



**DEPARTMENT OF PUBLIC WORKS
COUNTY OF HUMBOLDT
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AREA CODE 707**

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Facility Management	445-7621	Roads	445-7421
		Land Use	445-7205

ATTACHMENT 2

ELIGIBILITY DOCUMENTATION

Eel River Valley Groundwater Sustainability Plan and Monitoring Well Installation Project

November 14, 2019

GSA Status

Humboldt County is applying for this Sustainable Groundwater Management grant as a proxy for the soon-to-be-established Groundwater Sustainability Agency (“GSA”) for the Eel River Valley groundwater basin. The County is applying for Prop. 68 funding with the understanding that formation of a GSA is required and development of a Groundwater Sustainability Plan (“GSP”) will be required by January 2022.

Following the adoption of SGMA in September 2014, Humboldt County convened the Eel River Valley Groundwater Working Group (“Working Group”) in October 2015 and was awarded a Prop. 1 planning grant from DWR in July 2016. Prior to SGMA, there had been no focused studies on the interaction of groundwater and surface water in the basin. Monitoring was initiated in 2016 to begin to develop a baseline understanding of groundwater-surface water exchanges and other key processes within the basin. Based on information provided by groundwater users, analysis performed under the planning grant, and guidance from the Working Group, Humboldt County concluded that the Eel River Valley basin had been managed sustainably without undesirable results for at least ten years. A GSP Alternative for the Eel River Valley basin was submitted on December 30, 2016. Formation of a GSA was deferred because the GSP Alternative could be submitted by a local agency without forming a GSA. Monitoring activities as described in the GSP Alternative were performed for Water Years 2017 and 2018.

On July 17, 2019, DWR issued a notification letter and staff report stating that it intends to not approve the GSP Alternative submitted by the County. The letter and staff report state that DWR does not conclude that the Eel River Valley basin is, or has been, managed unsustainably. However, the letter and staff report state that the GSP Alternative did not contain all the required elements and did not provide sufficient evidence demonstrating that the requirements for sustainable groundwater management had been performed for a period of ten years. On November 13, 2019, DWR issued their final determination with a statement of findings that the GSP Alternative was disapproved.

On October 21, 2019, Humboldt County communicated with the State Water Resources Control Board regarding the presumed disapproval of the GSP Alternative and Humboldt County’s plans to form a GSA and apply for Prop. 68 funds to develop a GSP. The State Board explained that upon final disapproval, the basin will immediately be considered an “unmanaged area” and could be designated a probationary area six months following the final disapproval. The State Board seemed comfortable with Humboldt County’s approach and encouraged the County to develop specific milestones for GSA formation and keep the State Board updated.

On November 12, 2019, the Humboldt County Board of Supervisors approved Resolution 19-111 (Attachment 1) which affirmed Humboldt County’s commitment to work collaboratively with water users and stakeholders to form a GSA for the basin by April 2020. The resolution also affirmed Humboldt County’s intent to consider forming an interim GSA prior to April 2020, while continuing to work toward forming a GSA with a more permanent governance structure, if necessary for grant eligibility or to forestall state intervention. Competing or overlapping GSA applications are not expected.

Discussions have been initiated among water users and stakeholders regarding the appropriate governance structure for a GSA to manage the Eel River Valley basin. A range of models for governance structure from Sonoma, Mendocino, Del Norte, and Siskiyou Counties have been reviewed. One model is for the county to become the GSA with the Board of Supervisors serving as the board of directors for the GSA. Another model is to establish a joint powers agreement (“JPA”) with a board of directors formed by representatives of local public agencies and potentially non-agency stakeholders. For example, the Ukiah Valley GSA has a board of directors representing four public agencies along with seats for a tribal representative and agricultural representative. The Santa Rosa Plain GSA has a board of directors represented eight public agencies along with one seat for mutual water companies and PUC-regulated water corporations. Next steps include:

November 2019-January 2020

- Identify and evaluate additional GSA models.
- Share examples of GSA joint powers agreements (“JPA’s”) with water users and stakeholders.
- Seek consensus on appropriate governance structure.
- Develop initial budget for GSA administration.
- Seek consensus on establishing a formula for shared financial contributions.

February-March 2020

- Prepare GSA bylaws, JPA (if necessary), and resolution(s) to form the GSA.
- Hold a public hearing in accordance with Water Code § 10723(b).

April 2020

- Adopt formation documents and submit GSA Formation Information to DWR

Agricultural Water Management Compliance

Humboldt County is not an agricultural water supplier and the future Eel River Valley GSA will not be an agricultural water supplier.

CASGEM Compliance

Humboldt County serves as the monitoring entity for the California Statewide Groundwater Elevation Monitoring (CASGEM) program in collaboration with DWR.

Climate Change

The project is a planning project, not an implementation project. The project will analyze the risks to groundwater resources arising from climate change, including increased frequency and intensity of drought and saltwater intrusion. The North Coast Resource Partnership’s North Coast Integrated Regional Water Management Plan (August 2014) discusses the effects of climate change vulnerability and uncertainty on regional water-related issues. In addition, the North Coast Resource Partnership has commissioned several climate change studies including:

- Climate Mitigation Report for the North Coast Region of California (April 2018)
- North Coast Regional Climate Adaptation Strategies (January 2018)
- Climate & Natural Resource Analyses and Planning for the North Coast Resource Partnership (January 2018)
- North Coast Resource Partnership Integrated Strategic Plan – Climate Change Mitigation, GHG Emissions Reduction and Energy Independence (May 2017)

Consistency with the Delta Plan

The project is not located within the Sacramento-San Joaquin Delta or Suisun Marsh.

Groundwater Management Compliance

The project is not an implementation project.

Open and Transparent Water Data

The project will adhere to required protocols for data sharing, transparency, documentation, and quality control as applicable.

Public Utilities and Mutual Water Companies

One PUC-regulated public utility (Del Oro Water Company) operates within the basin. This utility is a stakeholder and not the project applicant.

Stormwater Resource Plan (SWRP) Compliance

The project does not involve stormwater or dry weather runoff capture.

Surface Water Diversion Reporting Compliance

Humboldt County is not a diverter of surface water and the future Eel River Valley GSA will not be a surface water diverter.

Sustainable Water Use and Demand Reduction

Humboldt County is not an urban water supplier and the future Eel River Valley GSA will not be an urban water supplier.

Urban Water Management Plan (UWMP)

Humboldt County is not an urban water supplier and the future Eel River Valley GSA will not be an urban water supplier.

Water Metering Compliance

Humboldt County is not an urban water supplier and the future Eel River Valley GSA will not be an urban water supplier.