CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

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RE: Department release of technical papers related to depletion of interconnected surface water caused by groundwater use

Dear interested parties,

Today, the Department of Water Resources' Sustainable Groundwater Management Office (SGMO) released drafts of the final two papers in a three-paper series of technical information related to interconnected surface water (ISW) and depletions of ISW caused by groundwater use. The papers aim to equip Groundwater Sustainability Agencies (GSAs) with fundamental technical information on ISW depletion, including data needs, quantification methods, and worked examples from two hypothetical basins. We are opening a 45-day public comment period and encourage interested parties to provide feedback on the contents of the papers. Please email any comments on the papers to: sgmps@water.ca.gov by November 4, 2024.

The science and techniques presented in the papers are not new, but applying these concepts to basinwide groundwater management in California is relatively new. Therefore, groundwater managers, users, and other interested parties may be unfamiliar with the scope and scale of ISW depletion estimates, including when, where, and how those depletions occur. ISW depletion cannot be measured directly and, therefore, must be estimated with tools such as numerical groundwater models. The estimates come with uncertainty, for example, regarding the timing and locations of surface water depletion. However, the science indicates that the quantity of ISW depletion will, over time, approach the amount of pumping consumptively used in many of California's groundwater basins. While concepts such as ISW depletion due to basinwide groundwater use may be novel for California, given the historical separation of groundwater and surface water management, the sooner we acknowledge these realities, the sooner we can effectively and sustainably manage our water resources.

To that end, while the information in these papers will help groundwater managers quantify the effect of groundwater use on interconnected surface water, they don't address how to manage groundwater resources in relation to surface water uses and users. Following the release of these papers, SGMO staff will begin work on a guidance document for managing ISW depletion, including considerations when setting sustainable management criteria. Consistent with one of SGMA's central tenets – that

groundwater management in California is best accomplished locally – it will be up to the GSAs to determine appropriate criteria for their basins based on the beneficial uses and users unique to those basins and consistent with the best available science.

We look forward to engaging with groundwater users and managers in furthering the development of the technical papers and the upcoming guidance document.

Thank You,

Paul Gosselin

Paul Gosselin
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Sustainable Water Management