SOUTH FORK KINGS
GROUNDWATER SUSTAINABILITY AGENCY

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sent via email: sgmps@water.ca.gov

Subject: Comments on Draft Land Subsidence Best Management Practices

Dear Mr. Gosselin:

The South Fork Kings Groundwater Sustainability Agency (SFK GSA) appreciates the opportunity to provide comments on the California Department of Water Resources' (DWR) *Public Draft Land Subsidence Best Management Practices* (Draft BMP) document. In addition, we greatly appreciate DWR holding one of the workshops in Clovis which allowed us to make comments in person and making staff available for discussion. We also recognize DWR's efforts in preparing the document. However, the guidance needs to remain consistent with the statutory language and legislative intent of the Sustainable Groundwater Management Act (SGMA). This letter provides our comments on policy and technical issues in the Draft BMP.

General Comments

1. Section 4 speaks to the importance of surface water deliveries and usage of same has historically resulted in significantly reduced groundwater reliance and the abatement of subsidence impacts. However, missing from that section, and the entire document, is any discussion of the regulatory reductions of those surface water deliveries and their correlation to current subsidence rates. . The BMP seems to suggest that droughts are the only cause of increased groundwater pumping and corresponding subsidence impacts, when in fact nothing could be further from the truth. Substantial regulatory reductions in the delivery of surface water supplies is clearly a factor and cannot be ignored. There are direct correlations between the areas that have experienced more than 0.5 feet of subsidence since 2015, as shown on Figure 4-4, and the areas that have

seen substantial decrease in surface water deliveries. This is a significant oversight and needs to be addressed before finalizing the document.

2. The document also does not adequately address is the substantial socioeconomic impacts to the agricultural community in considering impacts to how the BMP guidance might be most appropriately utilized. The document cannot ignore the substantial economic impacts of implementing these guidance policies, and completely fail to acknowledge that certain choices prompted by the BMP do not comport with real world economic realities for much of the agricultural community. The BMP clearly raises policy issues, and is not only a technical document but fails in every aspect to recognize policy challenges that the BMP's technical "solutions" promote. As such, a robust economic analysis is not only warranted, but essential.

Policy Comments

1. We concur with the Draft BMP that "groundwater activity in one GSA or basin may affect groundwater conditions in adjacent GSAs or subbasins." The SFK GSA has been actively engaged in coordinating with surrounding subbasins and will continue to support those efforts. The Draft BMP should elaborate that the coordination is not limited to just the subsidence minimum thresholds but rather focused on active management of groundwater pumping through the implementation of appropriate projects and management actions.

Technical Comments

1. The Draft BMP focuses on groundwater extraction as the main driver for both regional and local subsidence. Pumping is definitely a root cause of subsidence, but the geologic setting and distribution of compressible clay layers are also key factors, particularly for subsidence at a regional scale. The density of pumping (wellfields versus sparsely distributed wells) is also an important element, as well as the risk profile for different infrastructure that could be affected by subsidence. Together, these factors should be included a management framework that can address both regional and local subsidence. The Draft BMP takes an overly simplistic approach focused on local pumping with an aspirational goal of "zero subsidence." This is not helpful to GSA managers and their technical staff, who are grappling with complex geologic systems, variability in pumping regimes, diverse infrastructure, limited data, and uncertainty in the modeling tools available to predict subsidence. The Draft BMP should provide additional overarching guidance and context for the definition of regional versus local subsidence issues, how the scale of subsidence affects the management approach, and responsibility for implementing solutions and other technical assistance or regulatory support the State can provide to help the GSA address policy issues that are beyond their control. As currently framed, the Draft BMP does not provide "new" insights or guidance, and potentially creates unmanageable technical and financial burdens on GSAs.

2. While multiple methods are presented for measuring rates of subsidence, further discussion could be provided regarding their application. The Draft BMP should clarify the following:

    a. What are the technical and/or logistical limitations for the different methods? Are there limits to measurement precision or accuracy that should be considered? Are some methods more practical for identifying local versus regional subsidence patterns?

b. The Draft BMP states that the use of multiple methods is preferable for evaluating subsidence but does not provide additional guidance on how they can be used together to meet the provided goals. The document should include examples of how the different measurement methods could be used together to characterize subsidence under different conditions, similar to the management of land subsidence scenarios provided in Section 7.4.

c. The importance of sampling frequency is discussed in the Draft BMP, and general sampling frequencies are suggested, but guidance on which frequencies are recommended for different subsidence conditions should be included.

3. The Draft BMP should more clearly discuss how the overall nature of subsidence in a given area could drive the technical framework for subsidence management. Approaches could differ depending on, for example, whether areas are experiencing uniform versus nonuniform subsidence or slow versus rapid subsidence. Risks to infrastructure are also sensitive to these nuances, in addition to context such as total subsidence versus differential subsidence rates and the type or density of infrastructure that is affected. Including an appendix with example subsidence evaluations or frameworks would be helpful for both managers and technical staff to understand how the data from different geologic settings and measurement frameworks could be combined to provide suitable actionable results.

4. The use of extensometers is discussed as a means of measuring thickness changes in sediment at a specific location, but further guidance should be provided on how these devices can be strategically placed to evaluate subsidence processes in areas with differing geological settings or stratigraphy. Furthermore, the Draft BMP should describe how extensometer data could be used in models to predict future subsidence. Most models being used for groundwater management have highly simplified layering that would require significant refinements to simulate finer scale clay compaction behavior measured by extensometers.

Closing

Even prior to the release of the Draft BMP, SFK GSA was already moving forward to actively implement many of the recommended actions to limit subsidence. SFK already has a well registration program and over 66% of the area has registered their wells., closely coordinating with owners of infrastructure, and implementing a subsidence management plan to reduce groundwater demand should subsidence continue.

Thank you for considering these comments on behalf of SFK GSA. We look forward to working with DWR on continuing to implement our policies to achieve sustainable groundwater management.

Sincerely,

John A. Gailey III