Big Valley Groundwater Sustainability Plan Advisory Committee (GSPAC)
Hybrid Meeting, via Zoom Conference Call and In-Person
December 17, 2021, 11:00 a.m.–1:30 p.m.

Meeting Summary

The Big Valley Groundwater Sustainability Plan Advisory Committee (GSPAC) met on December 17, 2021, via Zoom videoconference and in-person in the Lake County Courthouse, Third Floor, Conference Room C. Below is a summary of key items discussed during the meeting. This document is not intended to be a meeting transcript; it focuses on the main points of the group’s discussion and highlights action items and recommendations that arise from the meeting. The agenda and full recording of the videoconference meeting is available on the Lake County Water Resources website at http://www.lakecountyca.gov/Government/Directory/WaterResources/Programs___Projects/Big_Valley_GSP/Advisory_Committee_Documents.htm

ACTION ITEMS

- For all GSPAC meetings and related topics, comments may be submitted to the committee via email at water.resources@lakecountyca.gov. Please include “GSPAC” in the subject line of all related emails.

GSPAC RECOMMENDATIONS

- During this meeting, the GSPAC provided their level of agreement on the overall GSP package. The level of agreement by each GSPAC member is found in part 6.1 of these notes. Levels of agreement will be shared as guidance with the Big Valley Groundwater Sustainability Agency (GSA) Board of Directors.

1. ROLL CALL

<table>
<thead>
<tr>
<th>GSPAC Attendee Name</th>
<th>Member</th>
<th>Status</th>
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<tbody>
<tr>
<td>Brenna Sullivan</td>
<td>Lake County Farm Bureau</td>
<td>Present</td>
</tr>
<tr>
<td>Pat Scully</td>
<td>Scully Packing Company</td>
<td>Present</td>
</tr>
<tr>
<td>David Weiss</td>
<td>Bella Vista Farming Company</td>
<td>Present</td>
</tr>
<tr>
<td>Peter Windrem</td>
<td>Chi Council for the Clear Lake Hitch</td>
<td>Present</td>
</tr>
<tr>
<td>Kyle Reams</td>
<td>Kelseyville Unified School District</td>
<td>Present</td>
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<tr>
<td>Sarah Ryan</td>
<td>Big Valley Band of Pomo Indians</td>
<td>Present</td>
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<tr>
<td>Scott Hornung</td>
<td>Lake County Special Districts</td>
<td>Present</td>
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<tr>
<td>Valerie Nixon</td>
<td>Lake County Land Trust</td>
<td>Present</td>
</tr>
<tr>
<td>Sky Hoyt</td>
<td>Domestic Well Owner</td>
<td>Present</td>
</tr>
<tr>
<td>Marina Deligiannis</td>
<td>Lake County Watershed Protection District</td>
<td>Present</td>
</tr>
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2. REVIEW AND APPROVE NOVEMBER 19, 2021, MEETING MINUTES

GSPAC Lead, Marina Deligiannis, asked if there were any questions or comments on the November 19 meeting summary. Sky Hoyt shared that he sent in three comments on the meeting summary. Comments shared will be integrated into the notes. Valerie Nixon made a motion to approve the meeting summary
with the edits shared by Hoyt, and David Weiss seconded the motion. The meeting summary will be revised and reposted on the Lake County Water Resources’ website.

3. BIG VALLEY GROUNDWATER UPDATES

3.1 Brief report of current groundwater conditions and drought-related information

Deligiannis gave an update on groundwater conditions and drought-related information. In the last meeting it was requested that Lake County have some process and documentation in place on how to report dry wells. Lake County Water Resources has been in communication with Environmental Health, and they will meet after the holidays to discuss the dry well reporting process. Since the last GSPAC meeting Environmental Health has received notice of 2 wells running dry, they are shallow (less than 50 feet deep).

Via the chat Sarah Ryan asked, “can you repeat what you said about operations near by? and also were the 2 wells in the Big Valley basin? Deligiannis shared that Environmental Health did not provide the location of the 2 wells, the information was not reported. For one of the wells running dry, the property owner called raising concerns about a neighbor proposing a well and was concerned about how it would impact his well. With this report, it was shared that there were complaints on nearby cannabis operations. If additional information is obtained it will be shared with the GSPAC.

Joan Moss, a member of the public, made a comment regarding water quality and mass balances. She shared that somewhere along the line water quality needs to be addressed. In reviewing the notes captured from the November GSPAC meeting she shared that she is unclear what “extrapolated” means with respect to the data used to develop the water budgets. Christy Clark, from the Stantec facilitation team, explained that water quality is part of the Groundwater Sustainability Plan (GSP), and when time allows during the meeting, Moss will be shown where she can read about the Big Valley Basin water quality. Extrapolation means the action of estimating or concluding something by assuming that existing trends will continue, or a current method will remain applicable.

Moss shared that she has a letter she would like to read from, that ties to the 2006 Water Sustainable Management Plan. Sharing this is important as it discusses geothermal water contaminating the water. Clark suggested that this topic be brought up during the public comment portion of the meeting.

3.2 Technical Support Services (TSS) Update

William Fox with Lake County Water Resources and Eddy Teasdale from Luhdorff & Scalmanini (LSCE) provided a general update on TSS.

Via the chat Bethany Hackenjos with FlowWest commented, “Someone experienced with studying GW/SW interactions should review the lateral and vertical distances of these proposed wells.”

Bethany Hackenjos with FlowWest asked if anyone that does groundwater/surface interactions has verified that the location of the proposed TSS wells is reasonable. Teasdale shared that the TSS well sites are good as they are close to data they know already exists. These TSS wells will also be on Lake County parcels. These wells are anticipated to be drilled by summer of 2022.

Hoyt asked how close the TSS wells are to the creek. Teasdale shared that the wells well be set back 50-100 feet from the creeks.
Weiss asked if the wells will be more than 200 feet deep. Teasdale shared that lithology will be used to determine depth of wells.

Via the chat Ryan commented, “we don’t want money wasted that isn’t going to provide the data needed.”

Via the chat Bethany Hackenjos with FlowWest commented, “Yes, it’s important to make sure these wells will help fill data gaps identified regarding surface water depletions. And someone with that experience can tell us whether more wells or other data collection efforts will be needed as well.”

Via the chat Ryan commented, “Big Valley Rancheria requests to be told who from the consultant team with experience studying GW/SW interactions will be reviewing the placement of the proposed wells, and we’d like a copy of the analysis.” Clark stated that the information will be shared.

4. DRAFT GROUNDWATER SUSTAINABILITY PLAN (GSP) PUBLIC COMMENT SUMMARY

4.1 Overview of responses received and an outline of topics to address and 4.2 Details of comment process and next steps for updating the GSP with related content

Megan Murray from Stantec provided an update on the public comment process. She shared that in addition to all of the public review done over the last several months, the public has a 75-day window to provide comments after the GSP has been adopted and submitted to the California Department of Water Resources (DWR). Comments received during the November 12-December 3, 2021, public comment period will be part of the final GSP.

Hoyt made a comment that he was denied access to the public comments after the public response period was over. He requested all comments provided, but those comments were not shared with him. He says the experience has been alienating. Clark shared that the process that has been done previously—with a specific method of receiving and sharing comments—is the same applied now for the public Draft GSP comments. This process follows formal public comment protocols. Public comments on the Big Valley Draft GSP were accepted through December 10, and the team is compiling them into a matrix to best address them. All of those comments will be available in the updated final GSP.

Hoyt shared that if he is the domestic well representative, he must know what other domestic well owners are saying, so that he may best represent them. Clark stated that no public comments were received from a domestic well owner during the public comment process.

5. Report on Additional GSP Technical Review Subcommittee Meetings

5.1 Big Valley Integrated Hydrologic Model (BVIHM) Subcommittee

Teasdale provided an overview on the subcommittee meeting held on December 2. Model development and water budget development was discussed in subcommittee.

The frost protection methodology was reviewed with the GSPAC. Assumed late March through May for frost protection application. This has been added in the model. Dataset can be improved with time. For estimated use, it can be variable (0 Acre Feet per Year to 6,400 Acre Feet per Year—depends on the climatic conditions) and could exceed 30 percent of the total applied water for crop irrigation. Stream depletion methodology was reviewed as well.
Via the chat Ryan commented, “Is Agriculture willing to measure their frost protection usage so we can get accurate information?” Teasdale recognizes importance of it but cannot be answered at the moment.

Hoyt made a comment on frost protection values. Application of frost protection of 4 hours per night is a small number. He doesn’t want the numbers doctored to show less water use. In his experience it’s 6-8 hours for application, up to 10-12 hours at most. Teasdale agrees that this is a variable that needs to be honed in.

Ryan commented that in previous presentations, Teasdale has referenced documents on frost protection applications. Ryan would like to know if these documents will be available to see before the DWR public review period of the final GSP. Teasdale shared that the references will be listed in the final GSP. Teasdale understands that values at the moment for frost protection aren’t perfect. Murray added that section 8 of GSP has all references from the main GSP body. The appendices have their own reference section as well.

Hoyt made a comment on the fate of water applied as frost protection. He thinks a lot of that water goes back to the water table. He would like to know what the fate of the water is. He is concerned about water sitting on the roots.

Moss from the public asked if the GSP will tell people how often they can turn on their sprinklers or how often to use frost protection. Teasdale clarified that the GSP will not dictate water usage, the GSP will only quantify water usage.

Demand management was also covered by Teasdale in presentation. Cannabis may impact water demands. Model can be used to look at projected impacts from cannabis as we know more about cannabis operations in Big Valley.

5.2 GSP Implementation and Financing Subcommittee

Teasdale provided an overview on the subcommittee meeting held on December 2. There is a need to generate revenue to implement GSP. This will be discussed more in January. He reviewed typical GSP implementation costs during the 5-year update. The annual average costs were reviewed. Options for funding were reviewed. If the local efforts fail and the state steps in, the costs tied to GSP implementation under the state management were reviewed.

Via the chat Scott Hornung commented, “so you would force well owners to install a meter? Is this a one time fee per acre, or a yearly cost.” Teasdale explained that it would depend on whether GSP implementation is done by local entities or the State. The fees are likely to be annual. Hornung is concerned that annual fees may be more than property tax. Clark clarified that costs do not need to be decided on at the moment, before the finalization of the GSP.

Hoyt made a comment. After participating in the subcommittee, he thought about how $400,000 per year is needed to have a stable basin. He thinks that this is a lot of money to solve a non-problem. To the subcommittee he proposed that they should look at a cost-share approach between agriculture (60 percent), the public water systems (20 percent) and domestic well owners (20 percent). He also thinks that the budget for legal fees should be greatly increased to challenge the state and become exempted from this GSP process. This GSP process is an expensive one for the people of Big Valley Basin. Teasdale shared that the concept proposed will be reviewed in January. Teasdale would like to hear from all stakeholders on their thoughts for the percent distribution of the suggested cost share.
Ryan commented that there are a lot of unknowns and that there are several wells going dry. Undesirable impacts will result. She is unsure why Hoyt says we have a stable basin.

6. GSPAC INPUT ON GSP, PRIOR TO ADOPTION

6.1 GSPAC member discussion and further input

Ibrahim Khadam from Stantec provided an update on the GSP draft. The DWR deadline to submit is January 31, 2022. The Board of Supervisors will hold a public hearing to then adopt the GSP on January 11, 2022. Given the timeline, the technical team is hoping to get feedback from GSPAC members to give guidance to the GSA on adopting the GSP. To do that, feedback from each GSPAC member was requested, to give input on the overall GSP package.

Clark clarified that the Board of Supervisors is the sitting Board of Directors for the GSA. They take guidance from Water Resources and the GSPAC. GSPAC meeting minutes will be available as part of the Board packet update. There are only 25 days until the GSP needs to get adopted. She reminded everyone that while the GSPAC isn’t a formal voting advisory committee, guidance is given via a level of agreement scale, as outlined in the group’s charter. As one of the final steps in completing the current version of the GSP, the team needs to record each GSPAC’s member level of agreement on the overall GSP package. The GSPAC may also provide any final thoughts on the GSP at this time. GSPAC members will also have an additional opportunity to provide written comments that will be included with this meeting summary. Any additional written comments should be submitted by Wednesday, December 22 to GSPAC Lead Deligiannis. (There were two submissions of additional written comments—from GSPAC members Sky Hoyt and Sarah Ryan—and those documents are included at the end of this meeting summary.) The level of agreement scale is included below for reference.

The table below captures the stated level of agreement for each GSPAC member on the overall GSP package and includes additional statements made by each respective GSPAC member.

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<thead>
<tr>
<th>GSPAC Member</th>
<th>Level of Agreement</th>
<th>Comments on Overall GSP</th>
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<tbody>
<tr>
<td>Brenna Sullivan</td>
<td>2</td>
<td>Overall, we were given nearly a year to do the GSP, and we need to get it through and circle back on the issues later.</td>
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<td>Pat Scully</td>
<td>3</td>
<td>There is a long way to go with the budget. Would like to see it dialed back to the minimum to fulfill the state requirements. Efforts can be more streamlined than what is being proposed.</td>
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<td>David Weiss</td>
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<td>There are a lot of holes in this GSP that will need work as we go ahead. Given the timeline, it is remarkable what progress has been made. He has faith that in the ensuing steps, after approval and</td>
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<tr>
<td>Name</td>
<td>Comments</td>
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<tr>
<td>Peter Windrem</td>
<td>It is unfortunate that it’s been an adversarial process. There is an abundant supply of water and there are mechanisms to do things that are beneficial to the hitch, and for agriculture. There is a lot of water, it is just a question of how it’s managed. High polarization will lead to animosity, and that will not get us where we need to go.</td>
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<tr>
<td>Kyle Reams</td>
<td>No additional comments to share.</td>
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<tr>
<td>Sarah Ryan</td>
<td>Will be providing written comments. It has been a good discussion process, but extremely rushed. In the rushing, it has led to a model that we got at the very end of the review process. The model shows that there is up to 90 percent depletions of Adobe Creek flows. Projects developed and minimum threshold (MT) set are not reflective of the model. She thinks there will be an undesirable result on the interconnected surface water. She is concerned that all of the seats on the GSPAC aren’t filled—not everyone’s voice is being heard. The MTs set may result in dry wells.</td>
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<td>Scott Hornung</td>
<td>States that it’s a shame that this process has been so rushed. He is concerned about how it will be funded. We don’t have Airborne Electromagnetic (AEM) Survey data from DWR to refine the model at the moment.</td>
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<td>Valerie Nixon</td>
<td>Not sure if she understands how everything will be funded. When MTs are triggered, how does the community respond? There needs to be a process on how to respond to MTs. There is water now, but the possibility we won’t in drought in the future. We need an outline of what happens when an MT is reached. Brown Act is limiting, as you can’t sit down with GSPAC members outside this setting to discuss the GSP. She wishes conversations could be held outside the GSPAC meetings.</td>
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<td>Sky Hoyt</td>
<td>It is imperative to turn in a plan. There are parts of this that don’t sit right for him. He agrees with Nixon on Brown Act restrictions. He doesn’t feel like he can represent the domestic well owners with those restrictions. He feels like he got a “gag order” such that he couldn’t discuss the GSP process with the public on his radio show. The GSP needs to be submitted though.</td>
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<tr>
<td>Marina Deligiannis</td>
<td>Commends all the efforts that went into the development of the GSP and is understanding of GSPAC member’s comments. It has been a quick process, and on behalf of the County, she is confident that they can identify problems, collect data, and get the additional GSPAC members we need. She is committed to this ongoing process.</td>
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Regarding a comment made by Hoyt, provided in the table above, Clark wanted to note that it was made clear on what Hoyt could and could not share on the radio show, under Brown Act restrictions. She
previously shared ideas with him on ways to talk about the GSP on the radio—where Hoyt could educate about groundwater, urge people to get involved with the GSP process, encourage people to submit comments, and he could share info on where to find the plan sections without formulating opinions—which is the nature of talk radio but not in keeping with Brown Act requirements.

Bethany Hackenjos with FlowWest provide a 5 for her level of agreement.

Moss from the public abstained from providing a level of agreement because she doesn’t know the facts and doesn’t know what is happening.

Ryan was surprised with the limitations that Hoyt experienced on what can be discussed on GSP development. Because Hoyt represents domestic well owners, it would have been a good opportunity to connect with domestic well owners on the radio. Ryan asked when does the Brown Act end, so Hoyt can reach out to the domestic well owners.

Clark clarified that Hoyt has always been able to talk directly to domestic well owners, but the gray area is doing so on a talk radio program which is an opinion-formulation environment. If GSPAC members are a part of the conversation, then a non-public noticed meeting is a Brown Act violation. Public domestic well owner outreach and discussion are encouraged through other options, which she has provided several times to Hoyt.

Via the chat Maile Field from the public commented, “But a radio program is public. So if the radio program is noticed (72 hours in advance via an adjudicated news distributor) ... a radio discussion could be held?” Clark answered that it is not just about public notice, that any discussion to develop opinions about the GSP need to have all GPSAC members present. County Counsel provided those Brown Act parameters at the very first GSPAC meeting in early May.

7. NEXT STEPS FOR GSP DEVELOPMENT: GSP ADOPTION PROCESS AND SUBMISSION

Khadam provided overview on next steps. Board of Supervisors adoption will occur on January 11. To consider GSP adoption there will be a public notice. The Board of Supervisors can have the technical team make edits to GSP if they wish, if so GSP will be revised and submitted to DWR.

Via the chat Nixon commented, “Do we need unanimous consent by the committee for the plan to be adopted? Who do we contact to discuss other possibilities for monitoring well placement? Who ultimately decides exactly how this is paid for, in other words does the plan just give options and the county adopts which plan to use?” Clark said no, the decision is in the hands of the Board of Supervisors as the sitting GSA Board of Directors. They will look at all comments, summaries, and GSP chapters; they’ve been reviewing them each month during Board updates. Teasdale added that the Board of Supervisors decides how this is paid for, but they want feedback. Likely GSPAC is the best avenue to work through the questions as things move into implementation.

Clark shared that the GSP public hearing and adoption is slated for January 11, 2022. This is part of the Sustainable Groundwater Management Act (SGMA) requirements, to provide the public with an opportunity to make comments on elements of the GSP and future implementation considerations.

Via the chat Ryan commented, “will it be a timed item?” Deligiannis said yes.
Hoyt asked the GSPAC members if they have been in contact with Supervisors Scott or Pyska? GSPAC members responded no, that they had not.

_Via chat Hornung asked, “don’t we need to iron out those issues, how it will be paid, etc prior to its submission, or can we defer it.”_ Teasdale said that it is deferred until after GSP submission. _Clark added that there doesn’t need to be a specific financial plan submitted as part of the SGMA requirements._

### 8. PUBLIC COMMENTS

Moss from the public clarified her position to abstain. She has been part of the press for a long time—trained by the San Francisco Chronicle and believes in putting both sides of the story and letting the reader decide. This is why she is here; she is a member of the public. From prior notes she asked for clarification on what is LSCE. LSCE, otherwise known as Luhdorff and Scalmmani is the consulting firm that Teasdale works for. They developed the model. Lake County Water Resources well own the model and can be trained to use it.

Moss from the public said that it is important that people get all the facts. The 2003 Groundwater Sustainable Act mentions geothermal water 20 times. She wants to know why contaminated water is not part of this. Is this water contaminated? Teasdale explained that under the GSP implementation there will be a monitoring network that looks at water quality. Water quality will be monitored and if there are influences of geothermal water that will be picked up. The monitoring section of the GSP contains more information that can be referenced.

Moss wants to publish a paper after the GSP is submitted. Paper would be shared with Spanish speakers and Big Valley Rancheria—they need to be involved and have a voice. She was given a map of the underground faults that go from Big Valley, the faults are connected. They must consider the surrounding parts of the basin.

Hoyt remembers there being a map that pinpointed water quality. Maybe that map can be shared with Moss to look at that for geothermal intrusion. Moss submitted comments to the GSP, and comments are being addressed.

Bethany Hackenjos with FlowWest provided background on why she provided a 5 for level of agreement on GSP package. She echoes appreciation for the involvement by the group and how meetings were run. The rushed time frame is important, it reduces ability to ask questions, come to resolution and agreement. Her priority is the survival of the Clear Lake hitch. When the model shows up to 90 percent depletion in April, that is an undesirable result to a species that is on the brink of extinction. She doesn’t know how the comments she provided will be implemented and change the GSP. May want to revisit Tier 1 Project and Management Actions because the basin is being managed to avoid undesirable results, but now the model is showing that there may be undesirable results—there may be projects to mitigate depletion.

Khadam responded that this is something we are considering on how to move forward with. He provided context; the depletion amount is consistent with what has been presented in previous meetings. Depletions of 2-3 cubic feet per second in general. Having monitoring gauges on Kelsey Creek creates good confidence on stream flows and depletion. Similar patterns are observed on Adobe Creek. What happens on Adobe Creek is that in certain months there is little to know flow—the same 2-3 cubic feet per second depletion is only 10 percent in one year but can be 90 percent in one year. Issue is we don’t
have a good gauge on upstream on Adobe Creek. We have synthetic flows and don’t know how accurate that is. There are also releases from the two reservoirs. So, there is a lot of uncertainty on flows. There is not 90 percent depletion, the flow is extremely low, or it is dry. If you put 5, 10, 15 cubic feet per second some parts will go to depletion. A solution can be flow augmentation as a management action - such adobe creek conjunctive use. The data used is affecting the results. Flow augmentation is a viable solution. Data can be improved with additional gauge data.

Bethany Hackenjos with FlowWest shared that Big Valley Rancheria will be installing gages on the reservoirs to better understand flows coming out. They will also investigate hitch flow requirements. They will explore options for hitch survival.

Peter Windrem shared that is important to have upstream and downstream gauges near reservoirs to help hitch.

Teasdale said that is important to coordinate. There is a lot of money coming for implementation. It would be great to put together projects to pursue funding opportunities, possibly through a sub-group.

9. FUTURE GSPAC MEETING DATES

The GSPAC will meet through January 2022, and then it will be rechartered in the first quarter of 2022.

Clark will be talking with each of the GSPAC members, to see if they would like to continue on the GSPAC. Meetings will likely not be monthly, after January’s scheduled meeting, but either bimonthly or quarterly.

Nixon is hoping to get a member to represent the “impacted community” in the GSPAC. Clark strongly agrees that this needs to be a focus for everyone to fill that GSPAC seat.

Nixon also shared that it may be helpful if material were translated to other languages to get the community engaged. Clark shared that any materials developed can be translated into Spanish for free.

Lake County has translation services and has been offering them in GSP-related public meetings. There was a Spanish translator at both of the most recent public meetings. If there are questions or recommendations, please call Lake County Water Resources. This process should be accessible to all members of the community.

Terre Logsdon from the public shared that in the last drought in the 1970s, there were some geothermal waters pumped out.

Moss from the public said that she wants to talk to the pilot who flew around the Big Valley Basin [for the AEM Survey]. Clark shared that the effort was led by DWR, and the data collected from the flights over Big Valley Basin will be available in the spring.

10. ADJOURNMENT

With no further business, the meeting was adjourned at 1:31 p.m.
Follow-up Comments Sent Via Email

From: sky hoyt <skychoyt@gmail.com>
Date: Wed, Dec 22, 2021, 9:07 AM
Subject: Comments on GSP
To: marina deligiannis <marina.deligiannis@lakecountyca.gov>; Clark, Christy <Christy.Clark@stantec.com>

1. The lack of accurate dry well reporting is a major impediment to me fully supporting the plan. I presented an idea to improve dry well reporting to the GSPAC. It was never presented to the committee for consideration.

2. The Brown Act restrictions, as explained to me, prohibited me from talking about the plan on my KPFZ radio program. That was a major impediment to representing the domestic well owners of the Big Valley basin. The small number of residents that I personally contacted were unaware of the content of the plan.

3. The proposed 5 year costs to the people of the Big Valley basin are very high for what appears to be a non-problem. Those costs should be kept to be an absolute minimum.

4. While it is easy to think the Big Valley basin is the only part of Lake County affected by this process. The failure of the Water Resources Department to receive a flood prevention stream clearing permit for Scotts Creek may be partly due to additional work for the Water Resources Department to comply with this state mandated program.

5. In my opinion the plan did not advocate for sufficient monitoring of hitch during freeze protection with sprinklers. I think there is a high likelihood of future challenges by hitch advocates. We need a monitoring program and plan adequate to satisfy any challenge to freeze protection with sprinklers. The importance of freeze protection to the economy of Big Valley is huge. Most non-farming people do not understand this. I hope the BOS will take time to educate themselves on this important topic before a challenge arrives.
Marina Deligiannis  
Deputy Water Resources Director  
County of Lake  

Dear Marina,

As a representative for the Big Valley Band of Pomo Indians on the Big Valley Groundwater Sustainability Plan Advisory Committee, I have participated throughout the development of the Big Valley Groundwater Sustainability Plan. The Tribe has also used their contractual resources to assist with review of each portion of the plan, and our consultants have brought their considerable skill and knowledge to bear on their review of the plan.

There are several insurmountable problems with the Groundwater Sustainability Plan in its draft final form that will be submitted to the California Department of Water Resources (DWR), in compliance with the Sustainable Groundwater Management Act. The problems have led to my rejection of this plan as it stands.

First, the makeup of the Advisory Committee was not representative of the groundwater users in the Big Valley basin. Because the majority of the Committee members were farmers, this did not allow for a diverse set of views to be robustly discussed. In addition, one seat was not filled – a Disadvantaged Community Seat, and this person could have provided a perspective of the impacts of groundwater management from their unique perspective. The agricultural skew, and the decision to go with majority voting led to several circumstances where an opposing view did not lead to any compromises being developed that would be beneficial to other stakeholders.

Second, the timeframe was unreasonably short to discuss and fully evaluate the materials. This resulted from Lake County’s decision to submit an Alt-GSP which was not accepted by DWR. For example, the important Hydrologic Model used data that we were not able to get copies of, and came to conclusions that many on the Committee questioned. This made our review incomplete, and based on some information that could not be corroborated.

Third, the Hydrologic Model also identified undesirable results which are supposed to be avoided with SGMA, specifically the depletion of surface water due to groundwater pumping. Because of recent comments from California Department of Fish and Wildlife biologists, we have become aware of the drastic situation of the Clear Lake hitch and the fact that there have been several years of no young sighted. We are extremely concerned that the GSP groundwater management of the Big Valley basin will not prevent the loss of this state listed species. This plan is supposed to prevent such undesirable results.

Fourth, the projects associated with the Plan were finalized prior to the Model being fully released to the group. If we had known the Model identified these undesirable results with surface water depletion, we would have prioritized some projects differently.
Fifth, the decisions of Minimum Thresholds created situations where a percentage of the wells in the Big Valley basin will go dry. I don’t believe that our community understands what they might have to experience, and I don’t believe that the Advisory Committee has the right to make decisions that will allow individuals’ wells to go dry.

Because of these and other issues, I had to vote to reject this Plan.

Sincerely,

-SR-

Sarah Ryan
Environmental Director
Big Valley Band of Pomo Indians