Print Form

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812 3044

County Clerk
County of: Siskiyou
311 Fourth Street, Room 201
Yreka CA 96097

From: (Public Agency): Environmental Health Division
806 South Main Street
Yreka CA 96097
(Address)

FILED
Siskiyou County
DEC 03 2024
LAURA BYNUM, CLERK
BY: ENDORSED-E. FRANCO
Deputy Clerk

Project Title: Water Well Permit #24105

Project Applicant: AAJM Group, LLC.

Project Location - Specific:

9543 Old Highway 99 Grenada, CA (APN: 038 110 040)

Project Location - City: Grenada Project Location - County: Siskiyou

Description of Nature, Purpose and Beneficiaries of Project:
Approval of a public production well.

Name of Public Agency Approving Project: Siskiyou County Community Development

Name of Person or Agency Carrying Out Project: Environmental Health Division

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1): 15268):
- ☐ Declared Emergency (Sec. 21080(b)(3): 15269(a)):
- ☐ Emergency Project (Sec. 21080(b)(4): 15269(b)(c)):
- ☒ Categorical Exemption. State type and section number: 15303 and 15061(b)(3)
- ☐ Statutory Exemptions. State code number:

Reasons why project is exempt:
See attachment.

Lead Agency Contact Person: Rick Dean Area Code/Telephone/Extension: 530-841-2100

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☒ Yes ☐ No

Signature: Date: 12/3/2024 Title: Director

☒ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code
Reference: Sections 21108, 21152 and 21152.1, Public Resources Code.

Date Received for filing at OPR:

Reason why project is exempt:

Larry Walker and Associates preformed a hydrogeological analysis utilizing their hydrologic modeling tool from which Natural Resources and Community Development has concluded the separation distance and well pumping drawdown indicates that the replacement well will not have a significant adverse impact on public trust resources. County staff has determined that the well does not pose any threat to human health, safety, or the environment. Per the Siskiyou County Flood Control District, this well is consistent with historic activity occurring on the parcel and is also consistent with the Groundwater Sustainability Plan for Shasta Valley. See memorandum for additional details.

November 13, 2024

MEMORANDUM

MEMO TO: RICK DEAN, DIRECTOR, COMMUNITY DEVELOPMENT DIRECTOR; DAN WESSELL, DEPUTY DIRECTOR ENVIRONMENTAL HEALTH, SISKIYOU COUNTY

FROM: MATT PARKER, SHASTA VALLEY GROUNDWATER SUSTAINABILITY AGENCY, PLAN MANAGER

RE: GSA COMPATABILITY REVIEW: AAJM GROUP, LLC. AMRITPAUL SINGH PUBLIC WELL PERMIT APPLICATION ON APN: 038-110-040

The Shasta Valley Groundwater Sustainability Agency (GSA), has reviewed the above entitled well permit application for a public well, in lieu of 3 existing wells (scheduled to be destroyed) and accompanying LWA technical memorandum for a public well in the Shasta Valley. The GSA has considered the information in the application, along with the Siskiyou County Flood Control and Water Conservation District's Groundwater Sustainability Plan for the Shasta Valley.

- <u>The Department finds</u>:
  - The application is for a public truck stop that will replace 3 existing wells scheduled to be destroyed.
  - The applicant is not expanding the property's historic water use practices pre-2015.
  - The proposed public well will not cause an increase in net consumptive groundwater use in the Shasta Valley groundwater basin in accordance with the "Avoiding Significant Increase of Total Net Groundwater Use from the Basin" in the Shasta Valley Groundwater Sustainability Plan (Shasta GSP), Chapter 4.
  - The applicant should be made aware of and encouraged to voluntarily implement practices as described in the Shasta GSP Chapter 4, to improve water use efficiency [for example, the applicant is welcome to work with Siskiyou County Natural Resources Staff, UC Cooperative Extension, Siskiyou RCD, NRCS or

other entities with resources to assist in acquiring funding for irrigation efficiency improvements].

- Attachment:
  - GSA Verification form
  - Attachment #1 - LWA Technical Memorandum.

November 13, 2024

MEMORANDUM

MEMO TO: RICK DEAN, DIRECTOR, COMMUNITY DEVELOPMENT DEPARTMENT; DAN WESSELL, DEPUTY DIRECTOR ENVIRONMENTAL HEALTH DEPARTMENT, SISKIYOU COUNTY

FROM: MATT PARKER, NATURAL RESOURCES SPECIALIST, NATURAL RESOURCES DEPARTMENT

RE: PUBLIC TRUST CONSIDERATION: AAJM GROUP, LLC. AMRITPAUL SINGH PUBLIC WELL PERMIT APPLICATION, APN: 038-110-040

Whereas the counties, as subdivisions of the State of California have a fiduciary duty to consider the public trust before authorizing the drilling of groundwater well whose extractions might have an adverse impact on public trust resources.

The Siskiyou County Natural Resources Department (Department) has reviewed the above entitled well permit application for a public well, in lieu of 3 existing wells (scheduled to be destroyed), to serve the purpose of providing water to a truck stop in the Shasta Valley. The Department has reviewed 1) the information in the application, and 2) the technical memorandum (Attachment #1) prepared by Larry Walker Associates to aid in its evaluation of Public Trust Doctrine consideration.

<u>The Department finds</u>:

- The proposed well location is approximately 2 miles from the nearest navigable waterway (Shasta River).
- The professional technical memorandum prepared by Larry Walker Associates, which models impacts from the proposed well, along with the other materials reviewed, do not indicate that extraction of water from the proposed well would substantially impair or interfere with public trust uses or values within interconnected downstream navigable waters, including the Shasta River.
- More specifically, under the conditions specified below, the limited pumping from this water use in the Shasta Valley watershed will not substantially impair or

interfere with public trust uses or values within interconnected downstream navigable waters, including the Shasta River.

- To the extent the use of groundwater from this site may ultimately contribute to cumulative reductions in surface waters in downstream navigable waters, the production of groundwater for use on this parcel in the Shasta Valley is within the public interest because this parcel holds groundwater rights intended to be put to beneficial use consistent with Article X, section 2 of the California Constitution.

- The issuance of this permit for a public well purpose qualifies as a Class 3 categorical exemption under Section 15303 of the CEQA Guidelines which allows for construction and installation of small new equipment facilities. In addition, the project has been found to be consistent with Siskiyou County Codes and Policies.

- Alternately, the issuance of this permit for a well is exempt from CEQA because the activity is covered by the common sense exemption (Cal. Code Regs. Title. 14 Sec. 15061(b)(3)). CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. The County has determined that the issuance of this permit qualifies under the common sense exemption because it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment based on the proposed continued use of groundwater is consistent with historic activity occurring on the parcels. Recommended well permit conditions:
  - This public well shall be located on the same parcel APN: 038-110-040, and replaces 3 existing wells that will be destroyed that serviced the same subject parcel.
  - Commercial well water production is subject to State Water Quality Control Board wastewater discharge permit. Not to exceed 10gpm (14.400 gallons per day)

Attachment:

- Attachment #1 - LWA Technical Memorandum

ATTACHMENT #1

Technical Memorandum

To: Laura Foglia
From: Gerald O'Neill
cc: Matt Parker
Date: November 26, 2024

Re: Preliminary evaluation of proposed well AAJM, APN 038-110-040

This memorandum describes a preliminary modeling analysis of the effects of pumping the proposed well AAJM in Shasta Valley, California (Figure 1) on groundwater levels at nearby wells and streams.

The Shasta Watershed Groundwater Model (SWGM), documented in the GSP[1], was used to simulate pumping from the proposed well. SWGM represents the best currently available scientific tool for this purpose in Shasta Valley. The model is presently being updated through the GSP process, and the most recent version available at the date of this memorandum (referred to herein as the current model) was used for the analysis presented herein.

SWGM was applied to compute impacts of the proposed pumping on nearby wells and the Shasta River, which may include changes in groundwater levels and changes in streamflow. Location, depth, pumping rate, and period of pumping, along with use information, were provided by the applicant and are summarized in Table 1.

Model grid cell locations were determined from information provided by the applicant and its consultant, and model layer for the pumping from AAJM was determined from the land surface elevation at the proposed well site and the expected completion depth of the well.

Changes from the current model were computed by pumping AAJM at 10 gpm, for 2 years from October 2021 through September 2023, with a total annual volume of groundwater pumped of approximately 16 acre-feet.

[1] Siskiyou County Flood Control and Water District Groundwater Sustainability Agency, Shasta Valley Groundwater Sustainability Plan, January 2022, https://www.co.siskiyou.ca.us/naturalresources/page/shasta-valley

Figure 1. Map showing Shasta Valley watershed and groundwater basin, and proposed location of well AAJM.

Table 1. Proposed well information.

Well	Estimated Pumping Rate (gpm)	Estimated Depth (ft)	Expected Pumping Period	Estimated Irrigated Area (acres)	Estimated Annual Volume Pumped (acre-ft)	Use
AAJM	10	150	Perpetual	None	16	Gas Station Convenience Store Restaurant Truck Stop

Note that Table 1 indicates that well AAJM has an estimated pumping rate of 10 gpm. Maximum daily use was estimated by the applicant to be 3.8 gpm, and the well capacity is expected to be 10-50 gpm[2]. Thus, a conservative pumping rate of 10 gpm was used in this evaluation to account for possible variability in the estimate.

[2] SB 1263 Preliminary Technical Report, Gas Station and Truck Stop, 9543 Old Highway 99 South, Grenada, California, *Prepared for confidential client*, March 2024, Sierra West Consultants, Inc., Fair Oaks, California.

Evaluation of Proposed Well AAJM

Figure 2 shows locations of the proposed pumping well AAJM, the closest private well (Chevron station), and nearby well c_28, which is a DWR regional monitoring well used in SWGM calibration. Well c_28 is the only CASGEM[3] well located within 1-mile of AAJM. The screen interval of AAJM is located within SWGM model layer 2, corresponding with its expected depth of 150 ft; the screen interval of c_28 also corresponds with model layer 2. The Chevron well depth of 330 ft places it within model layer 3. The model grid is shown for reference; the closest reach of the Shasta River, the nearest major surface water body simulated in SWGM, is located a little more than 2 miles to the east of AAJM approximately 11,100 ft away. Model grid cells are uniform 270 m squares (~886 ft).

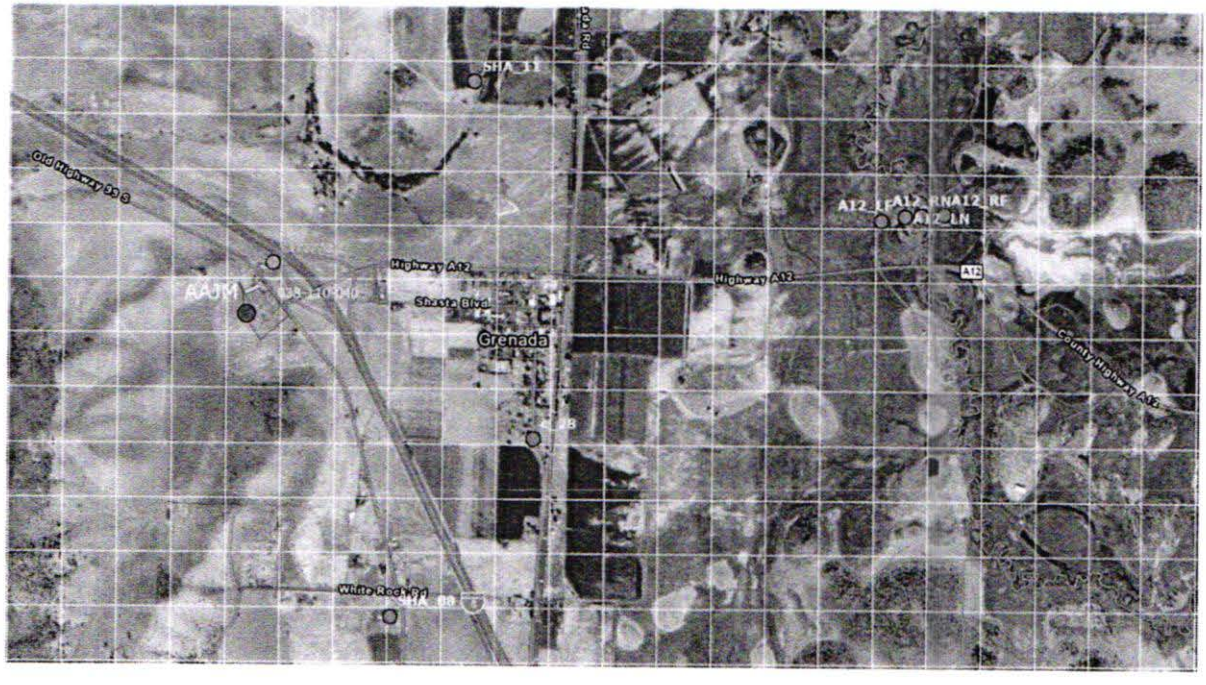

Figure 2. Map showing location of proposed well AAJM, the Chevron well, and DWR regional monitoring well c_28. Shasta River, and the model grid, are also shown.

Figure 3 shows a cross-section along model row 79, where AAJM is located in layer 2 as shown by the symbol: blue circle with an X inside. Layers are numbered from top to bottom, where the top of layer 1 represents the land surface, and the bottom of layer 4 represents the base of the aquifer system. Green shaded cells in layer 1 represent the Shasta River and its tributaries,

[3] California Statewide Groundwater Elevation Monitoring (CASGEM), California Statewide Groundwater Elevation Monitoring (CASGEM)

and red shaded cells represent virtual agricultural pumping wells[4] in model layer 3. Cyan shaded cells in layer 1 represent farmers ditches.

The model layers approximately correspond with different geologic units at depth. Thickness of model layer 1 in the vicinity of the proposed wells varies from about approximately 5-15 m, or about 15-50 ft; thickness of layer 2 is approximately 50 m, or about 164 ft, thickness of layer 3 is 100 m, or about 328 ft, and thickness of layer 4 is 350 m or about 1,150 ft.

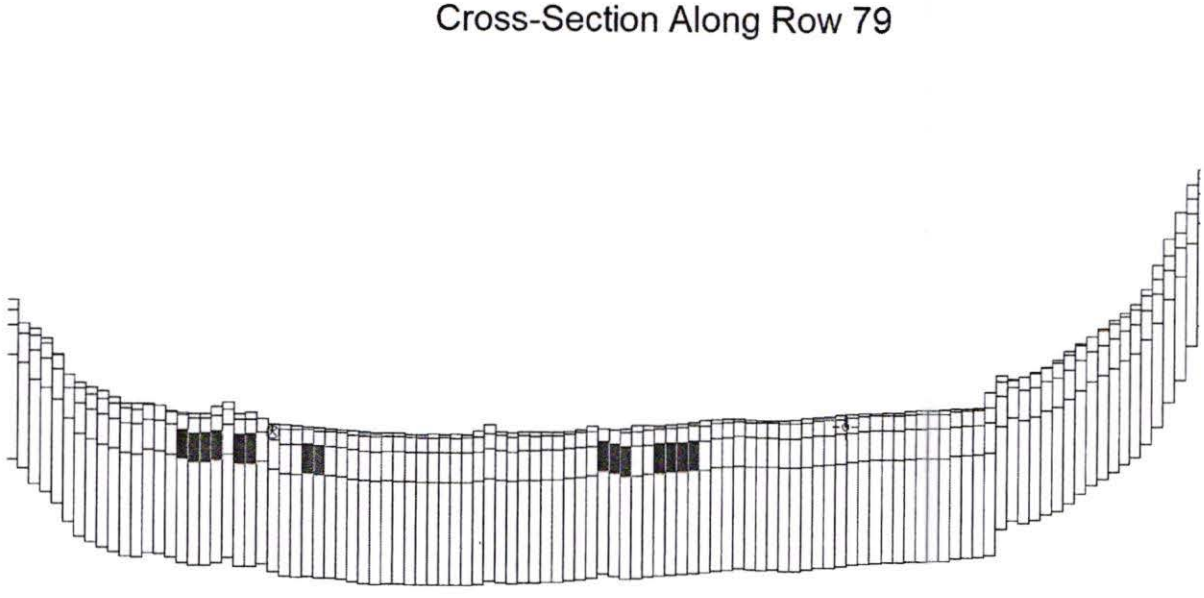

Figure 3. Cross-section of model grid in vicinity of well AAJM. Model rows are oriented along east-west cardinal directions on a compass: east is to the right and west is to the left.

[4] Actual agricultural irrigation well locations were not determined in the current model configuration; thus, virtual wells were used to distribute the irrigation pumping estimated by Davids Engineering and Larry Walker Associates.

Figure 4 shows the SWGM computed drawdown[5] at the Chevron well, located approximately 920 ft from AAJM. Drawdown is plotted for model layer 3 where the Chevron well is screened. Time is shown in days since the start of the simulation, with pumping beginning on October 1, 2021 or 11,323 days from October 1, 1990, and cessation of pumping on October 1, 2023 or 12,503 days from model start time, for a pumping period of 730 days or 2 years. Drawdown is plotted at the end of each monthly "stress period" in the model over which pumping and recharge and stream flows are constant. Maximum computed drawdown at the Chevron well after two years of pumping is approximately 0.05 m or about 0.16 ft.

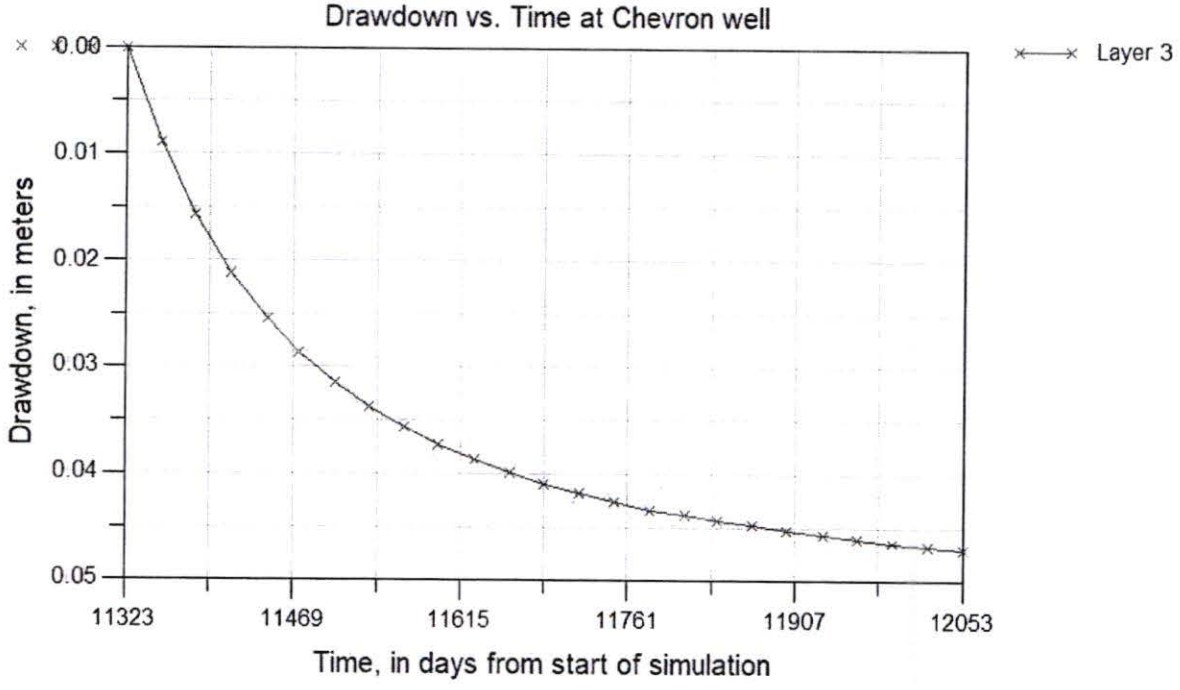

Figure 4. SWGM computed drawdown at Chevron well, due to pumping from Well AAJM.

Figure 5 shows computed drawdown at c_28, located approximately 5,116 ft from proposed well AAJM. Drawdown is plotted for model layer 2 where well c_28 is screened. Time is shown in days since the start of the simulation, with pumping beginning on October 1, 2021 or 11,323 days from October 1, 1990, and cessation of pumping on October 1, 2023 or 12,503 days from model start time, for a pumping period of 730 days or 2 years. Drawdown is plotted at the

[5] Note that "drawdown" shown on the figures presented in this memorandum refers to the groundwater level difference between the current model and the simulation results.

end of each monthly "stress period" in the model over which pumping and recharge and stream flows are constant. Maximum computed drawdown at c_28 after two years of pumping is approximately 0.006 m or about 0.02 ft.

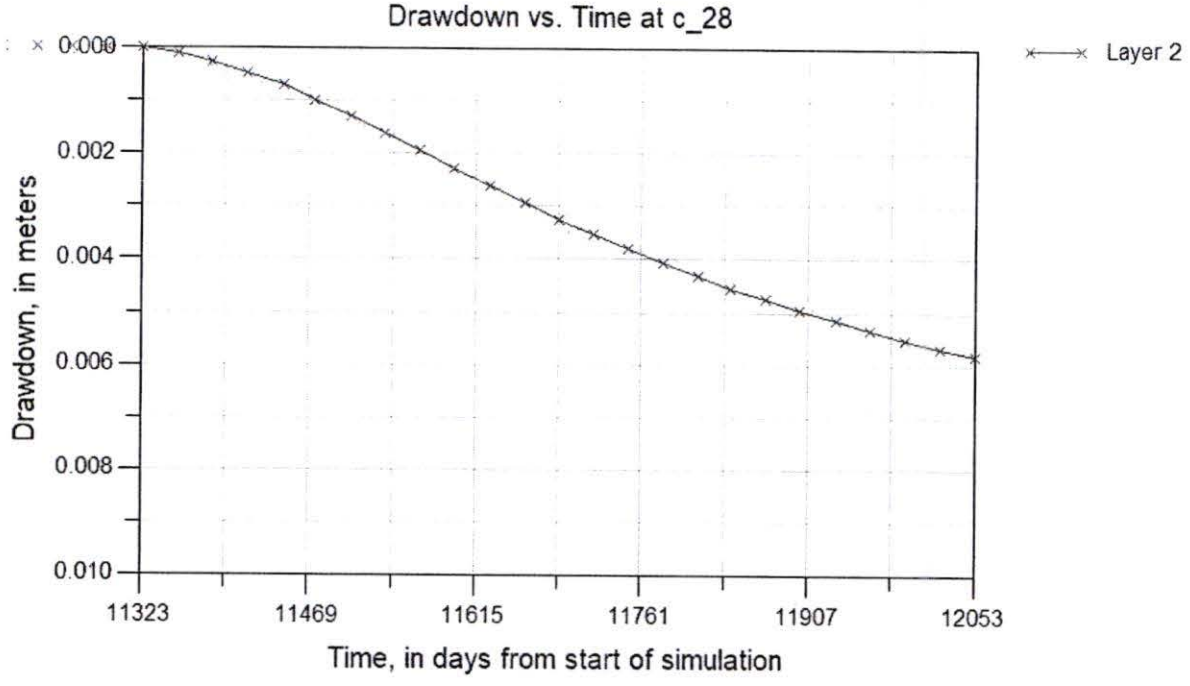

Figure 5. SWGM computed drawdown at well c_28, due to pumping from Well AAJM.

Figure 6 shows contours of drawdown of the water table. Model computed drawdown of the water table at the Shasta River is less than 1 cm (0.01 m).

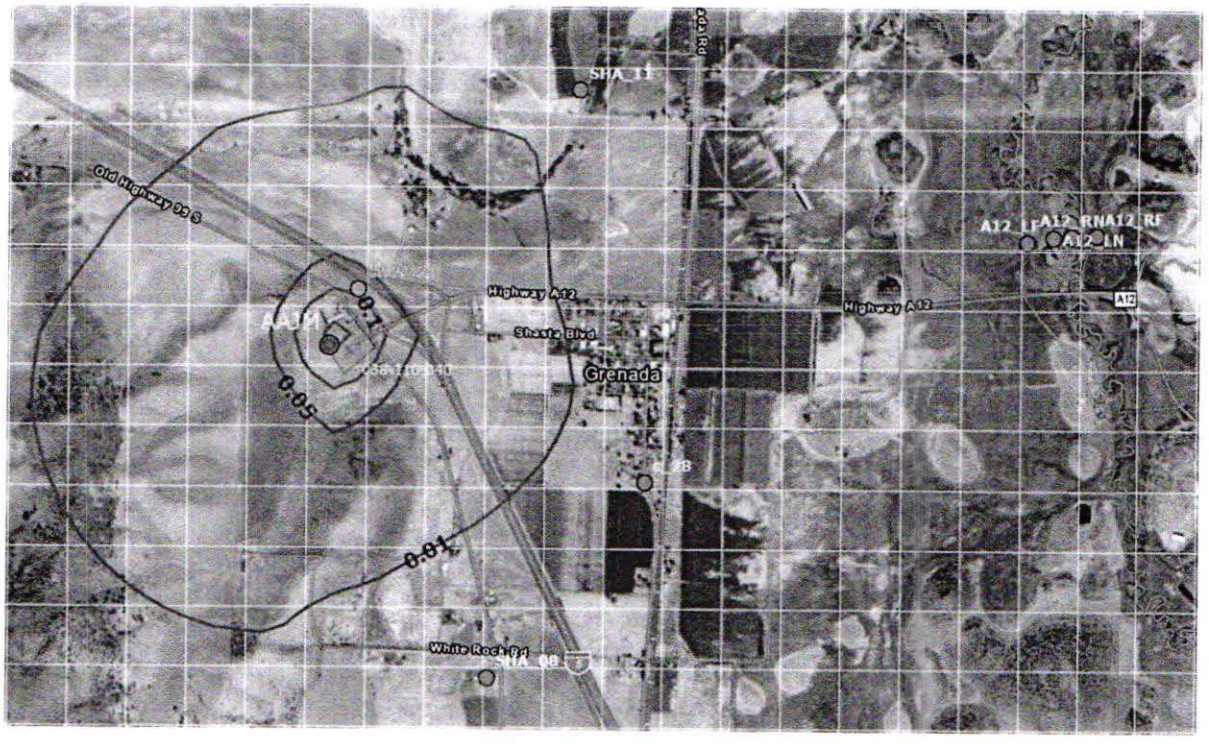

Figure 6. Drawdown contours of the water table, in meters, resulting from pumping Well AAJM for 24 months.

Contour levels are 0.01, 0.05, 0.1 and 0.2 meters.

Limitations

SWGM is presently being recalibrated with both new and updated hydrogeologic data, and with improved estimates of recharge, streamflow and diversions. Currently, some areas of the model are better calibrated than others. Thus, computed groundwater levels and flows, and stream flows, may change as improvements are included in the model. However, the proposed well evaluations are based on changes in heads from the current model, which should help minimize issues with the current status of calibration. An additional limitation of this analysis is that, currently, pumping from individual wells is being evaluated separately; however, the effects of permitting multiple new wells are additive, therefore a simulation that includes all newly permitted wells should also be performed. Further, pumping was simulated only in the most recent two years of the current model, i.e., from water year[6] (WY) 2022 though WY 2023. Assuming current model pumping rates do not change, future hydrology (wet or dry years), if different than the period simulated, could result in more or less computed drawdown due to differences in accompanying aquifer recharge rates. A future simulation with projected hydrology could address this limitation on estimating long-term impacts from the proposed pumping.

Conclusions

The SWGM was used to compute groundwater level impacts, from pumping proposed well AAJM, on nearby monitoring wells, and at the closest reach of the Shasta River. Results based on the current model suggest that pumping at the proposed location, depth, pumping rate and duration, would have minimal impact on groundwater levels at nearby wells and the water table underlying nearby streams.

References

Siskiyou County Flood Control and Water District Groundwater Sustainability Agency, Shasta Valley Groundwater Sustainability Plan, January 2022, https://www.co.siskiyou.ca.us/naturalresources/page/sustainable-groundwater-management-act-sgma

[6] A water year is defined as the 12-month period from October 1, for any given year through September 30, of the following year. The water year is named after the calendar year in which it ends.