required to facilitate AgMAR. There are over 25,000 acres in
3111 Big Valley of agricultural and native vegetation lands that are accessible to surface water and available
3112 for AgMAR. Land acquisition will be conducted with the following process:

- 3113 1. **Conduct initial screening.** The GSAs will use various datasets to identify a preliminary list of
3114 potential suitable sites in the BVGB. These datasets include land use data, soil data, the DWR's
3115 Airborne Electromagnetic (AEM) Survey data, surface water diversion locations, and property
3116 rights data.
- 3117 2. **Determine feasibility by discussing with landowners.** The GSAs will engage with the property
3118 owners of the areas identified in Step 1 to determine the feasibility of partnering with multiple
3119 landowners to conduct pilot tests to further assess the feasibility of the property for AgMAR.

Determine potential costs of infrastructure, labor, and power needed to facilitate recharge, and determine feasibility.

3. **Evaluate recharge potential of feasible sites.** Using pilot tests like those used in the AgMAR research described above, evaluate the recharge potential of each site, identifying the most favorable sites.

4. **Negotiate long-term recharge agreements with landowners.** Considering the potential recharge activities and costs of recharge, the GSAs will develop agreements with landowners to conduct regular recharge activities during wet years.

After agreements with landowners are reached, the GSAs will procure water rights permits to facilitate the recharge. The GSAs will then conduct, measure, and improve recharge operations over time to optimize the use of agricultural lands for recharge.

9.1.2 Drainage or Basin Recharge

Using the same principles as used in AgMAR, excess surface water can be diverted into irrigation drainages or canals and recharge basins to percolate into the groundwater table and replenish upper levels of the aquifer. This water is then available to be extracted later for beneficial use. The volume of water recharged is limited by the availability and access to surface water, infiltration rates of the soils, losses to evaporation, and available infrastructure.

The total number of feet or miles of irrigation canals or ditches needs to be determined, along with the availability of current water storage basins (reservoirs) for recharge. Additional basins may need to be created for the sole purpose of groundwater recharge. Producers wanting to participate in this program would notify the GSA and report diverted water for the purpose of drainage or Basin recharge. The development of a water availability study and permitting as described above and in **Table 9-3** also applies to this project. Unlined drainages, canals, and basins could recharge up to 90 percent of diverted surface water to the aquifer. Based on the WAA results and assumptions used for the availability of water for recharge described in Section 9.1.1, recharge from additional drainage or recharge basins could yield an additional 700 AFY of recharge (5,200 AFY * 30 percent water availability * 50 percent diversion capacity * 90 percent of diverted surface water recharging the aquifer).

9.1.3 Aquifer Storage and Recovery and Injection Wells

Aquifer storage and recovery (ASR) is the use of a new or existing well to inject and store water underground during wet periods and then extract by the same or other nearby wells to meet demand during dry periods. Increased aquifer storage provides some of the same benefits as new surface storage but can be phased in over time and can be less expensive. From an operations perspective, increased aquifer storage is a practical option since it involves the use of new or existing groundwater wells retrofitted for injection. ASR projects require a permit from the RWQCB, and the permitting method is usually the Statewide ASR General Order (General Order)⁶⁸ adopted by the State Water Board in 2012.

⁶⁸ https://www.waterboards.ca.gov/water_issues/programs/asr/

3155 The General Order requires that the water being injected into aquifer storage meet drinking water
3156 standards, so in the case of Big Valley, this will require filtration and chlorination of surface water prior
3157 to injection into aquifer storage.

3158 Because pre-treatment of the water source for injection and operation and maintenance of ASR wells is
3159 relatively expensive, ASR is typically used when surface spreading *via* basins or flooded fields is not
3160 feasible. ASR may be favored in areas of the Basin constrained by land area limitations, unfavorable
3161 surface soils, or shallow confining layers at or near the ground surface preventing deep percolation of
3162 applied water.

3163 In Big Valley, the most likely scenarios in which ASR would be implemented are when under the
3164 following conditions:

- 3165 • Flood MAR projects are not able to stabilize groundwater levels in some locations due to the
3166 presence of impermeable soils at or near the surface, or
- 3167 • As mitigation to reverse declining groundwater levels near public or domestic supply wells.

3168 ASR would be implemented in phases if the conditions above warrant it. ASR would only be feasible
3169 with outside funding assistance through either state or federal grant programs to both cover the capital
3170 expenses and assist with the monitoring required for compliance with the ASR General Order. Under
3171 these conditions, ASR will be developed in phases as summarized below:

- 3172 • Phase 1 – Assessment of wells and hydrogeology culminating in a technical report to accompany
3173 a notice of intent to inject provided to the RWQCB. This phase will identify locations and
3174 monitoring during ASR pilot testing.
- 3175 • Phase 2 – ASR pilot testing following receipt of a Notice of Applicability from the RWQCB.
3176 Pilot testing may include a single well test or may involve multiple wells throughout the Basin
3177 based on the finding and recommendations in the technical report developed in Phase 1.
- 3178 • Phase 3 – Implementation including retrofit of existing wells, construction of new wells, and
3179 operation of these facilities to stabilize or increase aquifer storage.

3180 More information about ASR is available from the U.S. Environmental Protection Agency.⁶⁹

3181 **9.2 Research and Data Development**

3182 Data gaps are mentioned and detailed throughout the GSP chapters. Continuing to fill these gaps,
3183 participate in research, and collect data to support the GSP is necessary to support sustainability using
3184 the best science available.

⁶⁹ <https://www.epa.gov/uic/aquifer-recharge-and-aquifer-storage-and-recovery>

9.2.1 Additional Stream Gages and Flow Measurement

Several seasonal streams contribute inflow to the Big Valley Basin (**Figure 9-2**). Many of these streams had historical stream gages or have current gages monitored by the USGS and DWR. The Pit River, which is a major inflow river and significant contributor of surface-water irrigation and recharge in Big Valley, has a gage 13 miles from where the Pit River enters Big Valley at the Canby bridge. There are many springs and small tributaries that flow into the Pit River after the Canby bridge, as well as irrigated-lands water use between Canby and the Big Valley Basin. Modoc County has been working to install an additional stream gage where the Pit River enters the Basin to fill this data gap and provide more current stream flow information for GSP development and water management. There is also funding for additional stream gages if locations of need can be determined. The current stream gages are in **Figure 9-2**. Two stream gages were recently added to the system, one on the Pit River near the basin mouth⁷⁰ and at Robert's Reservoir⁷¹.

9.2.2 Refined Water Budget and Domestic and Adin Community Supply Assessment

Many assumptions were taken to create the Big Valley water budget in Chapter 6 – Water Budget. Some of these assumptions stem from data gaps that need to be addressed, and other areas are opportunities to collect and analyze data that is being submitted through other regulatory programs. This section describes a combination of projects that will help improve the accuracy of the water budget and, in turn, better inform groundwater management in Big Valley.

1. **ET measurement and installation of a CIMIS station.** To improve the understanding of ET across Big Valley, the GSAs worked with the DWR to install a CIMIS station in 2023 in Nubieber. CIMIS stations have more sensors than typical weather stations, including solar radiation, soil temperature, air temperature, wind speed and direction, relative humidity, soil moisture, and rain gauging. These measurements can determine accurate ET, which is very helpful in creating a more refined water budget for the Basin and help maintain sustainable groundwater conditions. ET is used as a metric for applied water, especially when meters on actual applied water are not available. These stations can also help farmers in determining irrigation needs and promote water conversation, particularly early in the growing season.
2. **Applied water estimates.** With an accurate estimate of ET, the next assumption is the relationship between ET and applied water in Big Valley. Since most crops grown in Big Valley are hay crops, irrigation must be stopped when cutting, drying, and baling even though ET continues. Pinpointing the relationship between ET and applied water could greatly refine the water budget and amount of irrigation water that is being applied.
3. **Land use mapping.** An effort to refine mapping and land-use designations would further increase the accuracy of estimates related to water use within Big Valley. The water budget's assumptions are primarily derived from historical sources, many of which may need to be updated or expanded upon to reflect current conditions. The GSAs worked with Land IQ

⁷⁰ Additional information available in the DWR's California Data Exchange Center [website](#).

⁷¹ Additional information available in the DWR's California Data Exchange Center [website](#).

3222 beginning in 2020 to update the land use classifications and determine irrigation water sources
3223 across the Basin. This information was not completed in time to be included in this GSP and will
3224 be used for the five-year update. The GSAs intend to continue working to further improve land
3225 use and source water mapping.

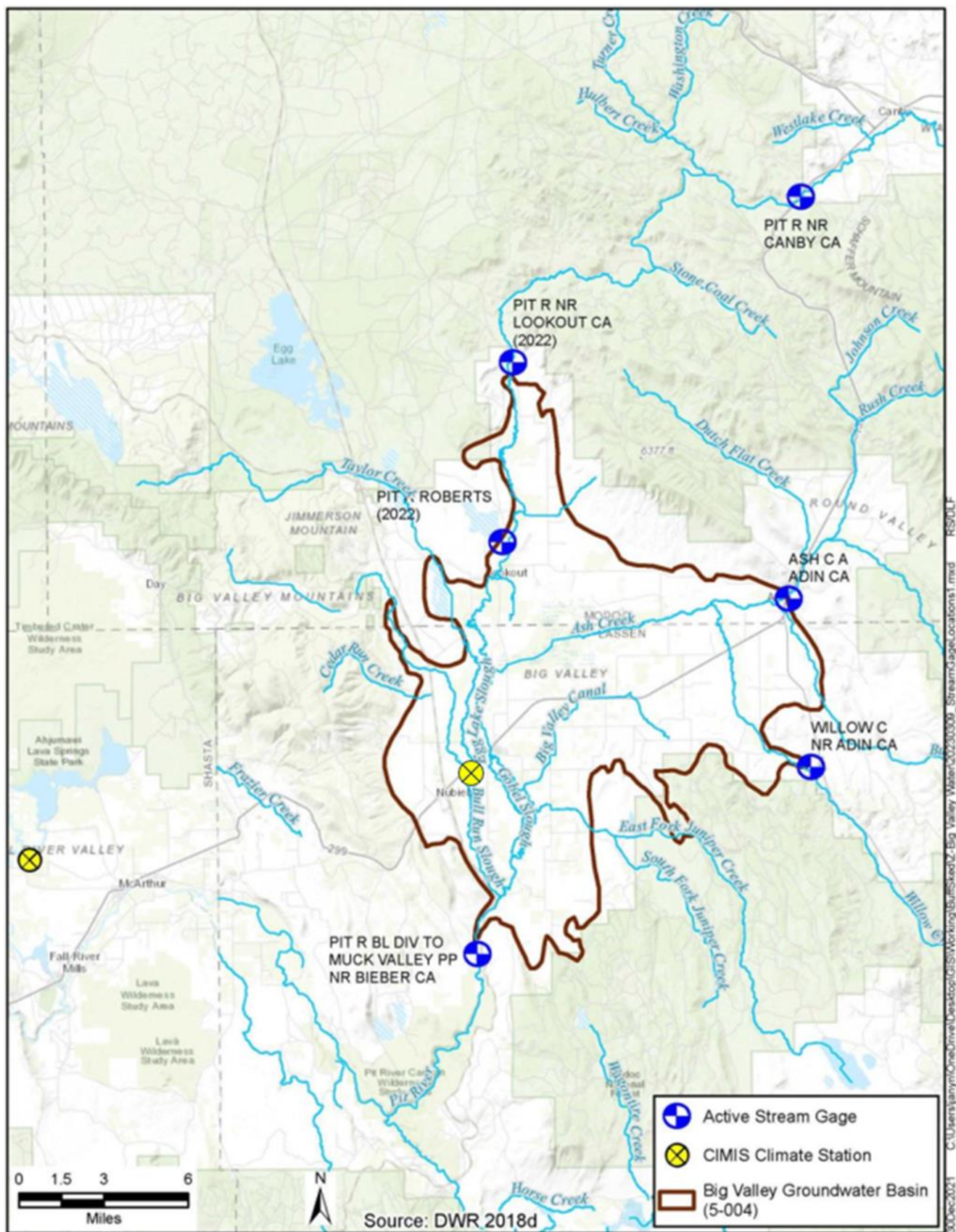


Figure 9-2 Current Stream Gages and CIMIS Stations

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4. **Determining sources of irrigation water.** There is considerable uncertainty in the proportions of groundwater and surface water that are used for irrigating cropland across the BVGB, which is a key data gap in constraining the water budget. To better understand the uses of surface water and groundwater across the BVGB, the GSAs plan to collect surface water diversion data from the State Water Board's water rights reporting database, survey landowners as feasible near waterways, and continue work to better understand land use classifications to refine these estimates and update the water budget.
5. **Voluntary well metering.** A voluntary well monitoring program has been available in Big Valley for upwards of two decades through the Lassen-Modoc Flood Control and Water Conservation District.⁷² Through this program, meters are available for agricultural and domestic water users. Reinvigorating this program by identifying meters that need to be replaced, conducting outreach to add new wells to the program, and organizing the historical data to fill data gaps would both provide critical data to refine the water budget and create the framework for the development of a basin wide well registry program. Although de minimis extractors (i.e. those that extract 10 AF per year or less for domestic use) have a minimal impact on the water budget and are not regulated under SGMA or by the Big Valley GSAs, management actions should reflect their intrinsic connection from both water quality and water availability perspectives. Water level and water quality data collected from this program and from the strictly-monitoring wells located throughout the basin can be used to assess domestic well supply and to pinpoint areas of concern, such as shallow and non-operational wells. Additionally, this registry could be used to assess both the need and feasibility of drilling a community supply well for the town of Adin. Funding from DWR in a grant to Modoc County is currently available to provide flow meters to voluntary applicants.
6. **Monitoring wells and surface water quality gages.** It would also be beneficial to identify additional monitoring wells to provide unobstructed measurements year-round. Several such wells have been installed at five sites within the Basin and generate continuous water level and water quality data across 15-minute intervals. Surface-water quality data is also periodically collected from points in Adin, Bieber, and Lookout within the Basin when funding allows. Expanding on this existing program would further refine the water budget and improve the capacity of the GSAs to make management decisions to the benefit of all users.
- Additionally, funding is available to install satellite transducers in key areas throughout the Basin, which would allow for real-time monitoring of domestic well levels. Coupled with an increased effort to both verify well numbers and update lists to reflect active *versus* inactive wells, these real-time monitoring locations will provide more accurate estimates of domestic groundwater demand and supply within the Basin. Thus, these combined actions will further inform water management strategies to ensure that domestic users' groundwater needs are represented equitably in the water budget.
7. **Subsurface flow.** The current water budget tool assumes that there is no subsurface inflow or outflow in the BVGB. However, as noted in Chapter 4 – Hydrogeologic Conceptual Model, there is evidence of upland recharge that feeds subsurface inflow. In addition, a 2022 study completed

⁷² Lassen-Modoc County Flood Control and Water Conservation District

as part of GSP implementation has helped to refine the hydrogeologic understanding of the connection of surrounding areas to the Basin (Appendix 13). Building on this understanding to develop a program to estimate subsurface inflow and outflow in the BVGB will assist refining the water budget and evaluating the impact of the PMAs listed under Section 9.4 – Improved Hydrologic Function and Upland Recharge.

Collectively, the continuation of applied research efforts will help to better quantify the impacts from those actions and thus help refine the water budget. Such research efforts, which will be discussed in depth in later sections of this chapter include: evaluating the effectiveness of off-season groundwater recharge in hay crop fields and pastures; the impacts of forest thinning projects such as fuels reductions and the removal of invasive junipers on water availability within the watershed; and the extent to which surface-water systems, including drainages, canals, and reservoirs contribute to recharge within the Basin. Additional research projects to support the water budget will be identified and undertaken as needed, contingent on funding.

9.2.3 Adaptive Management

There are many unknowns and data gaps with respect to groundwater resources in the Big Valley Basin. As a result, estimates and assumptions are currently used in the plan to determine several key variables. To address the lack of necessary information, a significant commitment to the continued monitoring of both ground and surface water is described in this plan. By further developing and enhancing monitoring networks in Big Valley, we can gather the data necessary to inform management and set criteria as more information becomes available.

Adaptive management is an approach to improve natural resource management which focuses on learning by doing. Learning occurs through monitoring, data development, outreach, and collaborative interpretation. Then, the adaptation of management criteria and tools is applied to existing practices as critical information becomes available. This approach is very applicable to the BVGB and will serve to maintain sustainability by providing current site-specific information to inform appropriate SMCs and thresholds as well as the ongoing assessment of projects and management actions in the Basin.

Although it is recognized and proven that the Big Valley Basin does not have the unsustainable conditions seen in other basins around the state, monitoring and filling data gaps from SMCs that were determined to not require thresholds helps us prepare for annual reports and five-year revisions and make management decisions. These SMCs without identified thresholds include interconnected surface water and groundwater, water quality, and subsidence. Additionally, monitoring could aid in the analysis of the relationship between groundwater levels and GDEs.

9.3 Increased Surface-water Storage Capacity

Increasing the capacity to store surface-water runoff during winter/spring high-flow periods could provide significant amounts of water for summer irrigation. An increase in surface water available for irrigation would lessen the reliance on groundwater and thus improve the Basin's ability to remain sustainable.

9.3.1 Expanding Existing Reservoirs

Expansion of several existing reservoirs serving Big Valley Basin would increase the capacity of surface water for irrigation and recharge projects, as well as help balance the water budget. An increase in water storage would make the Basin more sustainable regarding climate variability and decreases in snowpack while also relieving pressure on groundwater for irrigation in Big Valley. One larger reservoir, Roberts Reservoir, is located northeast of Lookout and has a current capacity of 5,500 AF. Possible scenarios for raising this reservoir's dam are shown on **Figure 9-3**. For example, raising Roberts Reservoir 3 feet would increase capacity by 35 percent, resulting in a total additional 1,900 AF of storage.

Other reservoirs include Iverson, Silva, and BLM reservoirs. From an engineering perspective, the base of the Iverson reservoir is much wider than it needed to be at the time it was built. This suggests that the foundation would easily support construction to increase its height.

Expanding current reservoirs may possibly be the most time- and cost-effective alternative for expanding surface-water storage compared with building new reservoirs, for which navigating the environmental review process and other regulations can be difficult.

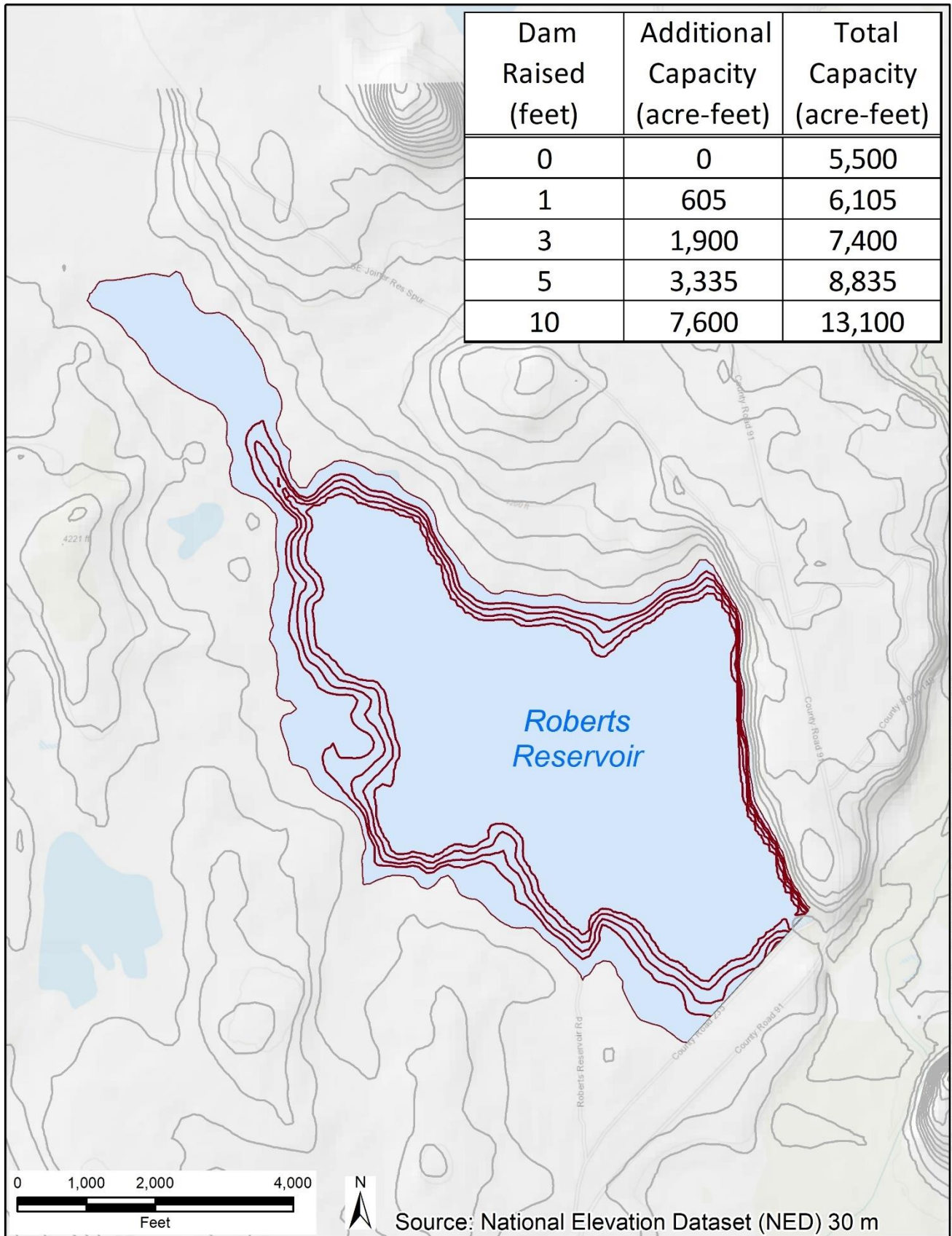
All reservoir expansion projects would undergo three phases:

- Phase 1: Feasibility study. The feasibility study would include:
 - A preliminary site assessment to evaluate the existing structure and assess risks
 - Hydraulic and hydrological studies to project future inflows and determine the impact of the expanded reservoir on downstream uses and users
 - A structural assessment to evaluate the reservoir's structural integrity and foundational stability
 - An environmental impact analysis to identify potential impacts ahead of any formal permitting, and determine mitigation measures for these impacts
 - A cost-benefit analysis to determine the extent to which the reservoir should be expanded based on technical feasibility, safety, and cost-effectiveness
 - Feasibility report documenting Phase 1 and including recommendations for the next steps for the reservoir expansion
- Phase 2: Engineering design and permitting. This phase would include:
 - Engineering design to develop a detailed design of the dam height increase, perform geotechnical investigations, and perform structural and hydraulic analyses
 - Permitting and regulatory compliance to augment or develop an Environmental Impact Report to comply with the California Environmental Quality Act, obtain or update water rights permits with the State Water Board, and any other regulatory compliance
- Phase 3: Construction and implementation.

Reservoir expansion is typically done through either sediment removal or by physically raising the height of the dam. Typically, expanding reservoirs through sediment removal is very costly, between

3340 “8,000 and 32,000 dollars per acre foot” and would be done very infrequently (Lund 2014). Raising dam
3341 heights or building new reservoirs is also expensive; an acre foot of storage space generally costs
3342 between “1,700 and 2,700 dollars” (Lund 2014). Depending on funding, sediment removal may be
3343 investigated, and removed sediment could potentially be repurposed to reinforce existing infrastructure
3344 such as the levees that protect Bieber and Lookout from Pit River flood events.

3345 Depending on funding availability, one or more feasibility studies could be initiated within the next two
3346 to three years. Assuming a typical timeline for each phase, it is reasonable to expect that one of the
3347 reservoirs could be expanded within the next 10 years. Based on the WAA results described in Section
3348 9.1, excess water is available for diversion and storage about 3 out of every 10 years. The excess flows
3349 that would be captured by the expanded reservoirs would have to be excess flows due to water rights
3350 permitting requirements, and therefore it would not impact downstream needs or water rights. Based on
3351 the potential expansion of the Roberts Reservoir and the expected water availability, additional surface
3352 water storage could exceed 2,000 AFY (7,600 AF of storage * 30% water availability). This additional
3353 storage could be used to offset groundwater supplies in dry years, reducing the impact to the basin.



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3354
3355

Figure 9-3 Roberts Reservoir Scenarios

9.3.2 Allen Camp Dam

The Allen Camp Dam and Reservoir (**Figure 9-4**) was authorized by the Department of the Interior (DOI) as part of the Allen Camp Unit of the Central Valley project in 1976 to regulate flows of the Pit River primarily for irrigation and fish and wildlife purposes, as well as flood control and recreation services. Despite strong local support for the project, the DOI's concluding report (DOI 1981) determined that the proposed project was economically advisable based on the existing criteria of the time. Now it may be appropriate to conduct a new investigation into the feasibility of this project to reflect the changes to water needs of the community, environment and state that have occurred over the last 40 years.

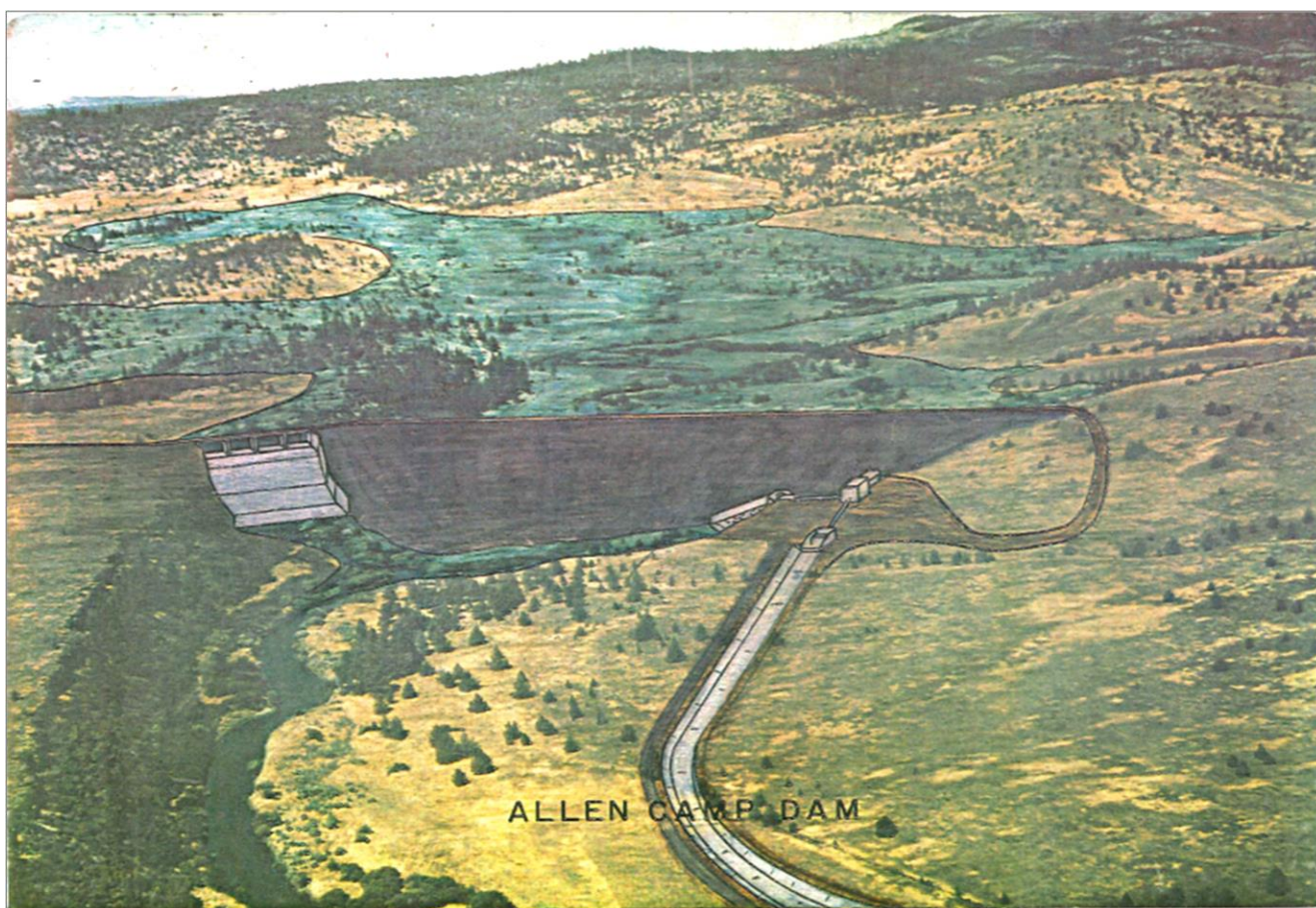


Figure 9-4 Allen Camp Dam Drawing

According to the original feasibility study (DOI 1981) the dam would be located around 11 miles north of the Modoc-Lassen County line, Allen Camp Reservoir would have a 90,000-AF storage capacity, a 18,000-AF surcharge, 2,350 acres of water surface area and a normal year yield of 22,400 AF. The dam would be constructed from earth and rock fill and would measure 103 feet from the streambed. The construction of the various proposed project components would require the acquisition of about 18,240 acres of private land through easements or through fee titles and the withdrawal of roughly 11,845 acres of public land. Most of the land acquired would be allocated for the dam and reservoir project features, a total of 18,015 acres. In the original document, another significant allocation, 11,562 acres, was for the proposed Big Valley National Wildlife Refuge. This addition was intended to

offset habitat loss for species such as deer and migratory waterfowl. An updated feasibility study for this project should consider the expansion of the Ash Creek Wildlife Refuge since 1970 as an alternative for this proposed mitigation measure. The remaining land would be partitioned at 355 acres for the Hillside Canal, 148 acres for the lateral distribution system and 5 acres for the Nubieber protective dike.

In 1981, there were 62 ownerships slotted to receive deliveries from this project, accounting for a total 11,700 irrigable acres all of which would benefit from full or supplemental water deliveries. The report stated that the groundwater basin area of the project has a storage capacity of roughly 532,000 AF with a safe yield of 7,000 AFY, with 5,000 AF of that developed. These numbers may have changed over the 40 years that have elapsed since the report was published and should be reviewed under an updated feasibility study. An increasingly variable climate casts uncertainty over water availability, with drier years driving an increased reliance on groundwater supplies. Further, an updated feasibility study might consider how this project could mitigate some of the effects of climate variability and watershed conditions on the BVGB by providing a reliable source of surface water, thereby reducing dependence on groundwater.

9.4 Improved Hydrologic Function and Upland Recharge

9.4.1 Forest Health / Conifer and Juniper Thinning

The watershed surrounding the Big Valley Basin is comprised of approximately 800,000 acres of conifer forest and rangeland (**Figure 9-5**). Management policies, such as fire suppression, have resulted in tree densities that are currently much higher than at the beginning of the 20th century. This includes western juniper and other mixed conifers (Stephens et al. 2016) (Miller and Tausch 2001).

There are two main mechanisms by which dense junipers and other conifers impact water availability in forested watersheds. First is the interception of snow (primarily) and rain that gets caught in branches and needles and evaporates before ever reaching soil surface, and second is the high rate of transpiration due to dense layered canopy and vigorous network of roots (Ryel and Leffler 2011). An excellent summary paper by Smerdon et al. (2009) describes linkages between forest health and tree density and groundwater recharge in a variety of landscapes.

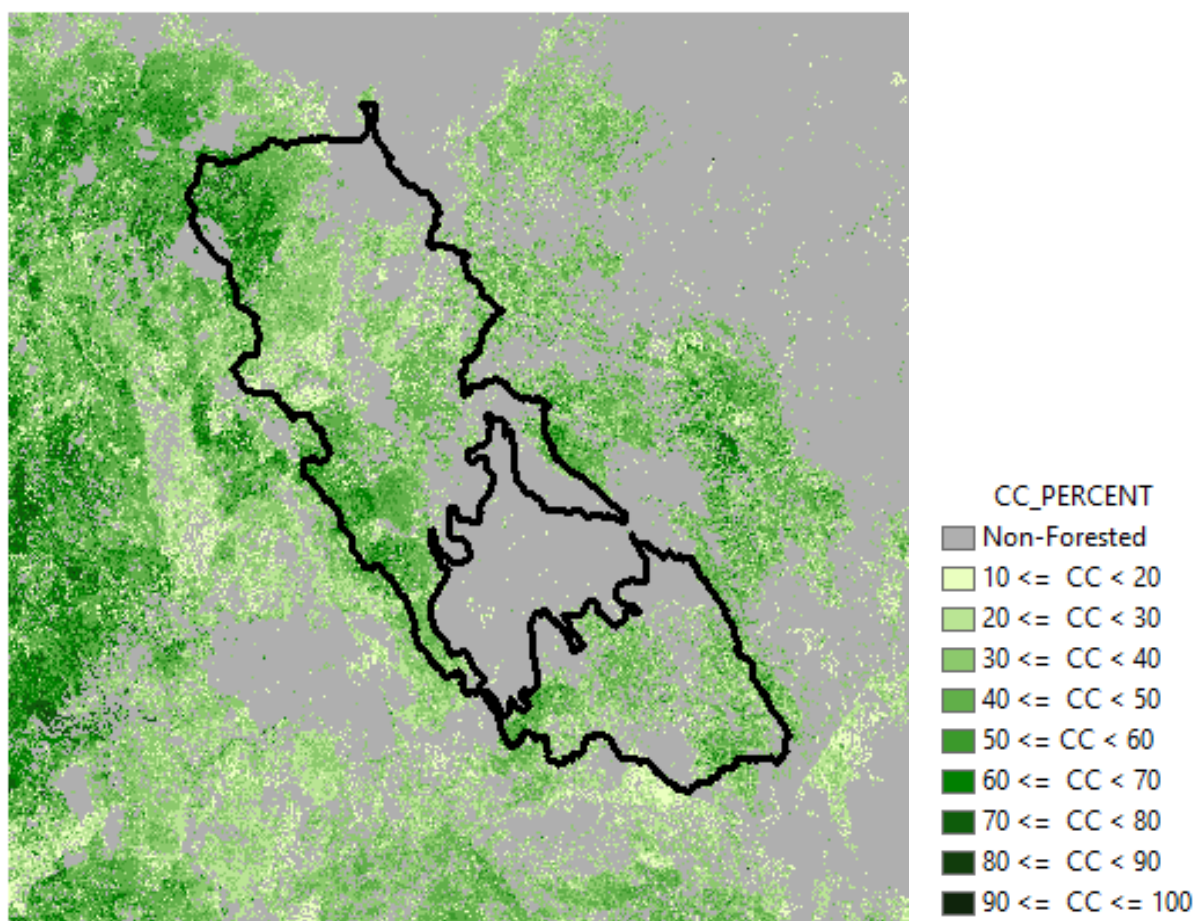


Figure 9-5 Canopy cover percentage of forested areas within the Big Valley watershed

Spring snow water content ranged from 33 to 44 percent higher in the aspen and an open meadow snowpack telemetry (SNOTEL⁷³) site *versus* adjacent juniper and conifer forest, where interception of snowfall was much higher (LaMalfa and Ryel 2008). Averaged over the entire catchment, strategically placed fuel treatments in the wetter central Sierra Nevada (American River) creating a relatively light vegetation decrease (8%), resulted in a 12 percent runoff increase, averaged over wet and dry years. With forest treatments, wildfire reduced vegetation by 38 percent and increased runoff by 55 percent. Without treatments, wildfire reduced vegetation by 50 percent and increased runoff by 67 percent.

Forest fuel reduction in drier sites in the southern Sierra had less increase in runoff than wetter sites in the central Sierra Nevada Range. (Saska 2019).

A similar increase in water availability has been documented on juniper-invaded rangelands. During the period of maximum water uptake, mature trees used between 45 and 69 times more water than juniper saplings depending on precipitation and, consequently, soil water availability. In summary, 1) juniper water use varies greatly with precipitation, and 2) because of the large difference between mature and sapling trees, juniper control results in considerable water savings, even after a 14-year period of juniper regrowth (Mata-Gonzales, et al. 2021). Paired watershed studies in Oregon have demonstrated increased

⁷³ SNOTEL is an automated system of snowpack and related climate sensors operated by the NRCS of the USDA in the Western U.S.

3419 deep soil moisture, increased spring flow, and increased surface-water runoff after juniper harvest
3420 compared to untreated areas. They have also documented a hydrologic connection between shallow
3421 groundwater on juniper sites and a nearby riparian valley (Ochoa et. al. 2016).

3422 The opportunity to enhance upland watershed recharge is significant as projects are already in planning
3423 and implementation stages to reduce fire risk and improved wildlife habitat (Miller 2001), and programs
3424 such as CAL FIRE's Forest Health Program support project implementation funding. Forest health
3425 projects can be developed and meet multiple resource objectives including hydrologic values. Removal
3426 of conifers from meadow edges, drainages, and spring areas, as well as improving hydrologic function
3427 of road crossings, ditches, and stream channels (where feasible) will enhance hydrologic and recharge
3428 benefits of forest health projects. Given the vast land area surrounding Big Valley, treatment of even a
3429 fraction of the land area would result in a significant amount of recharge. This could help mitigate any
3430 deficit. Recently, controlled burns and fuels reductions have gained considerable traction as forest
3431 management tools and could be utilized for the purposes discussed. It should be noted that federal
3432 support is required for projects that take place on Forest Service and Bureau of Land Management lands,
3433 which much of the watershed surrounding Big Valley is comprised of. Most if not all forest health
3434 projects mentioned here exceed the capacity of the local community to fund and implement, and require
3435 support from state and federal agencies.

3436 **9.4.2 Stream Channel Enhancement and Meadow Restoration**

3437 Several meadow restoration techniques exist for the purpose of returning proper hydrologic function to
3438 montane and rangeland meadows. Two used in the Big Valley Basin and surrounding uplands include
3439 pond and plug and beaver dam analogs. Both techniques result in reconnection of a stream channel with
3440 a functioning floodplain and restoration of a degraded meadow's water table up to its historical level.
3441 Restoration of the meadow water table results in re-watering of meadow soils and vegetation, with
3442 significant effects throughout the restored floodplain for meadow hydrology, wildlife use, and forage.
3443 Restored floodplain connectivity spreads flood flows so that a meadow's natural ability to settle the
3444 coarse or fine sediment delivered from steeper stream reaches is restored and natural percolation can
3445 occur. When floodplain function is restored, a portion of winter and spring runoff is stored in meadow
3446 soils rather than racing down the pre-project gully during the runoff season. Data indicates that release
3447 of this stored runoff results in increased stream flow in late spring. (Hunt et. al. 2018)

3448 In mountains of the western U.S., channel incision has drawn down the water table in many meadow
3449 floodplains. Increasing climate variability is resulting in earlier melt and reduced snowpack, and water
3450 resource managers are investing in meadow restoration which can increase springtime storage and
3451 summer flows. Between 2012 and 2015, during a record setting drought, a pond and plug restoration in
3452 Indian Valley in the Sierra Nevada Mountains was implemented and monitored. Despite sustained
3453 drought conditions after restoration, summer base-flow from the meadow increased 5 to 12 times.
3454 Before restoration, the total summer outflow from the meadow was five percent more than the total
3455 summer inflow. After restoration, total summer outflow from the meadow was between 35 and
3456 95 percent more than total summer inflow. In the worst year of the drought (2015), when inflow to the
3457 meadow ceased for at least one month, summer base-flow was at least five times greater than before

3458 restoration. Groundwater levels also rose at four out of five sites near the stream channel. Filling the
3459 incised channel and reconnecting the meadow floodplain increased water availability and streamflow,
3460 despite unprecedented drought conditions. (Hunt et. al. 2018)

3461 Other studies have also shown that these techniques may increase surface and subsurface storage and
3462 groundwater elevations that contribute to channel complexity and residence times. These factors could
3463 lead to stronger flow permanence in channels subject to seasonal drying. Increased availability of water
3464 and productivity of riparian vegetation can also support human uses in arid regions, such as irrigation
3465 and livestock production. (Pilliod et. al. 2018)

3466 **9.5 Water Conservation**

3467 **9.5.1 Irrigation Efficiency**

3468 The fundamental objective of an irrigation system is to deliver an optimum amount of water for crop
3469 growth during spring, summer, and fall growing seasons while temperature and daylength are conducive
3470 to plant growth but natural precipitation is lacking. Irrigation water and water application costs comprise
3471 the single biggest operational cost associated with alfalfa or grass hay production in the intermountain
3472 area, accounting for approximately 30 percent of total operating costs (Wilson et al. 2020) (Orloff et al.
3473 2016). Increasing the efficiency of crop water use is an economic, as well as a conservation-minded,
3474 goal. Farmers in the Big Valley area have been adopting water conservation measures as feasible
3475 opportunities arise and will continue to do so. Support for infrastructure, new technology, and education
3476 outreach will help attain this goal.

3477 Flood, wheel-line, and center pivot irrigation systems are all used on Big Valley farms. The best
3478 irrigation system depends on water availability, crop, soil type, and infrastructure. Commonly,
3479 center-pivots are rated as the most efficient systems, but there are appropriate uses for all three types.
3480 Many advancements in irrigation efficiency have been made and will continue to be developed and
3481 implemented. It is critical that implementation is done at a farm-by-farm basis in such a way as to fit
3482 specific conditions and production systems. A one-size-fits-all approach, such as SGMA, will be neither
3483 effective nor economically viable for the BVGB.

3484 It is important that any irrigation system be well-maintained to operate properly. Flood-irrigated fields
3485 should be appropriately leveled with appropriate width and length of irrigation check to provide for a
3486 uniform application of water. Sprinkler systems should be regularly checked for function and be
3487 designed with the right nozzle size for available flow and pressure. Systems that can utilize larger
3488 diameter nozzles can reduce droplet size and evaporation loss. Length of irrigation set should make use
3489 of soil water-holding capacity without incurring excessive tailwater. Specialized systems such as Low
3490 Energy Sprinkler Application (LESA) can improve water-use efficiency up to 15 percent.⁷⁴ Length of
3491 irrigation set should make full use of soil water-holding capacity without incurring excessive runoff.

3492 To optimize efficiency of water use, the amount and timing of irrigation water applied should closely
3493 match the amount of water needed by the crop, thus maintaining adequate soil moisture for crop growth

⁷⁴ [Low Energy Irrigation Technology - Bonneville Power Administration \(bpa.gov\)](https://www.bpa.gov/low-energy-irrigation-technology)

3494 while minimizing tail water runoff. Effective use of irrigation technology such as soil moisture sensors,
3495 tracking of evapotranspiration, flow meters, etc. are available to help farmers manage irrigation timing
3496 and length of set to get the most of their irrigation system. These irrigation efficiency techniques are
3497 already being used to some extent in the BVGB but could have a greater impact if used more widely.
3498 The State Water Efficiency Enhancement Program (SWEET) Irrigation Water Savings Assessment
3499 Tool⁷⁵ indicates irrigation efficiency improvements of 5 to 15 percent, with 15 percent being the greatest
3500 improvement occurring with the installation and use of soil moisture equipment, flow meters, and
3501 volumetric irrigation management.

3502 Genetic selection and the continued improvement of forage crop species has resulted in the increased
3503 availability of drought tolerant, heat tolerant, or short-season forage grasses that may provide growers
3504 with viable alternatives in certain situations, where water availability is otherwise limited. Crop
3505 selection is often based on the best fit for a particular soil depth, soil texture, and water availability, in
3506 conjunction with value and marketability. Although Big Valley cropping systems are heavily
3507 constrained by climate and growing season, ongoing forage crop improvement may provide growers
3508 with a wider range of species and variety options.

3509 Overall good agronomic practices in terms of soil fertility, weed control, harvest, etc. are critical and
3510 promote an efficient use of all resources, including water. As mentioned in other places in this plan,
3511 agricultural fields and farms provide important wildlife habitat in the valley. Irrigated lands are an
3512 important part of the overall landscape. A good example is that flood irrigated pastures are highly valued
3513 by migratory birds, particularly in the spring. Emphasis on water efficiency is important but should not
3514 become such a single-focused objective that other resource values or farm profitability are ignored.

3515 It should be clear that efficient use of water for irrigated forage crop production is multi-faceted, and
3516 several small improvements, strategically coupled together to fit on-farm conditions, are the most
3517 effective approaches. To this end, education outreach *via* U.C. Cooperative Extension, technical support
3518 from NRCS, and cost-share and grant programs are all critical to supporting water use efficiency
3519 measures. Support and incentive programs that have been used and can be further expanded upon in Big
3520 Valley are listed in **Table 9-1** (funding program table).

3521 Reductions in water demand due to improvements in irrigation efficiency will vary depending on the
3522 type of technology adopted, the extent of adoption, state of continued maintenance, and other factors.
3523 Based on the assumptions documented in Chapter 6 and Appendix 6A, the projected applied
3524 groundwater for irrigation averages about 44,000 acre-feet per year, assuming an 85 percent irrigation
3525 efficiency. Using a conservative estimate of basin-wide adoption in irrigation improvements, irrigation
3526 efficiency across the basin could improve by 5 to 10 percent. Assuming that half of the reduced
3527 irrigation would have recharged the groundwater basin, the net benefit to the groundwater basin would
3528 be about 1,000 to 2,000 acre-feet per year.

⁷⁵ <https://www.cdfa.ca.gov/oefi/sweet/docs/IrrigationWaterSavingsAssessmentTool.xlsx>

9.5.2 Landscaping and Domestic Water Conservation

While Big Valley is extremely rural and economically disadvantaged, there are opportunities to enhance water conservation among domestic water users, particularly regarding domestic landscaping, use of native drought adapted plants, irrigation timers, effective mulch, and rainwater/snow water catchments to reduce water requirements. Low-water landscaping can also be integrated with homeowner firesafe planning. Landscaping guides for homeowners can be distributed at public centers and at regional garden supply stores (Hartin et. al. 2014) (California Native Plant Society, 2021). Improvements in water conservation by domestic water uses will likely have a minimal benefit given the small population of the BVGB (on the order of tens of acre-feet per year), but working with the community to educate and implement domestic water conservation will further awareness and engagement in stewarding the BVGB.

9.5.3 Illegal Diversions and Groundwater Uses

As detailed in Section 3.3 – Land and Water Use, water use for illegal activities (i.e., unlicensed marijuana cultivation) occurs in the Basin and surrounding watershed. Lassen and Modoc County staff have limited time and resources to address this issue, but they do actively enforce their local cultivation ordinance (which does not allow for commercial marijuana cultivation). Staff in Lassen County conduct areal patrols and utilize high-resolution aerial imagery from an imaging contractor as part of their effort to identify and abate illegal cultivation. Unfortunately, federal and state agencies responsible for taking enforcement action against illegal marijuana grows in their jurisdictions (e.g., on public lands or when illegally diverting surface water) have not been aggressive in identifying and removing said illegal grows in the Basin and watershed. That said, when county resources are available, staff will continue to work in the field and with their imaging contractors to identify and abate illegal marijuana cultivation on private land. County staff will continue to report cultivation activities outside of their purview to the BLM, USFS, CDFW, State Water Board and the Bureau of Cannabis Control. The GSAs will rely on these agencies to take an aggressive approach in Big Valley with the objective of eradicating the Basin and watershed of illegal groundwater pumping and surface-water diversions. The potential for reduced water demands resulting from reducing or eliminating illegal diversions and groundwater uses is unknown but is expected to be on the order of hundreds of acre-feet per year.

9.6 Public Education and Outreach

The GSAs believe that public education and outreach are an important component of this GSP. Education can change use patterns that promote water conservation and protection of water resources. The GSAs support continued education on preventing illegal dumping, illegal marijuana growers, properly sealing abandoned wells and BMPs. Continued outreach to support the coordination of efforts and information sharing, fostering relationships with relevant agencies and organizations and attending meetings with local and regional groups involved in water management are also important. This includes increasing public outreach about funding opportunities and programs that support water conservation methods, increased recharge, mediation opportunities for decreasing water levels and addressing other SMCs like water quality. **Table 9-1** lists current state and local funding sources that can be targeted to support project planning and implementation. The GSAs plan to leverage existing grant information to maintain a list of funding sources for pumpers to monitor and address challenges at their wells.

3568 Additionally, the GSAs may elect to support local entities in applying for funding. More information on
3569 public outreach and communication can be found in Chapter 11 – Notice and Communications.

3570 As described in Chapter 8.2.2, the UCCE, with support from the GSAs, will implement a voluntary
3571 water quality monitoring program for nitrate and arsenic that will include materials for guidance on how
3572 to administer the tests and allow for voluntary reporting of water quality.

3573 Outreach methods that can be expanded include radio public service announcements, cooperator
3574 workshops with UCCE and social media posts informing the public about upcoming meetings and
3575 deadlines, BMPs, Plan updates, recharge opportunities and updated water conditions. An organized
3576 effort to compile recharge and conservation activities would aid GSAs in tracking impacts for future
3577 Plan revisions.

3578 **9.7 Domestic Well Mitigation Program**

3579 A domestic well mitigation program will be developed by the GSAs to support domestic well owners if
3580 their well goes dry or the quality of groundwater degrades due to the chronic lowering of groundwater
3581 levels. A general outline for a plan to implement a domestic well mitigation program is described below
3582 as many of the details have yet to be formulated. The development of the framework of the program will
3583 begin immediately following the development of the GSP, however securing funding for the mitigation
3584 measures of the program would likely occur once the measurable objective is exceeded.

3585 The following guidance documents were consulted in drafting the outline and general overview of the
3586 well mitigation program summarized herein, and each document will be consulted during the
3587 development of the program:

- 3588 • California Department of Water Resources (DWR), 2023. Considerations for Identifying and
3589 Addressing Drinking Water Well Impacts, Guidance for Sustainable Groundwater Management
3590 Act Implementation. March.
- 3591 • Self-Help Enterprises, Leadership Counsel for Justice and Accountability, and the Community
3592 Water Center, 2022. Framework for a Drinking Water Well Impact Mitigation Program. July.

3593 The domestic well mitigation program is a necessary component of the Big Valley GSP and will be
3594 developed following the completion of the GSP to mitigate impacts to domestic wells. The general
3595 outline for implementation will be as follows:

- 3596 1. Review existing and expected well mitigation programs within the State.
- 3597 2. Explore opportunities and secure long-term funding for program and/or collaboration with
3598 local agencies.
- 3599 3. Develop policies and procedures with GSAs, BVAC, and public input.
- 3600 4. Identify wells that may be or are at risk of being impacted.
- 3601 5. Develop criteria for qualifying wells.

3602 6. Develop an adaptive management trigger system.

3603 7. Develop mitigation measures for qualifying wells.

3604 8. Perform public outreach to landowners and stakeholders.

3605 9. Develop voluntary registration program for well mitigation assistance.

3606 Each of these above steps will culminate in a comprehensive domestic well mitigation program that will
3607 address wells that go dry within the basin. Each step is described further below.

3608 **Review of Existing Well Mitigation Programs**

3609 Many existing programs within the State can serve as a model for the Big Valley Basin’s domestic well
3610 mitigation program. The GSAs will perform a thorough review of existing programs to understand what
3611 will work for the BVB GSAs.

3612 **Funding and Collaboration with Local Agencies**

3613 Funding sources will be explored at the federal, state, and local levels. A funding plan will be developed
3614 for the BVB GSAs if the measurable objective is reached. Coordination with the Counties of Lassen and
3615 Modoc will also occur as related to SB 552.

3616 **Development of Policies and Procedures with Local Input**

3617 Following development and/or approval of this GSP, the GSAs will solicit local input on the policies
3618 and procedures that will govern the well mitigation program. Although the general outline of the
3619 program is described herein, the procedures and policies will be developed following input from the
3620 GSAs, BVAC, and Big Valley Basin locals.

3621 **Identify “At Risk” Domestic Wells**

3622 The GSAs will review their existing dataset for domestic wells that are “at risk” of going dry. The dataset
3623 will be compared against the water level minimum thresholds to identify wells that are at risk. The GSAs
3624 will update the existing dataset of domestic wells with a voluntary domestic well registration program.

3625 **Develop Criteria for Qualifying Wells**

3626 An application and evaluation process will be developed to identify active and permitted domestic wells
3627 that qualify for the program. The following are general criteria that may qualify or disqualify a domestic
3628 well for mitigation efforts covered by the GSAs and are subject to change:

- 3629 • Must be a domestic well within the Big Valley Basin and permitted with one of the Counties.
- 3630 • Undesirable results have occurred in the Basin.
- 3631 • Groundwater levels in the vicinity of the domestic well must be below the minimum threshold.

- Water loss in well must be related to declining water levels and not issues with the well or pump itself, such as mechanical issues with the pump, broken well components due to well age, etc.
- Optimal and most realistic mitigation measure will be applied to domestic wells that qualify for GSAs assistance under this program. For example, a new well will not be drilled if lowering of a pump would solve the issue.

Develop Adaptive Management Trigger System

An adaptive management trigger system may be developed for implementing the domestic well mitigation program, which will rely on the monitoring of groundwater for levels and quality at the monitoring network wells. It should be noted that any or all corrective actions undertaken by the GSAs are contingent on funding to the program, which will be developed once the measurable objectives are exceeded.

Develop Mitigation Measures for Qualifying Wells

Mitigation measures will be developed to provide qualifying domestic well users assistance if their well is to go dry related to the lowering of groundwater. Well owners would qualify for the program if groundwater in the vicinity is below their domestic well for three consecutive years and if undesirable results related to water levels were to occur within the Basin.⁷⁶ Mitigation measures can be broken up into short term and long term and can range from providing a short-term water supply such as bottled water to funding assistance to drill a new domestic well. Mitigation requires defining the level of mitigation necessary. Some examples of mitigation are listed below and may not represent the final program's mitigation measures:

- Providing a short-term mitigation measure while a longer-term mitigation measure is pursued. For example, bottled water or a water tank (short-term mitigation measure) while the domestic well user is connected to a nearby water system (long-term mitigation measure). This solution would foreseeably work for both water quantity and quality issues.
- Facilitating the domestic well user to a nearby water system (long-term mitigation).
- Providing funding for lowering a pump, deepening the well, drilling a new well, or an alternative equivalent water supply (such as a surface water source; long-term mitigation).
- Reducing or adjusting pumping near the affected domestic well(s) (long-term mitigation).

Perform Public Outreach and Develop Voluntary Registration Program

The GSAs will perform public outreach to let residents of the Big Valley Basin know of the domestic well mitigation program and voluntary registration program. Those who wish to benefit from the program must have a county-permitted well that was affected by the lowering of groundwater levels and has or will register for the program. The GSAs will work with other local organizations to spread word of the program and to improve access.

⁷⁶ Undesirable results for groundwater levels would occur when at least one third of representative monitoring wells fall below their minimum thresholds for three consecutive years. The minimum threshold is defined as 50 feet below the Spring 2015 groundwater levels.

3665 10. Implementation Plan

3666 GSP implementation generally consists of five categories of activities:

- 3667 • GSA Administration and Public Outreach
- 3668 • Monitoring and Data Management
- 3669 • Annual Reporting
- 3670 • Plan Evaluation (five-year updates)
- 3671 • Projects and Management Actions

3672 This chapter contains discussion of the details for each of these activities, then sets forth a schedule for
3673 implementation, estimates costs of implementation and discusses funding alternatives.

3674 10.1 GSA Administration and Public Outreach

3675 The nature of GSA administration is not addressed explicitly in the GSP Emergency Regulations. Much
3676 of the work to implement portions of the GSP (e.g., monitoring and projects and management actions)
3677 must be performed by outside entities such as DWR and hydrology professionals. However, this work
3678 will need to be coordinated by the GSAs, and some work will need to be performed by GSA staff.

3679 One category of work that rests on GSAs' shoulders is public outreach. The level of effort needed from
3680 GSA staff depends greatly on the details of public outreach discussed in Chapter 11 – Notice and
3681 Communications. In addition to the public outreach performed during GSP development, Regulations
3682 (§354.10(d)) require GSAs to develop a communication section of the plan that includes the following:

- 3683 1. An explanation of the Agency's decision-making process.
- 3684 2. Identification of opportunities for public engagement and a discussion of how public input and
3685 response will be used.
- 3686 3. A description of how the Agency encourages the active involvement of diverse social, cultural
3687 and economic elements of the population within the basin.
- 3688 4. The method the Agency shall follow to inform the public about progress implementing the Plan,
3689 including the status of projects and actions.

3690 Chapter 11 will contain the Communications and Engagement Plan, but the requirements of the
3691 Regulations are presented here for awareness by GSA staff to refine this chapter and understand the
3692 level of effort and expense that will be required for this component of GSP implementation. Decisions
3693 will need to be made regarding whether the BVAC continues as a functioning body after completion of
3694 the GSP. If the BVAC continues, what role they take and how often they meet will determine the level
3695 of GSA staff effort needed to facilitate BVAC meetings and activities.

10.2 GSP Annual Reporting

According to §356.2 of the Regulations, the Big Valley GSAs are required to provide an annual report to DWR by April 1 of each year following the adoption of the GSP. The first Annual Report will be provided to DWR by April 1, 2022, and will include data for the prior WY, which will be WY 2021 (October 1, 2020 – September 30, 2021). While the WY as defined by DWR isn't ideal for use in Big Valley, because it doesn't correlate with the growing season or surface-water irrigation season in Big Valley, the GSAs will assemble data based on DWR's definition as per SGMA statute and regulations. The Annual Report will establish the historical conditions of groundwater within the BVGB, the status of the GSP implementation and the trend towards maintaining sustainability. Unfortunately, while conditions won't differ significantly from when the GSP was developed, the GSAs are still required to submit the Annual Report to comply with GSP regulations. A general outline is included below:

- General Information
 - Executive Summary
 - Introduction (1 map of Basin)
- Basin Conditions
 - Groundwater Elevations (2 contour maps, 12 hydrographs)
 - Estimated Groundwater Extractions (1 table from water budget)
 - Estimated Surface-water Supply (1 table from water budget)
 - Estimated Total Water Use (1 table from water budget)
 - Estimated Change in Groundwater Storage (2 maps, 1 graph and 1 table)
- GSP Implementation Progress
 - Progress Toward Measurable Objectives
 - Updates on Projects and Management Actions

Another way to organize this requirement, and for GSA staff and stakeholders to understand the level of effort and expense involved in developing annual reports, is to outline major technical tasks. Much of the effort to develop the annual reports is to take available data collected by outside agencies, generate figures based on that data and then re-submit to DWR. Below is a summary outline of tasks to be performed by GSA staff and/or consultants to develop the annual report:

- Download Water Level Data from state website and generate:
 - Hydrographs for 12 representative wells
 - Assumed spring and fall groundwater contours
 - Assumed groundwater difference contours (e.g., fall 2020 to fall 2021)

- Download water budget data from state websites⁷⁷
 - Run water budget for the WY and generate estimates of:
 - Groundwater extractions
 - Surface-water supply
 - Total water use
- Assemble and write Annual Report, including the estimates and assumptions
- Upload report and data, including the estimates and assumptions, to state website

10.2.1 General Information

In accordance with §356.2(a), each Annual Report will include, at the front of the report, an executive summary that will summarize the activities and the condition of groundwater levels within the BVGB for the prior year. The executive summary shall also include a map of the BVGB, its GSAs, and the monitoring network.

The Annual Report will include an introduction that will describe the following:

- A description of the BVGB and the two GSAs
- The general conditions of the BVGB for the prior WY (precipitation, surface-water allocations, crop demands, municipal demands, etc.)
- Any significant activities or events that would impact the water supply and/or groundwater conditions for the BVGB

10.2.2 Basin Conditions

Included in the Annual Report will be a discussion of specific local water supply conditions per §356.2(b). This section will provide a description of the water supply conditions for the WY being reported along with a graphical representation of the conditions. A WY shall be defined as the 12-month period starting October 1 through September 30 of the following year. Water supply conditions that will be discussed include:

- Assumed Groundwater Elevations – elevation data from the monitoring network, including hydrographs for the representative wells and groundwater contours for spring and fall.
- Assumed Groundwater Extractions – groundwater pumping estimates and measurements for agricultural, municipal, domestic and industrial⁷⁸ pumping; generated from the water budget.
- Assumed Surface-water Supply – data from surface-water supplies to irrigation demand,⁷⁹ conveyance losses and groundwater recharge; generated from the water budget.

⁷⁷ This includes precipitation and reference evapotranspiration (ET_o) from CIMIS and streamflow data from CDEC, BVWUA, Brookfield Energy, and other sources.

⁷⁸ This includes both in-basin industries as well as fire, wildlife, logging, and construction (which use both surface and groundwater).

⁷⁹ Summer flows in the BVGB are 100% allocated under existing water rights.

- Assumed Total Water Use – total water uses by agricultural, municipal, domestic and industrial sectors; generated from the water budget.
- Assumed Change in Groundwater Storage – a determination of the groundwater (volumetric) change; calculated from groundwater difference contours and/or the water budget.

10.2.3 Plan Progress

The Annual Report also needs to describe the progress of the Plan since the previous report, including progress in maintaining measurable objectives and status of projects and management actions.

10.3 Data Management System

The Regulations require a data management system (DMS), but do not give strict guidance on format or how to develop and maintain the DMS. §352.6 of the Regulations states:

Each Agency shall develop and maintain a data management system that is capable of storing and reporting information relevant to the development or implementation of the Plan and monitoring of the basin.

The DMS proposed for Big Valley is separated into two categories: data for annual reports and data for GSP updates, much of which is taking data already managed by the state and returning it to the state in a new format.

10.3.1 Annual Report DMS

Annual reports require water-level data and other data to update the water budget. **Table 10-1** lists the data needed and the sources of those data. The DMS can be stored using common software (Microsoft Excel and ArcGIS) on GSA servers. Water-level data will be downloaded from the state website⁸⁰ and stored in an Excel hydrograph spreadsheet tool. This tool will store the well information, water-level data, WY types and sustainable management criteria (minimum thresholds and measurable objectives). The tool will allow users to generate hydrographs and provide the data needed to generate contours. **Figure 10-1** shows a screenshot of the Excel Water Level Tool for storing water-well and water-level data and generating hydrographs.

Table 10-1 Annual Report DMS Data Types

Data Type	Collecting Entity	Data Source	DMS Tool
Water Levels	DWR	SGMA Data Viewer	Excel Water Level Tool
Precipitation	DWR	CIMIS	Excel Water Budget Tool
Evapotranspiration	DWR	CIMIS	Excel Water Budget Tool
Streamflow (gages)	USGS/DWR	CDEC	Excel Water Budget Tool
Streamflow (water rights reporting)	State Water Board	eWRIMS	Excel Water Budget Tool
GIS Base Data ¹	GSAs	various	GIS Database
Notes:			

⁸⁰ Currently water level data for Big Valley is being managed and stored through [DWR's CASGEM system](#). Once the GSP is completed, the data will be brought into DWR's new [SGMA Portal](#) Monitoring Network Module (MNM). Data from either of these systems is available through the [SGMA Data Viewer](#).

¹Base data includes GIS layers such as the county boundaries, streams, roads, well locations, etc., which generally don't change over time and don't need to be updated.
CDEC = California Data Exchange Center

Water budget data will also be stored in an Excel spreadsheet tool as shown in **Figure 10-2**. Each of these spreadsheet tools has instructions, sheets to store raw data, and sheets that perform calculations and generate the needed figures for annual reports or other purposes.

Annual reports require maps, which are generated with widely-used ArcGIS software. The geographic information system (GIS) data, including base data such as streams, roads and well locations, will be organized into a folder structure as shown in **Figure 10-3**. Water level data will be imported into GIS to generate contours for annual reports.

10.3.2 GSP Update DMS

Additional types of data are needed to update the GSP, listed in **Table 10-2**. Much of this additional data is GIS-based and will be stored in the GIS database, shown in **Figure 10-3**. Water quality data will need to be downloaded from the State Water Board's GAMA groundwater system in 2026 to support the five-year update.

Table 10-2 GSP Update DMS Data Types

Data Type	Collecting Entity	Data Source	DMS Tool
Water Levels	DWR	SGMA Data Viewer	Excel Water Level Tool
Precipitation	DWR	CIMIS	Excel Water Budget Tool
Evapotranspiration	DWR	CIMIS	Excel Water Budget Tool
Streamflow (gages)	USGS/DWR	CDEC	Excel Water Budget Tool
Streamflow (water rights reporting)	State Water Board	eWRIMS	Excel Water Budget Tool
Water Quality	State Water Board	GAMA	Data to be downloaded for five-year update.
Land Use	DWR	SGMA Data Viewer	GIS Database
Subsidence (InSAR)	DWR	SGMA Data Viewer	GIS Database
GIS Base Data ¹	GSAs	various	GIS Database
Note: ¹ Base data includes GIS layers such as the county boundaries, streams, roads, well locations, etc., which generally don't change over time and won't need to be updated.			

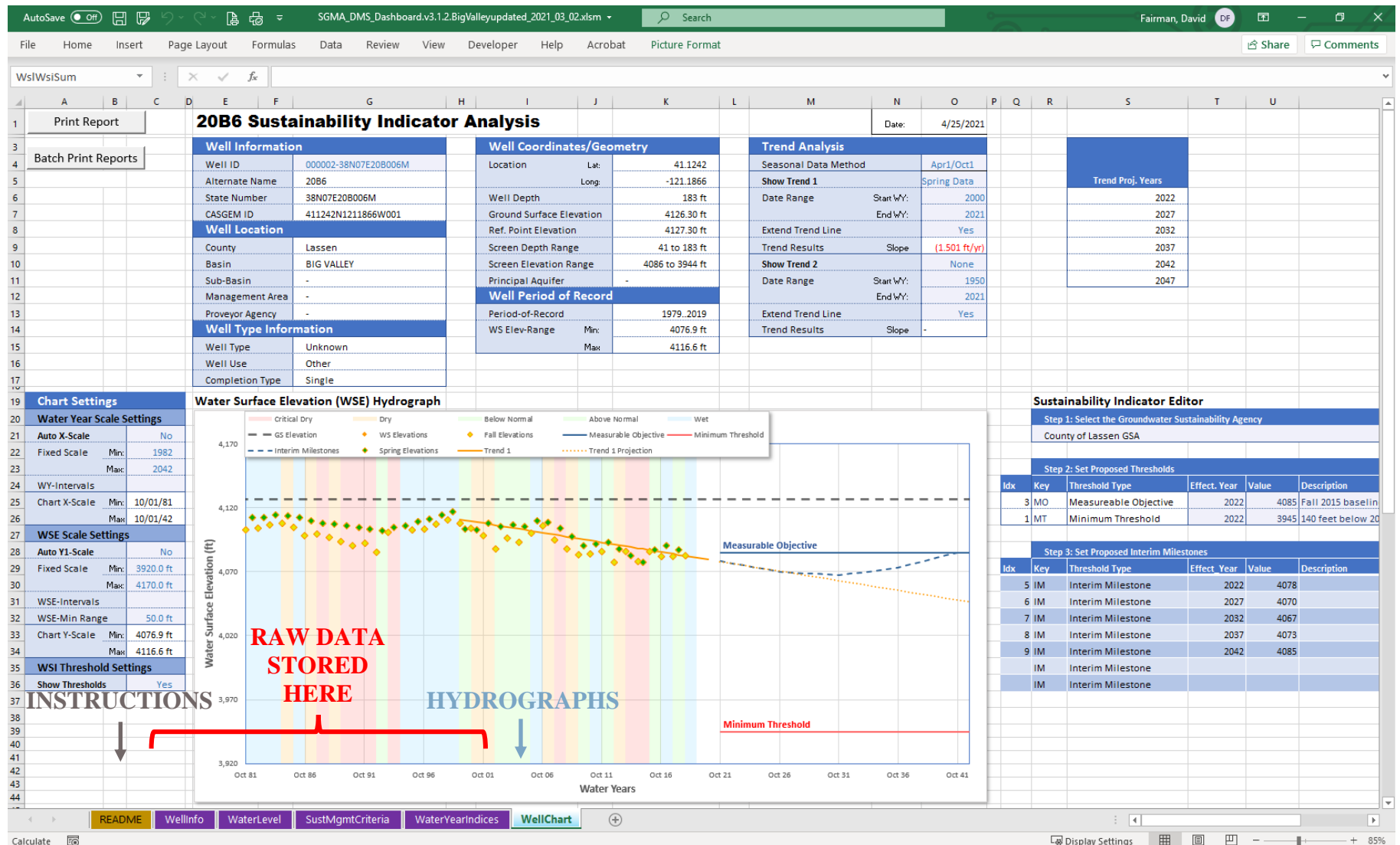


Figure 10-1 Excel Water Level Tool

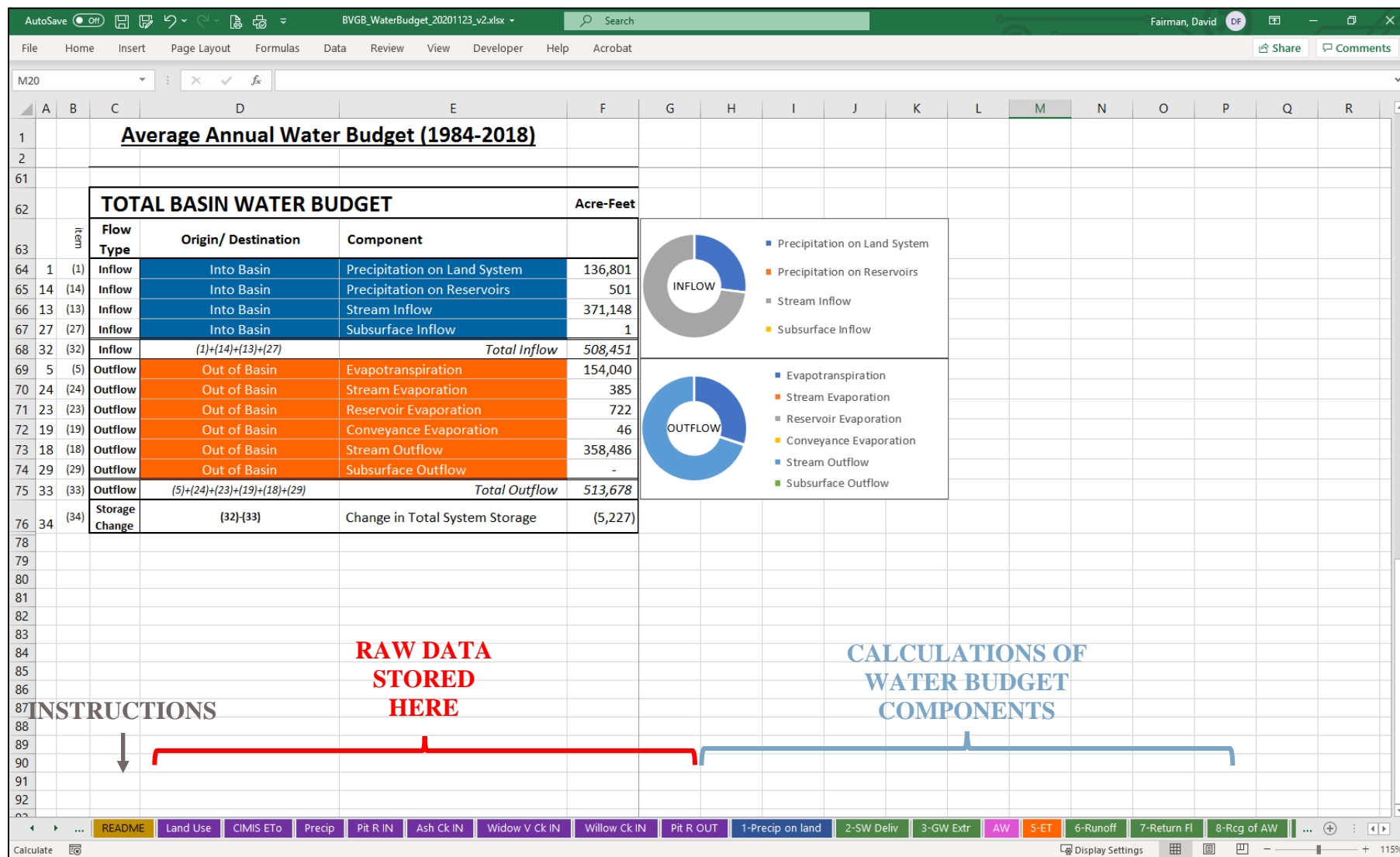


Figure 10-2 Excel Water Budget Tool

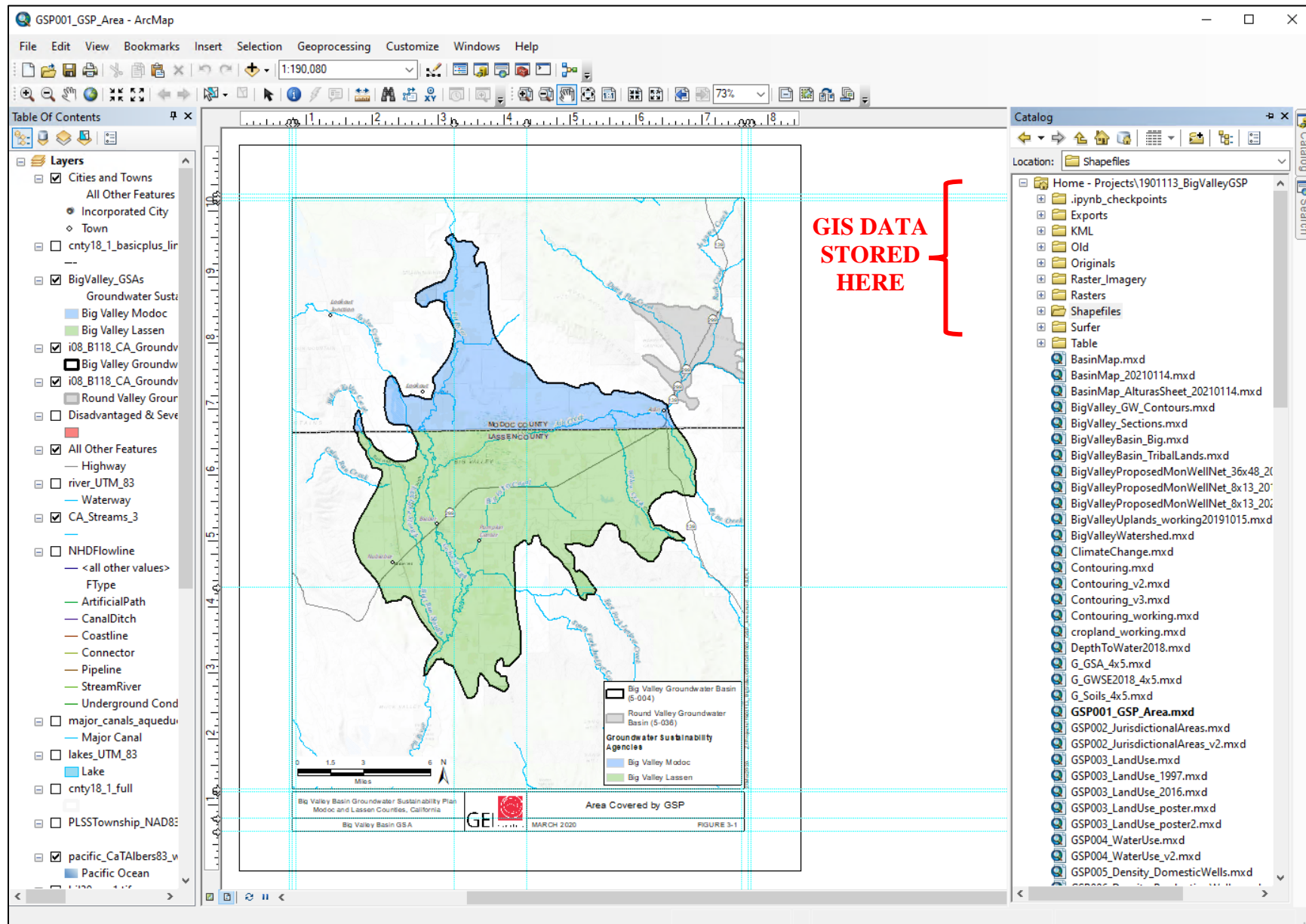


Figure 10-3 GIS Database

10.4 Periodic Evaluations of GSP (Five-Year Updates)

Updates and amendments to the GSP can be performed at any time, but at a minimum the GSAs must submit an update and evaluation of the plan every five years (CWC §356.4). While much of the content of the GSP will likely remain unchanged for these five-year updates, the Regulations require that most chapters of the plan be updated and supplemented with any new information obtained in the preceding five years. Chapters that are likely to require significant updates and re-evaluation include:

- Chapter 4 – Hydrogeologic Conceptual Model
- Chapter 5 – Groundwater Conditions
- Chapter 6 – Water Budget
- Chapter 7 – Sustainable Management Criteria
- Chapter 8 – Monitoring Network
- Chapter 9 – Projects and Management Actions

The Basin Setting (Chapters 4-6) is signed and stamped by a California Professional Geologist or Engineer.

10.5 Implementation Schedule

Figure 10-5 shows the implementation schedule. *See* Chapter 9 – Projects and Management Actions for the schedules for individual projects that are still under development.

10.6 Cost of Implementation

The legislation and regulations provide little guidance on how to develop and define costs. An analysis of GSPs from critically overdrafted basins found a broad variety of approaches, categories of costs and level of detail, from a single cost with no detail or justification to detailed costs for multiple categories. The purpose of this section is to present some information of cost ranges given for other basins and to give estimates of costs for the categories of implementation presented in this chapter, listed below. These costs may change based on how the GSAs choose to implement the GSP (e.g., the amount and type of public outreach and the amount and type of support sought from outside hydrology professionals such as consultants and/or UCCE).

- GSA Administration and Public Outreach
- Monitoring and Data Management
- Annual Reporting
- Plan Evaluation (five-year updates)
- Projects and Management Actions

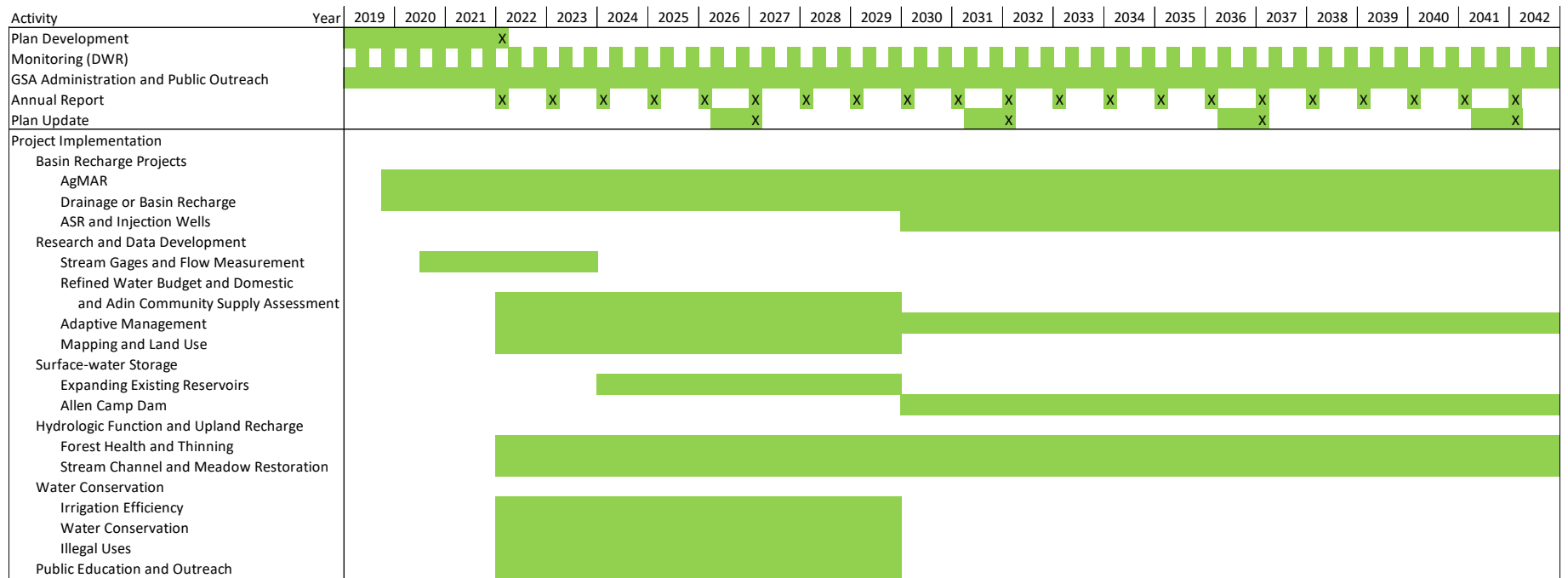


Figure 10-4 Implementation Schedule

Cost is a fundamental concern to the GSAs and stakeholders in the BVGB, as the Basin is a disadvantaged community and there is little to no revenue generated in the counties to fund the state unfunded mandates of SGMA. This is a big burden for a small, disadvantaged Basin that has no incorporated cities, low value crops and no revenue stream to pay the costs for the mandated GSP. Therefore, the approach in implementing the plan and estimating costs is to leverage as much outside funding and technical support as possible to cover costs. For costs that must be borne by the GSAs, efficient implementation methods while still meeting SGMA requirements to support the GSP is the desired outcome. **Table 10-3** shows a summary of the costs from GSPs submitted in 2020. As mentioned, not every GSP had every category of costs listed, but the number of GSPs that did detail costs for each category is shown. It should be noted that Big Valley is extremely unique in a variety of ways documented in Chapter 1 – Introduction.

Table 10-3 GSP Implementation Cost Statistics for 2020 GSPs in California

	Annual Cost Details						5-Year Update
	Total Annual	GSA Admin	Public Outreach	Annual Monitoring	DMS Update	Annual Report	
count	34	21	11	23	8	15	20
min	\$ 50,000	\$ 51,000	\$ 5,000	\$ 20,000	\$ 10,000	\$ 20,000	\$ 50,000
max	\$ 2,596,384	\$ 1,538,794	\$ 75,000	\$ 1,057,590	\$ 170,000	\$ 350,000	\$ 1,400,000
mean	\$ 981,296	\$ 607,861	\$ 27,573	\$ 293,907	\$ 42,875	\$ 56,267	\$ 455,369
median	\$ 720,100	\$ 418,900	\$ 20,000	\$ 136,000	\$ 20,000	\$ 25,000	\$ 330,000

Source: Fricke 2020

10.6.1 GSA Administration and Public Outreach

The fundamental activities that will need to be performed by the GSAs are public outreach and coordination of GSP activities. Public outreach may entail updates at County Board of Supervisors’ meetings and/or public outreach meetings. At a minimum the GSAs will receive and respond to public input on the Plan and inform the public about progress implementing the GSP as required by §354.10(d)(4) of the Regulations. Coordination activities would include ensuring monitoring is performed, annual reports to DWR, five-year GSP updates, and projects and management action coordination. Based on current grants which have funded filling of data gaps and identifying recharge opportunities, the GSA administrative costs of projects and management actions may be largely covered by grant funds.

In other GSPs already submitted, 21 GSPs itemized GSA administration and had estimates ranging from \$51,000 to over \$1.5 million (M) per year, with a median of about \$200,000. However, most of these basins are much larger than Big Valley, have more complex governance structures (i.e., have multiple GSPs in the basin) and have more stakeholder groups. This cost for Big Valley could vary depending on the nature of public outreach written in the GSP.

3865 **10.6.2 Monitoring and Data Management**

3866 Twenty-three GSPs submitted to DWR to date have itemized annual monitoring with cost estimates
3867 ranging from \$20,000 to over \$1M per year, with a median of about \$65,000. Twelve GSPs itemized
3868 DMS updates with costs ranging from \$3,000 to \$170,000, with a median cost of \$15,000.

3869 DWR staff currently measure water levels in the Basin and posts results on their website and have
3870 indicated that they will continue to do so for the foreseeable future. DWR has also indicated that they
3871 could monitor water levels in the newly constructed monitoring wells. If DWR follows through on this
3872 assumption, there would be little to no costs to the GSAs for monitoring. The GSAs would need to
3873 download and populate the DMS tools detailed above. However, for costing purposes, we have assumed
3874 this to be covered under the Annual Report cost category.

3875 If DWR chooses to discontinue its water level monitoring of wells in Big Valley, the cost could be on
3876 the order of \$2,000 to \$3,000, which equates to 40 to 60 staff-hours.

3877 **10.6.3 Annual Reporting**

3878 Annual Report costs were estimated in 15 GSPs ranging from \$20,000 to \$350,000, with a median cost
3879 of \$25,000. Annual reports have substantial requirements, including assembling the data, processing and
3880 generating the necessary charts, maps and tables and writing the text described in Section 10.2 – GSP
3881 Annual Reporting. There are ways to streamline and automate the process of retrieving, reformatting and
3882 returning the data to the state, many of which are described in Section 10.2.3 – Plan Progress. The level
3883 of effort and cost will be reduced over the course of the first few years. The cost of developing an
3884 Annual Report initially is estimated to be \$25,000 for the first year, then reducing to approximately
3885 \$10,000, if written and submitted by GSA staff. This equates to about 200 county unreimbursable staff
3886 hours per Annual Report.

3887 **10.6.4 Plan Evaluation (Five-Year Updates)**

3888 The cost of updates to the GSP will be lower than the cost of initially developing the GSP. However, the
3889 Regulations require all parts of the GSP to be updated with recent data and information and will require
3890 substantial effort from a licensed professional. Of the 20 GSPs submitted that had GSP update cost
3891 estimates, they ranged from \$50,000 to \$1.4M with a median cost of \$330,000. However, many of the
3892 GSPs already submitted are in basins with multiple GSPs. In those types of basins, the Basin Setting
3893 (Chapters 4-6) is typically performed on a basin-wide basis. Big Valley will have to update the complete
3894 document. Therefore, a range of about \$200,000 to \$300,000 is estimated to update the GSP. **Table 10-4**
3895 summarizes the cost estimates of Annual Reports and five-year updates.

3896 **10.6.5 Projects and Management Actions**

3897 Costs of projects and management actions are addressed in Chapter 9 – Projects and Management
3898 Actions. If, and when, the GSAs seek outside funding, the costs will be put out to bid to ensure the
3899 reasonableness of the costs when implemented.

3900 **Table 10-4 Summary of Big Valley Cost Estimates**

		Annual Cost Details			
		GSA Admin and Public Outreach	Annual Monitoring and DMS Update	Annual Report	5-Year Update
Low	\$ 30,000	\$ 20,000	\$ -	\$ 10,000	\$ 200,000
High	\$ 68,000	\$ 40,000	\$ 3,000	\$ 25,000	\$ 300,000

3902 10.7 Funding Alternatives

3903 This section discusses funding alternatives. As discussed in various parts of this GSP, the GSAs and
 3904 residents of Big Valley have no ability to take on the ongoing costs of implementing this GSP and
 3905 contend that SGMA is an unfunded mandate. Therefore, the GSAs are forced to rely on outside sources
 3906 to fund the Plan. **Table 10-5** describes the various funding options available to the GSAs. The table
 3907 describes both outside funding (state and federal assistance and grants) and local funding (general fund,
 3908 fees and taxes). Annual costs are less likely to be funded directly by outside sources because of the
 3909 premise of SGMA that groundwater basins are best managed locally, and administration, monitoring and
 3910 reporting costs are most likely to be seen as an obligation for the local GSAs under this premise.
 3911 However, five-year updates and projects and management actions are good candidates for outside
 3912 funding. Some of this outside funding that currently exists could be through the DWR Prop 1 grants
 3913 obtained by the North Cal-Neva, and Modoc County could potentially be leveraged to support annual
 3914 reporting in the near term. This depends on the degree of overlap between the scopes of work for the
 3915 grants and the annual report requirements. These two existing grants are laying the groundwork for
 3916 recharge projects and filling data gaps.

3917 In addition, the Modoc County GSA received \$2.6 million from the DWR's Sustainable Groundwater
 3918 Management Grant Program in 2023 to support its GSP implementation in the BVGB.⁸¹ The scope of
 3919 work covered by this funding includes:

- 3920 • Modifying the GSP in response to DWR's review and determination.
- 3921 • Preparing Annual Reports, the five-year GSP update, and an update of the water budget
3922 presented in the GSP.
- 3923 • Conducting GSP engagement and outreach (Project 9.6).
- 3924 • Monitoring and conducting research to fill data gaps in the BVGB (Project 9.2).
- 3925 • Completing a Water Availability Analysis and applying for a temporary diversion permit for
3926 groundwater recharge (Project 9.1).
- 3927 • Completing a water storage and community supply feasibility assessment.
- 3928 • Completing and submitting a basin boundary modification for the BVGB.

⁸¹ [award-list_sgma_r2_final_list_sept2023_w_components.xlsx \(ca.gov\)](#)

3929 The GSAs are committed to implementing the scope covered by the DWR’s grant in the agreed-upon
3930 timeline.

3931 **The entire BVGB is a disadvantaged community with much of the Basin designated as severely**
3932 **disadvantaged. The GSAs adamantly oppose new taxes or fees as additional taxes or fees would**
3933 **harm the community and alter the ability of residents to live and work in the Basin. The GSAs will**
3934 **identify and pursue grants to fund the implementation of this GSP. To that end the GSA will look**
3935 **toward funding options presented by the California Financing Coordinating Committee (CFCC)**
3936 **through their Funding Fairs.**⁸²

⁸² More information on CFCC including their 2021 Funding Fairs Handbook is available at <https://www.cfcc.ca.gov/funding-fairs/>.

Table 10-5 Summary of GSP Funding Mechanisms

Funding Mechanism		Description
Assistance Programs		DWR offers Technical Services Support and Facilitation Services Support Programs to assistance GSAs in development and implementation of their GSPs. If granted, services provided under these programs are offered at no-cost to the GSAs.
Grant Funding	State Grants	DWR's Sustainable Groundwater Management Grant Program, funded by Proposition 1 and Proposition 68, provides funding for sustainable groundwater planning and implementation projects. Both DWR and the State Water Board offer a number of grant and loan programs that support integrated water management, watershed protection, water quality improvement and access to safe drinking water. Other state agencies and entities with grant or loan programs related to water and environment include the CDFW and California Water Commission.
	Federal Grants	Federal grant and loan programs related to water planning and infrastructure include the Water Infrastructure Finance and Innovation Act, Water Infrastructure Improvement for the Nation Act and the DOI Reclamation's WaterSMART program.
General Funds		Cities and counties maintain a general fund which include funding from taxes, certain fees, state shared revenue, interest income and other revenues. While not a funding mechanism, the general funds from cities and counties may be used to fund or provide in-kind services for GSA activities and GSP implementation.
Fees	Fees	Fees include "various charges levied in exchanges for a specific service" (Hanak et al., 2014). This includes water and wastewater bills, or developer or connection fees, and permitting fees. Under rules established by Proposition 218 (1996), new property-related fee increases are subject to a public hearing and must be approved by either a simple majority of property owners subject to the fee or by two-thirds of all registered voters (Hanak et al., 2014; League of California Cities, 2019).
	Groundwater Extraction Fees	SGMA grants GSAs certain powers and authorities, including the authority to impose fees. Section 10730 of the Water Code states that a GSA may "permit fees and fees on groundwater extraction or other regulated activity, to fund the costs of a groundwater sustainability program, including, but not limited to, preparation, adoption and amendment of a groundwater sustainability plan, and investigations, inspections, compliance assistance, enforcement, and program administration, including a prudent reserve."
	Assessments	Assessments are a specific type of fee that are levied on property to pay for a public improvement or service that benefits that property.
Taxes		Taxes imposed by local agencies include general taxes, special taxes, and property taxes. Taxes generally fall into one of two categories: general or special (Institute for Local Government, 2016). <i>General taxes</i> are defined as "any tax imposed for general governmental purposes" (Cal. Const. art. XIII C, § 1, subd. [a]). <i>Special taxes</i> are "any tax imposed for specific purposes, including a tax imposed for a specific purpose, which is placed into a general fund" (Cal. Const. art. XIII C, § 1, subd. [d]). Proposition 218 (1996) states that special districts, "could not levy general taxes, but only special taxes, and it clarified that local general taxes always required simple majority voter approval and that local special taxes always required two-thirds voter approval."

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11. Notice and Communications §354.10

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11.1 Background

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SGMA compliance, outreach and communication efforts in the BVGB began before GSP development. When SGMA was signed into law, local agencies in the BVGB explored options for forming GSAs by the June 30, 2017 statutory deadline. On February 23, 2016, Lassen and Modoc counties held a public meeting of the Lassen and Modoc County Boards of Supervisors in Adin to explore whether the District⁸³ could become a GSA for the Basin and if that option was preferred over the two counties becoming the GSAs. These were the only two options available under existing public agency structures. The preferred options resulting from the meeting was that the two counties become the GSAs for their respective Basin jurisdictions and develop a single, coordinated GSP.

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The county boards moved forward to become GSAs, held public hearings and passed resolutions in early 2017, included in **Appendix 2A**. They registered with DWR as the Big Valley Modoc GSA and Big Valley Lassen GSA, each covering the portion of the Basin in their respective county. After becoming established as the GSAs, the counties developed a workplan under guidance from consultants to determine the scope, schedule and cost for GSP development; an application for a state grant was submitted and grant awarded; and the GSAs submitted a notice of intent to develop one GSP to cover the entire BVGB. A timeline of these events is presented in **Table 11-1**.

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Table 11-1 Pre-GSP Development Outreach Efforts

Date	Activity
November 2015	Public Outreach meeting in Adin
February 2016	Joint Lassen-Modoc Board of Supervisors meeting to explore GSA options to comply with SGMA
February 2016 to present	Modoc County Groundwater Advisory Committee Meetings (bimonthly)
January 2017	Public outreach meeting in Bieber to solicit comment on the counties becoming GSAs
February 2017	County of Modoc GSA Formation Public Hearing
March 2017	County of Lassen GSA Formation Public Hearing
July-September 2017	GSP Workplan developed to determine scope, schedule and cost of GSP development
November 2017	Lassen County submits application for state grant to fund GSP development
June 2018	Notice of Intent to develop one GSP for the entire BVGB submitted to DWR
November 2018	Lassen County entered into SGMA grant agreement with the state

⁸³ Lassen-Modoc Flood Control and Water Conservation District

11.2 Challenges of Developing GSP in a Rural Area and During the COVID-19 Pandemic

A major challenge and constraint during the development of the GSP was the COVID-19 pandemic that started in early 2020. The pandemic made thorough and proper public outreach and participation impossible throughout 2020 and early 2021, the time during which key GSP content was developed and discussed by consultants, GSA staff and the BVAC. Due to state restrictions from the Governor's executive orders, GSA staff had to cancel BVAC meetings, restrict public attendance at meetings and facilitate participation through remote technology. Many interested parties did not feel safe attending meetings in person, and remote attendance did not facilitate appropriate participation.

Internet connectivity and quality in this portion of the state is poor to nonexistent, and the counties have very limited technological resources. These disadvantaged communities are on the losing end of the digital divide. While the GSAs made every attempt to conduct BVAC meetings with the ability for remote public participation, there were still major logistical and technical challenges both with conducting such meetings and members of the public participating. Those participants that had internet connectivity frequently could not hear or understand the dialogue in the Big Valley community venues and could not interact in the most effective way. However, the GSAs made the best of the circumstances and addressed all comments provided through the various means.

The GSAs recognized the obstacles presented by the COVID-19 pandemic early in the efforts to develop a GSP and were proactive in reaching out to both the Governor and Legislature to identify potential solutions. The Governor severely restricted public meetings (and initially did not allow public meetings at all) because of the pandemic. Obviously, this made the GSAs' efforts to develop a GSP with constructive input from the public extremely difficult since, as outlined above, there is limited internet connectivity to conduct meetings remotely. Further, the limited GSA staff and technology was challenged to offer meetings remotely.

One obvious solution would be to recognize the emergency that is occurring across the state (and nation) and provide additional time to submit the required GSP. As such, on August 11, 2020, a letter was sent from the Lassen County Board of Supervisors (acting as the Lassen County GSA) to both the Legislature and the Governor requesting additional time. There was no response from either the Legislature or the Governor, so the Lassen County Board of Supervisors sent follow-up letters to the Governor on November 17, 2020, February 16, 2021, March 23, 2021, and April 27, 2021. Neither the Legislature nor the Governor responded. However, a response was eventually received (dated June 3, 2021) from Karla A. Nemeth, with DWR denying the request, even though the Board of Supervisors sent the above letters to the Governor and not to DWR.

In February 2021, State Assembly Member Devon Mathis introduced Assembly Bill 754 which would have extended the GSP deadline. The Lassen and Modoc County Boards of Supervisors sent letters to State Assembly committee leaders in support of the bill. Supervisor Byrne testified before both the Senate and Assembly committees in support of the bill citing the constraints of inadequate broadband in

3994 the community for meaningful public participation. The bill was passed by the State Assembly but did
3995 not pass out of committee in the State Senate.

3996 Letters from the GSA to the governor and assembly, along with the response letter from DWR, are
3997 included in **Appendix 11A**.

3998 **11.3 Goals of Communication and Engagement**

3999 In developing the GSP, the GSAs implemented communication and engagement (C&E) with the goals
4000 of:

4001 **Educating the public about the importance of the GSP and their input.** Public input is an important
4002 part of the GSP development process. The local community defines the values of the Basin and the
4003 priorities for groundwater management. This input guided decision-making and development of the
4004 GSP, particularly the development of the sustainability goal, sustainable management criteria and
4005 projects and management actions.

4006 **Engaging stakeholders through a variety of methods.** One size does not fit all when it comes to
4007 stakeholder engagement in GSP development. This chapter outlines how the GSAs performed C&E at
4008 multiple venues through a variety of media to reach varied audiences.

4009 **Making public participation easy and accessible.** The C&E described in this chapter describes the
4010 many methods employed to make it easy for the public to be informed and provide input.

4011 **Providing a roadmap for GSP development.** The GSAs provided a schedule for stakeholders, keeping
4012 C&E efforts consistent and on track.

4013 **11.4 Stakeholder Identification**

4014 The Water Code §10723.2 requires consideration of all beneficial uses and users of groundwater.
4015 Primary beneficial uses of groundwater in the BVGB include agriculture, domestic use and habitat. In
4016 addition to farmers and individual well owners in the valley, this includes a small community system in
4017 Bieber, the Intermountain Conservation Camp and CDFW, which uses groundwater to supplement and
4018 maintain some habitat in the ACWA in the center of the Basin. Other significant uses include industrial
4019 uses such as logging, construction and fire suppression.

4020 The Big Valley GSAs recognize that C&E with Big Valley water users and stakeholders is key to the
4021 success of GSP development and implementation. Particularly important is the engagement of local
4022 landowners given that both county seats are distant from Big Valley. Both counties have engaged
4023 stakeholders through various processes and efforts, including Modoc County's Groundwater Resources
4024 Advisory Committee, the LCGMP development and Basin Management Objectives program
4025 implementation and the BVAC described in this chapter. In addition, the GSAs performed several public
4026 workshops to solicit more input from interested parties. A listing of the BVAC, public workshop and
4027 other public outreach meetings is included in **Appendix 11B**.

4028 The following is an initial list of interested parties that were contacted during GSA formation and
4029 GSP development:

- 4030 • Agricultural users
- 4031 • Domestic well owners
- 4032 • Public water systems
- 4033 • CDFW
- 4034 • Surface-water user groups (including BVWUA and the Roberts Reservoir group)
- 4035 • Lassen-Modoc County Flood Control and Water Conservation District
- 4036 • Modoc County Groundwater Resources Advisory Committee
- 4037 • Federal agencies (including the Forest Service and BLM)
- 4038 • Tribes (including the Pit River Tribe)
- 4039 • DWR
- 4040 • North Cal-Neva

4041 Prior to establishing themselves as the GSAs, the names and contact information for the above groups
4042 were compiled in spreadsheets. People on the interested parties lists were under no obligations and
4043 received information about GSP development, including meeting announcements and opportunities to
4044 provide input and become more involved.

4045 The GSAs developed a website (described below) to facilitate C&E, and anyone interested in GSP
4046 development or implementation in the BVGB was able add themselves to the interested parties list. In
4047 addition, sign-in sheets at all public meetings allowed attendees to add themselves to the interested
4048 parties list.

4049 Outreach with the Pit River Tribe was performed, and tribal contacts were added to the interested parties
4050 list when it was first developed in February 2016. Therefore, tribal contacts have received all
4051 notifications of GSP development activity. Applications to become members of the BVAC were sent to
4052 the tribes. In addition, the Modoc County Groundwater Resources Advisory Committee, a committee of
4053 the Modoc County Board and a forum for obtaining updates about GSP development, has a tribal
4054 position. Numerous contacts between Modoc County staff and tribal contacts have occurred during GSP
4055 development. A list of outreach activities with tribal contacts is included in **Appendix 11B**.

11.5 Venues and Tools

11.5.1 Stakeholder Survey

The GSAs performed a C&E survey with the purpose of soliciting information about how stakeholders wish to be involved in the GSP and what concerns they have relevant to the GSP. Paper copies of the survey were available at public meetings and was also available online.⁸⁴

11.5.2 Website and Communication Portal

A website⁸⁵ was deployed for GSP development to facilitate communication and track the communication in a database. The website is meant to enhance, not replace outreach efforts. Tools of the website allowed the GSAs to communicate with interested parties. These tools include the following:

- **Calendar.** The website includes a calendar with meeting dates, locations, times and documents such as meeting agendas, meeting minutes, presentations and BVAC packets.
- **Interested Parties List.** The website allows users to add themselves to the interested parties list and to select whether they wish to receive communication through email or physical mail.
- **Documents.** In addition to the meeting documents mentioned above, the website has a general documents page where the GSAs posted GSP chapters, scientific references and other supported documents related to GSP development.
- **E-Blast.** E-mails are sent to interested parties using the e-blast tool. E-blasts help to notify interested parties with email addresses to receive information about GSP development progress, upcoming meetings and new information or documents available.
- **Public Comment.** GSP chapters posted on the website are available for public comment during comment periods throughout GSP development. A web form is available for anyone to submit comments on documents open for comment. The form allows the user to comment by page and line number for GSA review and response.

The website address is included on printed materials and announced at public meetings.

11.5.3 Community Flyers

Physical copies of flyers announcing upcoming public meetings are posted in high-traffic locations such as community centers, public buildings, local markets and post offices.

11.5.4 Newspaper

All public meetings, including BVAC meetings, are announced in the Lassen County Times, the Modoc Record, The Intermountain News and the Mountain Echo.

⁸⁴ <https://www.surveymonkey.com/r/TQ9HCQK>

⁸⁵ <https://bigvalleygsp.org>

11.5.5 Social Media

Information about GSP development and meeting announcements have been, and will continue to be, made available through social media. UC Cooperative Extension in Modoc County hosts the Devil's Garden Research and Education Facebook page, as well as a website with the same name. Through their Facebook page,⁸⁶ events are publicized and shared with other connected pages in the area to reach a wider stakeholder base. This platform also enables workshops and other events to be shared through live video and recordings. Recently, a blog detailing stakeholder engagement in Big Valley was published to the website.⁸⁷

11.5.6 Brochure

In 2021, the GSAs transitioned from the background and scientific portions of the GSP (Chapters 1-6, including Basin Setting and Water Budget) to the policy and decision-making portions of the GSP (Chapters 7-9, Sustainable Management Criteria, Monitoring Networks and Projects and Management Actions). To facilitate engagement of people who may have been coming into the process at that time, a four-page informational brochure was developed, summarizing Chapters 1 through 6. This brochure was distributed on the website, through email and at public meetings. The brochure is included as **Appendix 11C**.

11.5.7 Big Valley Advisory Committee

The GSAs established the BVAC through an MOU to advise both Lassen and Modoc counties on GSP preparation. The goals of the BVAC, as stated in the MOU (**Appendix 2B**), include the following:

- Advise the two GSAs on the preparation of a GSP.
- Provide a forum for the public to comment during the preparation of the GSP.
- Provide recommendations to the two GSAs that would result in actions which have as minimal impact as possible on the residents of Big Valley.
- Advise the two GSAs on the preparation of a GSP to produce the lowest possible future costs to the residents of Big Valley.
- Ensure local control of the BVGB be maintained by the two GSAs.

Prepare a product that is acceptable to the GSA Boards for approval. Membership of the BVAC is composed of:

- one member of the Lassen County Board of Supervisors selected by said Board.
- one alternate member of the Lassen County Board of Supervisors selected by said Board.
- one member of the Modoc County Board of Supervisors selected by said Board.
- one alternate member of the Modoc County Board of Supervisors selected by said Board.

⁸⁶ <http://www.facebook.com/devilsgardenresearchandeducation>

⁸⁷ <http://www.devilsgardenucce.org/>

- two public members selected by the Lassen County Board of Supervisors. Said members must either reside or own property within the Lassen County portion of the BVGB.
- two public members selected by the Modoc County Board of Supervisors. Said members must either reside or own property within the Modoc County portion of the BVGB.

The BVAC operates in compliance with the Ralph M. Brown Act (Brown Act). BVAC meetings are noticed and agendas posted according to the Brown Act. BVAC meetings are open to the public and public comment is allowed as much as possible given COVID-19 pandemic restrictions.

During the development of Chapters 7 through 9, the BVAC established Ad Hoc committees to investigate, discuss and recommend content for the sustainability goal, sustainable management criteria, monitoring network and projects and management actions.

11.6 Decision-Making Process

The MOA describes the decision-making process for the BVAC. However, while the BVAC made recommendations, it was not a formal decision-making body like the Lassen or Modoc GSAs. The Lassen County GSA, led by the Lassen County Board of Supervisors and the Modoc County GSA, led by the Modoc County Board of Supervisors, were ultimately responsible for adopting and submitting a GSP to DWR. The GSAs considered all input received from the BVAC and other interested parties.

To develop each chapter of the GSP, the GSAs followed an iterative process illustrated in **Figure 11-1**. The process involved multiple drafts of each chapter, including administrative, public and (often multiple) revised drafts. Once the BVAC was satisfied that the chapter was at a point where the GSAs were comfortable to move on, they voted to “set aside” the chapter until the entire draft GSP was assembled. This recommendation did not indicate approval but was implemented to keep the development process moving forward. The GSP was then assembled into a complete draft to undergo the same process of administrative, public and revised drafts. The BVAC will then vote whether to recommend to the GSA boards if they should approve the GSP. The GSA boards will vote whether to approve the GSP prior to submittal to DWR.

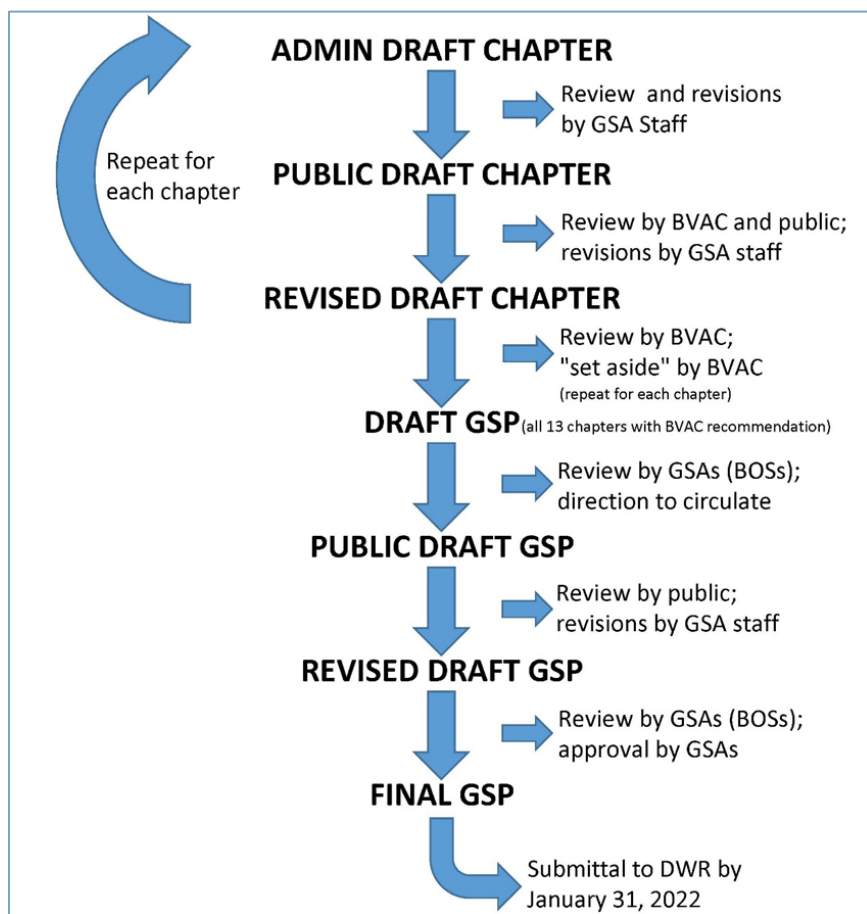


Figure 11-1 GSP Development Process

11.7 Comments and Incorporation of Feedback

All formal feedback on the GSP was documented both through the GSP website and from public meetings. The comments received, including how each comment was addressed, is included in **Appendix 11D**. The BVAC passed resolution BVAC-2021-1 recommending adoption of this GSP, included in **Appendix 11E**. The GSA resolutions adopting this GSP are included in **Appendix 11F**.

11.8 Communication and Engagement During Plan Implementation

The BVAC was established by the GSAs for the specific purpose of advising during development of the GSP and providing a product that is acceptable to the GSA Boards for approval. The MOU establishing the BVAC therefore expires after the GSP is adopted by the GSAs and submitted to DWR. The C&E during Plan implementation will then shift to the GSA Boards who will continue to inform the public about Plan progress and status of projects and management actions as required by §354.10(d)(4) of the Regulations.

This ongoing C&E will be performed through the forum of meetings of the County Boards of Supervisors where GSA staff will give regular reports to the Boards and the public along with annual reports to be submitted to DWR as required by GSP Regulations. Communication to stakeholders on the interested parties list will continue to occur *via* email and physical mail. Development of annual reports and coordination and implementation of projects and management actions will require significant effort from GSA staff. The GSAs are considering the development of an MOU to clearly define roles, responsibilities, and costs of each GSA.

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Appendix 1A Background Information Regarding Basin Prioritization and Boundary

Appendix 2A Resolutions Establishing Lassen and Modoc Counties as the GSAs for the BVGB

**Appendix 2B MOU Establishing the Big Valley
Groundwater Advisory Committee**

Appendix 3A Monitoring Well Surveyors Report

Appendix 4A Aquifer Test Results

Appendix 5A Water Level Hydrographs

Appendix 5B Groundwater Elevation Contours 1983 to 2018

Appendix 5C Transducer Data from Monitoring Well Clusters 1 and 4

Appendix 6A Water Budget Components

Appendix 6B Water Budget Details

Appendix 6C Water Budget Bar Charts

Appendix 7A Pumping Cost Calculations

Appendix 8A Water Level Monitoring Well Details

Appendix 8B New Monitoring Well As-Built Drawings

Appendix 8C Selection from DWR Monitoring BMP

Appendix 11A GSA Letters to Governor and Legislature

Appendix 11B List of Public Meetings

Appendix 11C Brochure Summarizing the Big Valley GSP May 2021

Appendix 11D Comment Matrix

**Appendix 11E Big Valley Advisory Committee Resolution
No. BVAC-2021-1**

Appendix 11F GSA Resolutions Adopting the GSP

Appendix 12 Water Availability Analysis for a Water Right Application Workplan

TECHNICAL MEMORANDUM

DATE: January 31, 2023

Project No.: 1030-80-22-01

SENT VIA: EMAIL

TO: Tiffany Martinez, Clerk of the Board/Assistant County Administrative Officer for the County of Modoc

FROM: Garrett Rapp, PE, RCE #86007
Carolina Sanchez, PE, RCE #85598

REVIEWED BY: Polly Boissevain, PE, RCE #36164

SUBJECT: Water Availability Analysis for a Water Right Application Workplan



BACKGROUND AND OBJECTIVES

The County of Modoc (County) and the County of Lassen are the two Groundwater Sustainability Agencies (GSAs) overlying the Big Valley Groundwater Basin (Basin). Figure 1 shows the location of the Basin, the watershed tributary to the Basin, and the boundaries of Modoc and Lassen Counties.

The Groundwater Sustainability Plan (GSP) for the Basin was completed in December 2021 and includes recommendations for projects and management actions (PMAs) to achieve long-term sustainability of the Basin. One of the PMAs involves investigating and implementing groundwater recharge projects through agricultural managed aquifer recharge (AgMAR). There are several challenges in implementing AgMAR in the Basin, including:

- There is a limited understanding of the impacts of AgMAR on the types of crops grown in the Basin, such as irrigated pasture and hay fields
- There is a limited understanding on the existing water rights in the Basin
- There is a limited understanding of the volume of water available for AgMAR
- The potential surface water diversion period may be impacted by the cold winters that cause the ground to freeze

To address the crop-specific questions, the County is working with the University of California Cooperative Extension, Modoc County (UCCE), to research crop responses to AgMAR. The research is ongoing, and the next steps include the implementation of AgMAR at a small scale. In order to implement any type of AgMAR project, the County (or AgMAR project implementer) will require a water right diversion permit from the State Water Resources Control Board (State Board).

Water right permits can either be standard or temporary. Standard permits require a rigorous water availability analysis (WAA) to demonstrate that a proposed diversion does not encroach upon senior water

rights holders or impair environmental or other flow requirements. Temporary permits require a simpler WAA than a standard permit and may be valid for either 180 days or 5 years. The State Board expects a temporary permit to serve as a foundation for the eventual application for a standard permit. Thus, before applying for a standard permit, the County will apply for a 180-day temporary permit to continue exploring methods and locations to implement AgMAR.

The application for a temporary water right permit requires a WAA; however, the State Board does not provide clear direction on how to perform it. On May 6, 2022, the County, West Yost, and UCCE staff met with the State Board staff responsible for reviewing all water right permit applications related to groundwater storage (i.e., diversions for groundwater recharge projects). During this meeting, State Board staff explained that there is no specific scope that can be followed to ensure the approval of a water right permit application and provided a general framework of the types of data and analyses that can be used to conduct a WAA.

The next step for the County is to determine the scope of the technical demonstrations that need to be performed to complete the WAA for a temporary water right permit application to perform the pilot AgMAR project. The technical scope is dependent on a variety of factors, including: 1) the complexity and number of existing water right permits within and downstream of the Basin, 2) the availability of surface water data within and downstream of the Basin, 3) the timing of the proposed diversions for AgMAR, 4) potential impacts to the Sacramento-San Joaquin Delta (Delta), and 4) other factors that may be introduced by the State Board during the application process.

This technical memorandum describes the proposed technical scope to complete a WAA, including the portion of the scope that has been completed thus far.

WAA SCOPE OF WORK

The following are the key tasks necessary to perform the proposed scope of services, each further described below:

- Task 1 – Coordination with the State Board, California Department of Fish and Wildlife, and Other Agencies
- Task 2 – Collect and Evaluate Data
- Task 3 – Conduct WAA
- Task 4 – Document the WAA
- Task 5 – Evaluate Applicability of Temporary Transfers

Task 1 – Coordinate with the State Board, California Department of Fish and Wildlife, and Other Agencies

The objective of this task is to obtain buy-in from the State Board and other relevant agencies on the WAA. This includes, but is not limited to:

- Coordinating with the State Board continuously through the development of the WAA to obtain input on the methods and analyses being used. The State can provide important input on: (1) the aptness of the WAA analyses; (2) the required documentation for submitting the WAA to the State; and, (3) other general input.

- Consulting with the California Department of Fish and Wildlife (CDFW) once the WAA is completed to discuss the project and how the proposed diversion will be protective of fish and wildlife. A temporary permit application requires a consultation with CDFW prior to its submittal.
- Consulting with the US Bureau of Reclamation (USBR) to ensure the WAA is responsive to its Shasta Dam operations and permit.

In addition to the May 6, 2022 meeting with State Board staff, West Yost and the County have met with State Board staff regularly through the development of the technical scope of work for the WAA to ensure that the data collection, research, and recommendations are in line with the State Board's expectations. Additionally, West Yost staff met with the California Department of Water Resources (DWR) to discuss its technical regulatory assistance for temporary water rights for groundwater recharge;¹ and with the USBR to discuss operations and water demands at Shasta Dam. A total of seven meetings were conducted. Agendas for the six meetings with the State Board are included as Attachment A. A summary of the outcomes of each meeting is below.

- August 5, 2022 meeting with State Board staff, in which staff:
 - Provided resources summarizing the difference between the types of water right permit applications (180-day temporary permit, 5-year temporary permit, etc.).²
 - Recommended applying for a 180-day temporary permit using the WAA for streamlined recharge permitting (streamlined WAA).³ The streamlined WAA requires an application of a "90th Percentile/20 Percent method" (90/20 method) to define daily limits on diversion. The 90/20 method is described in Task 3.
 - Emphasized that the information supporting a temporary permit application should be consistent with the information that would be used in a future standard permit application. For example, if the temporary permit is conducted as part of the streamlined recharge permitting process (i.e., for high flow events from December to March), the standard permit should as well.
 - Did not provide a specific method to address the time-step discrepancies between the 90/20 method, which relies on daily estimates, and water right permits, which specify monthly limits.
 - Restated that there is no specific scope that can be followed to ensure the approval of a water right permit application.
- August 22, 2022 meeting with State Board staff, in which staff:
 - Underlined their concerns of the impacts this project may have on Shasta Dam operations.
 - Agreed to put more thought into their concerns with Shasta Dam to provide direction on how to address their concerns.

¹ <https://resources.ca.gov/-/media/DWR-Website/Web-Pages/Water-Basics/Drought/Files/Groundwater/Expediting-Water-Rights-FactsheetFINAL2-20220919.pdf>

² [State Board Water Rights Fiscal Year 2021-2022 Fee Schedule Summary](#)

³ [Water Availability Analysis for Streamline Recharge Permitting](#)

- Recommended that West Yost reach out to the USBR to obtain their feedback on reconciling Shasta Dam water rights in the WAA.
- The State Board staff mentioned a bill (Senate Bill No. 1205)⁴ that may result in the standardization of WAAs. The bill was signed by the Governor and filed with Secretary of State on September 16, 2022. As of this meeting, there was no timeline associated with the implementation of the bill.
- September 13, 2022 meeting with USBR staff, in which staff:
 - Stated their general view that new diversions upstream of their reservoirs would adversely affect their storage operations. However, it is possible to characterize conditions when both Shasta Lake’s water demands are met, and new upstream diversions can take place.
 - Indicated that demonstrating that Shasta Lake’s water demands are met includes demonstrating at least two criteria:
 - Shasta Dam is releasing water to increase available storage capacity. USBR staff provided link to Army Corps of Engineers website to find historical operations data.
 - The Delta is in “excess” condition and Term 91⁵ is not in effect. USBR staff provided link to monthly SWP-CVP Coordinated Operations Agreement reports, which list the Delta status daily through 2019.
 - Suggested that West Yost schedule a follow-up meeting with the USBR after compiling the data and developing a proposed characterization of water availability in the Pit River upstream of Shasta Lake.
- October 3, 2022 meeting with State Board staff:
 - The State Board staff shared the operations manual for Shasta Dam.
 - The meeting attendees discussed and agreed on a general process of what the permit conditions may entail, which can be translated into the steps that need to be addressed in the WAA. These steps included:
 - Identifying if flow at the proposed point of diversion (POD) meets the flow thresholds established with the 90/20 method and is protective of Shasta Dam water rights and operations
 - Identifying if the Delta is in “excess” per Term 91
 - Identifying if flows in the Sacramento River, downstream of Shasta Dam and upstream of the Delta, are sufficient to meet water rights requirements along the Sacramento River

⁴ [Senate Bill No. 1205](#)

⁵ Term 91 has been included in permits and licenses, granted after 1965, for diversion and use of water in the Delta watershed. Term 91 requires that those holding such permits and licenses cease diverting water when the State Water Resources Control Board’s Division of Water Rights (Division) gives notice that water is not available for use under those permits and licenses. This occurs at times when the State Water Project and Central Valley Project are releasing previously stored water to meet water quality and flow requirements in the Delta and the Delta is termed to be in “balanced conditions,” generally during the summer and fall. The Division will also give notice when Term 91 is no longer in effect (i.e., when the Delta is in “excess conditions”). ([State Board website](#) accessed on October 3, 2022).

- Diverting water per the WAA and permit conditions
- The State Board staff clarified that a separate department leads the petitions for water transfers. The State Board staff provided resources to better understand the requirements for and potential challenges involved in temporary water transfers.
- The State Board staff offered to review the proposed technical scope for the WAA.
- November 18, 2022 meeting with DWR staff, in which staff:
 - Indicated that they could provide technical assistance to GSAs developing applications for 180-day temporary water right permits for groundwater recharge. This assistance is available to GSAs in the order that they contact the DWR for this assistance. Based on West Yost’s initial contact with the DWR on November 8, 2022, the DWR staff estimated that they would be available to provide technical assistance to the Basin GSAs in the spring of 2023.
 - Explained that the DWR requires that a potential recharge project have a refined level of detail (i.e., defined PODs, diversion rates, and fields on which the water will be recharged) before providing technical assistance.
 - Generally agreed with the proposed WAA.
 - Suggested considering using a “flood threshold” method to define available water for diversion as opposed to the 90/20 method. The flood threshold method would involve defining flood conditions in the area of diversion as a threshold for diverting flows. This approach has the potential benefits of being easier to define than the 90/20 method and allowing for an extension of the diversion period beyond March 31, possibly to the end of May. Note that the potential for extension of the diversion season is not written anywhere, but the DWR indicated that they have some discretion when evaluating permit applications. The DWR staff indicated their willingness to assist with developing a flood threshold method.
- December 12, 2022 meeting with State Board staff:
 - West Yost staff presented preliminary results on the analysis of the flows at the Canby gage using the 90/20 method, including considerations for the diversion rights for Shasta Dam
 - The State Board staff proposed several considerations and recommendations, including:
 - General agreement with the WAA approach outlined in the October 26, 2022 draft workplan provided to them on November 8, 2022 for review and comment.
 - Recommendation to focus on application for a 180-day temporary permit for submittal by June or July if possible. This will provide ample time for resolving any potential conflict or opposition.
 - Recommendation to engage with the CDFW as soon as practical to discuss need for notification of streambed alteration, fish screens, or other requirements.
 - Recommendation to review temporary permits that the State Board will be approving soon. The State Board staff will notify us when they are approved, and documentation is available.
 - Note that Ash Creek is fully appropriated from March 15th to October 31st each year, and the Pit River is fully appropriated from April 1st to October 31st each year.

- The State Board staff agreed to review water rights on the flow path between: 1) the Basin and Shasta Dam; and, 2) from Shasta Dam to the Delta to support our analysis of the water rights downstream of the Basin. West Yost staff agreed to compile the water rights information on these segments to send to the State Board staff.
 - State applications do not need to be included in the analysis of downstream water rights.
- January 9, 2023 meeting with State Board staff, in which staff:
 - Explained that they had not yet reviewed the water right information that West Yost staff sent on January 5, 2023. They expect to have more availability to assist in mid-February.
 - Sent information to West Yost staff regarding recently approved temporary permits that use the 90/20 method for the WAA.
 - Committed to send West Yost staff a statewide dataset of monthly demands for statements of diversions that was compiled in 2018, to assist in the quantification of water demands for statements of diversion.
 - Stated that there were no defined thresholds to demonstrate water availability in a WAA.

Additional meetings with the State Board and DWR staff will be required to complete the WAA. At least one additional meeting with the USBR will be required to approve the proposed analysis to consider the storage requirements at Shasta Dam (see Task 3.3). Additionally, the County will need to meet with the CDFW to discuss any conditions that they may require for the permit. These coordination meetings have and will continue to guide the scope of the subsequent tasks.

Task 2 – Collect and Evaluate Data

The objective of this task is to ensure that all data required to for the WAA is collected and analyzed. As described herein, much of the available data has already been collected and processed for use in the WAA.

The following data were collected to characterize the surface water and permitted points of diversion in the study area:

- Surface water flow data. Historical and current surface water flow data was collected and reviewed. Table 1 summarizes the gages within the Big Valley watershed, the data collector, watershed area, and period of record. Figure 1 shows the locations of these gages.
- Water rights data. Two sets of water rights data were collected and reviewed:
 - Water rights data and point of diversion locations from eWRIMS. Figure 2 shows the location of all points of diversion downstream of the Basin to Shasta Dam and upstream of the Basin to the Warner Mountains that are in the eWRIMS database. This does not include the pre-1914 water rights that have not been geolocated.
 - Water rights data from a recent WAA to support an application for a water right permit downstream of the Pit River. A permit applicant (Downstream Applicant) recently developed a tool that includes all water rights upstream of Freeport, near Sacramento, which includes the Pit River watershed. This tool, herein referred to as the Face Value (FV) Tool, includes all water rights information (water right type, effective date, status, face value, etc.) from the Sacramento Delta to the Warner Mountains. The tool was

developed in May 2022 and thus is missing the water rights information for any new water rights approved/applied for since May 2022.

- Information and data on the operations of Shasta Dam. During the August 22, 2022 meeting with the State Board, State Board staff recommended meeting with the USBR to determine the analysis necessary to demonstrate that any new diversions upstream of Shasta Dam do not encroach upon the diversion rights of Shasta Dam. West Yost staff met with USBR staff on September 13, 2022 to discuss the recommendations and available data for this analysis. USBR staff indicated that the following two conditions generally indicate that any new diversions upstream of Shasta Dam do not encroach upon the diversion rights of Shasta Dam:
 - Water levels behind Shasta Dam are higher than the conservation water level. The USBR operates Shasta Dam for water storage, flood management, and hydropower. The operations of the dam vary based on antecedent conditions, predicted inflows, and required outflows, and does not operate based on rigid thresholds. USBR staff recommended using the historical operation data to characterize conditions when water levels behind the dam are higher than the conservation water level. Data on historical operations beginning in 1995 are found on the Army Corps of Engineers' website.⁶
 - The Delta is in "excess." The USBR publishes monthly reports characterizing the daily coordinated operations between the Central Valley Project and the State Water Project.⁷ These reports indicate whether the Delta is in "balance" or "excess."
- Basin water budget and other GSP data. The Basin water budget was obtained to identify the method use to estimate surface water flow inputs and output to the Basin. Initially, the intent was to utilize this data in the WAA, however the data was on an annual time-step and this did not meet the needs of the WAA. In addition to the water budget information, GIS files of the basin boundary, surface water gages, etc. were collected.
- Technical Information for Preparing Water Transfer Proposals. The DWR developed a white paper⁸ with information on preparing proposals for water rights transfers. This white paper was downloaded and reviewed for the County to consider transfers as a potential alternative to obtaining a temporary permit.

Table 1. Surface Water Gages within the Big Valley Subbasin Watershed

Gage Name	Gage Number	Data Collector	Watershed Area, acres	Period of Record
Ash C A Adin CA	11350500	USGS	165,120	Aug 1904 to Sep 1982
Ash C A Ash Valley CA	11349500	USGS	87,040	Oct 1928 to Sep 1931
Willow Creek Nr Adin CA	11351000	USGS	40,320	Apr 1930 to Sep 1931
Widow Valley C Nr Lookout CA	11351500	USGS	17,728	Apr 1930 to Sep 1931
Pit R Nr Lookout CA	11349000	USGS	1,014,400	Apr 1929 to Sep 1980

⁶ [SPK WCDS - California Plots \(army.mil\)](https://www.army.mil/)

⁷ [Water Accounting Reports \(usbr.gov\)](https://www.usbr.gov/)

⁸ [Technical Information for Preparing Water Transfer Proposals \(Water Transfer White Paper\) Information for Parties Preparing Proposals for Water Transfers Requiring Department of Water Resources or Bureau of Reclamation Approval](#) (DWR, 2019)

Table 1. Surface Water Gages within the Big Valley Subbasin Watershed				
Gage Name	Gage Number	Data Collector	Watershed Area, acres	Period of Record
Pit R Nr Canby CA	11348500	USGS	915,840	Oct 1929 to Present
Muck Valley PP nr Bieber CA	n/a	Private	1,584,000	Jan 2010 to Present
Pit R Nr County Rd ^(a)	n/a	Private	1,014,400	Sep 2022 to Present
(a) This gage was recently installed by the County with support from DWR. The data will become available online in the near future.				

Additional data may be required based on future coordination with the State Board, CDFW, and others.

Task 3 – Conduct WAA

Task 3 involves an evaluation of the data collected in Task 2 pursuant to the streamlined WAA process. The streamlined WAA presents two methods for demonstrating water availability for a diversion permit application:

- The 90/20 method, which relies on historical data at local surface water gages to derive a conservative threshold for the volume of divertible water. By using the surface water gage data, the 90/20 method assumes that upstream diversions and water rights are reflected in the flow at the gage.
- Demonstrating the imminent threat of flood conditions in the source waters and the need for flood control actions to identify water available for diversions.

Since a flood control agency does not operate in the region of the proposed diversions, the method of demonstrating flood conditions may not be applicable and will require discussions with DWR staff to determine applicability to the Basin. Therefore, the 90/20 method is appropriate for demonstrating water availability. The following describes the four steps of the 90/20 method.

1. *Gage selection.* An appropriate stream gage must be selected to estimate the 90th percentile flows at or near the project's proposed POD. Ideally, the gage would be operated by the United States Geological Survey (USGS) and have a record of at least 30 years. The State Board provides recommendations for alternative solutions if no appropriate gage exists, including using data from multiple gages.
2. *90th percentile diversion threshold.* The 90th percentile diversion threshold must be calculated for each day over the proposed diversion period (December 1 through March 31). When using paired gages, the 90th percentile flows must be prorated to the POD based on the relative drainage areas and precipitation over the drainage areas using the following formula:

$$Q_{POD} = Q_{gage} * \left(\frac{DA_{POD}}{DA_{gage}} \right) * \left(\frac{P_{POD}}{P_{gage}} \right)$$

Where:

- Q_{POD} = 90th percentile flow at the POD;
- Q_{gage} = 90th percentile flow calculated for the gage;
- DA_{POD} = drainage area at the POD;

- DA_{gage} = drainage area at gage;
 - P_{POD} = average annual precipitation at the POD; and
 - P_{gage} = average annual precipitation at the gage.
3. *Downstream demand.* The streamlined WAA states that “[s]enior demands and environmental flows along the source water body’s downstream flow path need to be compiled and compared against the 90th percentile flow at the POD to verify that the 90th percentile is a high enough flow rate to ensure downstream demands are satisfied... Projects located within the Sacramento-San Joaquin Watershed may calculate demands along a flow path that ends at the Legal Delta and accept terms related to the Delta, including a term based on the Net Delta Outflow Index to ensure demands on the Delta are satisfied.”
 4. *Diversion threshold and downstream demand comparison.* The calculated downstream demands should be compared to the 90th percentile flow at the POD(s). The streamlined WAA states that “If the needs of downstream diverters and the environment exceed the chosen diversion thresholds, then further analysis or a higher threshold will be needed to demonstrate that instream beneficial uses and senior water rights are protected.”

In addition to establishing the 90th percentile (or greater) threshold for diversion, the total daily diversion cannot exceed 20 percent of the total estimated daily flow at the POD.

The streamlined WAA process is parallel to the potential permit conditions discussed at the October 3, 2022 coordination meeting with the State Board staff. The process consists of:

- Identifying if flow at the study area meets the flow thresholds established with the 90/20 method and is protective of Shasta Dam water rights and operations
- Identifying if the Delta is in “excess” per Term 91
- Identifying if flows in the Sacramento River, downstream of Shasta Dam and upstream of the Delta, are sufficient to meet water rights requirements along the Sacramento River
- Diverting water per the WAA and permit conditions

Tasks 3.1 through 3.4 discuss the application of the four steps of the streamlined WAA to the Big Valley Basin and how the potential permit conditions are addressed. Figure 3 shows these steps graphically and is explained along with each task.

Task 3.1 Select Appropriate Gage(s) for the WAA

The objective of this task is to select the correct local gage to perform the WAA. Table 1 and Figure 1 summarize the stream gages proximate to the watershed. Based on the locations and period of record, West Yost proposes to use a combination of the two USGS gages along the Pit River (Pit R Nr Lookout CA and Pit R Nr Canby CA) to apply the 90/20 method. The “Pit R Nr Lookout CA” gage (Lookout gage) is closer to the Basin than the “Pit R Nr Canby CA” gage (Canby gage), but the Canby gage has a more complete period of record. The daily streamflow measurements for these gages over the concurrent period of record⁹ are highly correlated (r-squared = 0.96), and there are few additional inputs or diversions from

⁹ The Canby and Lookout gages have concurrent daily streamflow measurements for about 32 percent of their 51-year concurrent period of record.

the Pit River between the two gages (see Figures 1 and 2). Therefore, using both gages to define the 90th percentile flow at the Lookout gage would be appropriate.

Task 3.2 Estimate the 90th Percentile Diversion Threshold

The objective of this task is to estimate the 90th percentile diversion threshold per the streamlined WAA. The threshold was estimated for the Lookout and Canby gages. Figure 3a shows the 90th percentile daily flows at the Canby gage based on its entire period of record, and the daily flows at the Canby gage for Water Year (WY) 2017 during the WAA period of December 1 through March 31. Table 2 summarizes the statistics of the 90th percentile daily flows at the Lookout and Canby gages by each month over the WAA period.

Table 2. 90th Percentile Flows at Lookout and Canby Gages					
Gage Name	Month	90th Percentile Daily Flow Statistic, cfs			
		Minimum	Maximum	Mean	Median
Pit R Nr Lookout CA	December	181	728	342	305
	January	340	1,270	656	583
	February	553	1,460	900	858
	March	866	1,530	1,152	1,120
Pit R Nr Canby CA	December	194	711	394	351
	January	228	3,180	1,668	2,174
	February	778	3,284	1,299	1,234
	March	589	1,830	1,110	1,087

Task 3.3 Evaluate Downstream Demands

The objective of this task is to identify all downstream demands and evaluate how they may be impacted by the proposed diversion. The streamlined WAA suggests collecting and reviewing water rights data using eWRIMS tools to determine downstream water demands. Based on initial discussions with the State Board staff, water rights information downstream of Shasta Dam did not seem to be applicable to a WAA for a temporary permit. Thus, West Yost’s original intent was to collect and review all water rights data upstream of the Basin and along the downstream trace of the Pit River to Shasta Dam. Figure 2 shows the locations of the points of diversions downstream of the Basin to Shasta Dam and upstream of the Basin to the Warner Mountains. However, the State Board later emphasized the need to include Shasta Dam operations in the WAA (see Task 1).

A challenge to the data collected from eWRIMS is that no digital documentation of pre-1914 rights exists other than Supplemental Statements of Diversion and Use and limited location information. Analyzing Supplemental Statements of Diversion and Use would require digitizing information from PDFs to a usable format like Excel. Additional challenges include interpreting the diverse conditions of water right permits, which can define storage rights, rights to divert water for non-consumptive use, or may include multiple PODs. The State Board recommended that West Yost contact the Downstream Applicant to obtain their FV tool to leverage for our water rights analysis. West Yost has obtained the FV tool, the data from which should be used to complete Task 3.3.

Quantification of Water Availability Based on 90/20 Method and Shasta Dam Demands

As described earlier, one of the State Board staff's main concerns is how the WAA will address the water right permits and operations at Shasta Dam. As such, the first step in continuing the WAA analysis is to correlate the gaged data within the Study Area to Shasta Dam Operations as described by and with additional input from the USBR. To complete this analysis, West Yost compared the following datasets of daily data for their concurrent period of record:

- Streamflow data at the Canby gage
- 90th percentile daily streamflow at the Canby gage
- Shasta Dam operational data, including water levels and conservation storage levels
- The USBR's monthly reports characterizing the daily coordinated operations between the Central Valley Project and the State Water Project to determine when the Delta is in "excess" condition.

The Shasta Dam operational data and the USBR data were concurrent for WYs 2000 through 2019, covering 20 years. For each of the 20 years over the temporary permit diversion period of December 1 through March 31, the daily streamflow data at the Canby gage was compared to the Shasta Dam operational data and the Delta condition. This analysis quantifies the number of days when the following criteria are met:

1. Daily flow at the Canby gage is above the 90th percentile threshold.
2. Water levels at the Shasta Dam are above the conservation storage levels, indicating that the Shasta Dam will be releasing water to increase storage capacity.
3. The Delta is in "excess" condition.

This analysis assumes that the lag time between flows at the Canby gage and Shasta Dam are negligible, and thus, the gaged flows at the Canby gage and conditions at Shasta Dam can be compared on the same day that they are recorded. To determine the validity of this assumption, a cross-correlation analysis was completed between the daily flows at the Canby gage and a gage just upstream of Shasta Lake. The greatest correlation coefficient between the two daily flows occurred without any lag time, suggesting that this assumption is valid. Of the 20 years analyzed, six of the years had at least one day where the three criteria were met, and four of those years were considered wet water years. Table 3 below summarizes the results of the analysis, including the water year type, divertible volume, and minimum and maximum potential diversion rates.

Table 3. Analysis of Water Availability Considering Shasta Dam Operations and Delta Conditions				
Water Year—Year Type¹⁰	Number of Days Meeting Criteria	Total Divertible Volume Considering 20 Percent Limit, af	Minimum Potential Diversion Rate, cfs	Maximum Potential Diversion Rate, cfs
2000-AN	0	-	-	-
2001-D	0	-	-	-
2002-D	0	-	-	-
2003=AN	0	-	-	-
2004-BN	4	3,128	35	566
2005=AN	0	-	-	-
2006-W	30	14,231	6	726
2007-D	0	-	-	-
2008-C	0	-	-	-
2009-D	0	-	-	-
2010-BN	0	-	-	-
2011-W	6	1,642	5	318
2012-BN	0	-	-	-
2013-D	0	-	-	-
2014-C	0	-	-	-
2015-C	0	-	-	-
2016-BN	3	1,908	190	418
2017-W	43	33,557	10	1,096
2018-BN	0	-	-	-
2019-W	14	7,381	1	566

Of the six years where the three criteria were met, the total divertible volume ranged from 1,600 afy to 33,600 afy. The total divertible volume accounts for the limitation specified in the 90/20 method that no more than 20 percent of flow can be diverted per day. The minimum average daily diversion rate was 1 cfs (2019), and the maximum average daily diversion rate was over 1,000 cfs (2017).

Figure 3b demonstrates these conditions graphically for WY 2017. Days when the measured daily flow (green line) is greater than the 90th percentile daily flow (blue line) indicates that criterion 1 is met. The periods shaded in pink in Figure 3b are periods where criteria 2 and 3 are met. The three criteria are met in January, February, and March 2017. This analysis demonstrates that there may be water available for diversion under certain hydrologic conditions.

This task should be updated when the diversion capacity of the project is defined to refine the divertible volume and flow rate based on the expected project capacity.

¹⁰ Based on the Sacramento Valley Water Year Index and Type: C = Critical; D = Dry; BN = Below Normal; AN = Above Normal; W = Wet

Task 3.4 Compare the Diversion Threshold to Downstream Demands

The objective of this task is to determine whether flows during potential diversion periods, as characterized in Task 3.3, are sufficient to meet downstream demands. The recommended method to perform this is by:

1. Identifying the existing points of diversion along the Pit River between the northern-most boundary of Big Valley Basin and Shasta Dam
2. Quantifying the sum of the direct diversion amounts for the points of diversion identified in Step 1, which represents the downstream demands between the northern-most boundary of Big Valley Basin and Shasta Dam
3. Identifying a representative gage immediately upstream of Shasta Dam
4. Comparing the gaged flow at the gage selected in Step 3 to the downstream demands between the northern-most boundary of Big Valley Basin and Shasta Dam
5. Repeat the process in Steps 1 through 4 for the flow line along the Sacramento River between Shasta Dam and the Delta

As of January 31, 2023, Step 1 has been completed for both the: (1) flow line along the Pit River between the northern-most boundary of Big Valley Basin and Shasta Dam; and (2) flow line along the Sacramento River between Shasta Dam and the Delta. Items 2 through 4 still need to be completed.

Figure 3c is a concept graphic of how downstream water rights may be included in the analysis: the same information from Figure 3b will be plotted along with the period of sufficient flow for water rights downstream of the POD. The days when the flow at the gage is: (1) above the 90th percentile; (2) during the time when Shasta Dam storage is above the conservation storage and Delta outflow is in “excess” per Term 91; and (3) during a period when flow is sufficient to meet downstream demands represent times when water is available. Figure 3d is a concept graphic of the water availability determination by day, the total daily flow is broken down as follows:

- Volume of water allocated to satisfy senior downstream water rights.
- Volume of water required to meet instream flow requirements (to be determined in coordination with the CDFW).
 - To assist an understanding of the potential instream flow requirements, the State Board provided information on a policy that establishes instream flow requirements for major stream locations across California, including in the Pit River at the Muck Valley Dam downstream of the Basin.¹¹ The flow requirement in the Pit River at the Muck Valley Dam downstream of the Basin from November to March ranges from 216 cfs in February to 255 cfs in December. The 90th percentile daily flows at the Canby and Lookout gages exceed the instream flow requirements at the Muck Valley Dam over 95 percent of the time.
 - The hypothetical example shown in Figure 3d assumes that the water required for senior downstream water rights and instream flows is less than the 90th percentile daily flow volume. If “the needs of downstream diverters and the environment exceed the chosen diversion thresholds” (see step 4 of the streamlined WAA), then the threshold

¹¹ [Pit River at the Muck Valley Dam Instream Flow Requirements](#)

would have to be increased above the 90th percentile daily flow based on further analysis.

- Unallocated volume under the 90th percentile
- Divertible water, which is the lesser of:
 - Total daily flow minus the 90th percentile flow for that day, or
 - 20 percent of the total daily flow.
- Volume of water greater than the 20 percent threshold

Task 4 – Document the WAA

The objective of this task is to document the WAA for review by the State Board. The WAA documentation will include:

- Summary of the County’s objectives and background information on the Basin.
- Summary of feedback obtained by the State Board staff throughout the process and how the feedback was addressed in the WAA.
- Detailed description of methodology used to address each step in the streamlined WAA and the State Board staff’s comments.
- Detailed charts and graphics explaining the analysis performed for each step in the streamlined WAA.
- Conclusion of the water availability, comparing (1) the average, minimum and maximum annual volume of water available and (2) the frequency of water availability to the anticipated capacity of the project.
- Backup documentation of the analysis performed for each step in the streamlined WAA.

Optional Task 5 – Evaluate Applicability of Temporary Transfers

The objective of this task is to determine the applicability of obtaining a temporary water rights transfer as an alternative to obtaining a temporary permit. This would provide the County with flexibility to temporarily divert water if there are any delays with the temporary permit application. As such, it is an optional task.

The DWR developed a white paper¹² with information on preparing proposals for water rights transfers. The DWR white paper outlines a set of criteria for eligible transfers. Eligible transfers include transfers based on cropland idling and crop shifting, which may be an applicable transfer for the County. Under this type of transfer, only certain crops are allowed for transfers, including alfalfa (limited to the Sacramento Valley floor and north of the American River), rice, wild rice, Sudan grass, etc. Crops not allowed for transfer include alfalfa in the delta region, pastures, orchards, mixed and miscellaneous grasses, etc. The types of crops for the Basin include native pasture, grass hay, alfalfa hay, wild rice, and rangeland. Based

¹² [Technical Information for Preparing Water Transfer Proposals \(Water Transfer White Paper\) Information for Parties Preparing Proposals for Water Transfers Requiring Department of Water Resources or Bureau of Reclamation Approval](#) (DWR, 2019)

on these guidelines, there is a potential to temporarily transfer water rights for idled lands of alfalfa and wild rice in the Basin.

There is some uncertainty around the applicability of this alternative to meet the County's objectives and the level of effort to move forward with a transfer application. As such, this task includes:

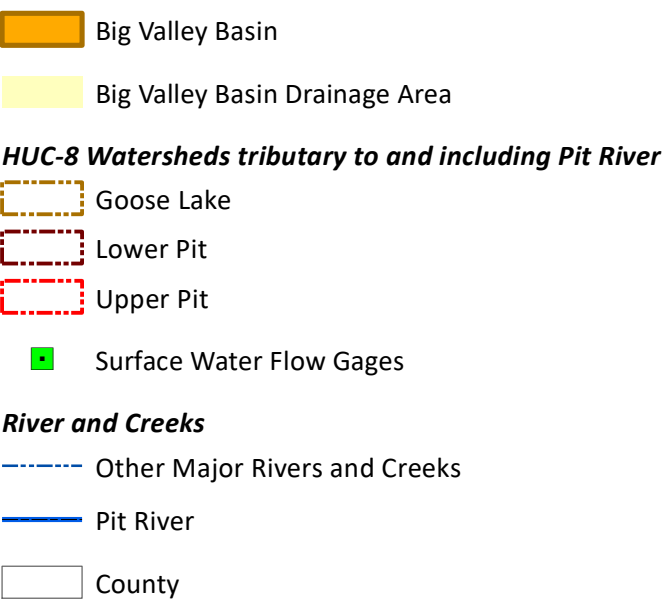
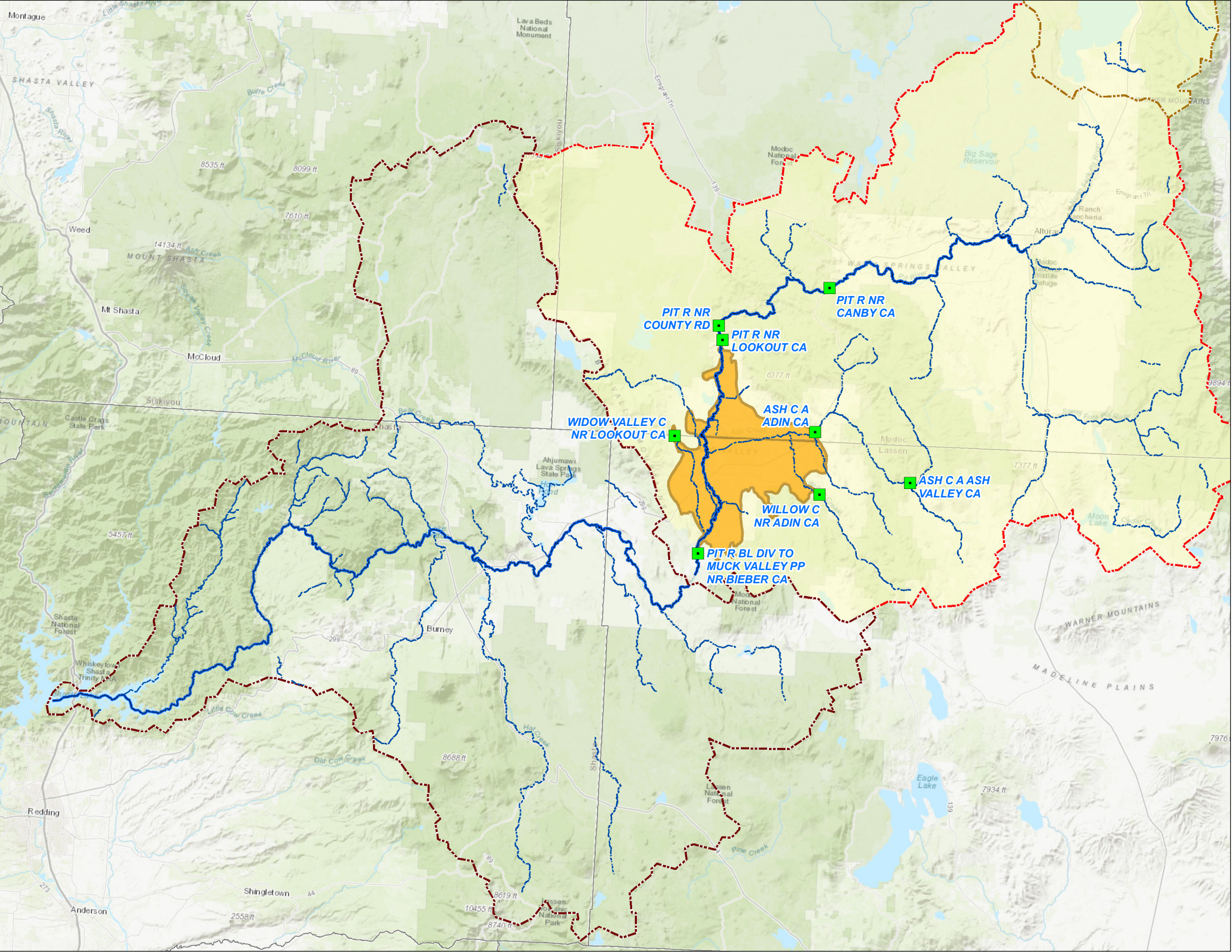
- Coordinating with the DWR to obtain guidance and input on the transfer process
- Conducting research to identify lands currently growing the types of crops eligible for transfer that hold water rights with the Basin
- Working with the growers from the lands identified to determine any plans for fallowing/idling the lands

SUMMARY OF NEXT STEPS TO COMPLETE THE WAA AND ADDITIONAL CONSIDERATIONS

The WAA scope of work described herein includes a description of work that has already been completed and the specific steps required to complete the WAA, by task, including:

- **Task 1 – Coordination with the State Board, California Department of Fish and Wildlife, and Other Agencies.** Although the County has been in communication with the State since May 2022, additional meetings will be required to complete the WAA. Additionally, the County will need to meet with the CDFW and USBR. These coordination meetings have and will continue to guide the scope of the subsequent tasks.
- **Task 2 – Collect and Evaluate Data.** At this time, it appears all relevant data to conduct the WAA has been collected and reviewed. However, additional data may be required based on future coordination with the State Board, CDFW and others.
- **Task 3 – Conduct WAA.** Tasks 3.1 and 3.2 have been completed. Tasks 3.3 and 3.4 have been partially completed and their completion will be required to finalize the WAA.
- **Task 4 – Document the WAA.** This TM partly documents the WAA, specifically the data collected thus far, and the analysis performed for Task 3. The documentation will need to be expanded to document the final WAA once Tasks 3.3 and 3.4 are completed.
- **Optional Task 5 – Evaluate Applicability of Temporary Transfers.** This task has yet to be initiated.

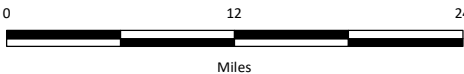
The work completed thus far has emphasized the complexity of the water right application process and the potential risks involved due to the location of the Basin and proposed diversion upstream of Shasta Dam, the Delta, and myriad downstream senior water rights. Because of this complexity, West Yost recommends acquiring legal advice to guide the County in the process to develop the WAA and the temporary permit application or to assist with a temporary water rights transfer if that becomes the preferred option.



Prepared by:



Author: GR
Date: 10/26/2022
File: Fig01_BasinGages.mxd

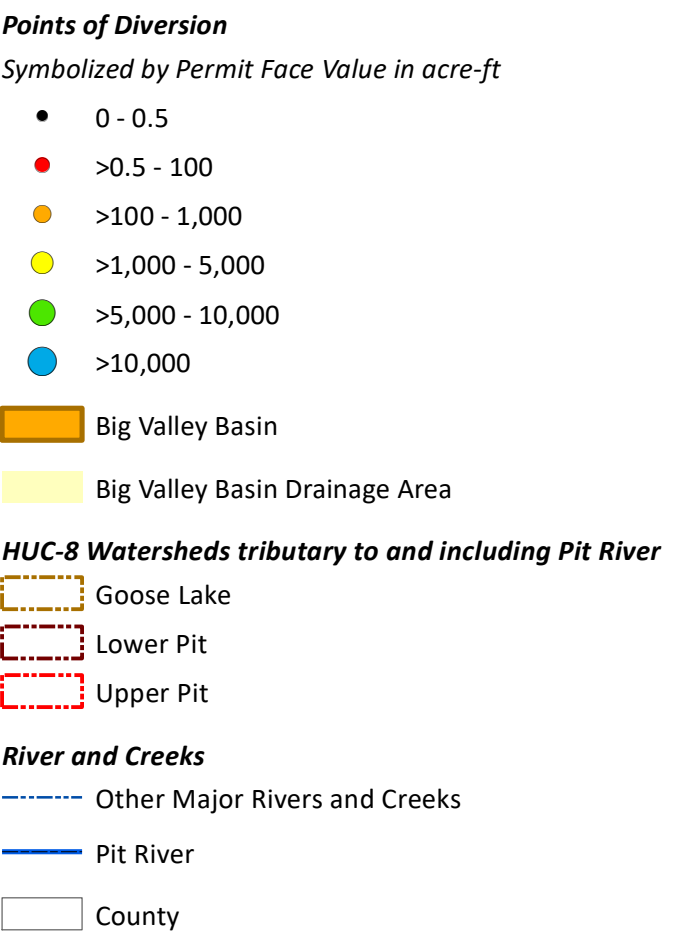
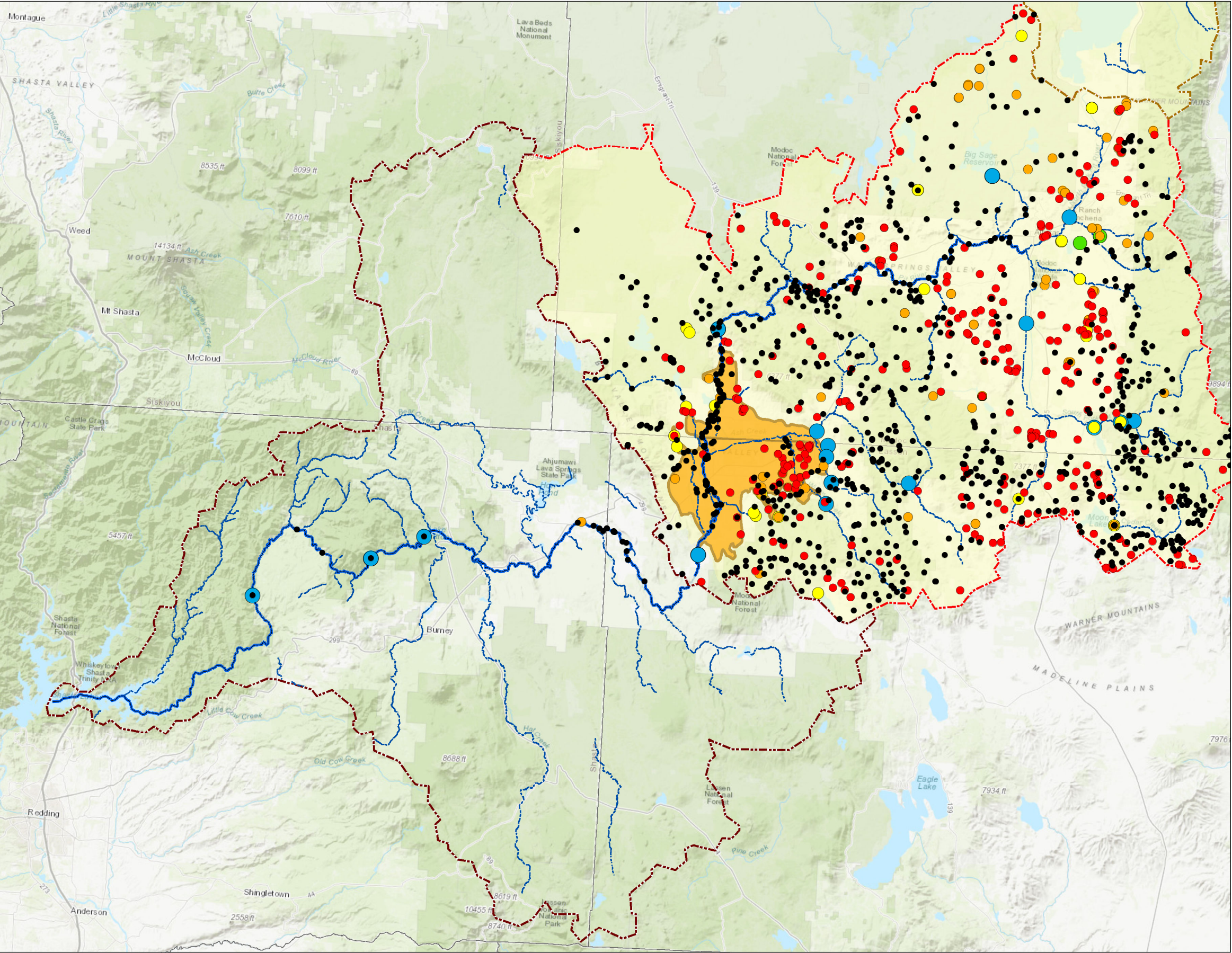


Prepared for:



Big Valley Basin and Gage Locations

Figure 1



Note:
The location and face value information of the points of diversion shown herein is from eWRIMS. eWRIMS has no digital documentation on the locations of pre-1914 rights. As such, these permits are not included herein.

Figure 3a. Daily Flow and 90th Percentile Flows at Canby Gage, WY 2017 (Task 3.2)

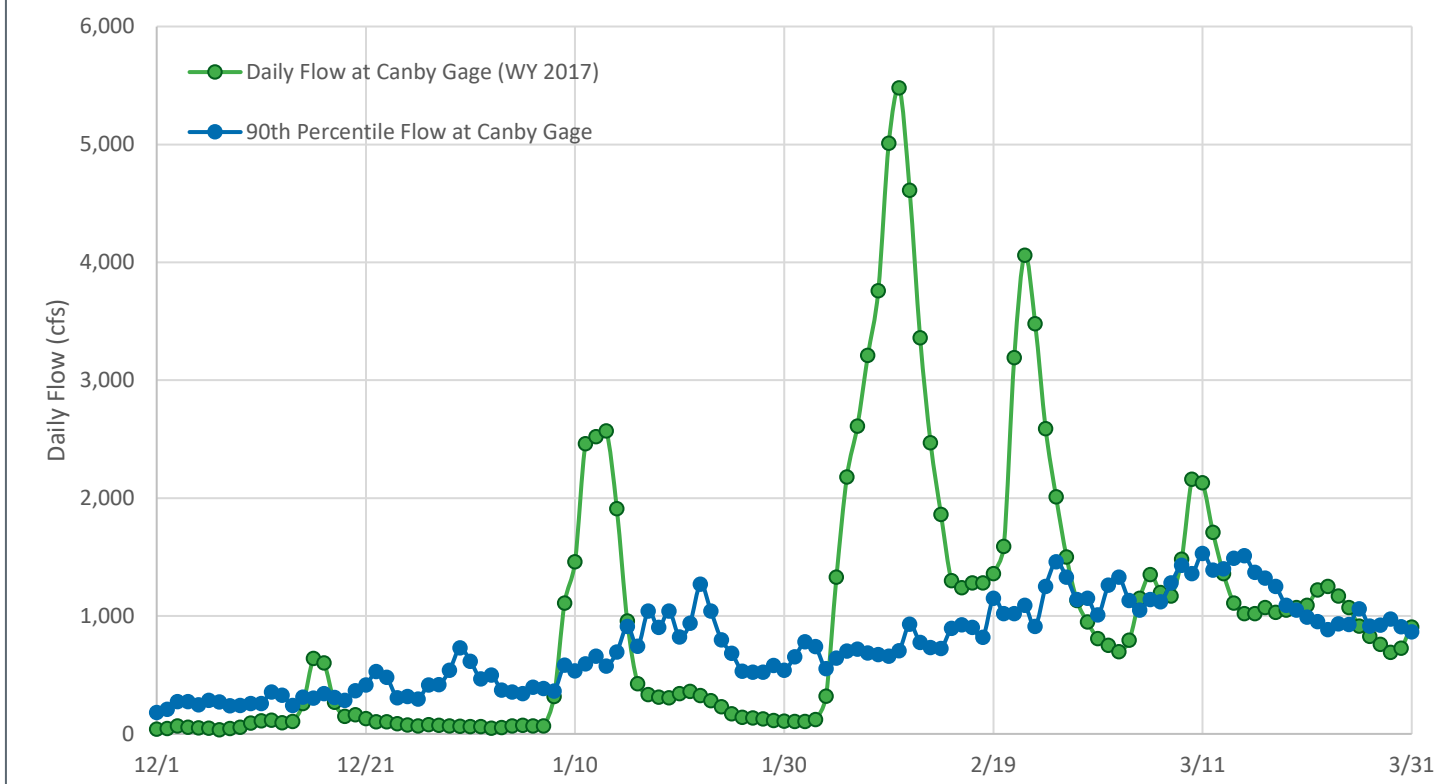


Figure 3b. Water Availability Considering Shasta Dam Water Rights (Task 3.3)

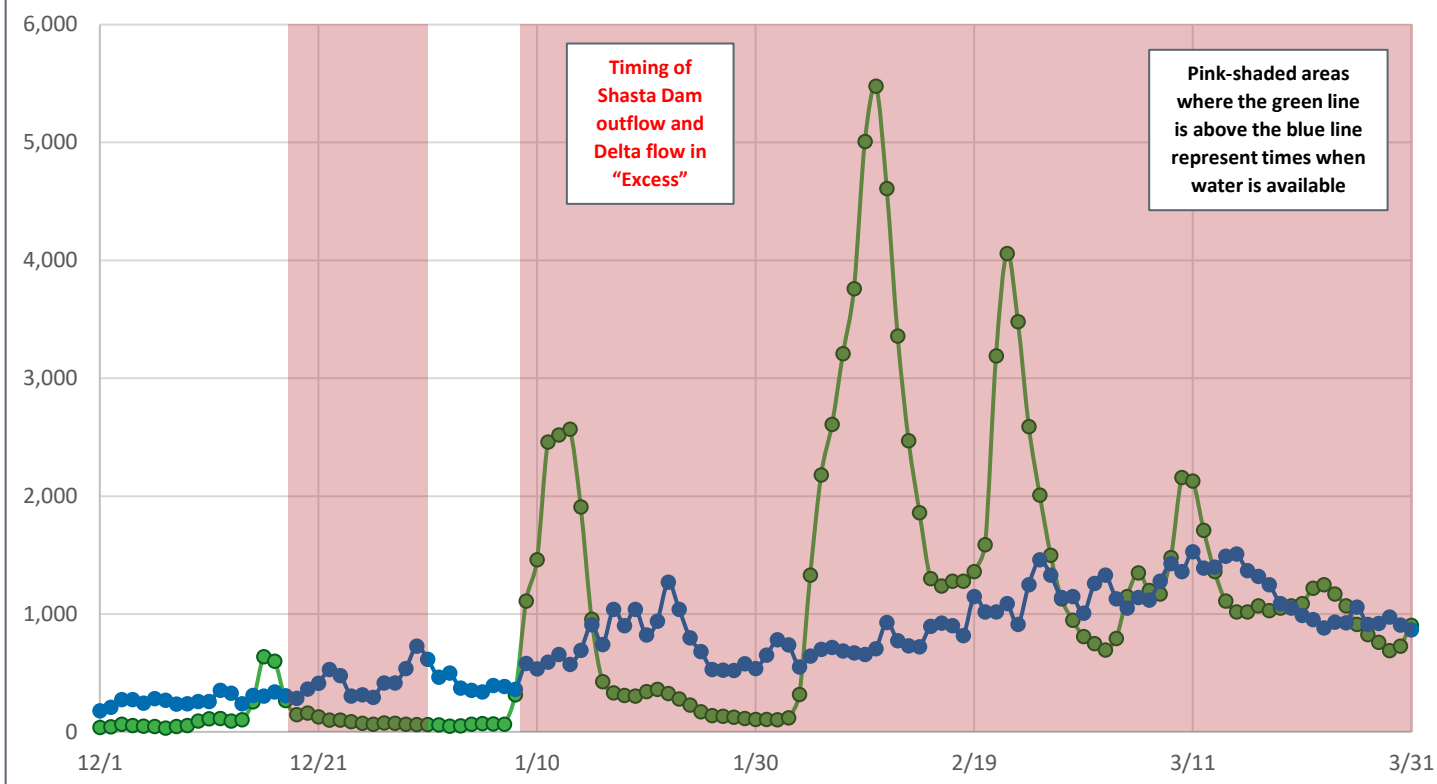


Figure 3c. Hypothetical Water Availability Considering Shasta Dam Operations and Other Downstream Water Rights (Task 3.3)

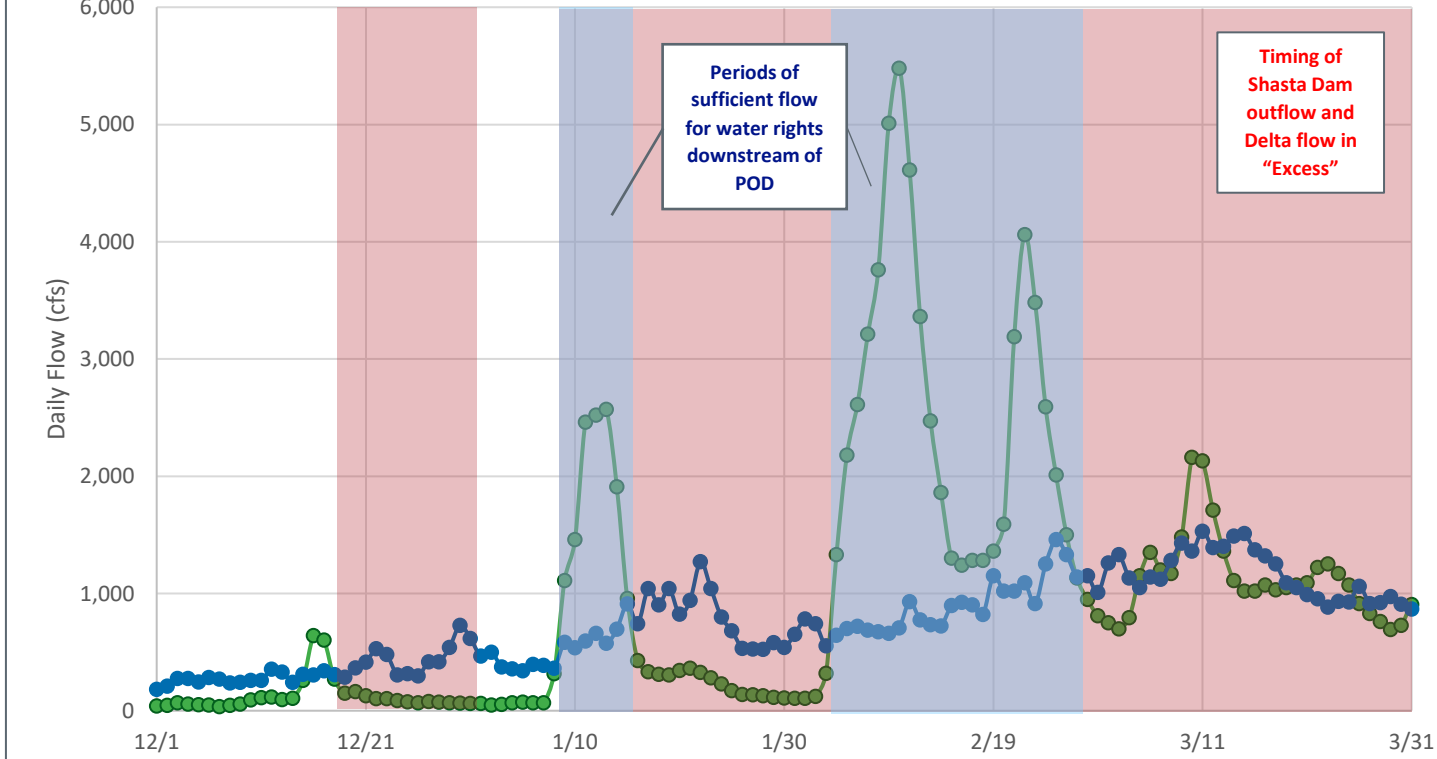
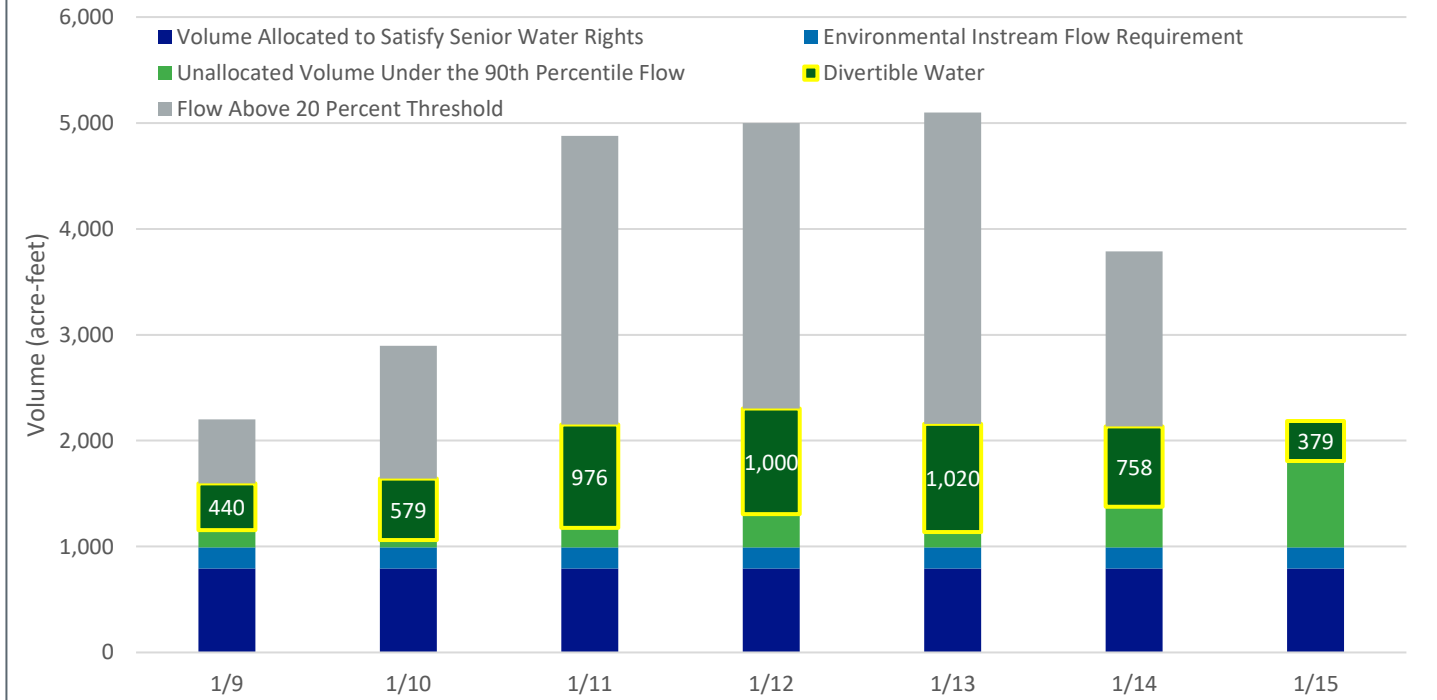


Figure 3d. Hypothetical Water Availability for January 2017 (Task 3.4)



Attachment A

Agendas for Meetings with State Board Staff,
May 2022 through January 2023

State Board and County of Modoc

Water Availability Analysis for the Big Valley Groundwater Basin

Location: Teams Video Call
Date: May 6, 2022
Time: 1:00 PM
Attendees: Nick Kehrlein (State Board)
Tiffany Martinez (County of Modoc)
Claire Bjork (UC Davis Extension)
Garrett Rapp, Carolina Sanchez (West Yost)

AGENDA ITEMS

1. Background and objectives
 - a. Overview of the Big Valley Groundwater Basin and its recharge goals
 - b. Meeting objectives
 - i. Improve understanding of the water rights permitting process and the requirements to prepare a water availability analysis
2. State Board Water Rights Process
 - a. What is the process to apply for a water rights permit?
 - b. What is the correct type of water right to divert surface water for groundwater recharge?
 - c. Are there any recent applications for water rights in the area that can be shared with the County?
 - d. What level of involvement/support can be expected from State Board staff?
3. Water Availability Analysis Resources from State Board
 - a. Does the State Board still support the “rainfall-runoff” and “area-ratio” methods to estimate water availability?
 - i. If so, are these methods considered a final or preliminary method?
 - b. What other methods are supported (excluding watershed modeling)?
 - c. eWRIMS – Confirmation that the existing database is comprehensive of all water rights
 - d. The State Board suggests taking climate change into consideration when performing a water availability analysis, how has this been done when using simplified methods like the “area-ratio” method?

Additional Information

We obtained the “Water Availability Analysis Resources” from the State Board’s website here: https://www.waterboards.ca.gov/waterrights/water_issues/programs/water_availability/

State Board and County of Modoc

Water Availability Analysis for the Pit River/Big Valley Groundwater Basin

Location: Teams Video Call
Date: August 5, 2022
Time: 10:00 AM
Attendees: Nick Kehrlein (State Board)
Mike Conway (State Board)
Julian Storelli (State Board)
Tiffany Martinez (County of Modoc)
Garrett Rapp, Carolina Sanchez (West Yost)

AGENDA ITEMS

1. Background and objectives
 - a. Overview of the Big Valley Groundwater Basin and its recharge goals
 - b. Recap of discussion on 5/6/2022
 - c. Meeting objectives
 - i. Gather feedback on the current process to develop WAA
 - ii. Understand instream flow requirements
2. Process to develop WAA
 - a. West Yost to give background and explain proposed process to determine water availability
 - i. Water rights records database – Annual water use reports, maximum rates of diversion, permit face value
 - ii. Comparison to stream gage data and instream flow requirements
 - b. Discussion on proposed process, recommendations from State Board staff
 - c. Questions on instream flow requirements:
 - i. Confirm understanding of instream flow requirements.
 - ii. Is it sufficient to demonstrate that the Cannabis Policy Flow Requirement is met in the months specified?
 - iii. Can we propose a compliance gage to evaluate instream flow requirements if one is not specified? (e.g., Muck Valley Dam)
 - iv. Is there an instream flow requirement for months outside of those specified? Does it revert to the existing flow requirement?
 - v. Do all diversions need to comply with the 50% bypass requirement discussed on p. 12 of the Cannabis Cultivation Policy? Is there any information that can be provided to be exempt from that requirement?
 - vi. Recommendations on addressing different time step in data vs. requirements (monthly reporting vs. daily instream flow requirements).
3. Next steps
 - a. Schedule next monthly meeting

State Board and County of Modoc

Water Availability Analysis for the Pit River/Big Valley Groundwater Basin

Location: Teams Video Call
Date: October 3, 2022
Time: 11:00 AM
Attendees: Ben McCovery (State Board)
Mike Conway (State Board)
Julian Storelli (State Board)
Tiffany Martinez (County of Modoc)
Garrett Rapp, Carolina Sanchez (West Yost)

AGENDA ITEMS

1. Background and objectives
 - a. Overview of the Big Valley Groundwater Basin and its recharge goals
 - b. Recap of discussion on 8/22/2022
 - c. Meeting objectives
 - i. Gather feedback on proposed WAA process
2. Process to develop WAA
 - a. Shasta Lake water rights and data
 - b. West Yost explains proposed WAA process based on guidelines for WAA for Streamlined Recharge Permitting
 - i. 90/20 estimates at nearby gages
 - ii. Using daily values for monthly/annual face values
 - iii. Transfers of water rights
3. Next steps
 - a. Review of proposed scope of work for conducting a WAA for Streamlined Recharge Permitting

State Board and County of Modoc

Water Availability Analysis for the Pit River/Big Valley Groundwater Basin

Location: Teams Video Call
Date: December 12, 2022
Time: 10:00 AM
Attendees: Ben McCovery (State Board)
Mike Conway (State Board)
Julian Storelli (State Board)
Tiffany Martinez (County of Modoc)
Garrett Rapp, Carolina Sanchez (West Yost)

AGENDA ITEMS

1. Background and objectives
 - a. Overview of the Big Valley Groundwater Basin and its recharge goals
 - b. Recap of discussion on 10/3/2022
 - c. Meeting objectives
 - i. Discuss feedback on proposed WAA scope document
2. Feedback on proposed WAA scope document
 - a. State Board comments
 - b. West Yost presents preliminary results on 90/20 analysis
3. Summary of West Yost discussion with DWR on regulatory support
 - a. Suggestion of flood threshold for determining water availability
4. Next steps
 - a. Address State Board comments
 - b. Continue project definition (location, diversion volume, etc.)

State Board and County of Modoc

Water Availability Analysis for the Pit River/Big Valley Groundwater Basin

Location: Teams Video Call
Date: January 10, 2023
Time: 10:00 AM
Attendees: Ben McCovery (State Board)
Julian Storelli (State Board)
Tiffany Martinez (County of Modoc)
Garrett Rapp, Carolina Sanchez (West Yost)

AGENDA ITEMS

1. Feedback on proposed WAA scope document and water rights
 - a. Insights and advice from recent temporary permits
 - b. Feedback on water right data provided by West Yost
 - c. Initial Statements of Diversion and Use or other data that can be used to quantify pre-1914 diversions
 - d. Recommendations for methods to compare the water rights to the chosen gage for the 90/20 analysis to determine availability
 - e. Other considerations and specific feedback on workplan
2. Optional discussion - Summary of West Yost discussion with DWR on regulatory support
 - a. Suggestion of flood threshold for determining water availability
3. Next steps
 - a. Address State Board comments
 - b. Continue project definition (location, diversion volume, etc.)
 - c. Engage with CDFW

Appendix 13 Uplands Geologic Assessment - Big Valley Groundwater Basin

Memo



To: Mr. Gaylon Norwood
From: Chris Petersen, Brian Hausback, David Fairman
Date: April 11, 2022
Re: Uplands Geologic Assessment
Big Valley Groundwater Basin
GEI Project 1901113

Dear Mr. Norwood:

GEI Consultants, Inc. (GEI), in coordination with volcanologist Brian Hausback from Sacramento State University, prepared this technical memorandum to describe the results of the Uplands Geologic Assessment (UGA) for the Big Valley Groundwater Basin (BVGB or Basin). The UGA was performed during development of the Groundwater Sustainability Plan (GSP) for the BVGB to investigate the geologic conditions in the areas surrounding the BVGB and further understand the role of these areas related to groundwater in the BVGB and, in particular, recharge to the BVGB originating from uplands areas.

Background and Geologic Units

The BVGB is located on the border between Lassen and Modoc counties in northeastern California and is identified by the California Department of Water Resources (DWR) as Basin No. 5-004. The Basin boundary was drawn by DWR using a 1958, 1:250,000 scale geologic map produced by the California Geologic Survey (CGS 1958), included as **Figure 1**. This map shows the source of recent lava flows northwest of the BVGB. This source area can be identified by the numerous cinders labeled as asterisks (*). Further information about the geology of the BVGB and surrounding areas can be found in the GSP. (Lassen and Modoc GSAs 2021)

DWR defines a groundwater basin as an "...aquifer or stacked series of aquifers with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom..." (DWR 2020) DWR's delineation of the BVGB was determined by DWR to coincide with the boundary between units described as alluvial and those described as volcanic on the CGS (1958) map.

However, the BVGB boundary as drawn may not represent "...features that significantly impede groundwater flow..." because in volcanic areas such as this, volcanic, alluvial, and lake deposits often interfinger with one another for long distances away from the valley floor. Furthermore, volcanic deposits themselves can often transmit water readily due to being either highly fractured, or porous in nature such as ash, tuff, pumice, and cinder deposits. Some volcanic deposits, such as ash-fall, can be altered into clays to form aquicludes. However, these horizontal confining layers do not affect the ability of groundwater to move laterally across the basin boundary.

DWR's (1963) investigation of groundwater resources in the region specifically identified areas outside of the valley floor as "forebays" for recharge into the valley. Those "upland recharge" areas are shown on **Figure 2** and are generally in three locations relative to the BVGB: to the northeast (along Barber

Ridge), northwest, and southeast. The UGA investigates each of these regions for their potential to provide recharge to the BVGB.

In addition to geologic maps from the CGS (1958) and DWR (1963), a more detailed geologic map was drawn by GeothermEx (1975) during an investigation of geothermal resources in the area. This map, shown on **Figure 3**, is considerably more detailed than the previous ones. A summary of the geologic units defined by GeothermEx is included in **Attachment A**.

Methods of Analysis

For this UGA, several methods of analysis were employed. On October 21-22, 2019, Modoc County Farm Advisor, Laura Snell, accompanied volcanologist Brian Hausback and David Fairman on a field survey of the upland area geologic units. Hand samples were collected representative of different upland areas and different geologic units identified by GeothermEx (1975). Locations of the hand samples are shown on **Figure 3**. Samples were analyzed for geochemical composition or assessed by microscopic thin section, or both. Geochemical analysis was performed by ALS Global¹ for a combination of major elements, rare earth and trace elements from method ME-MS81d and for major and minor oxides using method ME-ICP06. Thin sections were prepared by Wagner Petrographic² using a blue epoxy impregnation to allow visualization of sample pore spaces. Additionally, an analysis of well completion reports³ in the upland areas northwest and southeast of Big Valley was performed to evaluate the amount of interfingering of alluvial deposits among these areas mapped as volcanic.

Results

Attachment B contains the geochemical evaluation of the samples analyzed. **Attachment C** contains the petrographic analysis of the thin sections analyzed. Locations of the samples are shown on **Figure 3**. **Table 1** contains a summary of the findings from these assessments. Based on the assessment, distinction among the older Tertiary (T) units distinguished by GeothermEx (Tpbu, Tpbl, and Tm) could not be made. Identification of these older units were combined into a single summary unit: Tb. More recent volcanic units are summarized as Qtb. Finally, the sedimentary units that make up much of the BVGB aquifer and are exposed in areas around the basin are summarized as Ttsl and Ttsu. The criteria used to designate the units are shown in **Table 2**.

Well log records from DWR (2022) from northwest and southeast of the BVGB were inspected and digitized. Each of the material descriptions were transcribed and converted to standardized lithologies. These lithologies were then classified as alluvial or non-alluvial (i.e. hard rock) and the percentage of alluvial sediments for each well calculated. **Table 3** summarizes the results of this analysis and the raw data is included in **Attachment D**. These results indicate that there is likely significant interfingering of alluvial sediments (38-86%) with areas northwest of the BVGB. Results from the area southeast of the BVGB are less clear, as there were fewer well logs to analyze and the variability was greater (8-100%).

¹ ALS Minerals Division – Geochemistry located in Reno, NV.

<https://www.alsglobal.com/en/locations/americas/north-america/usa/nevada/reno-geochemistry>

² Located in Linden, UT. <https://www.wagnerpetrographic.com/>

³ Assembled by DWR in their OSWCR database and made available on the SGMA Data Viewer. <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer>

Findings

DWR (1963) delineates recharge areas northeast (along Barber Ridge), northwest, and southeast of the BVGB. Assessment of the likelihood of recharge from these upland areas into the BVGB is discussed below.

Contrary to the mapping by DWR (1963), the uplands northeast of the BVGB along Barber Ridge are unlikely to provide subsurface recharge. Based on both the GeothermEx map and the samples collected in this study, that area is of Tertiary age and has a low probability that it is significantly interconnected to the groundwater basin through the subsurface. The primary route for recharge of precipitation on Barber Ridge to the BVGB is likely through surface or shallow subsurface flow off the mountains encountering the coarse alluvial deposits (Qal) along the edge of the valley. Managed recharge efforts could be focused on this edge of the basin.

To the northwest, subsurface recharge from the uplands to the BVGB is likely to occur. The GeothermEx map and results of this study validate that area as being of relatively young (Quaternary) volcanics. Interfingering of alluvial deposits is indicated by the high percentage of alluvial descriptions in well logs in that area.

To the southeast, subsurface recharge from the uplands to the BVGB may occur. This study validated most of the GeothermEx mapping which shows older (Tertiary) volcanic deposits in much of the uplands area. The small area of younger (Quaternary) volcanics may provide recharge. Additionally, these younger deposits may extend further south than mapped by GeothermEx because sample BH19BV-02 was sampled in an area mapped as older, but the chemical and petrographic analyses indicate it is more likely younger. The interfingering of alluvial deposits was less clear in the analysis of well logs.

Conclusions

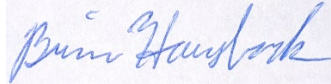
Subsurface recharge from uplands areas northwest and southeast of the BVGB is likely to occur. This study validates that the GeothermEx geologic map (GeothermEx 1975) is more detailed and likely more accurate than the one used by DWR (CGS 1958) to delineate the basin boundary. Usage of the GeothermEx map in any future basin boundary modifications may be warranted. Furthermore, inclusion of upland young volcanics (Qtb) within the groundwater basin may be justified due to their ability to store and transmit groundwater, their interfingering with alluvial sediments, and their potentially significant role in providing recharge to the BVGB.

Please let us know if you have any questions about this memorandum.

Regards,



Chris Petersen



Brian Hausback



David Fairman

Enclosures:

Tables 1-3

Figures 1-3

Attachment A: Big Valley Upland Geologic Units

Attachment B: Geochemical Evaluation of Upland Lavas Surrounding Big Valley

Attachment C: Big Valley Petrography

Attachment D: Well Log Analysis

Attachment E: References

Table 1: Summary of Geochemical-Petrographic Unit Designations

SAMPLE	GeothermEx Unit	Field Unit	Geochem Unit	SiO ₂	Petrographic Unit	Summary Unit
BH19BV-01	Tpbu	Tpbu	Tb-like	52.48	Tb-like	Tb
BH19BV-01A	Tpbu	Tpbu			Tb-like ash	Tb
BH19BV-02	Tpbu	Qtb	Qtb-like	47.65	Qtb-like	Qtb*
BH19BV-03	Qtb	Qtb	Qtb-like	47.53	Qtb-like	Qtb
BH19BV-04	Qtb	Qtb	Qtb-like	48.03	Qtb-like	Qtb
BH19BV-05	Ttsu	Ttsu			Ttsu	Ttsu
BH19BV-06	Ttsu	Ttsu			Ttsu	Ttsu
BH19BV-08	Tpbl	Tpbl	Tb-like	56.07	Tb-like	Tb
BH19BV-10	Tm	Tb	Tb-like	51.10	Tb-like	Tb
BH19BV-11	Tm	Tb	Tb-like	53.83	Tb-like	Tb
BH19BV-12	Tm	Tb			Tb-like	Tb
BH19BV-13	Qtb	Qtb	Qtb-like	47.17	Qtb-like	Qtb
BH19BV-15	Ttsl	Ttsl			Ttsl	Ttsl
BH19BV-16A	Ttsl	Ttsl			Ttsl	Ttsl
BH19BV-16B	Ttsl	Ttsl			Ttsl	Ttsl
BH19BV-17	Tpbl	Qtb	Qtb-like	47.42	Qtb-like	Qtb
BH19BV-18	Tpbu	Tpbu	Tb-like	54.08	Tb-like	Tb

* indicates that summary unit is different from unit mapped by GeothermEx

Table 2: Summary Unit Designation Criteria

Summary Unit	Age	Rock Type	Petrographic Designation Criteria
Qtb	Quaternary-Pliocene	basalt	Plagioclase = Clinopyroxene > Olivine Distinctive Subophitic groundmass texture ± Phenocrysts of olivine (up to 2 mm)
Tb	Tertiary-Miocene	basaltic andesite	Plagioclase dominant > olivine; ± groundmass clinopyroxene; ± orthopyroxene Variable texture: trachytic, intersertal, intergranular ± Phenocrysts of olivine (up to 3mm); uncommon plagioclase
Ttsl and Ttsu	Tertiary	sedimentary (Bieber Formation)	Reworked siliceous ash and volcanic sandstone. Upper part (Ttsu) fresh and glassy, angular clasts (less reworked). Lower part (Ttsl) altered, rounded clasts (more reworked); significant clay content; possibly hydrothermal alteration.

Table 3: Well Log Assessment for Areas Northwest and Southeast of the BVGB

Well Completion Report Number	Total Well Depth (feet)	Length of Alluvial Sediments (feet)	Length of Hard Rock (feet)	Percent Alluvial Sediments
Northwest of Big Valley				
WCR1980-006723	140	71	69	51%
WCR2006-007508	145	125	20	86%
WCR1993-009774	185	100	85	54%
WCR1992-013718	205	127	78	62%
WCR2006-007502	225	85	140	38%
WCR2004-011016	775	435	340	56%
Southeast of Big Valley				
WCR1993-009636	302	24	278	8%
WCR2006-009179	246	246	0	100%
WCR1977-007356	648	299	349	46%
WCR1985-008010	152	70	82	46%

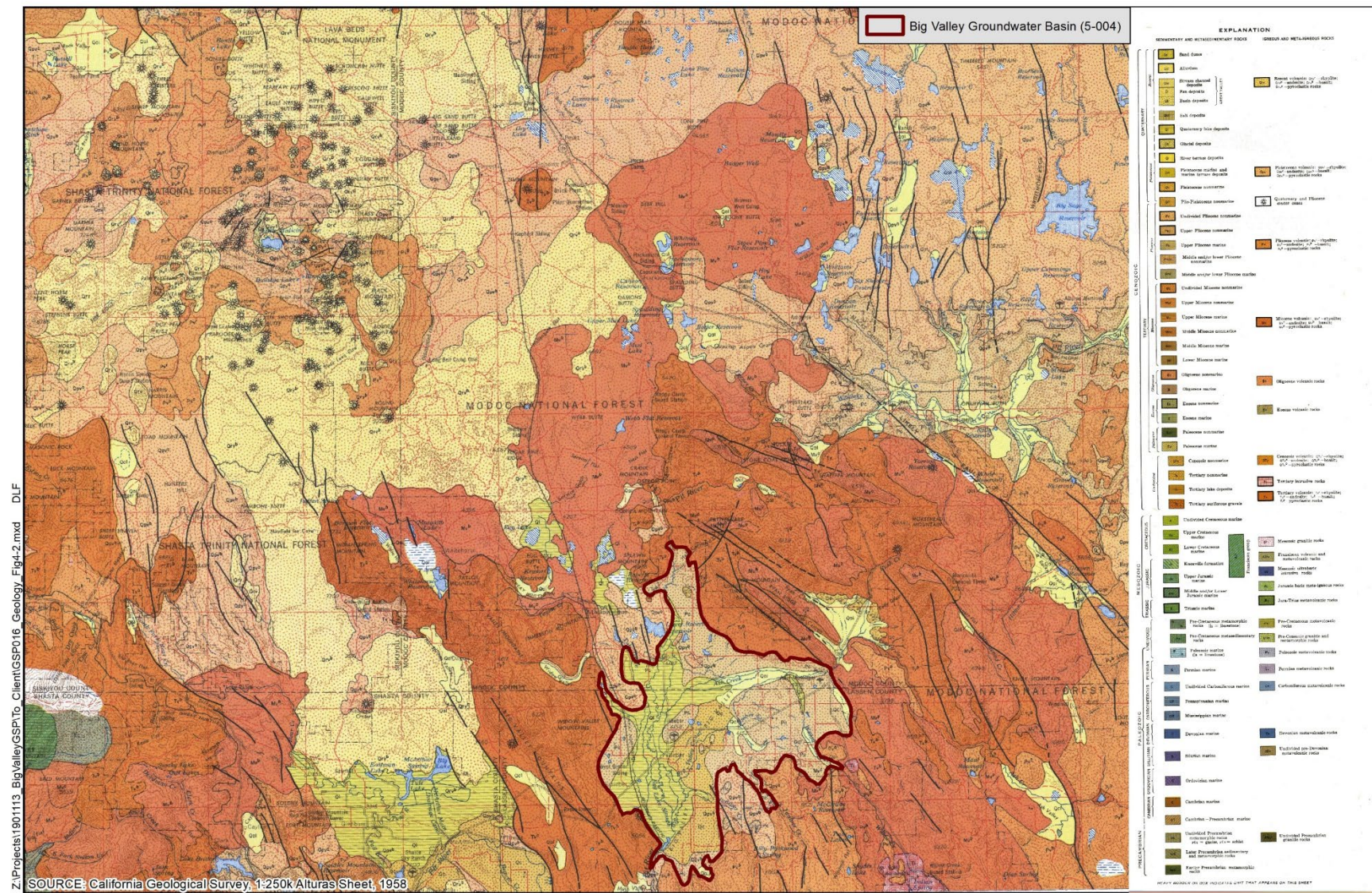


Figure 1: Regional Geology, Alturas Sheet: California Geological Survey 1:250,000 scale

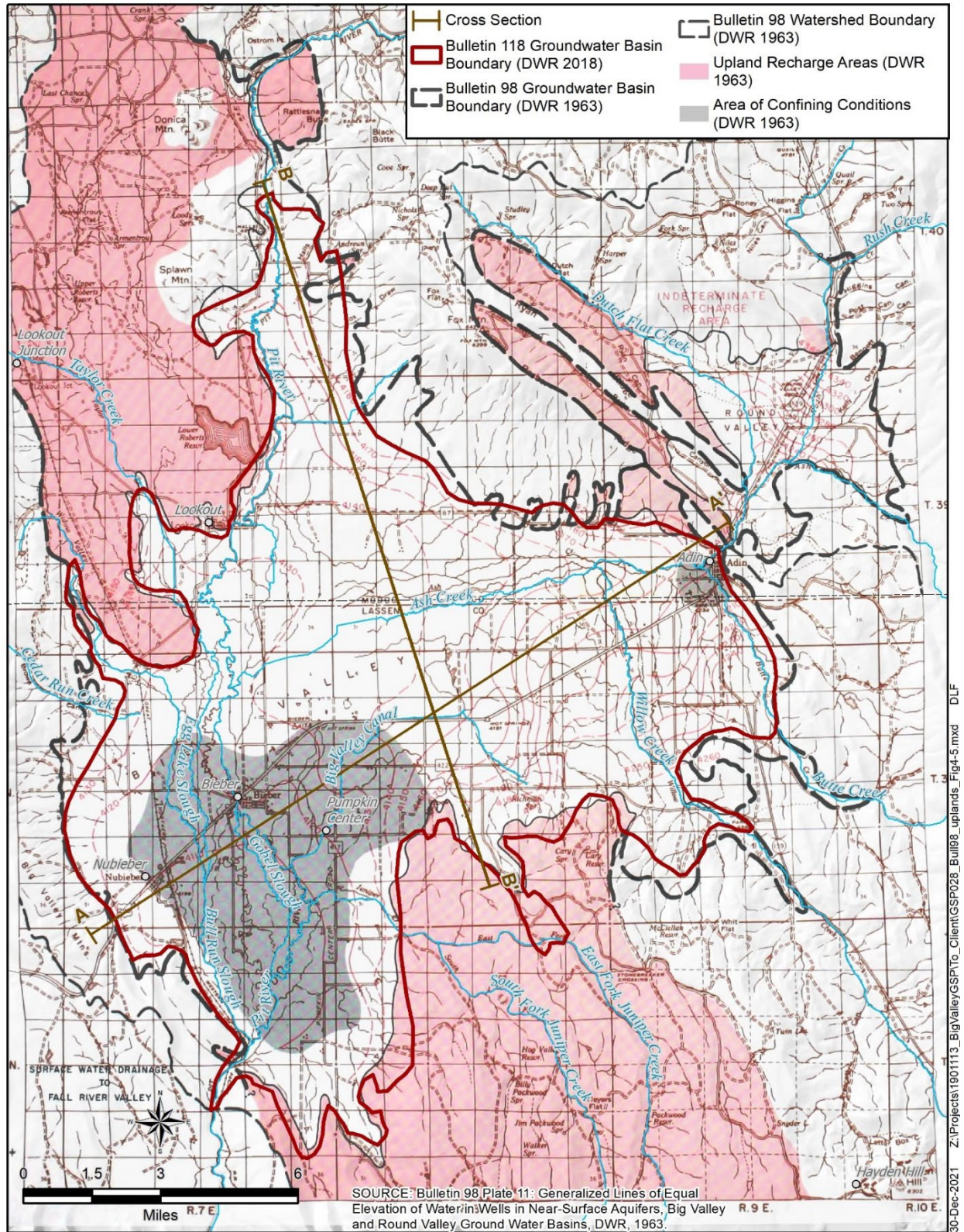


Figure 2: Upland Recharge Areas, Northeastern Counties Ground Water Investigation, Bulletin 98, DWR (1963)

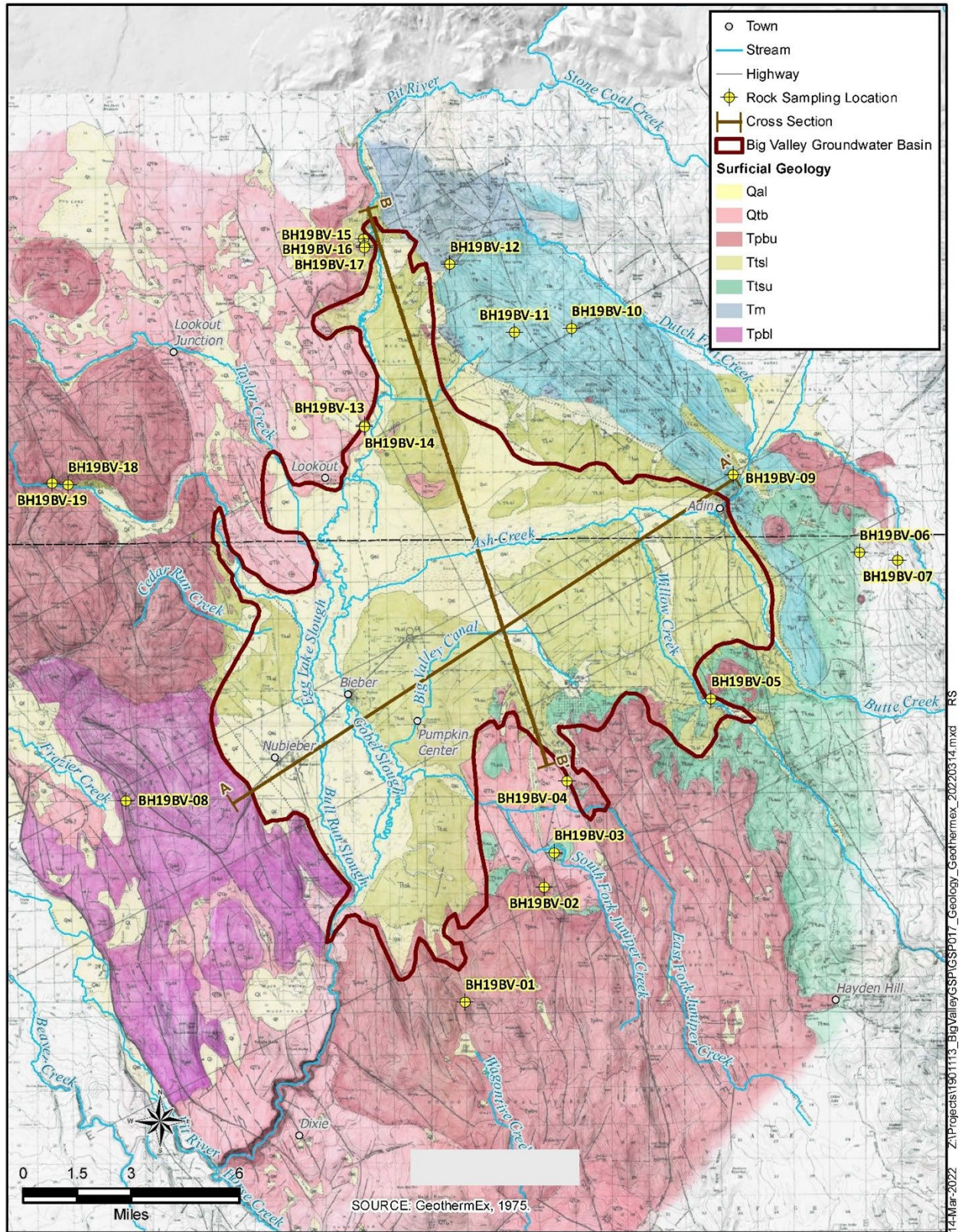


Figure 3: Geologic Map, Geology of the Big Valley Geothermal Prospect, GeothermEx (1975)

Attachment A

Big Valley Upland Geologic Units

Big Valley Upland Geologic Units

Unit names and symbols from Geothermix Study, 1975; Listed young to old

Compiled by Brian Hausback, 2019

QTb – basalt flows and eruptive centers

Description: light grey, plagioclase-rich flows, as are all the others in this general group. Cover an eroded surface developed on (Tts) rocks, similar to the position held by certain (Tpbu) units. They form a continuous plateau in the northern part of the mapped area, north of Lookout. Isolated erosional remnants of flows also are present in the northern Juniper Creek Hills and elsewhere. These may not all be part of a formerly continuous sheet, but they occupy a generally similar position in the stratigraphic sequence of the area. The thickness of the isolated basalt caps in the southern part of the region amount to a few tens of feet. Thickness appears to increase northward from Lookout.

Stratigraphy-Age: Spans the Plio-Pleistocene interval, based on stratigraphic relations, and amount of weathering, dissection, and deformation. At the north end of the valley (Ttsl) is covered by flood basalts of the (QTb) unit. Tpbl is overlain by QTb in the Pit River gorge

Distinction: less faulted than adjacent older flows.

Unit – Ttsu

Description: Thinly bedded tuffaceous siltstone, which may be diatomaceous; poorly consolidated cross-bedded sands and pebbly sands; beds of massive, light-colored ash-flow tuff, with large, fresh pumice fragments; two, or possibly more, massive units of dark gray ash-flow tuff characterized by large fragments of black pumice, dacite glass and basalt; and at least two thin, glassy basalt flows showing evidence of extrusion into water. Ttsu unit is the most recent product of silicic volcanism in the project area.

Stratigraphy-Age: $6.67 \pm 2.5\text{Ma}$ from welded tuff from near the top of the section in the Hayden Hill area. Ttsu is at least 1,000 feet thick. The massive tuffs appear to be thickest and most coarsely textured in the Hayden Hill area and in the hills to the east of Highway 139. The thin bedded, fine-grained water-laid materials increase northward, toward Big Valley. It appears to overlie (Tb) in the hills southeast of Adin. Dacite or rhyolite intrude the tuffs near Hayden Hill. Altered andesite dikes intrude the unit at Little Gold Hill. The largest of these intrusions is only a few acres in extent. In both of these areas the surrounding tuffs have undergone silicification, kaolinization and zeolitic alteration. A gold mining district was developed at Hayden Hill in mineralization related to these intrusives. The intrusives are younger than the upper member tuffs which they penetrate, but they appear to be similar in composition to the tuffs and probably are essentially contemporaneous with them.

Unit – Ttsl - Diatomaceous and tuffaceous sediments of Big Valley

Description: Characteristic lithologies are white, tuffaceous diatomite in beds up to 10 feet or more thick, and thin-bedded grey sandstone containing basalt fragments. Cross-bedded fluvial sands are present locally. Thin scoriaceous basalt flows were extruded into the lacustrine beds in the northern and northwestern parts of the area. Surface exposures are limited to a few tens of feet of section in any one locality.

Stratigraphy-Age: Pliocene. More than 1200 feet thickness in water wells in Big Valley. The relationship of the (Ttsl) unit to older rocks is not exposed in any field locality, and none of the well logs in Big Valley provides information on the materials underlying it. On the west side of the valley, general field relationships suggest that the basalt flows of the southern Big Valley Mountains (Tpbl) are older than Ttsl and underlie the unit at least locally. Farther north, along the west side of the valley, the large basalt eruptive centers of Widow Mountain and Jimmerson Mountain appear to be either contemporaneous with or slightly younger than Ttsl. At the north end of the valley (Ttsl) is covered by flood basalts of the (QTb) unit.

Tpbl – Lower Unit Basalt Flows of Pliocene Age

Description: basalt flows and cindery agglutinate within which minor amounts of basaltic tuff. Mostly of light grey plagioclase-rich holocrystalline basalt, with a range of textures including slightly porphyritic and diktytaxitic variations. Locally, near eruptive centers, the rock is a red, cindery breccia. The flows average 15 to 20 feet in thickness. Adjacent flows are often separated by a foot or two of red, cindery soil. Representative exposure can be seen along Highway 299, between MacArthur and Nubieber. Distinguished from petrologically similar, younger, plagioclase-rich basalts by its weathering characteristics. Most of the original scoriaceous surfaces have been destroyed, soils are well-developed, and the interior parts of flows often are weathered into rounded boulders.

Stratigraphy-Age:believed to be contemporaneous with parts of the Tts. Equivalent to the "Big Valley Mountains Volcanic Series" of Hail (1961). General field relationships suggest that the basalt flows of the southern Big Valley Mountains (Tpbl) are older than (Ttsl).

Distinction: Distinguishable from younger flows of the (Qb) assemblage on the basis of the amount of deformation and erosion effecting them and by their apparent relationships to Pliocene-age sediments (Tts).

Tb - Basalt Flows, Breccias and Lithic Tuff

Description: Interbedded basalt flows, flow breccias and lithic ash-flow tuffs. Typical basalts of this unit are dark grey and fine grained, with small (<2mm) phenocrysts of olivine and plagioclase. Pyroclastic rocks, which make up the largest part of the member, consist of massive tuff breccias containing basalt fragments, and lapilli tuff with abundant white pumice fragments. These tuffs show a moderate to high degree of induration. Glass in the characteristic white pumice fragments appears to be devitrified, at least in surface outcrops. The pyroclastic units seem to increase in abundance upward in the section.

Stratigraphy-Age: late Miocene. 13.8 ± 2.4 Ma from a basalt at Barber Ridge. In Turner Canyon, an estimated thickness of 3,500 feet of the unit is present, without either top or base being exposed.

Distinction: The olivine characteristically is altered to iddingsite, an important factor in distinguishing these flows from younger basalts.

Tm – Andesite and Tuff

Description: The most characteristic rock type is red, porphyritic andesite, containing phenocrysts of plagioclase and hornblende. The vesicles are filled with zeolite minerals, calcite or chalcedony. Calcite veins are common. Estimated that about 65 percent of the member is pyroclastic in origin, consisting of tuff breccia and air-fall tuff. About 15 percent is made up of tuffaceous sediments and about 25 percent consists of flows and flow breccias of andesite or basalt. Poorly exposed and details of the lithology are known only in small areas. It tends to form smooth, moderately steep slopes where tuffs predominate. Areas underlain by lava flows are characterized by poorly defined ledges. Some of the tuffaceous rocks of this unit are green, apparently due to alteration. Fine-grained, tuffaceous sediments and lignite are reported from this member also, with petrified wood float associated with it.

Stratigraphy-Age: Miocene. Oldest stratigraphic unit exposed in the project area. More than 2,000 feet of strata are exposed south of Black Butte. Neither the top nor the bottom of the unit is exposed. Its only contact with the overlying unit (Tb) appears to be a fault.

Distinction: In general, unit Tm is distinguished by its abundance of andesite flows as compared to the predominantly basalt character in the overlying Tb unit. The degree of alteration and fracturing distinguish it from other, younger andesite units.

Attachment B

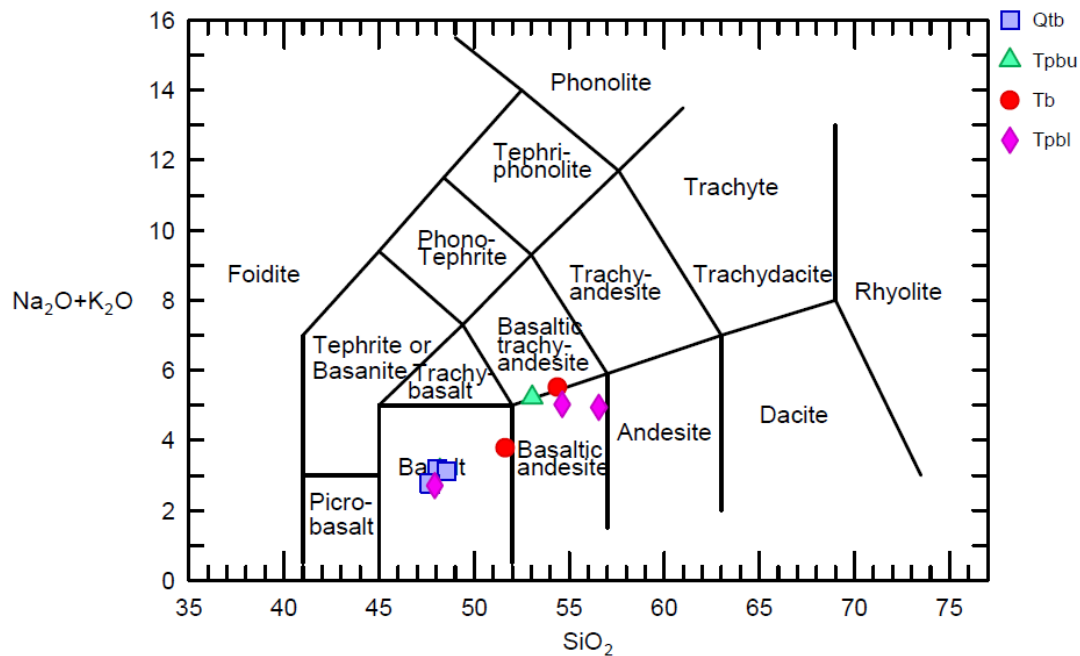
Geochemical Evaluation of Upland Lavas Surrounding Big Valley

Geochemical Evaluation of Upland Lavas Surrounding Big Valley, California

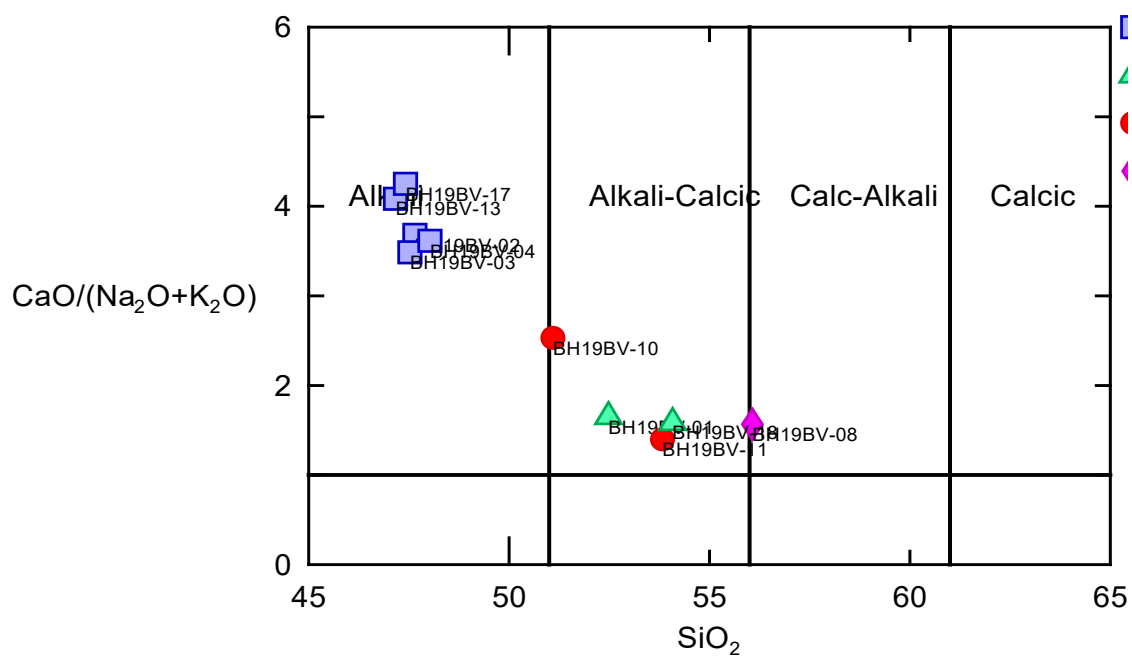
Brian Hausback

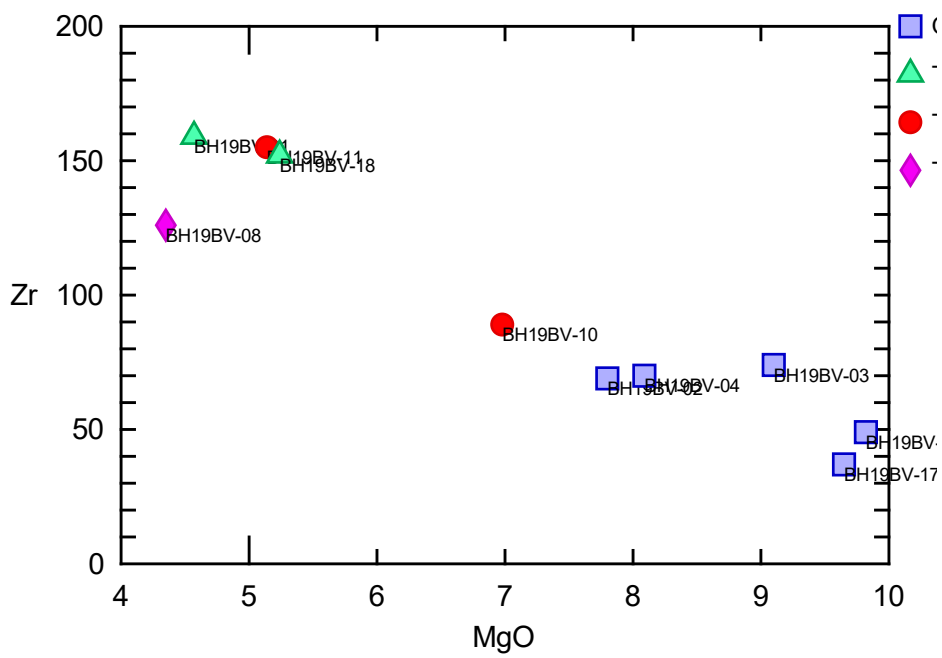
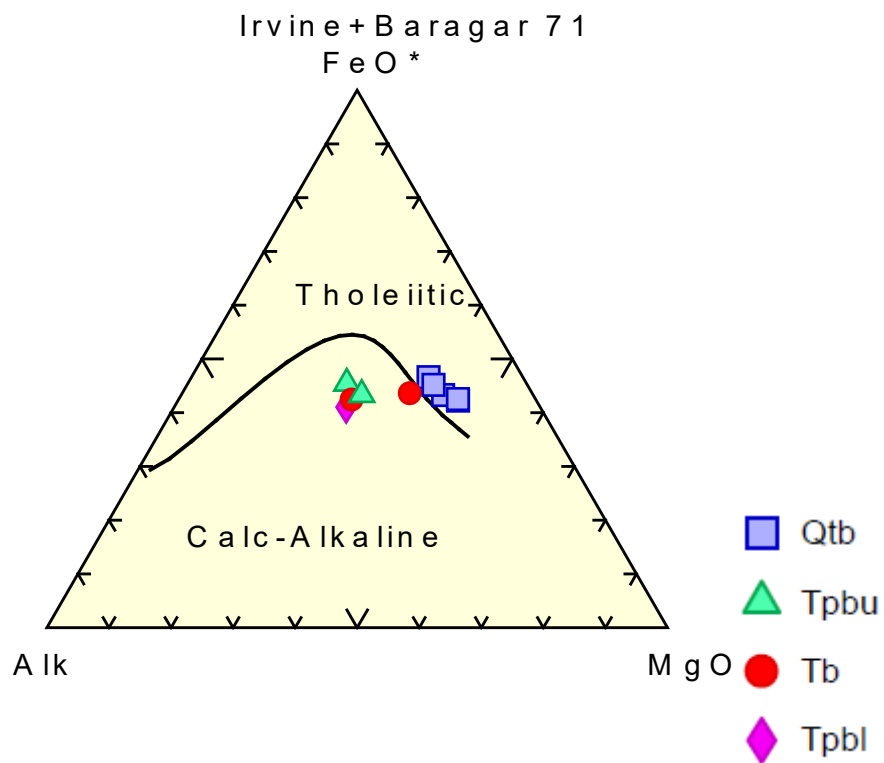
Summary and Interpretation of Geochemistry

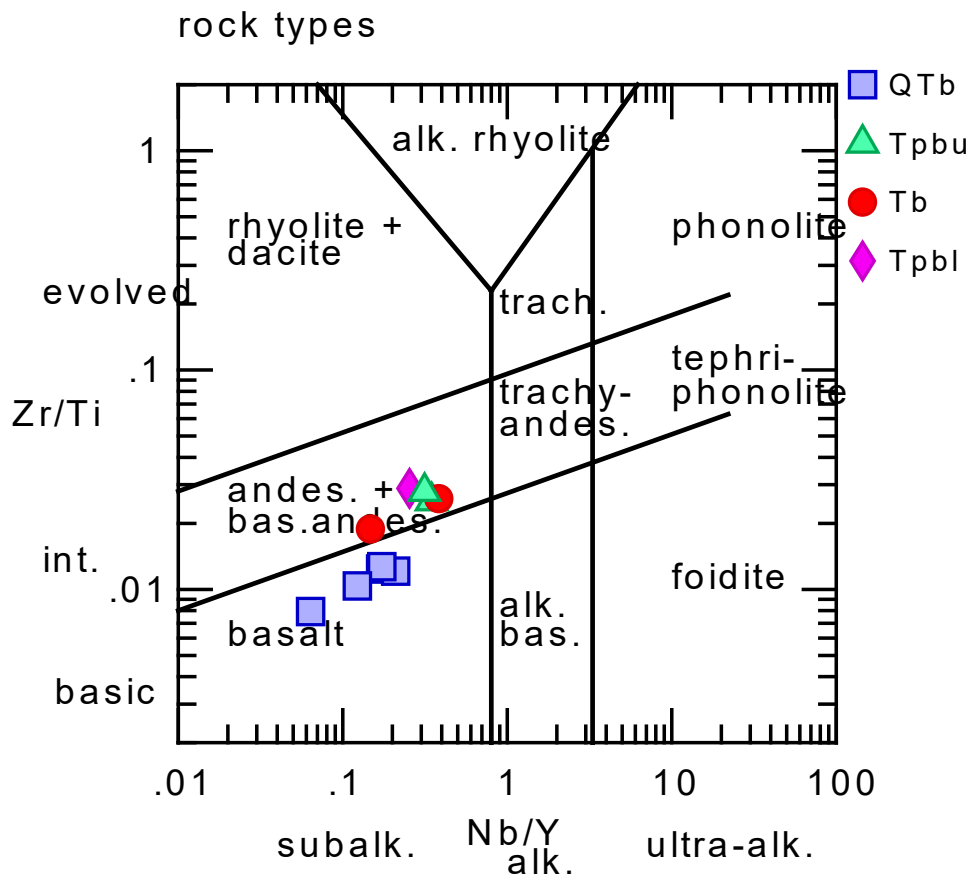
There appear to be two suites of lavas surrounding Big Valley. The two suites are distinctive in their geochemical patterns, in both combinations of major and trace elements. QTb, the younger (Quaternary-Pliocene) unit consists of true basalts and show a mantle geochemical affinity. The older (Miocene) unit (combination of Tb, Tpbu, and Tpbl) are an assortment of basaltic andesites with a distinctive subduction zone chemical affinity. The volcanic evolution of the area began with Miocene subduction volcanism from scattered vents in the eastern portion of the Cascade arc. Probably associated with Pliocene to Recent, Basin and Range structural extension, the tholeiitic, shallow mantle melts of the QTb unit erupted from fissure vents along a developing normal fault system. The extension produced shallow mantle melting and developed the modern topography that includes graben-basins such as Big Valley.



Peacock 1931

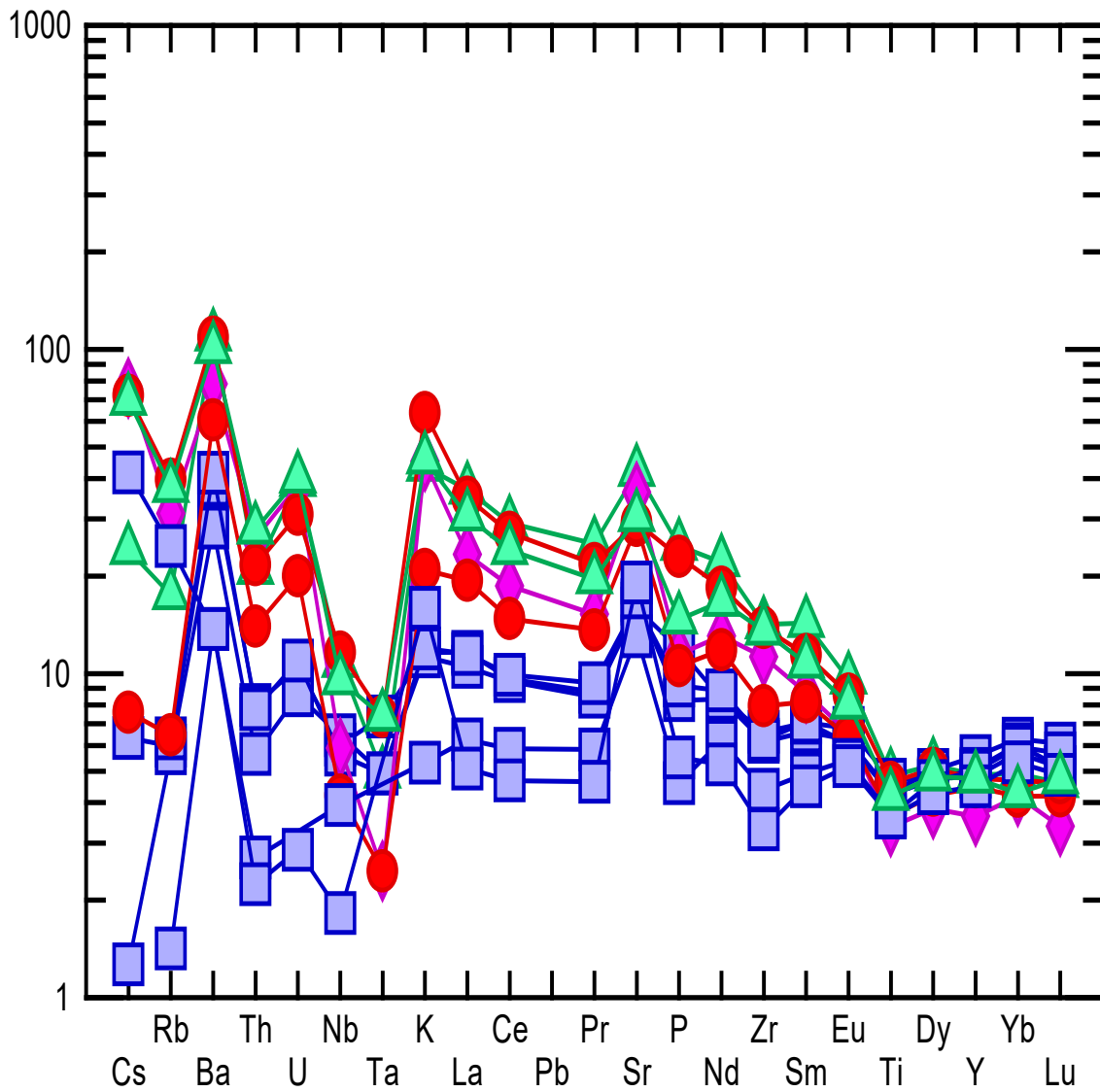






Rock/Primitive Mantle

Sun+McDon. 1989





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To: CALIFORNIA STATE UNIVERSITY
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SACRAMENTO CA 95819-6043

Page: 1
Total # Pages: 2 (A - D)
Plus Appendix Pages
Finalized Date: 28-NOV-2019
Account: CALSSA

CERTIFICATE RE19279282

Project: Volcanic petrologic geochem

This report is for 10 Rock samples submitted to our lab in Reno, NV, USA on 4-NOV-2019.

The following have access to data associated with this certificate:

DAVID FAIRMAN

BRIAN HAUSBACK

SAMPLE PREPARATION

ALS CODE	DESCRIPTION
WEI-21	Received Sample Weight
SND-ALS	Send samples to internal laboratory
CRU-QC	Crushing QC Test
LOG-22	Sample login - Rcd w/o BarCode
CRU-31	Fine crushing - 70% <2mm
PUL-31	Pulverize up to 250g 85% <75 um

ANALYTICAL PROCEDURES

ALS CODE	DESCRIPTION	INSTRUMENT
ME-ICP06	Whole Rock Package - ICP-AES	ICP-AES
OA-GRA05	Loss on Ignition at 1000C	WST-SEQ
ME-MS81	Lithium Borate Fusion ICP-MS	ICP-MS
TOT-ICP06	Total Calculation for ICP06	

The results of this assay were based solely upon the content of the sample submitted. Any decision to invest should be made only after the potential investment value of the claim 'or deposit has been determined based on the results of assays of multiple samples of geological materials collected by the prospective investor or by a qualified person selected by him/her and based on an evaluation of all engineering data which is available concerning any proposed project. Statement required by Nevada State Law NRS 519

This is the Final Report and supersedes any preliminary report with this certificate number. Results apply to samples as submitted. All pages of this report have been checked and approved for release.

***** See Appendix Page for comments regarding this certificate *****

Comments: full project name: Volcanic Petrologic Geochemistry

Signature:

Saa Traxler, General Manager, North Vancouver



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Project: Volcanic petrologic geochem

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Total # Pages: 2 (A - D)
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Finalized Date: 28-NOV-2019
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CERTIFICATE OF ANALYSIS RE19279282

Sample Description	Method Analyte Units LOD	WEI-21	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81
		Recvd Wt.	Ba	Ce	Cr	Cs	Dy	Er	Eu	Ga	Gd	Hf	Ho	La	Lu
		kg	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm
		0.02	0.5	0.1	10	0.01	0.05	0.03	0.03	0.1	0.05	0.2	0.01	0.1	0.01
BH19BV-01		0.08	767	51.7	80	0.19	3.84	2.46	1.61	19.3	5.35	3.8	0.84	25.4	0.34
BH19BV-02		0.14	267	17.1	200	0.05	3.71	2.79	1.05	15.4	3.60	1.8	0.89	8.0	0.45
BH19BV-03		0.16	197.0	16.8	210	0.01	3.50	2.58	1.14	14.4	3.65	1.7	0.88	7.2	0.38
BH19BV-04		0.20	291	17.6	210	<0.01	3.46	2.64	1.02	15.2	3.36	1.7	0.89	7.9	0.38
BH19BV-08		0.14	547	33.1	60	0.60	2.82	1.84	1.10	19.1	3.39	2.9	0.62	16.0	0.25
BH19BV-10		0.22	423	26.2	210	0.06	3.10	2.13	1.07	17.8	3.59	2.3	0.72	13.3	0.31
BH19BV-11		0.12	762	48.3	120	0.57	3.75	2.43	1.45	18.2	4.76	3.4	0.82	24.0	0.34
BH19BV-13		0.14	95.8	10.4	200	<0.01	3.43	2.80	0.91	14.6	3.19	1.3	0.82	4.3	0.42
BH19BV-17		0.20	95.8	8.3	220	0.33	3.15	2.36	0.87	13.1	2.90	1.1	0.81	3.5	0.36
BH19BV-18		0.10	702	42.7	140	0.55	3.55	2.15	1.35	18.5	4.75	3.6	0.78	21.0	0.35

Comments: full project name: Volcanic Petrologic Geochemistry

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CERTIFICATE OF ANALYSIS RE19279282

Sample Description	Method Analyte Units LOD	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81	ME-MS81
		Nd	Pr	Rb	Sm	Sn	Sr	Ta	Tb	Th	Tm	U	V	W	Y
		ppm 0.1	ppm 0.03	ppm 0.2	ppm 0.03	ppm 1	ppm 0.1	ppm 0.1	ppm 0.01	ppm 0.05	ppm 0.01	ppm 0.05	ppm 5	ppm 1	ppm 0.1
BH19BV-01		29.9	6.93	11.1	6.36	1	884	0.2	0.73	1.78	0.32	0.82	213	1	22.2
BH19BV-02		11.3	2.42	3.8	2.94	1	355	0.3	0.60	0.68	0.41	0.22	249	1	25.3
BH19BV-03		11.3	2.34	3.6	3.13	1	335	0.2	0.61	0.48	0.36	0.18	231	1	21.9
BH19BV-04		12.0	2.58	4.0	3.15	1	347	0.2	0.57	0.66	0.42	0.23	255	1	23.1
BH19BV-08		17.7	4.21	19.8	3.87	1	765	0.1	0.48	2.23	0.24	0.80	163	1	16.5
BH19BV-10		16.0	3.76	4.1	3.63	1	604	0.1	0.52	1.19	0.30	0.42	244	1	20.3
BH19BV-11		25.0	6.02	25.2	5.08	1	616	0.3	0.64	1.84	0.33	0.65	194	1	21.6
BH19BV-13		8.4	1.61	0.9	2.18	1	275	<0.1	0.54	0.23	0.40	<0.05	240	<1	22.8
BH19BV-17		7.1	1.28	15.7	1.99	1	403	<0.1	0.52	0.19	0.35	0.06	264	<1	20.4
BH19BV-18		22.6	5.40	23.8	4.77	1	643	0.3	0.63	2.37	0.31	0.84	195	1	21.6

Comments: full project name: Volcanic Petrologic Geochemistry

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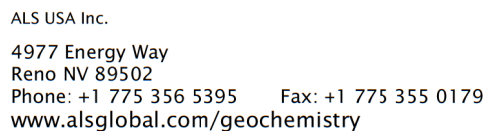
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Total # Pages: 2 (A - D)
Plus Appendix Pages
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Account: CALSSA

CERTIFICATE OF ANALYSIS RE19279282

Sample Description	Method Analyte Units LOD	ME-MS81	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	ME-ICP06	OA-GRA05
		Zr	SiO2	Al2O3	Fe2O3	CaO	MgO	Na2O	K2O	Cr2O3	TiO2	MnO	P2O5	SrO	BaO	LOI
		ppm	%	%	%	%	%	%	%	%	%	%	%	%	%	%
		2	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.002	0.01	0.01	0.01	0.01	0.01	0.01
BH19BV-01		159	52.5	18.35	9.00	8.52	4.57	3.86	1.31	0.011	1.05	0.14	0.54	0.10	0.09	0.80
BH19BV-02		69	47.8	18.15	10.60	11.45	7.82	2.76	0.35	0.027	0.93	0.17	0.18	0.04	0.03	0.26
BH19BV-03		74	47.7	17.50	10.40	10.95	9.13	2.80	0.34	0.030	1.02	0.17	0.26	0.04	0.02	-0.46
BH19BV-04		70	47.7	17.95	10.15	11.05	8.03	2.70	0.36	0.028	0.91	0.17	0.20	0.04	0.03	0.41
BH19BV-08		126	56.3	18.70	7.18	7.70	4.37	3.55	1.37	0.008	0.73	0.11	0.25	0.09	0.06	0.60
BH19BV-10		89	51.8	18.40	9.34	9.62	7.08	3.16	0.64	0.029	0.80	0.15	0.23	0.07	0.05	0.31
BH19BV-11		155	53.2	17.25	8.58	7.53	5.08	3.50	1.90	0.017	0.99	0.14	0.49	0.07	0.09	0.41
BH19BV-13		49	47.4	17.85	10.25	11.25	9.87	2.59	0.16	0.028	0.79	0.17	0.10	0.03	0.01	-0.46
BH19BV-17		37	46.4	17.20	9.91	11.15	9.44	2.15	0.47	0.031	0.76	0.17	0.12	0.04	0.01	2.39
BH19BV-18		152	55.1	17.95	8.83	8.02	5.34	3.66	1.41	0.020	0.93	0.15	0.33	0.07	0.08	0.00

Comments: full project name: Volcanic Petrologic Geochemistry

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Sample Description	Method Analyte Units LOD	TOT-ICP06 Total % 0.01
BH19BV-01		100.84
BH19BV-02		100.57
BH19BV-03		99.90
BH19BV-04		99.73
BH19BV-08		101.02
BH19BV-10		101.68
BH19BV-11		99.25
BH19BV-13		100.04
BH19BV-17		100.24
BH19BV-18		101.89

Comments: full project name: Volcanic Petrologic Geochemistry

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Page: Appendix 1
Total # Appendix Pages: 1
Finalized Date: 28-NOV-2019
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CERTIFICATE OF ANALYSIS RE19279282

	CERTIFICATE COMMENTS
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	LABORATORY ADDRESSES
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Applies to Method:	Processed at ALS Reno located at 4977 Energy Way, Reno, NV, USA. CRU-31 CRU-QC LOG-22 PUL-31 SND-ALS WEI-21
Applies to Method:	Processed at ALS Vancouver located at 2103 Dollarton Hwy, North Vancouver, BC, Canada. ME-ICP06 ME-MS81 OA-GRA05 TOT-ICP06

Attachment C
Big Valley Petrography

Big Valley Petrography

Brian Hausback

2021

General microscopy setup: All thin sections are mounted with blue-stained epoxy to illustrate pore space. Photographs are taken in pairs with plane-polarized light (PPL) on the left and cross-polarized light (XPL) on the right. The first row of photos is taken with a 4x objective lens; the second row is taken with a 10x objective lens.

Sample BH19BV-01

Location: 2 km north of Hoover Flat Reservoir; 14.4 km SE of Bieber

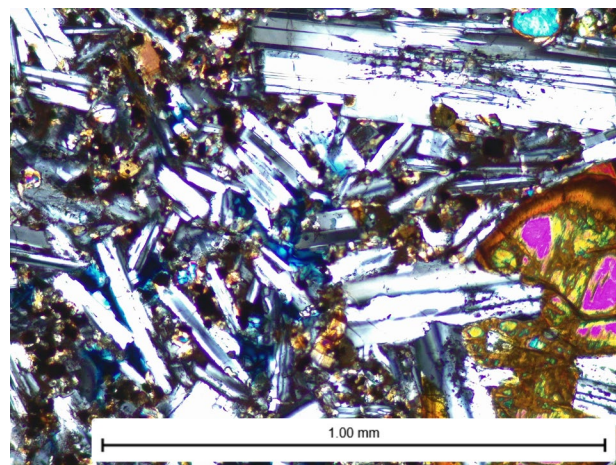
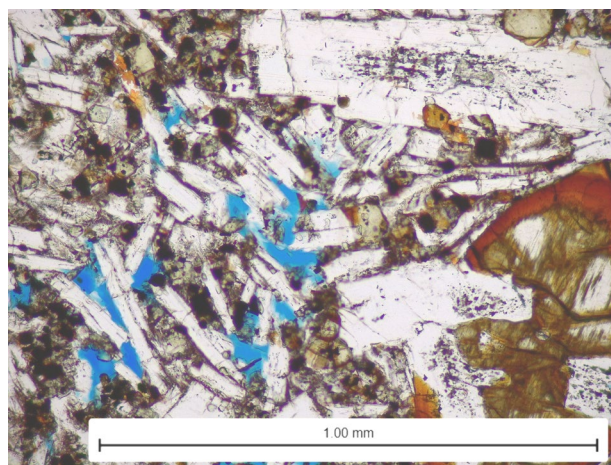
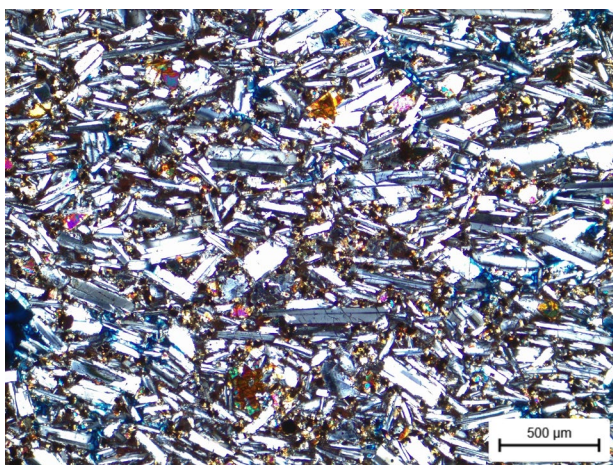
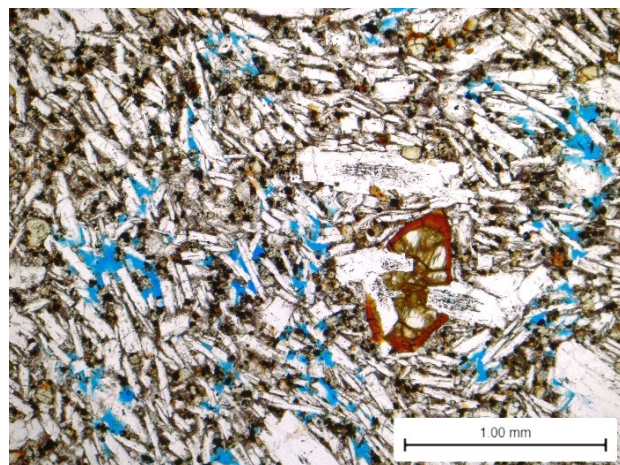
Map Unit: Tpbu

Interpretation: basaltic lava

Texture: fine-grained intergranular to micro-diktytaxitic trachytic groundmass (<1mm); seriate with micro-phenocrysts (1-3mm)

90% Groundmass: plagioclase > opaque > clinopyroxene > olivine

10% Micro-phenocrysts: plagioclase > olivine (strong iddingsite alteration)



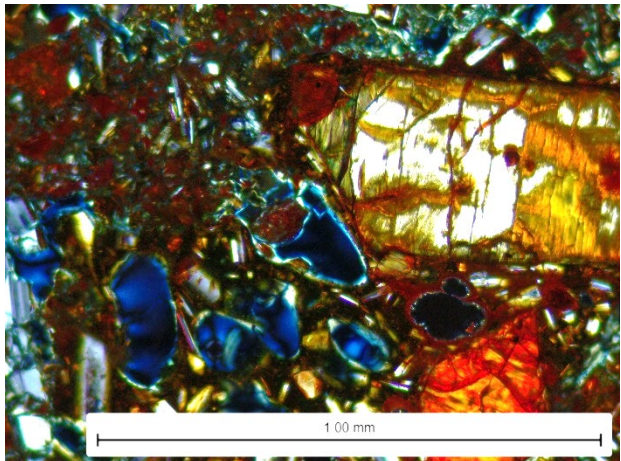
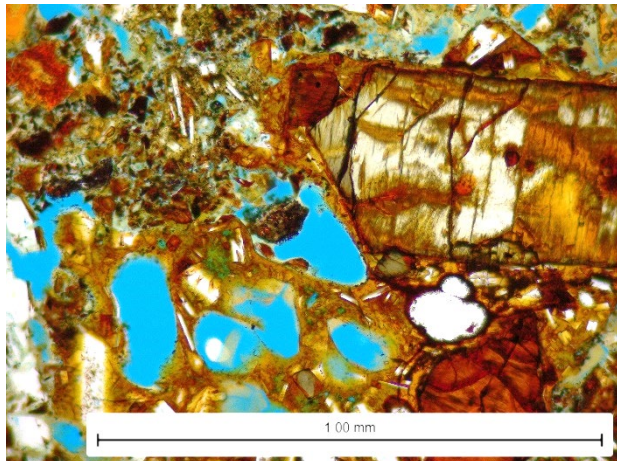
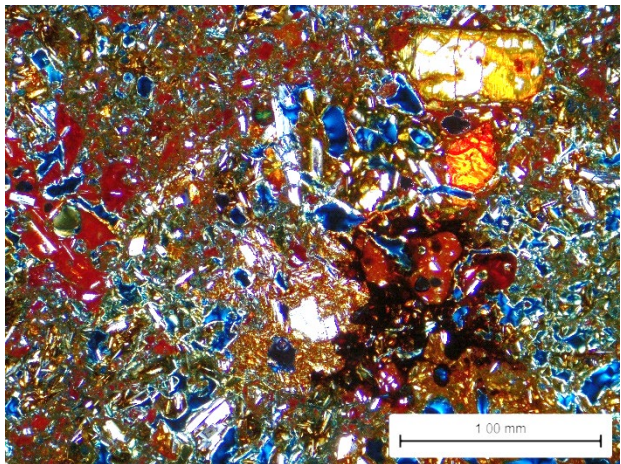
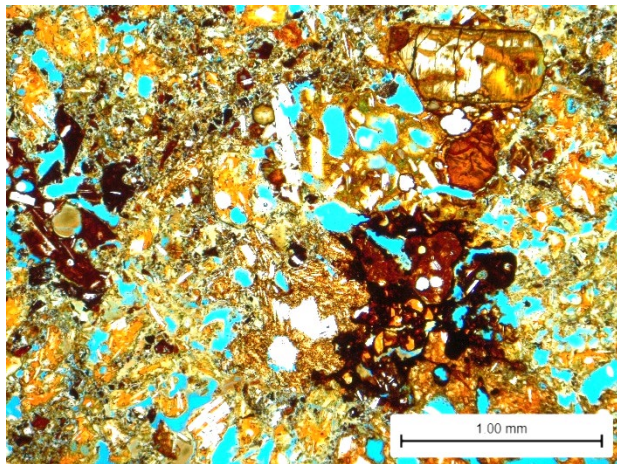
Sample BH19BV-01A

Location: 2 km north of Hoover Flat Reservoir; 14.4 km SE of Bieber

Map Unit: Tpbu

Interpretation: basaltic lapilli tuff, fall deposit

Texture: Very angular ash and fine lapilli clasts (up to 5mm diameter) of glassy to mildly altered finely-vesicular olivine, clinopyroxene, plagioclase basalt. Rock is lithified and clast boundaries are indistinct. Fresh basaltic glass (sideromelane) is orange-brown and locally altered to dark-brown and green.



Sample BH19BV-02

Location: Along Juniper Road; 12 km SE of Bieber

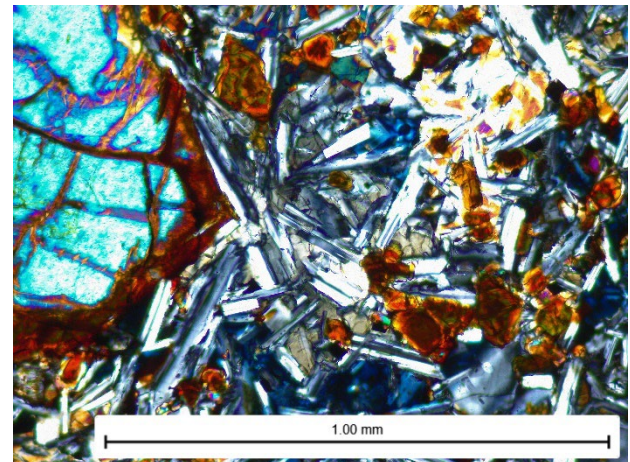
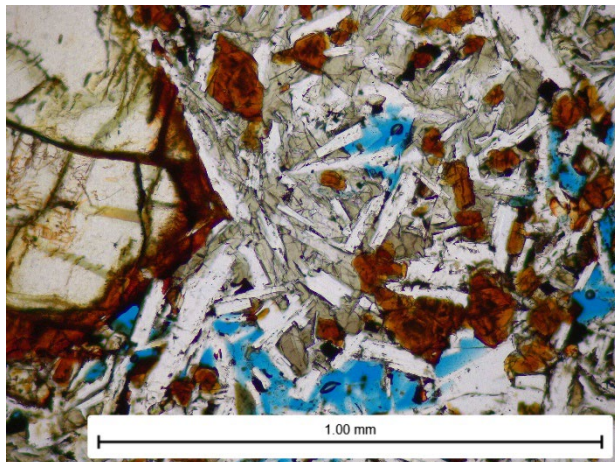
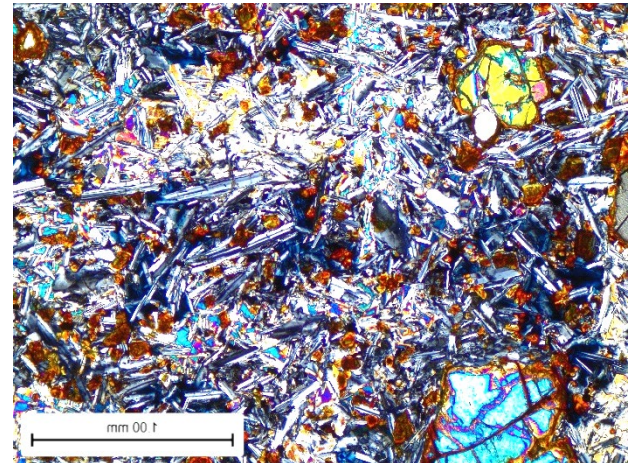
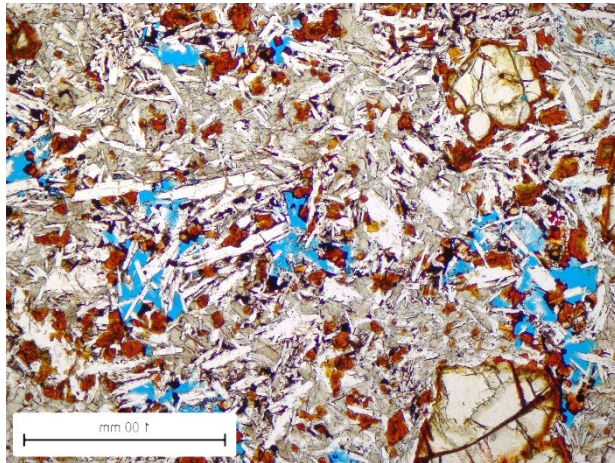
Map Unit: originally mapped as Tpbu (prob QTb)

Interpretation: basaltic lava

Texture: fine-grained subophitic and micro-diktytaxitic groundmass (<1mm); optically-continuous intergrown subophitic clinopyroxene (green in PPL) up to 3mm.

No phenocrysts.

Plagioclase = clinopyroxene > olivine (strong iddingsite alteration) >> opaques



Sample BH19BV-03

Location: Small mesa cap along South Fork of Juniper Creek; 11.5 km SE of Bieber

Map Unit: QTb

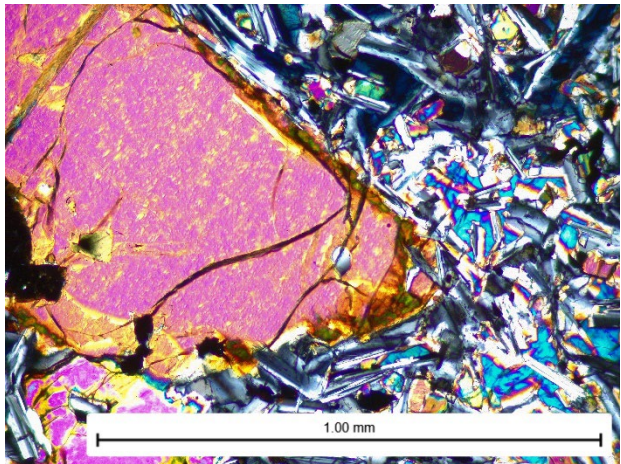
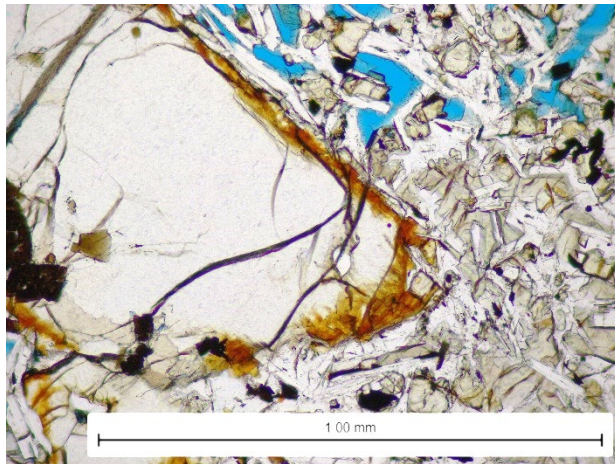
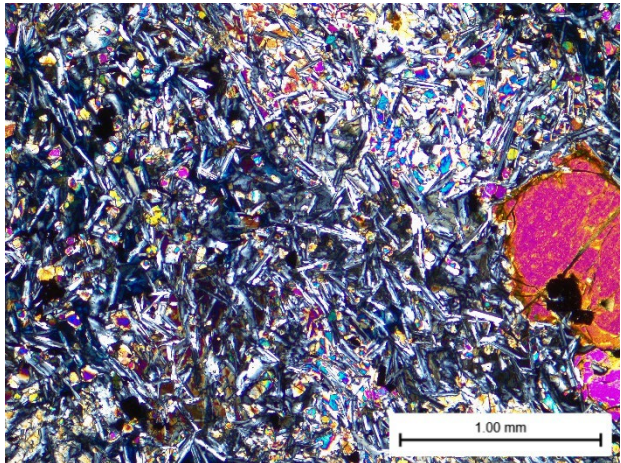
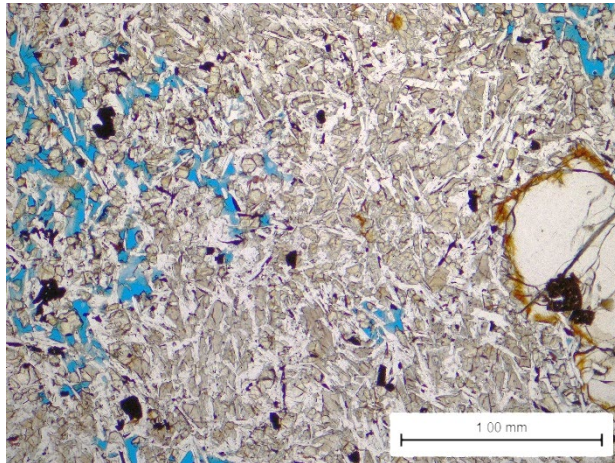
Interpretation: basaltic lava

Texture: fine-grained ophitic and patchy diktytaxitic groundmass (<1mm); optically-continuous intergrown subophitic clinopyroxene (green-tan in PPL) up to 2mm

Mineralogy:

99% Groundmass: Plagioclase = clinopyroxene > opaques >> olivine

<1% Phenocrysts of olivine up to 2 mm (mild iddingsite alteration)



Sample BH19BV-04

Location: Along Stone Breaker Road; 4.2 km SE of junction with Susanville Road

Map Unit: QTb

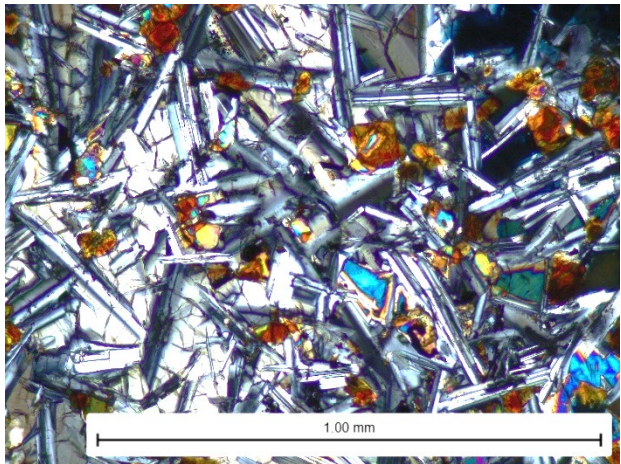
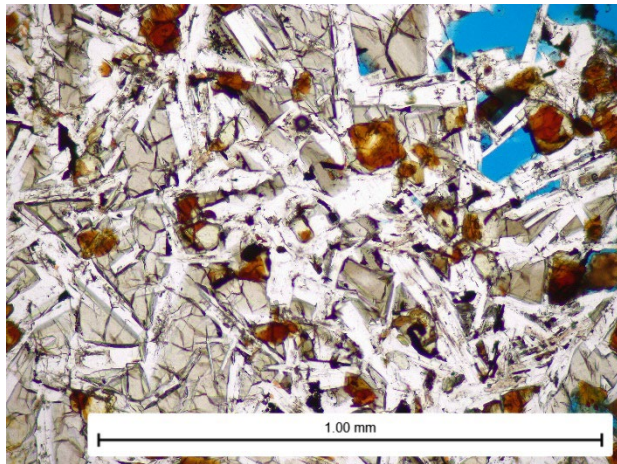
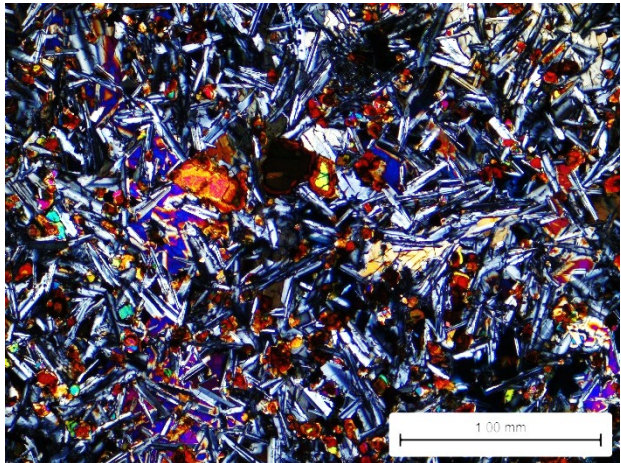
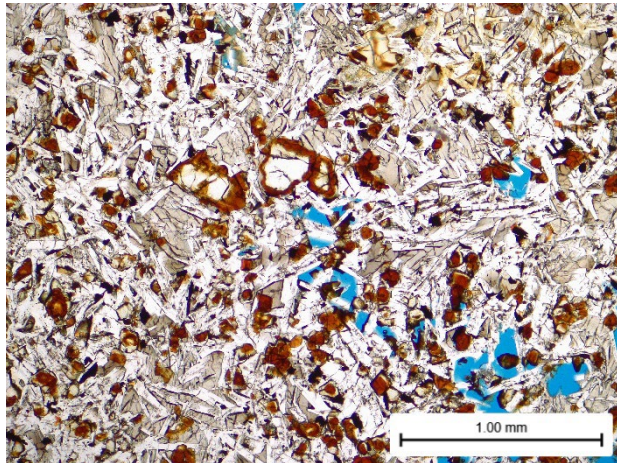
Interpretation: basaltic lava

Texture: fine-grained ophitic and patchy diktytaxitic groundmass (<1mm); optically-continuous intergrown subophitic clinopyroxene (green-tan in PPL) up to 2mm.

Mineralogy:

No phenocrysts.

Plagioclase = clinopyroxene > olivine (moderate iddingsite alteration) > opaques



Sample BH19BV-05

Location: North side of Susanville Road; 2.6 km west of junction with Highway 139

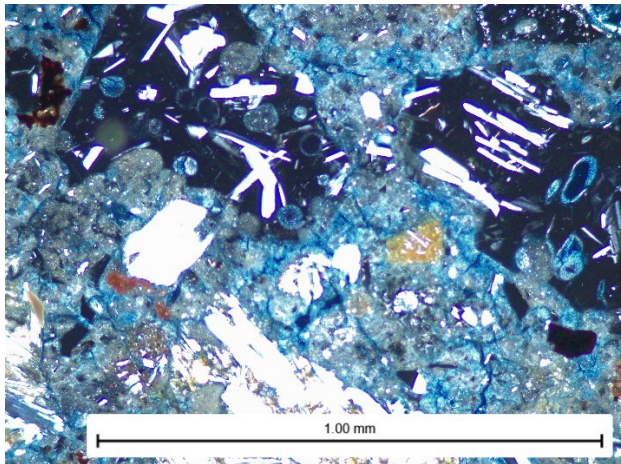
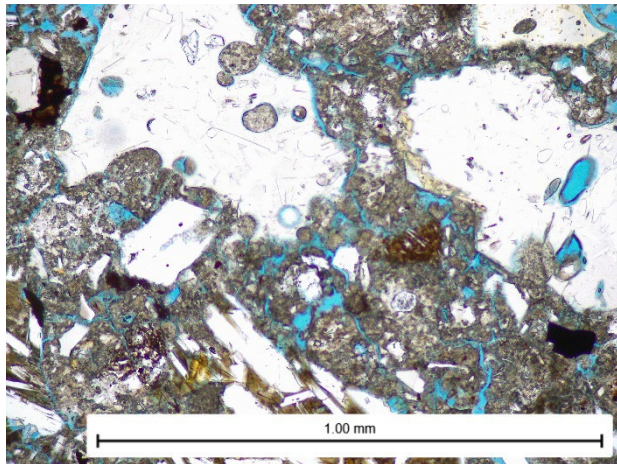
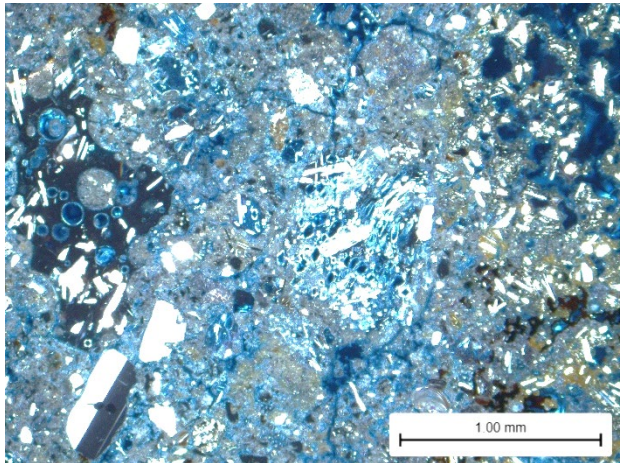
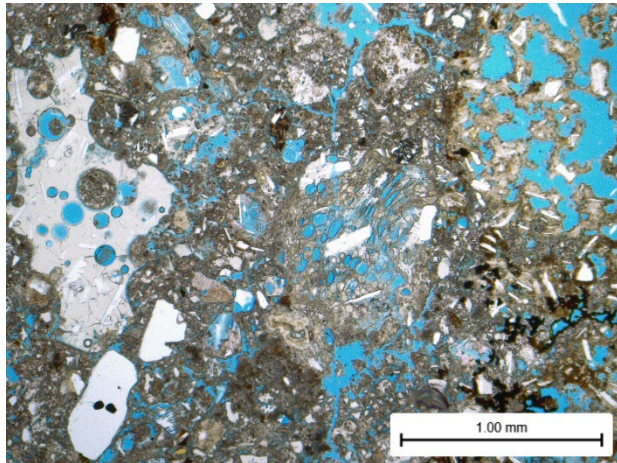
Map Unit: Ttsu (upper Bieber Formation)

Interpretation: impure silicic tuff; possibly a reworked deposit

Texture: Poorly-sorted ash to fine lapilli (up to 5mm). Clasts are crystal to lithic and angular to subangular.

Mineralogy:

Composed of fresh glassy (isotropic) vesicular rhyolite lithics, feldspar, quartz, and minor intermediate to mafic lithics



Sample BH19BV-06

Location: Along Ash Valley Road; 6.3 km SE of Adin

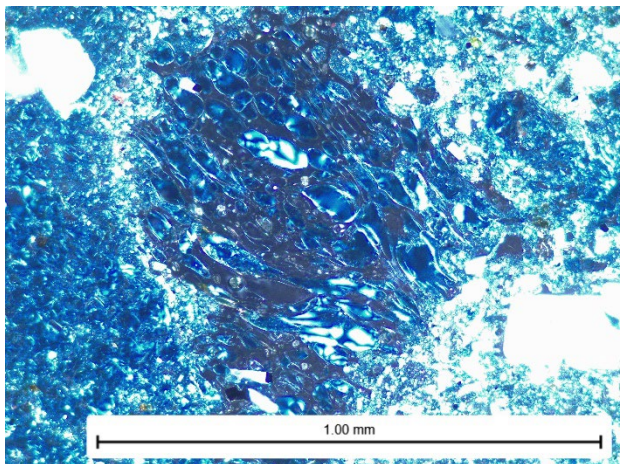
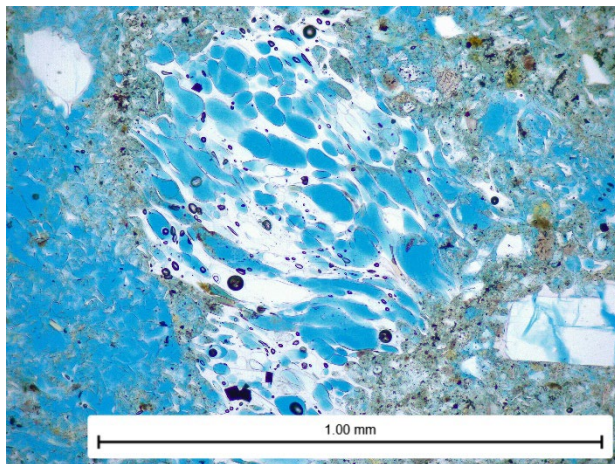
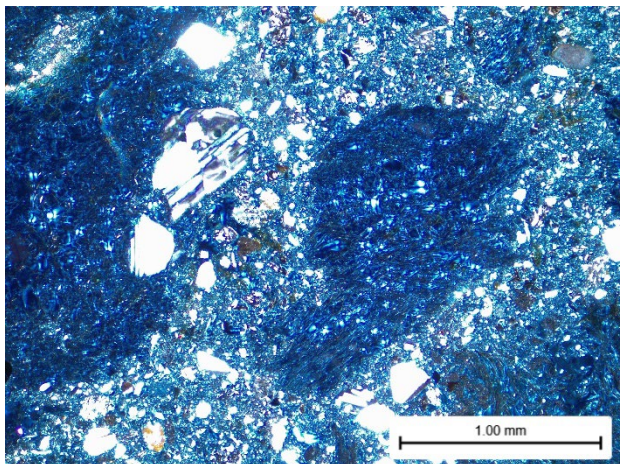
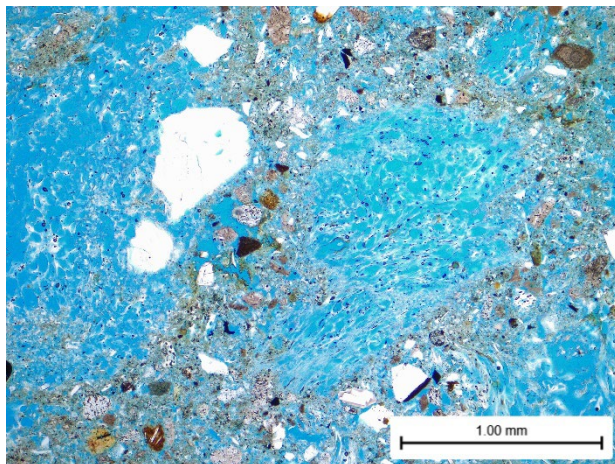
Map Unit: Ttsu (upper Bieber Formation)

Interpretation: Dacitic(?) crystal-lithic lapilli tuff. Probably reworked.

Texture: Poorly-sorted fine-ash to fine lapilli (up to 5mm). Angular to subangular highly-inflated pumice lapilli with large (up to 2mm plagioclase phenocrysts) set in a fine crystal-vitric ash matrix that includes some plagioclase-rich andesitic(?) lithic fragments.

Mineralogy:

Pumacious glass is fresh and isotropic. Lack of quartz and ferromagnesian grains suggests pumice is dacitic.



Sample BH19BV-08

Location: Roadcut on Hwy 299; 10 km road distance west of Nubieber

Map Unit: Tpbl

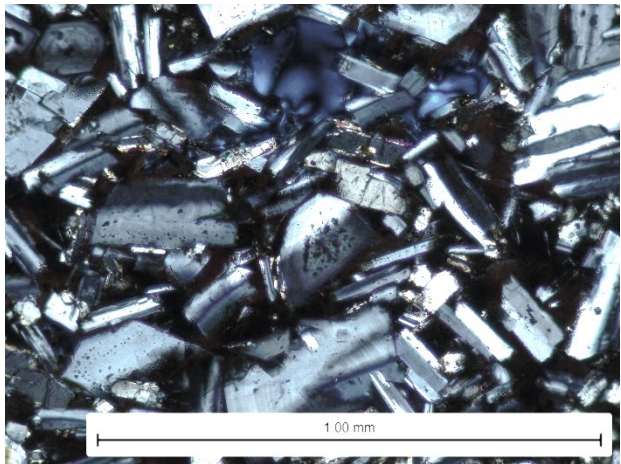
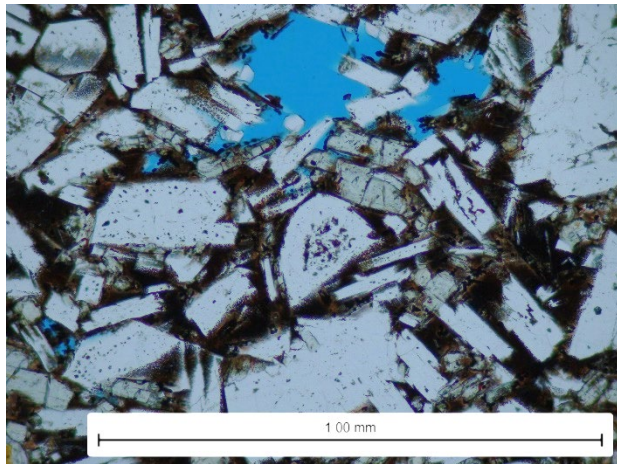
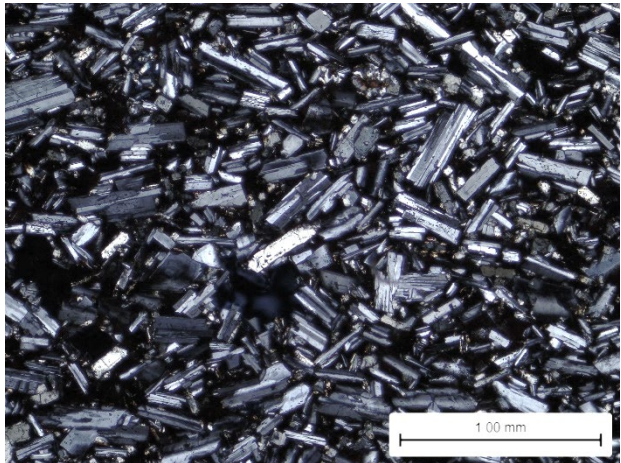
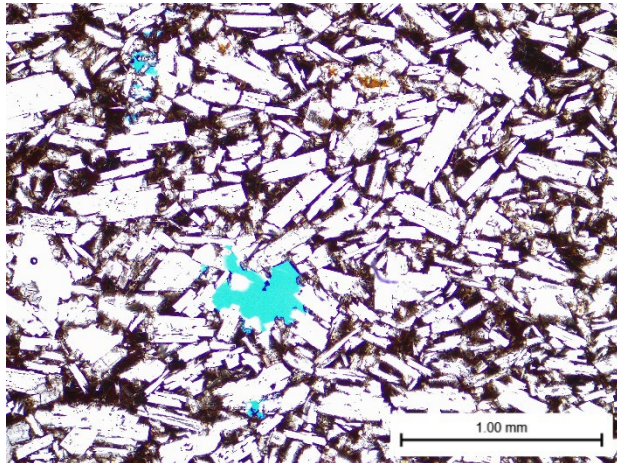
Interpretation: basaltic andesite lava

Texture: fine-grained intersertal groundmass (<1mm); with very little, scattered diktytaxitic vesicularity.

Mineralogy:

No phenocrysts.

Plagioclase > devitrified red-brown glass > orthopyroxene >> olivine (strong iddingsite alteration)



Sample BH19BV-10

Location: Roadside exposure in upper Barber Canyon; 1.4 km east of Fox Mtn

Map Unit: Tb

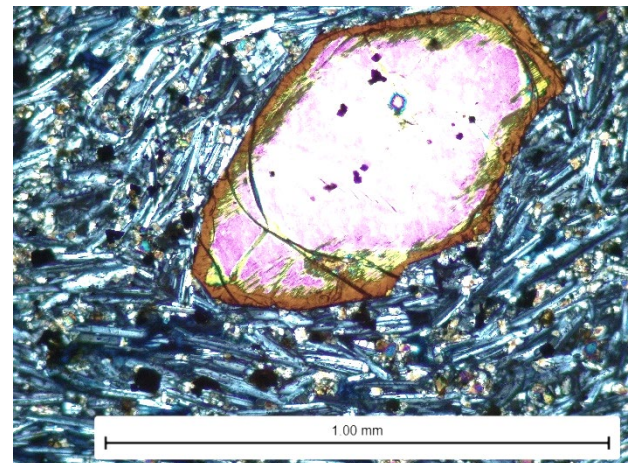
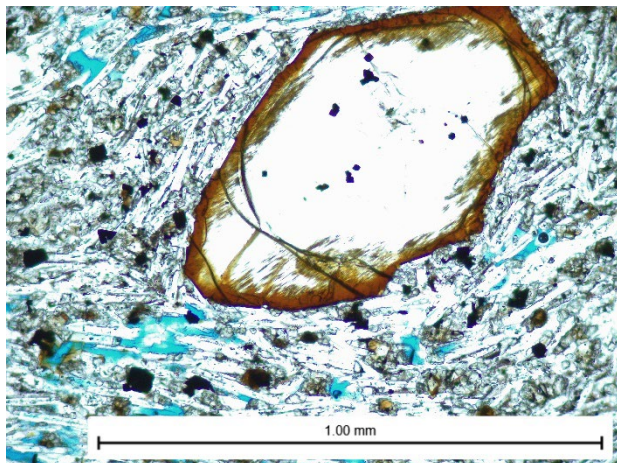
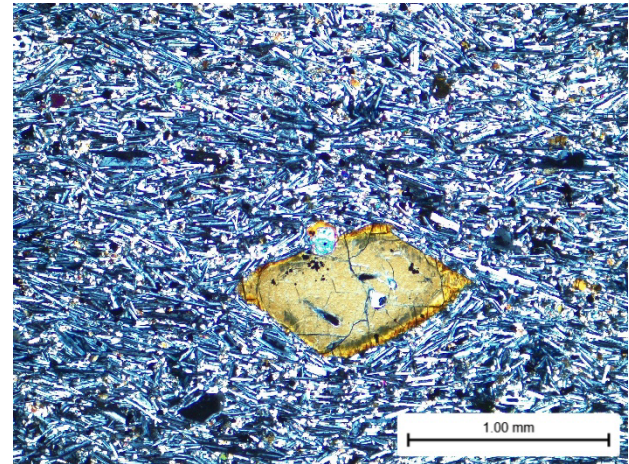
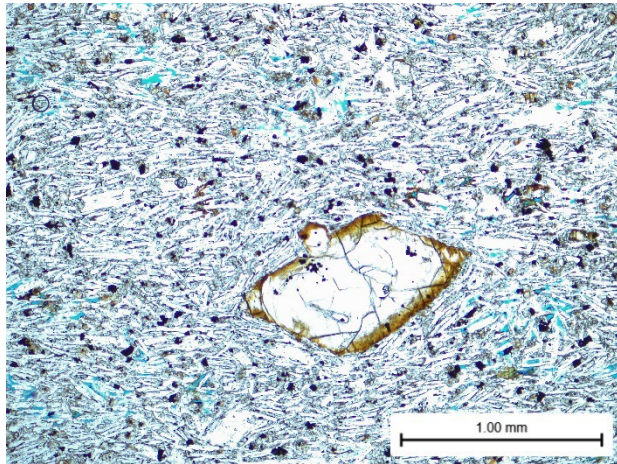
Interpretation: basaltic lava

Texture: fine-grained strongly-trachytic with intergranular groundmass (<1mm); scattered, minor micro-diktytaxitic voids.

Mineralogy:

97% Groundmass: plagioclase > clinopyroxene > opaques

3% Phenocrysts (up to 2 mm) of olivine (mild iddingsite alteration) and a trace of plagioclase



Sample BH19BV-11

Location: Top of NW-trending ridge; 1.2 km SW of Fox Mtn; same locality as Geothermex dated sample of 13.8 Ma.

Map Unit: Tb

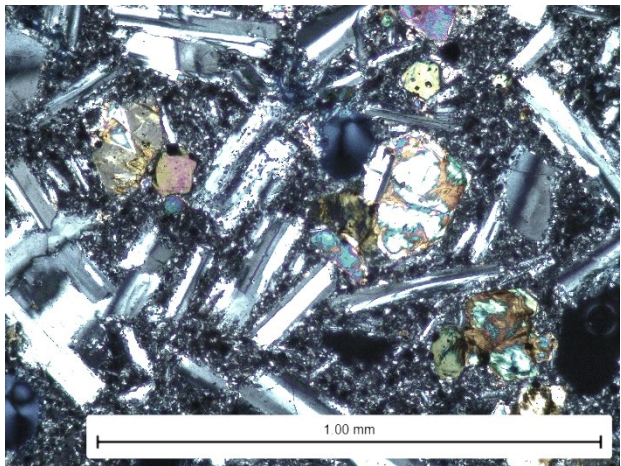
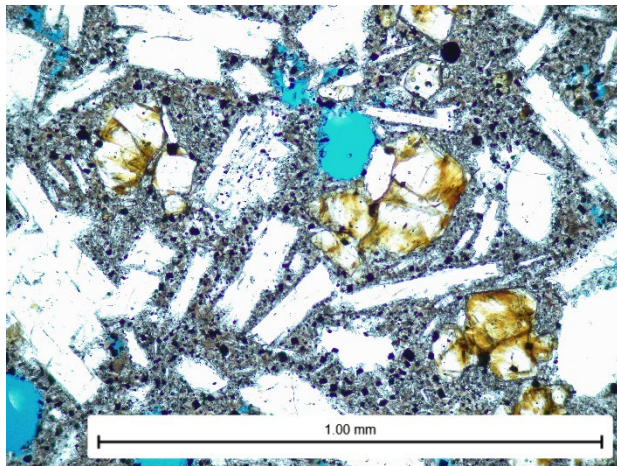
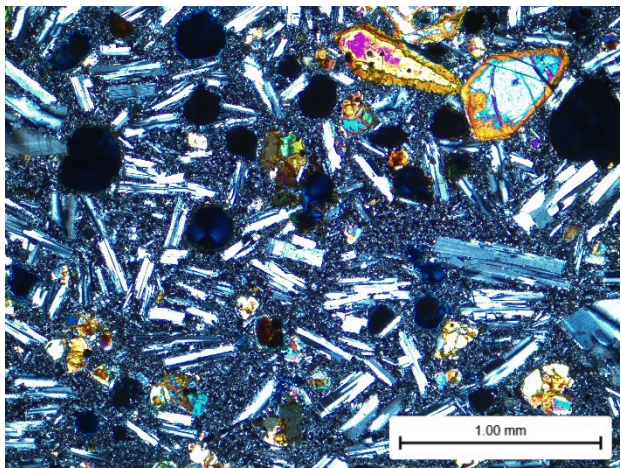
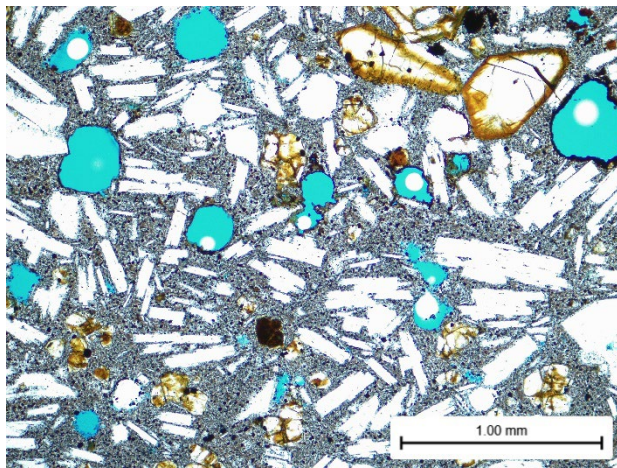
Interpretation: basaltic lava. Erupted with very fluid/liquid groundmass that probably quenched to glass and partly devitrified, massive groundmass texture.

Texture: Strongly bimodal texture with phenocrysts set in an extremely fine-grained (intersertal to vitrophyric); 3% round vesicles up to 0.5mm diameter.

Mineralogy:

40% Groundmass: microgranular felsic and glass(?) with opaques (all < 0.01mm)

60% Phenocrysts (0.1 – 2.5 mm) Plagioclase >> olivine (mild iddingsite alteration)



Sample BH19BV-12

Location: Lower Howell Canyon; 5.5 km east of Splawn Mtn.

Map Unit: Tb

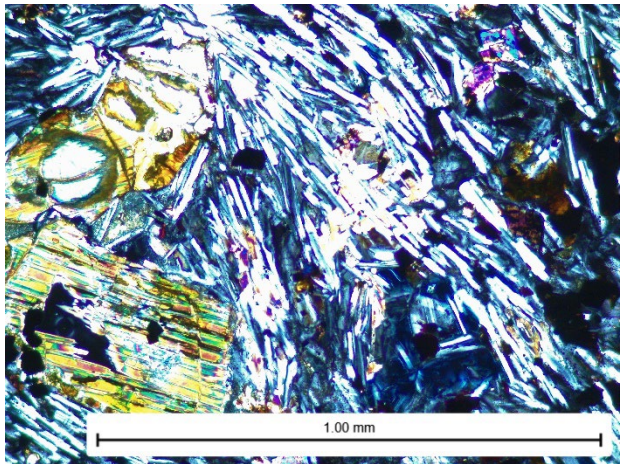
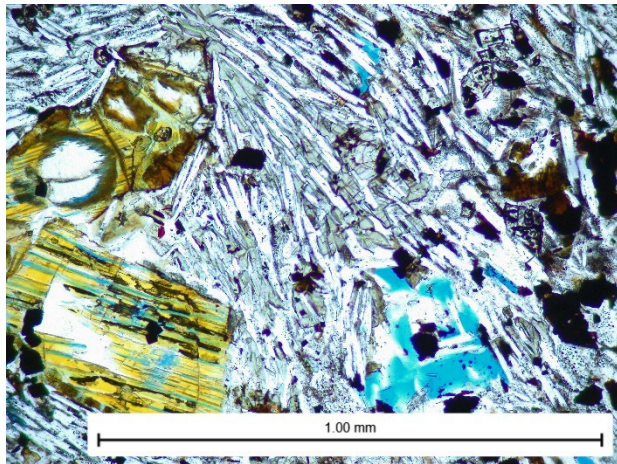
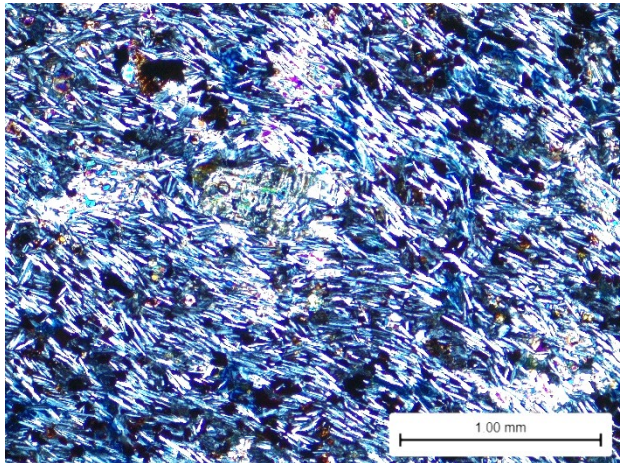
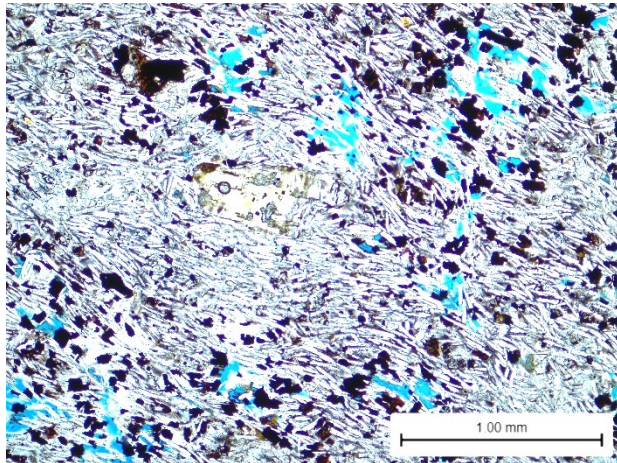
Interpretation: basaltic lava.

Texture: Very fine-grained with strongly trachytic texture; groundmass is a combination of intergranular, intersertal, and subophitic texture; patchy micro-diktytaxitic vesicularity throughout.

Mineralogy:

99% Groundmass: .01-0.2 Plagioclase > clinopyroxene > opaque > brown-gray glass > olivine

1% Phenocrysts (0.3 – 1 mm) Olivine (strong iddingsite alteration and locally replaced by cpx and opaque)



Sample BH19BV-13

Location: Near spillway of Lower Roberts Reservoir

Map Unit: QTb

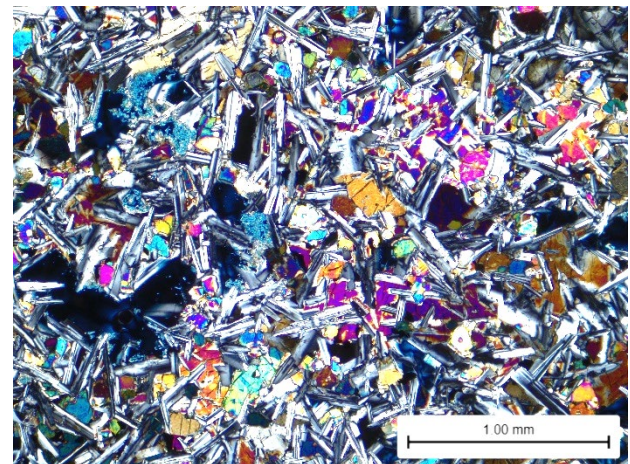
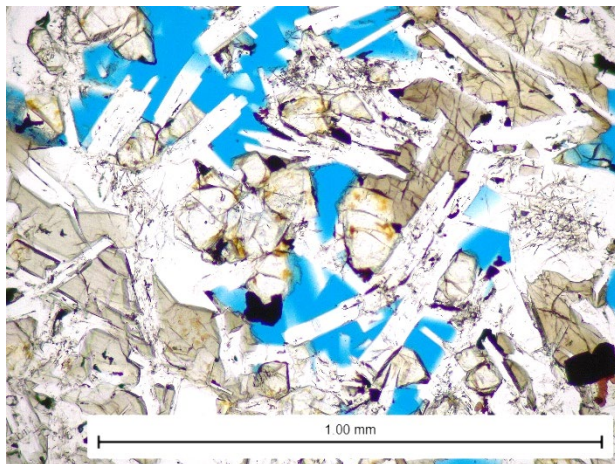
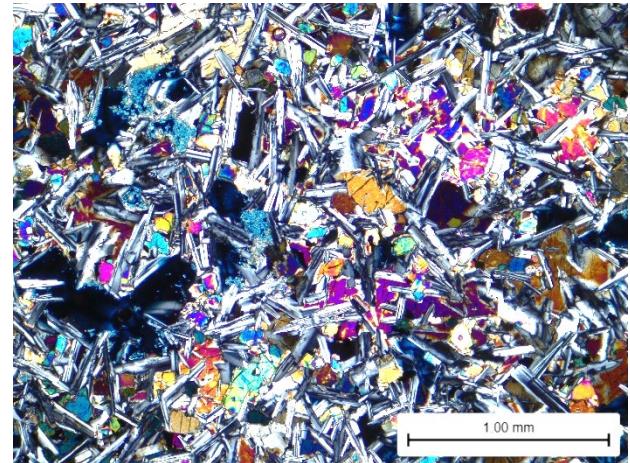
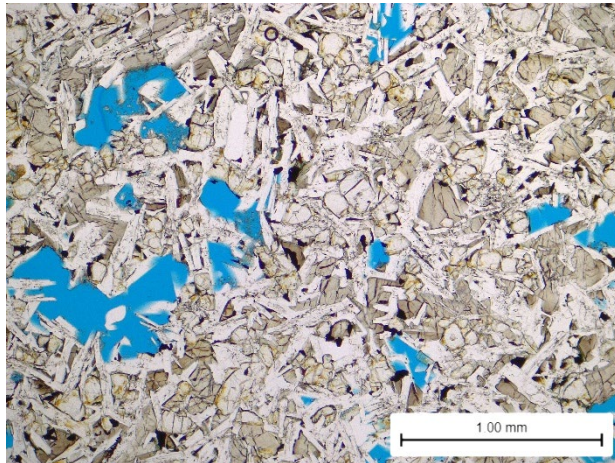
Interpretation: basaltic lava

Texture: fine-grained intergranular and diktytaxitic groundmass (<1mm); minor optically-continuous intergrown subophitic clinopyroxene (green-tan in PPL) up to 1mm.

Mineralogy:

No phenocrysts.

Plagioclase = clinopyroxene > olivine (incipient iddingsite alteration) > opaques



Sample BH19BV-15

Location: Roadcut on Lookout-Hackamore Road; 1.9 km NE of Splawn Mtn.

Map Unit: Ttsl (lower Bieber Formation)

Interpretation: volcanic sandstone. Mostly well rounded, silicic clasts; well size sorted

Sample BH19BV-16A

Location: Roadcut on Lookout-Hackamore Road; 1.7 km NE of Splawn Mtn.

Map Unit: Ttsl (lower Bieber Formation)

Interpretation: volcanic sandstone. Mostly well rounded, silicic clasts; well size sorted

Sample BH19BV-16B

Location: Roadcut on Lookout-Hackamore Road; 1.7 km NE of Splawn Mtn.

Map Unit: Ttsl (lower Bieber Formation)

Interpretation: volcanic sandstone. Mostly well rounded, silicic clasts; fragments of welded tuff and pumice; very altered

Sample BH19BV-17

Location: Roadcut on Lookout-Hackamore Road; 1.7 km NE of Splawn Mtn.

Map Unit: Originally mapped as Tpb1 (Probably QTb)

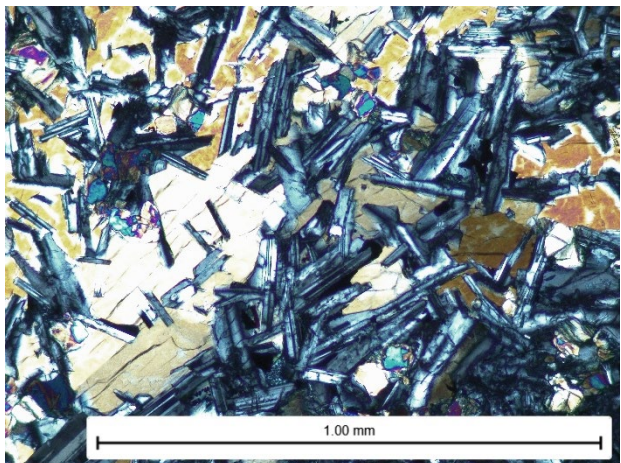
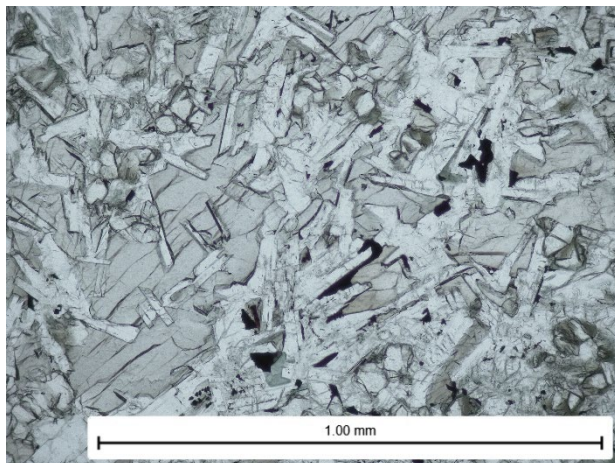
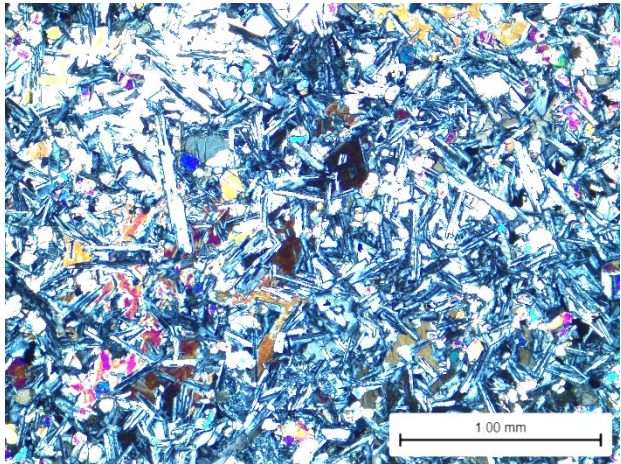
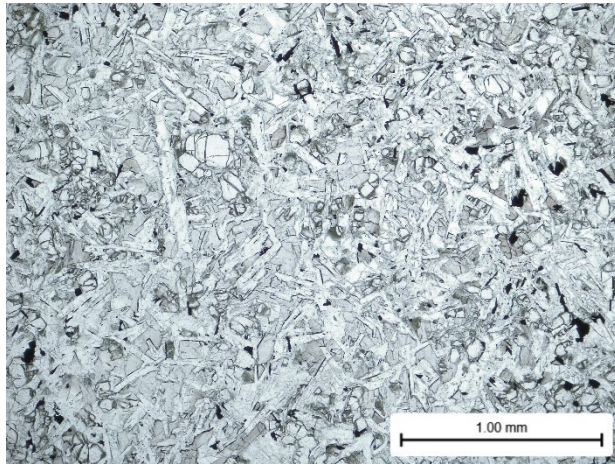
Interpretation: basaltic shallow intrusive or lava

Texture: fine-grained; patchy optically-continuous intergrown subophitic clinopyroxene (tan in PPL) up to 2mm; No vesicularity

Mineralogy:

No phenocrysts.

Plagioclase = clinopyroxene > olivine (incipient green bowlingite alteration) > opaques



Sample BH19BV-18

Location: West end of Widow Valley

Map Unit: Tpbu

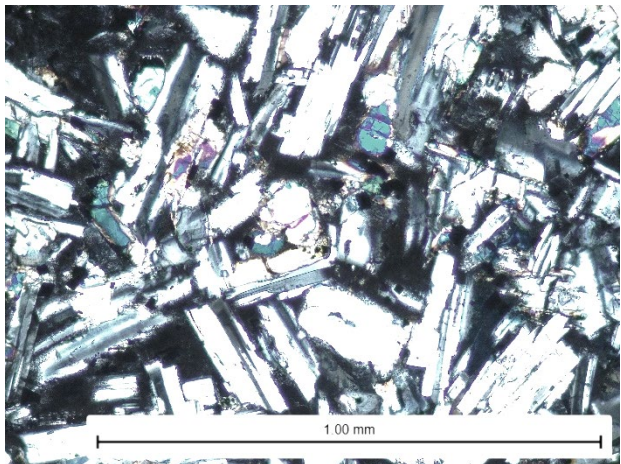
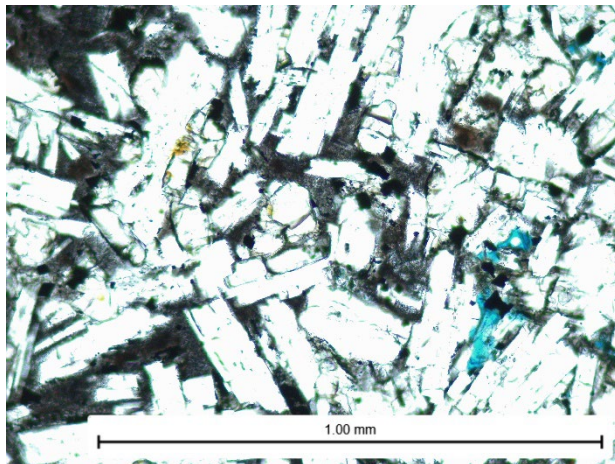
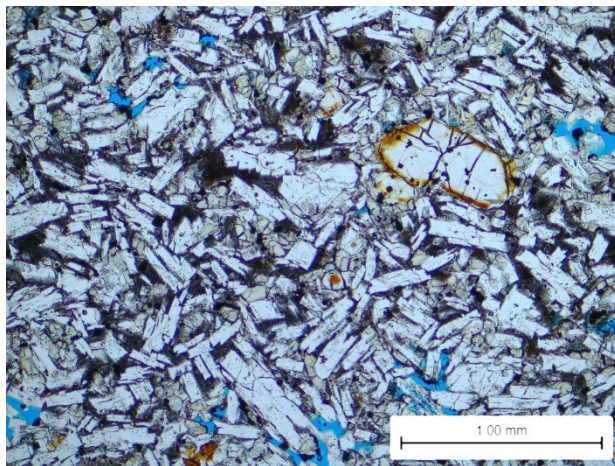
Interpretation: basaltic andesite lava

Texture: fine-grained intersertal to intergranular groundmass (up to ~1mm); with scattered diktytaxitic vesicularity.

Mineralogy:

No outsized phenocrysts but some olivine grains are up to about 1mm diameter.

Plagioclase > dark gray devitrified glass = orthopyroxene + clinopyroxene > olivine (mild iddingsite alteration)



Attachment D
Well Log Analysis

Well Info - Northwest

WCR_Number	Legacy_Log_Num	Lat_Approx	Lon_Approx	WCR_Link	File_Name	Total_Depth_ft	Alluvial_Thkness_ft	Pct_Alluvial
WCR1980-006723	112441	41.24858	-121.17223	https://cadwr.app.box.com/v/WellCompletionReports/file/463440903500	39N07E04_112441.pdf	140	71	51%
WCR2006-007508	1093237	41.23388	-121.17228	https://cadwr.app.box.com/v/WellCompletionReports/file/463438494236	39N07E09_1093237.pdf	145	125	86%
WCR1993-009774	431766	41.23365	-121.19156	https://cadwr.app.box.com/v/WellCompletionReports/file/463434667365	39N07E08_431766.pdf	185	100	54%
WCR1992-013718	393960	41.23363	-121.21039	https://cadwr.app.box.com/v/WellCompletionReports/file/463448070235	39N07E07_393960.pdf	205	127	62%
WCR2006-007502	1093234	41.24839	-121.2104	https://cadwr.app.box.com/v/WellCompletionReports/file/463448962037	39N07E06_1093234.pdf	225	85	38%
WCR2004-011016	1075204	41.27754	-121.21054	https://cadwr.app.box.com/v/WellCompletionReports/file/463444799136	40N07E30_1075204.pdf	775	435	56%

Lithology - Northwest

WCR_Number	TopDepth_ft	BotDepth_ft	Transcription	Lithology	Alluvial	Length_ft
WCR1980-006723	0	4	Soil Red	soil	1	4
WCR1980-006723	4	12	LAVA Broken	rock	0	8
WCR1980-006723	12	46	LAVA HARD	rock	0	34
WCR1980-006723	46	64	Cemented Material Small Gravel	gravel	1	18
WCR1980-006723	64	75	LAVA HARD	rock	0	11
WCR1980-006723	75	109	Cemented 1/2 & smaller gravel	gravel	1	34
WCR1980-006723	109	126	Very Hard Lava	rock	0	17
WCR1980-006723	126	139	Cemented material 1/2&smaller gravel	gravel	1	13
WCR1980-006723	138	140	Cemented clay	clay	1	2
WCR2006-007508	0	3	brown clay	clay	1	3
WCR2006-007508	3	10	brown sandstone	sand	1	7
WCR2006-007508	10	30	hard grey rock	rock	0	20
WCR2006-007508	30	90	brown clay & sandstone	clay	1	60
WCR2006-007508	90	105	porous brown sandstone	sand	1	15
WCR2006-007508	105	120	white pumice&sand	sand	1	15
WCR2006-007508	120	130	Black cinders & sand	sand	1	10
WCR2006-007508	130	135	sticky brown clay	clay	1	5
WCR2006-007508	135	145	porous brown sandstone	sand	1	10
WCR1993-009774	0	1	top soil	soil	1	1
WCR1993-009774	1	30	brown clay	clay	1	29
WCR1993-009774	30	50	green&black rock	rock	0	20
WCR1993-009774	50	70	hard black rock	rock	0	20
WCR1993-009774	70	105	grey lava rock	rock	0	35
WCR1993-009774	105	115	black rock	rock	0	10
WCR1993-009774	115	185	green sandstone layers of clay	sand	1	70
WCR1992-013718	0	2	top soil	soil	1	2
WCR1992-013718	2	44	hard grey rock	rock	0	42
WCR1992-013718	44	107	soft red&brown clay	clay	1	63
WCR1992-013718	107	119	hard black rock	rock	0	12
WCR1992-013718	119	150	grey rock	rock	0	31
WCR1992-013718	125	140	brown sandstone	sand	1	15
WCR1992-013718	140	180	grey sandstone	sand	1	40
WCR1992-013718	180	187	red&grey sandstone fractured	sand	1	7
WCR1992-013718	187	205	black rock	rock	0	18
WCR2006-007502	0	2	br clay	clay	1	2
WCR2006-007502	2	12	boulders & soil	boulders	1	10
WCR2006-007502	12	25	brown sandstone	sand	1	13
WCR2006-007502	25	45	hard grey rock	rock	0	20
WCR2006-007502	45	70	broken grey lava & clay	rock	0	25
WCR2006-007502	70	90	hard grey rock	rock	0	20
WCR2006-007502	90	105	grey lava some clay	rock	0	15
WCR2006-007502	105	125	brown sandstone	sand	1	20
WCR2006-007502	125	185	grey lava rock & talc	rock	0	60
WCR2006-007502	185	200	green clay & sandstone	clay	1	15
WCR2006-007502	200	225	porous green sandstone	sand	1	25
WCR2004-011016	0	8	brown clay	clay	1	8
WCR2004-011016	8	10	brown sandstone	sand	1	2
WCR2004-011016	10	27	grey rock	rock	0	17
WCR2004-011016	27	33	brown lava rock	rock	0	6
WCR2004-011016	75	104	broken grey rock	rock	0	29
WCR2004-011016	104	110	red lava rock	rock	0	6

WCR_Number	TopDepth_ft	BotDepth_ft	Transcription	Lithology	Alluvial	Length_ft
WCR2004-011016	110	130	broken brown and grey rock	rock	0	20
WCR2004-011016	130	164	grey rock	rock	0	34
WCR2004-011016	164	190	brown lava rock & talc	rock	0	26
WCR2004-011016	190	215	grey rock	rock	0	25
WCR2004-011016	215	220	brown lava	rock	0	5
WCR2004-011016	220	270	broken fractured grey & brown lava	rock	0	50
WCR2004-011016	270	307	grey rock	rock	0	37
WCR2004-011016	307	315	red lava rock	rock	0	8
WCR2004-011016	315	332	grey rock	rock	0	17
WCR2004-011016	332	345	brown lava rock	rock	0	13
WCR2004-011016	345	355	tan clay	clay	1	10
WCR2004-011016	355	360	black lava	rock	0	5
WCR2004-011016	360	370	grey sandstone&pumice	sand	1	10
WCR2004-011016	370	375	green clay	clay	1	5
WCR2004-011016	375	380	loose black sand	sand	1	5
WCR2004-011016	380	460	grey & green sandstone	sand	1	80
WCR2004-011016	460	575	green clay some sticky	clay	1	115
WCR2004-011016	575	580	brown clay rotten wood	clay	1	5
WCR2004-011016	580	620	porous green sandstone	sand	1	40
WCR2004-011016	620	675	green clay	clay	1	55
WCR2004-011016	675	710	white pumice	sand	1	35
WCR2004-011016	710	775	hard grey sandstone	sand	1	65

Well Info - Southeast

WCR_Number	Legacy_Log_Num	Lat_Approx	Lon_Approx	WCR_Link	File_Name	Total_Depth_ft	Alluvial_Thkness_ft	Pct_Alluvial
WCR1993-009636	406921	41.07416	-121.05718	https://cadwr.app.box.com/v/WellCompletionReports/file/461652724524	37N08E04_406921.pdf	302	24	8%
WCR2006-009179	1074760	41.08871	-120.99936	https://cadwr.app.box.com/v/WellCompletionReports/file/461646165434	38N08E36_1074760.pdf	246	246	100%
WCR1977-007356	14591	41.01521	-120.99902	https://cadwr.app.box.com/v/WellCompletionReports/file/461650296685	37N08E25_14591.pdf	648	299	46%
WCR1985-008010	091146	40.98635	-120.94095	https://cadwr.app.box.com/v/WellCompletionReports/file/461640914068	36N09E04_091146.pdf	152	70	46%

Lithology - Southeast

WCR_Number	TopDepth_ft	BotDepth_ft	Transcription	Lithology	Alluvial	Length_ft
WCR1993-009636	0	1	top soil	soil	1	1
WCR1993-009636	1	8	clay brown	clay	1	7
WCR1993-009636	8	19	clay brown lava boulders	clay	1	11
WCR1993-009636	19	38	lava gray	rock	0	19
WCR1993-009636	38	43	clay brown	clay	1	5
WCR1993-009636	43	68	lava gray frac	rock	0	25
WCR1993-009636	68	121	lava gray	rock	0	53
WCR1993-009636	121	180	lava gray clay seams	rock	0	59
WCR1993-009636	180	231	lava gray frac	rock	0	51
WCR1993-009636	231	258	lava gray	rock	0	27
WCR1993-009636	258	302	lava gray sandstone seams	rock	0	44
WCR2006-009179	0	1	top soil	soil	1	1
WCR2006-009179	1	20	brown sandstone	sand	1	19
WCR2006-009179	20	31	dark brown sandstone	sand	1	11
WCR2006-009179	31	60	brown sandy clay	clay	1	29
WCR2006-009179	60	69	brown sandstone	sand	1	9
WCR2006-009179	69	82	brown sand loose	sand	1	13
WCR2006-009179	82	98	black clay	clay	1	16
WCR2006-009179	98	115	yellow clay	clay	1	17
WCR2006-009179	115	132	gray clay	clay	1	17
WCR2006-009179	132	161	dark gray clay	clay	1	29
WCR2006-009179	161	170	green clay	clay	1	9
WCR2006-009179	170	225	gray clay	clay	1	55
WCR2006-009179	225	243	green clay	clay	1	18
WCR2006-009179	243	246	gray with white sand loose	sand	1	3
WCR1977-007356	0	2	soil & boulders	soil	1	2
WCR1977-007356	2	75	brown sandy claystone	clay	1	73
WCR1977-007356	75	79	boulders & clay	boulders	1	4
WCR1977-007356	79	83	brown sandstone	sand	1	4
WCR1977-007356	83	146	boulders & clay	boulders	1	63
WCR1977-007356	146	165	black basalt	rock	0	19
WCR1977-007356	165	195	red&brown basalt	rock	0	30
WCR1977-007356	195	200	black basalt	rock	0	5
WCR1977-007356	200	212	gray basalt hard	rock	0	12
WCR1977-007356	212	218	red basalt	rock	0	6
WCR1977-007356	218	225	black basalt some clay	rock	0	7
WCR1977-007356	225	290	red basalt	rock	0	65
WCR1977-007356	290	315	gray basalt hard	rock	0	25
WCR1977-007356	315	335	redish brown basalt	rock	0	20
WCR1977-007356	335	360	redish gray basalt	rock	0	25
WCR1977-007356	360	435	black rock fractured & clay	rock	0	75
WCR1977-007356	435	525	brown sandstone & pumice	sand	1	90
WCR1977-007356	525	540	black basalt & clay	rock	0	15
WCR1977-007356	540	560	gray basalt hard	rock	0	20
WCR1977-007356	560	585	red cinders	rock	0	25
WCR1977-007356	585	605	brown sandstone	sand	1	20
WCR1977-007356	605	648	brown sandstone & pumice	sand	1	43
WCR1985-008010	0	1	top soil	soil	1	1
WCR1985-008010	1	36	brn clay hard pan	clay	1	35
WCR1985-008010	36	40	grey rock	rock	0	4
WCR1985-008010	40	58	brn sand stone	sand	1	18

WCR_Number	TopDepth_ft	BotDepth_ft	Transcription	Lithology	Alluvial	Length_ft
WCR1985-008010	58	135	brn rock	rock	0	77
WCR1985-008010	135	136	broken rock	rock	0	1
WCR1985-008010	136	152	large gravel 1" loose	gravel	1	16

Attachment E

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