STATE OF CALIFORNIA- CALIFORNIA NATURAL RESOURCES AGENCY GAVIN NEWSOM, Governor

**DEPARTMENT OF WATER RESOURCES**

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December 26, 2019

Patty Piore

Kern Groundwater Authority 1800 30th Street, Suite 280

Bakersfield, California 93301 Dear Ms. Piore:

Thank you for affording the California Department of Water Resources (DWR) State Water Project (SWP) the opportunity to review the Kern Groundwater Authority, Draft Groundwater Sustainability Plan (GSP) as required under the Sustainable Groundwater Management Act (SGMA) of 2014.

The SWP's chief goals regarding subsidence are to remediate past and ongoing damage to the California Aqueduct (Aqueduct) while also addressing the underlying causes. More than 70 miles of the Aqueduct are located within the Kern Groundwater Authority, and subsidence within this area has reduced the Aqueduct's conveyance capacity and operational flexibility. The areas and magnitudes of these impacts can be found in DWR's California Aqueduct Subsidence Study (June 2017) and the California Aqueduct Subsidence Study: Supplemental Report (March 2019). We have completed an initial review of the draft GSP and we have the following general comments:

1. GSP Section 3.1.3 *Undesirable Results for Land Subsidence,* contains the following sentence: *"While it is generally acknowledged that subsidence exists within the Subbasin, there are generally no significant impacts to infrastructure within the Subbasin."We* disagree with this conclusion, as subsidence has reduced the flow capacity of the Aqueduct by 19% near Highway 46; these findings are documented in the California Aqueduct Subsidence Study

(June 2017) and the California Aqueduct Subsidence Study: Supplemental Report (March 2019).

1. The GSP uses a "Subsidence Monitoring Design Approach" (Figure 3-4) which asks many questions and lists many tasks. Most of these questions and tasks have already been answered or completed, with respect to the Aqueduct, and documented in the above-mentioned reports. We recommend moving forward with the remaining elements of the plan to address subsidence.
2. The GSP states that subsidence associated with oil and gas activities may also occur within the Subbasin. In fact, the March 2019 report finds that oil extraction from the Lost Hill Oilfields did not have a significant contribution along the Aqueduct.
3. DWR will continue to collect precise survey data along the Aqueduct. We recommend inclusion of SWP Aqueduct survey data in the GSP's monitoring

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plan and commit to facilitating transfer of this data. This approach will allow the GSAs and SWP to obtain relevant, high-quality data related to subsidence along the Aqueduct.

These comments are provided on behalf of the SWP. Regulatory decisions and actions under SGMA are managed separately and independently by the Department's Sustainable Groundwater Management Office (SGMO).

The SWP looks forward to working with your agency to engage on these comments on the draft GSP. If you have any questions, please contact the California Aqueduct Subsidence Program Manager Mike lnamine at (916) 213-3810 or michael.inamine@water.c.agov.

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G/ Ted Craddock

Acting Deputy Director State Water Project