

Appendix J

Friant Water Authority Letter of Support for Subbasin Subsidence Mitigation on the Lower Reach of the Friant-Kern Canal

- J1 Kern Subbasin Progress Report on Friant-Kern Canal Lower Reach Subsidence Mitigation Studies and Requests for Letter of Support from Friant Water Authority
- J2 Friant Water Authority Letter of Support

April 16, 2024

Jason R. Phillips, CEO
Friant Water Authority
856 North Harvard Avenue
Lindsay, CA 93247
Via email: jphillips@friantwater.org

Subject: Kern Subbasin Progress Report on Friant-Kern Canal Lower Reach Subsidence Mitigation Studies and Request for Letter of Support from Friant Water Authority

Dear Mr. Phillips:

As you may be aware, the Kern Subbasin (Subbasin) Groundwater Sustainability Plans (GSPs) were deemed incomplete by the Department of Water Resources (DWR) in 2020 and inadequate in 2022. Since the receipt of the Inadequate Determination, the Subbasin Groundwater Sustainability Agencies (GSAs) have been diligently working to address the DWR-identified deficiencies in the Inadequate Determination, so as to avoid entering probation under the State Water Resources Control Board (SWRCB). At a very high level, the Subbasin GSAs need to address issues related to coordination and consistency of methodologies and set Sustainable Management Criteria that are consistent with SGMA regulations – including subsidence. The Subbasin has been making significant progress in addressing the issues in the Inadequate Determination, and the current schedule indicates the submittal of revised GSPs to the SWRCB in May 2024.

Regarding subsidence, the Subbasin has greatly appreciated the numerous meetings held with the staff and consultants of the Friant Water Authority (FWA). During those meetings, FWA staff has made it very clear that “any unmitigated subsidence beyond 2020 is unacceptable”. Analysis has shown that our proposed groundwater level Minimum Thresholds (MTs) will lead to some amount of subsidence in the future along the lower reach of the Friant-Kern Canal (FKC), which is that portion that is covered by Kern Subbasin GSAs. As such, the Subbasin has been conducting analyses hand-in-hand with FWA staff and consultants to estimate the amount of potential future subsidence and estimate the cost to mitigate that potential subsidence. Through that work, the Subbasin has conservatively estimated a potential of up to 3 feet of subsidence along the aforementioned lower reach of the FKC, and a preliminary cost estimate of \$40M attributable to Kern County GSAs.

Three tasks need to take place to move forward on this analysis and ultimately begin mitigating subsidence on the FKC:

1. Finalize the estimated amount of future potential subsidence caused by groundwater management in the Subbasin
2. Finalize the cost estimate to mitigate the potential subsidence, and determine how it will interact with the capacity correction projections FWA is currently working on
3. Conduct an attribution analysis to determine how mitigation costs may be split between Kern County GSAs

Unfortunately, none of the three tasks above will be completed prior to the May 2024 submittal of the revised GSPs to the SWRCB.

This letter has two goals: Firstly, the Subbasin GSAs wish to clearly state to FWA that the Subbasin GSAs are committed to working with FWA to expeditiously complete the above three tasks and mitigate post-2020 potential subsidence. Secondly, the Subbasin GSAs are requesting a letter of support from FWA for the Subbasin to include within their GSPs with regards to how the Subbasin is handling potential subsidence along the FKC. Since the above three tasks cannot be completed prior to submitting revised GSPs to the SWRCB, the hope is that the work the Subbasin has done to date with

FWA (several technical meetings, cost estimates, impacts analyses, installation of an extensometer along the FKC at Kimberlina Road) combined with the proposed path forward will be sufficient to assure FWA that post-2020 subsidence along the FKC will be mitigated.

To emphasize the Subbasin's commitment to this process, please find attached a scope of work and a cost-share agreement between most Subbasin GSAs to fund the model calibration necessary to complete tasks 1 and 3 above. The aim is to complete this work in 2024, and the Subbasin GSAs look forward to working with FWA to determine how mitigation will fit into the grand scheme of FKC Capacity Correction projects.

Please don't hesitate to contact Kristin Pittack if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Kristin Pittack". The signature is written in a cursive style with a large initial "K".

Kristin Pittack, MS
Kern County Subbasin Plan Manager/Point-of-Contact
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(760) 223-5602

CC:

Johnny Amaral, COO/Chief of External Affairs
jamaral@friantwater.org

Attachments

Attachment 1 INTERA Scope of Work



Jim Erickson
Madera I.D.
Chairman of the Board

Rick Borges
Tulare I.D.
Vice Chairman

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Michael Brownfield
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Lindsay-Strathmore I.D.

Kent H. Stephens
Kern-Tulare W.D.

Arlen Miller
Orange Cove I.D.

Bill De Groot
Pixley I.D.

Brett McCowan
Porterville I.D.

Mark Merritt
Saucelito I.D.

Craig Fulwyler
Shafter-Wasco I.D.

Matt Leider
Tea Pot Dome W.D.

Kurt Parsons
Terra Bella I.D.

Jason R. Phillips
Chief Executive Officer

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April 30, 2024

Kristin Pittack, MS Kern County Subbasin Plan Manager
Rincon Consultants
4825 J St Ste 200
Sacramento, CA 95819

Subject: Kern Subbasin Progress Report on Friant-Kern Canal Lower Reach
Subsidence Mitigation Studies and Request for Letter of Support from Friant
Water Authority

Dear Ms. Pittack and Kern Subbasin GSPs:

We are in receipt of your letter dated April 16, 2024. The letter accurately outlined the history of coordination and communication between Kern Subbasin GSAs and Friant Water Authority (FWA) with regards to subsidence along the lower reach of the Friant-Kern Canal (FKC). As the letter stated, numerous meetings have been held with the goal of estimating projected future subsidence and estimating the cost to mitigate that subsidence.

As you recalled, one of the common points made during the meetings between the Kern Subbasin GSAs and FWA was related to FWAs “zero-tolerance absent proper mitigation” position for future subsidence that impacts the carrying capacity of the Friant-Kern Canal. Given the severity of the carrying capacity impacts as well as the harm done to contractors and communities whose livelihoods depend on a fully functioning canal, FWA has no other choice than to rigorously adhere to this policy, by any means necessary.

With that said, we very much appreciate the candor and transparency of those meetings and that the Kern Subbasin GSAs are committed to adhering to FWA’s policy. We also understand that more time is needed to further analyze and finalize subsidence projections, finalize cost amounts, and conduct an attribution analysis to ultimately determine a cost allocation between the Kern GSAs. Given the coordination thus far, we have confidence that this additional work will be completed expeditiously and that the GSPs in the Kern Subbasin will properly mitigate impacts to the FKC.

Sincerely,

Jason Phillips, CEO
Friant Water Authority