



ANGIOLA WATER DISTRICT

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VIA EMAIL AND ONLINE SUBMISSION

Craig Altare
Supervising Engineering Geologist
Department of Water Resources
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Email: craig.altare@water.ca.gov
Portal: <http://sgma.water.ca.gov/portal#gsp>

Re: Tulare Lake Subbasin Groundwater Sustainability Plan (Basin 5-022.12)

Dear Mr. Altare:

I am submitting these comments on the Tulare Lake Subbasin Groundwater Sustainability Plan ("GSP") on behalf of Angiola Water District ("Angiola"). Angiola is concerned that the GSP does not adequately address groundwater overdraft and land subsidence in the Tulare Lake Subbasin. The GSP delays significant action on these critical issues until 2035, and Angiola requests that DWR require the Groundwater Sustainability Agencies responsible for the GSP ("GSAs") to impose additional measures to eliminate these significant and unreasonable undesirable results.

The adverse impacts of land subsidence in the Subbasin are significant, and those impacts have directly affected Angiola and its landowners. Ditches and canals that historically carried water by gravity have had their flow significantly slowed and even reversed, including both Angiola Ditch and Utica Canal, which are significant components of Angiola's water conveyance and distribution system. Angiola has spent \$780,000 to construct the Tucson Avenue Lift Station on Angiola Ditch to enable continued flow, and it has spent \$1,127,000 on the Utica Avenue Canal Improvement Project to restore the natural flow of Utica Canal. Additionally, the subsidence problem near Empire Weir No. 2 has reduced the capacity of the Blakely Canal by over 50 percent (from 250 cfs to 120 cfs). Despite these clearly consequential impacts, the GSP asserts that land subsidence in the area has been "effectively managed." Clearly it has not, and the GSP does not provide a plan for effectively managing the problem. Angiola requests that DWR find the GSP inadequate and require the GSAs to improve it in four ways.

First, particularly given the importance of the Corcoran Clay (which creates a two-aquifer system with an upper, unconfined aquifer and a lower, confined aquifer), collection of information about existing wells, including well completion reports, is foundational to management of the Subbasin. The GSP, in section 5.4.1.3, allows the GSAs to take until 2025 to collect that information. Angiola requests that DWR require the GSAs to collect that information as quickly as is practicable, within the first year of SGMA implementation.

Second, the GSP finds that existing subsidence impacts to infrastructure are not significant and unreasonable, which is plainly untrue given the cost of remediating damage to facilities like Angiola Ditch and Utica Canal. Angiola requests that DWR reject that finding and require the GSAs to realistically consider the subsidence impacts on these facilities.

Third, the GSP admits, in section 4.3.1.3, that “[c]ontinued land subsidence in the Subbasin may result in impacts to beneficial uses and users that are significant and unreasonable” and that “the GSA’s may not be able to manage and/or mitigate the effects to infrastructure and land use.” This is not consonant with the purposes of SGMA. The GSP should be a plan for preventing those impacts to beneficial users, including damage to Angiola’s infrastructure. Angiola requests that DWR require the GSAs to adjust the minimum thresholds and measurable objectives to reasonably address impacts to that infrastructure.

Fourth, Angiola requests that DWR require the GSAs to include additional management actions that would address the subsidence problem realistically. Three proposals have been made that Angiola believes should be included in the GSP:

- Confined Aquifer Well Moratorium. As demonstrated by Figure 3-35a and Figure 3-35b of the GSP, subsidence has accelerated since the passage of SGMA, largely due to the creation of new wells pumping from the confined aquifer wells since 2014. Because pumping from these confined aquifer wells makes the most significant contribution to the problem, the GSP should include a moratorium on drilling new confined aquifer wells (with the exception of replacement wells) and on pumping from confined aquifer wells (other than replacement wells) drilled after 2014. This moratorium should last at least until the GSAs demonstrate progress toward reducing subsidence.
- Proportional Reduction. Pumping from confined aquifer wells should be gradually reduced by imposing proportional reductions in pumping (subject to prescriptive rights based on historical pumping).
- Extraction Fees. Because the subsidence impacts have caused, and are continuing to cause, significant damage to infrastructure in the Subbasin, the GSP should include an extraction fee on confined aquifer wells that would collect sufficient funds to mitigate those infrastructure impacts.

In addition to these deficiencies in the GSP, which Angiola asks DWR to address, Angiola also notes that the subsidence problem cannot be fully addressed without adequate data. At this time, as noted in the GSP, there are no USGS extensometers installed in the Subbasin. Angiola requests that DWR expedite the process of funding and installing at least two in the first year of SGMA implementation.

Angiola appreciates the opportunity to provide comments to DWR on the GSP, and I encourage you to contact me if you have any questions regarding our comments or the issues discussed above.

Sincerely,



Mark Grewal
General Manager
Angiola Water District