

6 April 2026

To: Eric Limas, PE, Lower Tule River Irrigation District Groundwater Sustainability Agency (LTRID) and Pixley Irrigation District Groundwater Sustainability Agency (Pixley)
Travis Millwee (LTRID and Pixley)

Cc: Alex Peltzer, Peltzer and Richardson LLP
Jennifer L Spaletta, Stoel Rives LLP

From: EKI Environment & Water, Inc. (EKI)

Subject: Comments on State Water Resources Control Board's Review of *Requests for Exclusion from Probationary Reporting and Fees, Tule Subbasin*

EKI Environment & Water, Inc. (EKI) is submitting this letter on behalf of the Lower Tule River Irrigation District Groundwater Sustainability GSA (LTRID) and Pixley Irrigation District GSA (Pixley), collectively referred to herein as the "LT GSAs" in response to the State Water Resources Control Board's (SWRCB's) March 2026 *Review of Requests for Exclusion from Probationary Reporting and Fees for the Tule Subbasin* (Staff Report¹). These comments are informed by the California Department of Water Resources' (DWR's) Land Subsidence Best Management Practices² (BMP) which provides the State's technical guidance for the subsidence management under the Sustainable Groundwater Management Act (SGMA).

We appreciate SWRCB's thorough and detailed review of the exclusion request and recognize the significant effort undertaken to evaluate the technical materials. However, in light of current progress in the Subbasin and additional comments on the Staff Report listed below, we request that the SWRCB reconsider its recommendation for denying the LT GSAs' exclusion request. We believe that there are some key technical and policy issues that we can work to get alignment on that achieve the shared goals of achieving groundwater sustainability within the Tule Subbasin while mitigating some of the devastating economic and other impacts in the LT GSAs that would disproportionately occur under some of the proposals put forward in the Staff Report.

CURRENT PROGRESS IN THE SUBBASIN

Currently, and over the last several months, there have been significant coordination efforts among the Tule Subbasin GSAs at the technical, managerial and policy level. The intent of these efforts is to address many of the concerns described in the SWRCB Staff Report including fragmentation and lack of

¹ State Water Resources Control Board, 2026. Review of Requests for Exclusion from Probationary Reporting and Fees, Tule Subbasin. March.

² California Department of Water Resources, 2026. Land Subsidence Best Management Practices. January.

coordination in the Subbasin, as well as ongoing subsidence, well mitigation, and groundwater quality. These efforts have led to the following:

- Agreement by at least 11 of the GSAs to develop a single Groundwater Sustainability Plan (GSP) for the Subbasin in 2026.
- Initiation of the Southern Land Subsidence Study Area (SLSSA) analysis, which is intended to address subsidence concerns in the southern portion of the Subbasin and will incorporate guidance from DWR's Land Subsidence BMP.

COMMENTS AND CLARIFICATIONS ON THE STAFF REPORT

1. The GSPs Established Subsidence Minimum Thresholds to Avoid Significant and Unreasonable Impacts on Critical Infrastructure and Land Uses

Sections 2 and 5 of the BMP² states that subsidence management under SGMA should focus on avoiding significant and unreasonable impacts to critical infrastructure and land uses, and emphasizes that adaptive management is a key component of successful long-term implementation.

Consistent with this guidance, the Tule Subbasin GSAs defined undesirable results for land subsidence under the 2022 Coordination Agreement³ as *“Land subsidence that occurs during the transition period from 2020 to 2040 will be considered significant and unreasonable if damage and/or loss of functionality of a structure or facility occurs to the extent that the structure or facility cannot reasonably operate without either repair or replacement, as determined by the GSA where the structure and facility are located or where beneficial use is impacted due to the damage and/or loss of functionality of the structure or facility.”* This definition directly aligns with the BMP's impact-based framework.

In further alignment with this definition, the Tule Subbasin GSAs established subsidence minimum thresholds (MTs) by explicitly evaluating critical infrastructure across the Tule Subbasin and selecting thresholds that are protective of the most vulnerable land uses. As documented by Thomas Harder & Company (TH&Co), *“In areas with multiple land uses/infrastructure types, the cumulative land subsidence MTs were selected to be protective of the most vulnerable land uses⁴.”* Accordingly, while the adopted MTs within the LT GSA areas allow for some additional subsidence during the SGMA implementation period (2020–2040), the allowable subsidence was determined to be protective of critical infrastructure. For areas within the Subbasin where MTs have not yet been finalized due to data gaps, technical uncertainties, or ongoing coordination, the Tule Subbasin GSAs have initiated additional work including the current Southern Land Subsidence Area Study led by TH&Co, to further refine and appropriately establish MTs based on site-specific conditions.

The Tule Subbasin GSAs also coordinated the subsidence MTs regionally to ensure consistency across subbasin boundaries as shown in **Figure 1**. TH&Co⁴ describes that, *“Land subsidence MTs were also selected to be coordinated with neighboring subbasins. Minimum thresholds along the northern, western*

³ Tule Subbasin GSAs, 2022. Tule Subbasin Coordination Agreement. July 13.

⁴ Thomas Harder & Co., 2024. Technical Support for Land Subsidence Sustainable Management Criteria in the Tule Subbasin. July 22.

and southern Tule Subbasin boundaries are consistent with those being proposed for the Kaweah Subbasin, Tulare Lake Subbasin, and Kern Subbasin, respectively.”

As described in the GSPs (Section 3.5.1.3.2), “The MTs for the land subsidence sustainability indicator were used to define the lower aquifer [groundwater level] MTs.” If the Staff Report recommends that the subsidence and water level MTs be revised significantly upward in the Tule Subbasin, then there will be a direct conflict with those that have, for example, been approved in the neighboring Kaweah Subbasin. It is not realistic to assume that the LTRID GSA could raise water levels by 100s of feet as the SWRCB is suggesting and eliminate any future subsidence, if directly at its border an approved GSP is allowing for 60 feet of additional water level decline and 7 feet of subsidence by 2040.

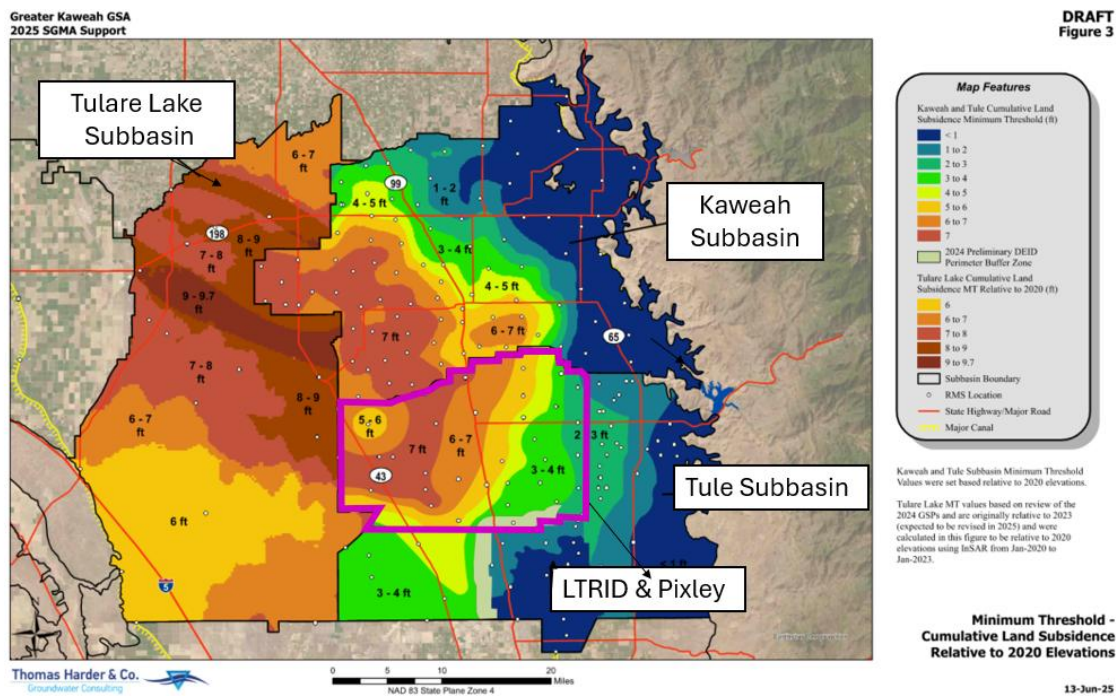


Figure 1. Coordinated Land Subsidence Minimum Thresholds in the Tule Subbasin, Kaweah Subbasin and Tulare Lake Subbasin. Annotated version of a figure presented at the 13 June 2025 Regional Subsidence Monitoring and Action Plan Meeting.

2. Land Subsidence Management Targets Should Reflect SGMA Timeline and Critical Head Corresponding to Established Subsidence MTs

The BMP (page ES-1) states that GSAs should “adaptively manag[e] a basin as conditions change.” Presumably this would occur over the 2020–2040 planning horizon, with evaluation of conditions relative to sustainable management criteria, including MTs, measurable objectives (MOs), and allowable subsidence. The BMP framework recognizes that GSAs may not achieve immediate stabilization of subsidence; rather, groundwater levels should be managed over time to avoid significant and unreasonable impacts while progressing toward sustainability, as illustrated in Figure 2.

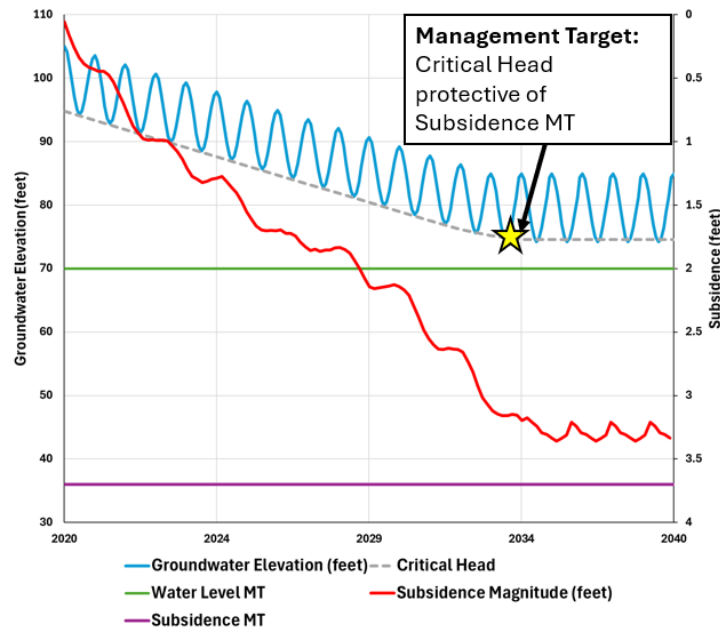


Figure 2. Illustrative Schematic of a Critical Head Value Aligned with the Adopted Subsidence MTs

Consistent with this framework, the Tule Subbasin GSAs have established subsidence MTs that allow for a limited amount of additional subsidence during the SGMA implementation period, provided that such subsidence remains protective of critical infrastructure. The LT GSAs’ ongoing efforts, including development of Subsidence Management Plans (SMP), are focused on adaptive management and achieving the MO of no inelastic subsidence after 2040, consistent with the SGMA timeline.

The Staff Report relies on a study conducted by Intera⁵ that includes an interpretation of critical head (CH) conditions as of 2024 and applies these values as a benchmark for evaluating groundwater and subsidence management in the Tule Subbasin. As shown in **Figure 3**, the CHs referenced in the Staff Report are based on 2024 conditions, which effectively precludes any additional inelastic subsidence going forward, in contrast to the adopted subsidence MTs, and would substantially limit the LT GSAs’ operational flexibility to achieve sustainability by 2040. This framing assumes that subsidence must be halted at the present-day instead of over the SGMA implementation timeline, which allows for a transition period through 2040 as long as significant and unreasonable impacts are not occurring. As stated above, per work done by TH&Co⁴, the adopted subsidence MTs in the LT GSAs are designed to prevent significant and unreasonable impacts.

⁵ Intera, Inc., 2025. Tule Subbasin Subsidence Simulations Critical Head Analysis and Model Predictions.

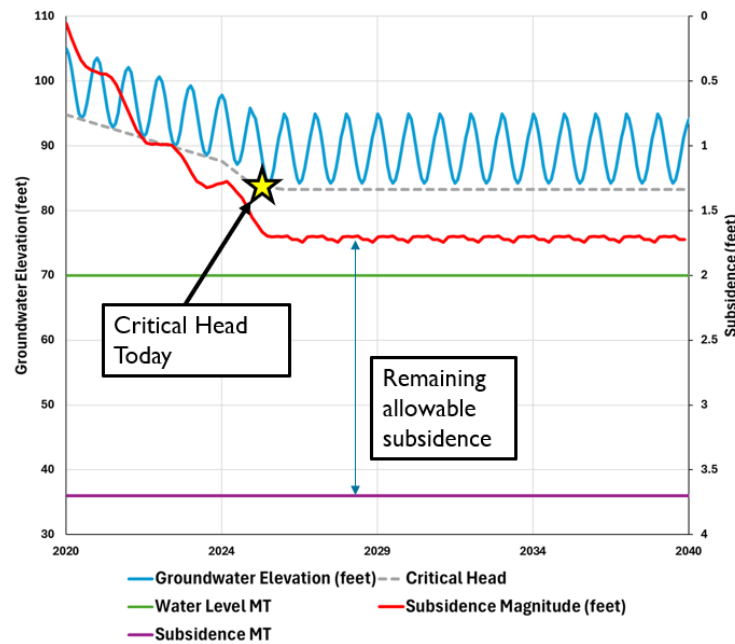


Figure 3. Illustrative Schematic Depicting how the Critical Head Referenced in the Staff Report is not Consistent with the Adopted Subsidence MTs

The Staff Report relies on three sites within the LT GSA area (T949R, PTS18, and J88) to represent land subsidence and groundwater level conditions. However, these sites are neither designated groundwater level representative monitoring sites (RMS) nor land subsidence RMS within the LT GSAs. Groundwater level and subsidence data for these locations appear to have been compiled from nearby or adjacent sites, and lithologic conditions were interpreted to support development of the corresponding one-dimensional (1D) models. In addition to the InSAR subsidence data, the analyses rely on a limited number of historical spirit-leveling measurements—eight data points for PTS18, eleven for J88, and nine for T949R—primarily spanning the period from the 1920s through the 1980s. The LT GSAs were unable to verify the sources and quality of these data, as well as the associated lithologic interpretations. This is despite the LT GSAs maintaining well registration programs and having access to local borehole information provided by landowners that could support or refine such interpretations.

The resulting CHs estimated from the 1D models for the three sites within LT GSAs depart substantially from observed groundwater levels over the past three decades, remaining consistently above measured water levels (see the left column on **Figure 4**). This behavior contrasts with other example sites in the BMP where the estimated CH and groundwater levels generally remain more closely aligned (see the right column on **Figure 4**). The divergence between the observed water levels and the CH values cited in the Staff Report at T949R, PTS18 and J88 may stem from model parameterization, post-processing, or expert judgement, however, the LT GSAs and other interested parties lack visibility and input into the CH estimates cited by the Staff Report at these locations.

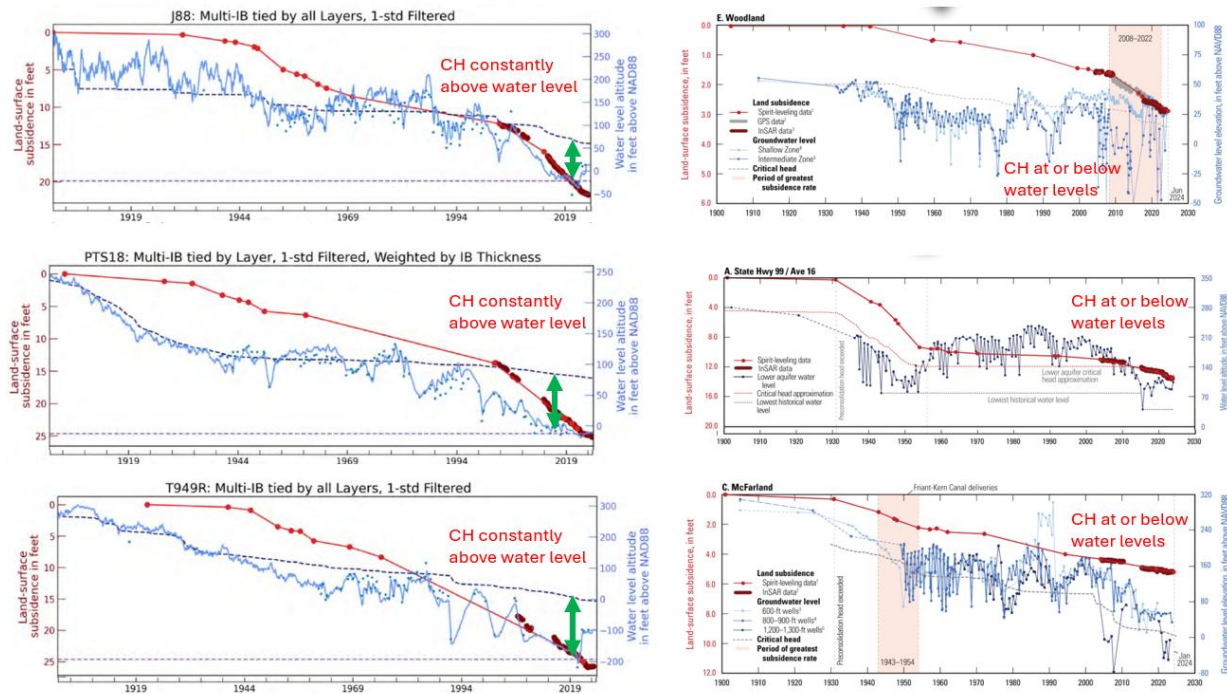


Figure 4. Comparison of Observed Groundwater Levels and Critical Head (2024) Estimates at the LT GSA Sites (Intera, 2025) to Other BMP Example Sites

3. Critical Head is Not a Singular or Certain Value

As noted in the BMP, CH is not a singular or certain value and “varies by location and depth,” (BMP page 4-7) and with time. Additionally, the BMP recognizes that estimates of CH are inherently uncertain and “should be communicated as a relative indicator with associated uncertainty clearly conveyed to stakeholders,” (BMP page 5-13). This guidance is fundamental to the appropriate interpretation and application of CH in groundwater and land subsidence management.

The BMP identifies 1D subsidence numerical modeling as an effective tool for estimating CH and supporting the development of subsidence MTs. At the same time, the BMP explicitly acknowledges that 1D models involve simplifying assumptions and do not capture the full spatial variability of groundwater flow, pumping, or recharge across a Basin. As such, results from these models should be interpreted within the context of their limitations and inherent uncertainty.

The 1D modeling approach referenced in the Staff Report is consistent with BMP-recommended tools in that it utilizes MODFLOW 6 with the Skeletal Storage, Compaction and Subsidence (CSUB) package and incorporates PEST-PyEMU⁶ for ensemble-based data assimilation and model calibration, enabling robust estimation of critical heads and projection of future subsidence under various groundwater management scenarios⁷. However, by design, PEST-PyEMU generates an ensemble of model realizations that represent

⁶ White, J.T. et al., 2016. A python framework for environmental model uncertainty analysis, Environmental Modelling & Software, Volume 85. November.

⁷ <https://data.cnra.ca.gov/dataset/cv-1d-subsidence-models-and-tech-memo>

a wide range of plausible parameter combinations and system responses. As a result, the output is not a single CH value, but a distribution of possible values that must be interpreted to derive a representative metric.

The BMP (page C-9) states that “For models that use multiple systems of delay interbeds, an average can be taken across each system of delay interbeds to provide a representative critical head”. This recommendation explicitly supports the use of representative (e.g., average or central tendency) values rather than extreme values (e.g., maximum or upper bounds) when interpreting modeling results that inherently produce a large range of plausible outcomes.

To date, the LT GSAs have applied the BMP-recommended 1D modeling approach to evaluate CH at the existing sites cited by the SWRCB (J88, T949R, and PTS18)⁸ and are working to expand this analysis to its actual groundwater level and land subsidence RMS, where sufficient data are available. As an example, **Figure 5** presents preliminary CH estimates for T949R and J88, and **Table 1** summarizes key statistics of these estimates, including the modeled range of values.

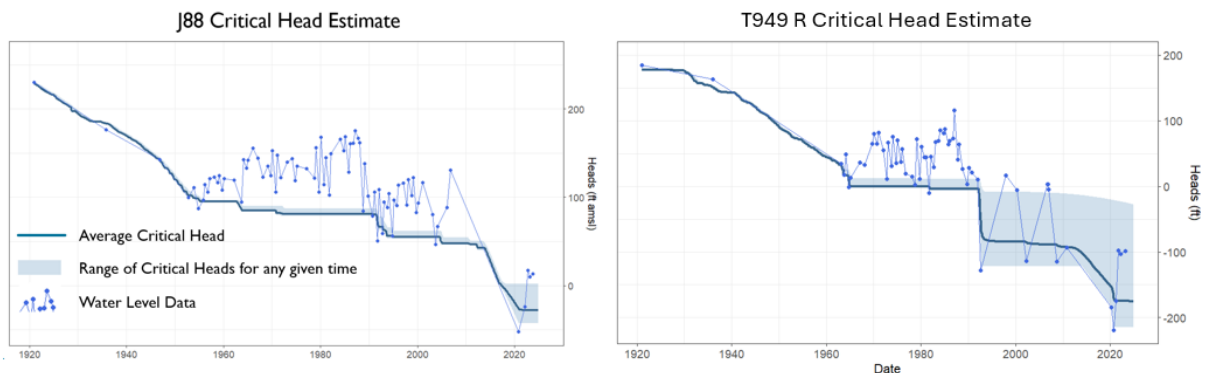


Figure 5. Preliminary Critical Head Estimate for J88 and T949R

Table 1. Comparisons of LT GSAs Critical Head Analysis to CH Values Referenced in Staff Report

	J88			T949R		
Statistics (2024-09)	Model CH (ft amsl)	Staff Report CH (ft amsl)	GWL-MT (ft amsl)	Model CH (ft amsl)	Staff Report CH (ft amsl)	GWL-MT (ft amsl)
Min	-52	59	-38	-215	-5	-118
Mean	-30			-175		
Max	11.2			-27		

⁸ The BMP-recommended 1D subsidence modeling approach was only recently formalized in January 2026 and provides limited prescriptive technical guidance for implementation. The LT GSAs have promptly applied this updated framework and are continuing to refine and expand the analysis as additional data becomes available. This iterative and evolving approach is consistent with BMP’s emphasis on adaptive management.

These results (and those shown on the right side of **Figures 6 and 7**) demonstrate that, when evaluated using representative average CH values consistent with BMP guidance, the groundwater level minimum thresholds (GWL-MTs) and current water levels within the LT GSA areas are generally much closer, and in some cases above, the CH values presented in the Staff Report. And again, these CH values do not reflect the additional allowable subsidence that was determined in the GSPs to not cause significant and unreasonable impacts to critical infrastructure⁴.

Figure 4 of the Staff Report compares interpolated lower aquifer GWL-MTs to the estimated CH values and states that the LT GSAs would need to increase GWL-MTs by approximately 100 to 163 feet (left side of **Figure 6**). Figure 5 of the Staff Report further shows that current groundwater levels are approximately 50 to 100 feet below the estimated CH at these sites (left side of **Figure 7**). Having conducted this independent analysis, it is not clear to us what the basis was for the CH estimates used in the Staff Report, as they appear to be closer to the maximum potential CH value generated by the 1D model, and significantly above the BMP-recommended average values.

Further, we note these sites are not proximate to critical infrastructure and that the groundwater level targets identified in the Staff Report are broadly consistent with 1980s-era conditions. Achieving such conditions would represent a substantial departure from the codification of 2015 as a SGMA baseline (CWC §10727.2(b)(4)) and raises significant questions regarding the feasibility and consistency of these targets within the SGMA implementation framework, not to mention the resulting devastating economic impacts associated with trying to achieve these water levels to avoid any subsidence when additional allowable water level decline and subsidence has been approved in adjacent subbasins.

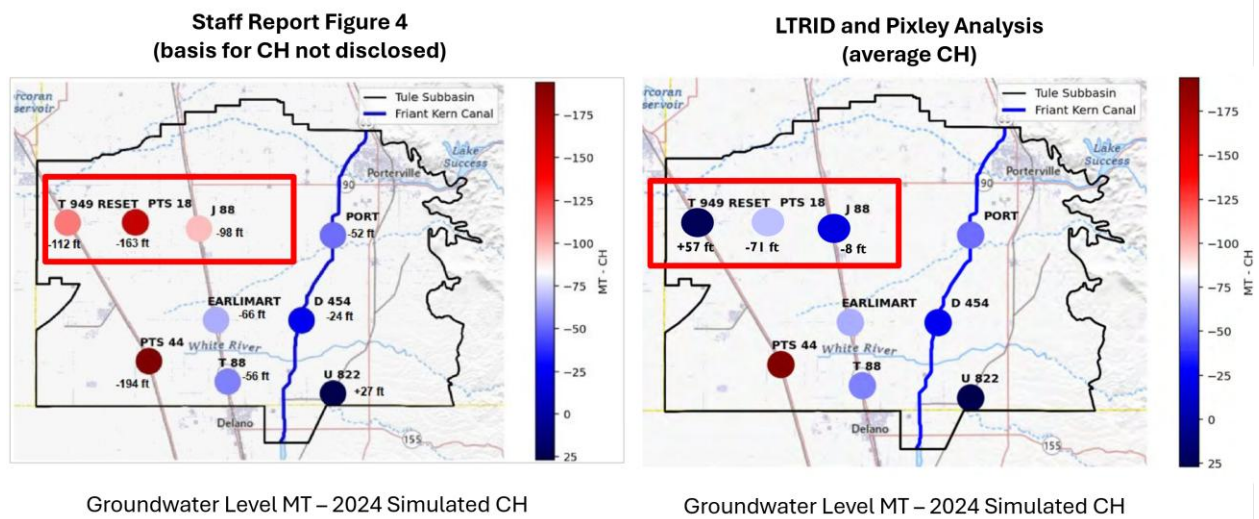


Figure 6. Comparison of Groundwater Level MTs and 2024 Simulated Critical Heads

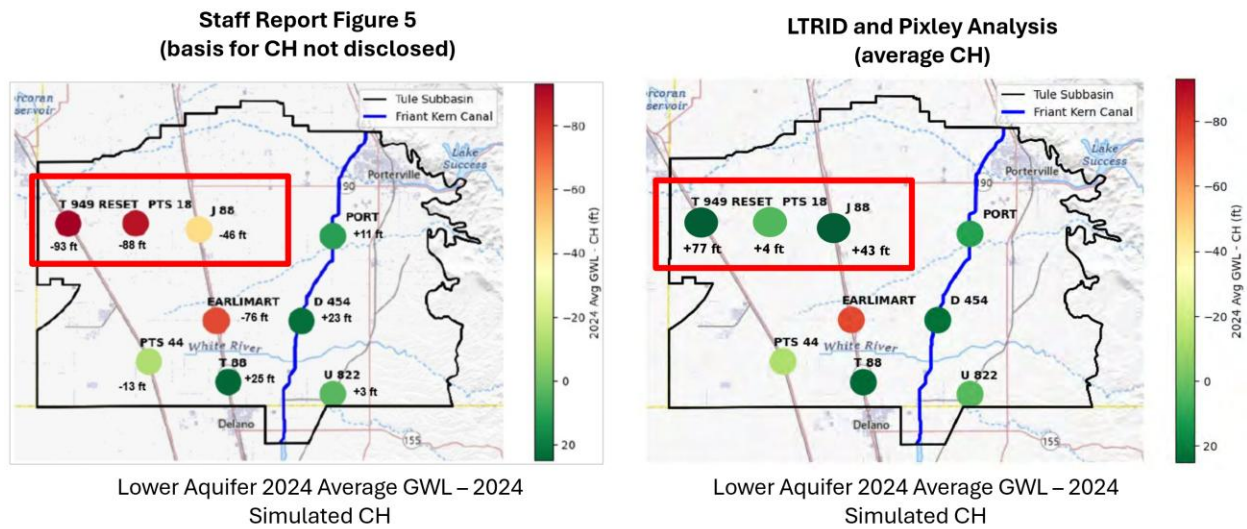


Figure 7. Comparison of Lower Aquifer 2024 Average Groundwater Level and 2024 Simulated Critical Heads

4. Consistency of GWL-MTs with Adopted Subsidence MTs and MOs

The Staff Report states that the LT GSA’s Lower Aquifer GWL-MTs need to be raised significantly to avoid subsidence MTs and states that it is unclear if the GWL-MTs will be adjusted to be protective of subsidence based on estimates of CH (page 25).

Evaluation of subsidence responses under various groundwater level scenarios further demonstrates that the adopted GWL-MTs are protective of subsidence MTs at sites J88 and T949R. The LT GSAs are actively working to expand this analysis to additional representative monitoring sites (RMS), where data are available.

As shown in **Figure 8**, BMP 1D model simulations were performed at the LT GSA sites under multiple groundwater level scenarios, including: (1) 2015 groundwater level conditions; (2) GWL-MT conditions; and (3) a no-SGMA implementation scenario. These simulations were evaluated across full ensemble realizations to account for model uncertainty and variability in aquifer response. Results indicate that, under GWL-MT conditions, projected subsidence remains below the established subsidence MT through 2040 across the ensemble range. Furthermore, model results indicate that post-2040 subsidence behavior generally stabilizes under GWL-MT conditions, with most ensemble realizations showing minimal additional subsidence over time. This behavior is consistent with the intended SGMA implementation period (2020–2040), during which some level of subsidence may occur, followed by stabilization as groundwater conditions are managed sustainably.

Overall, these results provide quantitative support that the LT GSAs’ GWL-MTs appear to be sufficient to maintain subsidence within acceptable limits and achieve long-term sustainability objectives and do not need to be radically re-defined as suggested in the Staff Report. Rather, the focus should remain on managing water levels above the GWL-MTs.

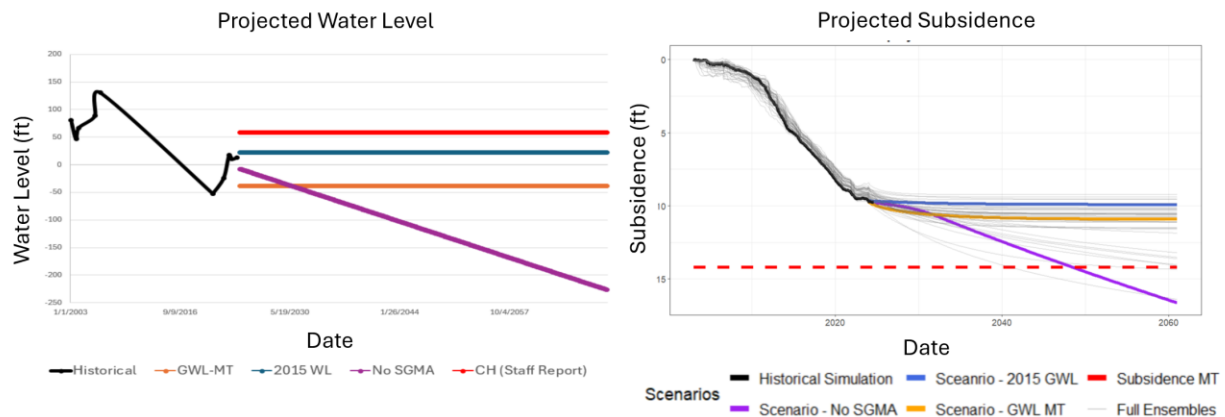


Figure 8. Simulated Projected Subsidence under Various Projected Water Level Scenarios

5. Clarification of Staff Report Interpretation of EKI 2025 Analyses

The Staff Report (page 13) states:

“GSA’s current management approaches do not appear to be sufficient to stop subsidence at the 2040 target and, if following the same trajectory, will more than likely exceed their 2040 targets, potentially as soon as 2028 in some areas (EKI, 2025).”

To clarify, the referenced results are based on a projected baseline (business-as-usual) scenario, which assumes continuation of recent (WY 2020–2024 average) groundwater pumping conditions within the LT GSA area. This scenario was intentionally developed to evaluate potential subsidence outcomes in the absence of additional management actions. As such, the scenario represents a hypothetical baseline condition rather than a projection of future conditions under current or planned groundwater management within the LT GSAs. Importantly, the results of this baseline scenario were used to inform management decisions, including the implementation of reduced allocations for 2026 and a commitment to further reductions in the future as needed to arrest subsidence. Accordingly, the projected baseline scenario should not be interpreted as reflecting the trajectory of current management conditions within the LT GSAs.

6. Clarification on LTRID and PID Allocations and Use of Precipitation Credits

Staff Report (page 23) states:

“The GSPs include allocation plans that, if followed, would limit pumping to the sustainable yield described in the plan (1.03 acre-feet per acre (AF/A)) by 2040 (2024 LTRID GSA GSP, Appendix 5-A; 2024 PIXID GSA GSP, Appendix 5-A; Limas, 2025e, Attachment 3) and milestone-driven subsidence plans that include requirements to reduce allocations more quickly if subsidence rates are not on track to avoid established MTs”

Further, the Staff Report (page 25) states:

“The GSAs should take a more proactive approach to reduce subsidence. Subsidence values have approached or exceeded 50% of MTs over large portions of Lower Tule and Pixley (LTRID and PIXID GSAs, 2025b), and it is unclear if GSAs are taking the actions required by their milestone-driven subsidence plans. Lower Tule and Pixley GSAs adopted new subsidence MTs in their 2024 GSPs; subsidence was already approaching or exceeding 50% of these new 2024 MTs at the time they were established. The current rate of subsidence would result in exceedances of their 2040 target in 2028 or earlier in Pixley based on their consultants’ modelling (Samuelson, 2026 and EKI, 2025).”

As an adaptive management action in response to current subsidence conditions, in 2025 LTRID and PID adopted GSA-wide allocations for **2026 only** that are more aggressive than what would be required in their currently adopted GSPs and SMPs. The LT GSAs have: (1) established GSA-wide allocations for 2026 that are significantly lower than previous allocations to broadly curtail pumping, instead of making targeted SMMZ-specific reductions based on subsidence thresholds and reflect stronger action than required in the SMPs; (2) committed to review and update allocations on an annual basis in response to changing conditions and new data to manage subsidence above MTs; and (3) moved on an accelerated basis to remove transitional pumping, as reflected in the 2026 allocations.

Elsewhere (page 24), the Staff Report states, “Because not all precipitation will result in groundwater recharge, it may no longer be appropriate to use precipitation values to directly correlate to allocation credits” as the GSAs move to metering pumping.

The LT GSA 2026 Allocations remain based on evapotranspiration, and as such, actual pumped volumes in 2026 will likely be below the allocated amounts. Additionally, both GSAs are actively evaluating to what extent precipitation credits will be revised for 2027.

7. Pixley GSA is committed to intra-basin coordination to address DEID’s concerns

Staff Report (page 25) states:

“Pixley should adjust water level and subsidence MTs to take into account subsidence impacts to DEID infrastructure. Pixley stated that it is actively coordinating with the Delano-Earlimart Irrigation District (DEID) to avoid significant and unreasonable impacts to DEID’s water delivery pipelines. Through this ongoing coordination and the collection of additional data, MTs in these areas may change (Limas 2025c); however, the MTs have not yet been coordinated between Pixley and DEID.”

As mentioned above, Pixley GSA is among the GSAs that have approved the SLSSA analysis that will be conducted by TH&Co. The purpose of this study is to evaluate the spatial relationship between groundwater pumping and land subsidence within the southern portion of the Tule Subbasin, including Pixley GSA and DEID GSA. The analysis will quantify how pumping both within and outside a given area contributes to subsidence, recognizing that hydrogeologic impacts may cross GSA boundaries. This analysis will leverage a modified version of the Tule Subbasin Groundwater Flow Model to simulate multiple pumping scenarios, including reduced and redistributed pumping, and will quantify their relative contributions to subsidence in different GSAs. The results of this study will directly inform refinement of SMCs and mitigation strategies, including potential adjustments to subsidence and GWL MTs in the vicinity of the Pixley/DEID boundary.

8. LT GSAs Are Actively Addressing Groundwater Quality Through Coordinated Subbasin Efforts

Staff Report (page 25) states:

“GSAs need to develop proposals sufficient to fully resolve remaining groundwater quality deficiencies and incorporate those proposals in revised GSPs. Some current issues include that one of the criteria for an undesirable result requires that MTs be exceeded at 33% of RMS, which would represent widespread water quality degradation, that monitoring frequencies are not sufficient, and water quality mitigation is not sufficient”

The Tule Subbasin has established an ongoing Groundwater Quality Technical Working Group (GWQ TWG), led by 4 Creeks, consisting of technical representatives from GSAs and supporting consultants. The GWQ TWG has led a coordinated, subbasin-wide effort to evaluate groundwater quality conditions and has been actively engaged with SWRCB staff on groundwater quality issues. Through this process, the GWQ TWG is developing a consistent and technically defensible framework for groundwater quality management and mitigation.

9. Analysis Does Not Support Raising Lower Aquifer Groundwater Level MTs by up to 175 Feet in LT GSAs

Staff Report (page 25) states:

“Lower Tule, Pixley, and Tea Pot Dome should significantly raise many lower aquifer groundwater level MTs (by up to about 175 feet) to slow subsidence and prevent exceedance of subsidence MTs. While these GSAs indicated in December that they plan to estimate critical head (Limas, 2025a; Limas, 2025c; Limas, 2025e), it is unclear whether they plan to modify MTs accordingly and manage water levels (via allocations) to avoid new MTs”

As demonstrated in Sections 1, 2, and 3 of this comment letter, the LT GSAs’ analyses conducted to date indicates that the current lower aquifer GWL-MTs are protective of subsidence-related sustainability criteria (TH&Co, 2024) and coordinated within the Subbasin and across subbasin boundaries. The CH work conducted to date at the three sites cited in the Staff Report similarly indicates that the average CH value is aligned with the GWL-MTs.

The Staff Report’s assertion that GWL-MTs should be raised by up to 175 feet in the LT GSAs appears to rely on CH estimates that cannot be directly replicated using the BMP guidance to use the average of the model ensemble results. Further, these CH estimates are not aligned with the adopted subsidence MTs, which, as described above, were developed to be protective of critical infrastructure.

Furthermore, the LT GSAs have just begun to analyze CH in recent months since the BMP and supporting tools have been finalized, and are actively advancing and expanding the CH evaluation to additional RMS using a consistent and technically defensible methodology. This ongoing work will further refine the relationship between groundwater levels, CH, and subsidence across the GSAs and guide any refinement of GWL- MTs, if warranted.

10. LTRID Used the Best Available Science and Tools to Demonstrate Net-Recharger Status and Have Committed to Well Registration and Metering Programs via Implementation of Subsidence Management Plan

Table 1 of the Staff Report (page 9) displays cumulative water budget values (acre-feet per acre, AF/A) for three periods (1987-2024, 2015-2024, and 2020-2024). Table 1 shows that LTRID's cumulative water budget was 0.42 AF/A for 2015-2024 and 0.45 AF/A for 2020-2024. These results indicate LTRID is a net-neutral / net-recharger in the Subbasin. In addition, Table 2 of the Staff Report (page 11) shows the progress of LTRID's well registration, well metering and allocation progress.

In Resolution No. 2024-0030, the SWRCB granted reporting and fee exclusions to pumpers within the Kern-Tulare Water District and DEID GSAs based **largely** on their status as net-neutral or net-rechargers, along with demonstrated management actions, including well registration and metering programs and **intentions** for demand management. These determinations establish a clear precedent that positive or near-neutral water budget conditions, supported by appropriate management and accounting, are sufficient to demonstrate adequate management.

The LTRID GSA clearly satisfies these same criteria:

- Demonstrated net-positive water budget in post-SGMA timeline as shown in Table 1 of Staff Report.
- Well registration and metering program, as shown in Table 2 of Staff Report.
- Intentions to develop demand management actions, as demonstrated in LTRID's Land Subsidence Management Plan and associated 2026 Allocations that eliminated all transitional pumping allocations.

Accordingly, consistent with established precedent in the Subbasin, the LTRID GSA should be granted exclusion of reporting and fees such that it can continue to focus resources on local groundwater management.

SUMMARY

Per the above, we have identified some key technical issues that we would like the opportunity to further address with the SWRCB staff, and that the Subbasin GSAs will be directly addressing as part of the development of a single GSP and the SLSSA efforts. In particular, coming to alignment on the appropriate GWL-MTs and Subsidence MTs to be protective of significant and unreasonable impacts, and enforcing the demand management and other policies to then achieve compliance with those MTs.