

1 Vulnerable well impact analysis in the  
2 Sierra Valley Subbasin: well  
3 inventory, historical groundwater  
4 trends, and analysis to inform  
5 Sustainable Management Criteria

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8	<b>Table of Contents</b>	
9	<b>1. Executive Summary</b> .....	<i>ii</i>
10	<b>2. Introduction</b> .....	<i>1</i>
11	<b>3. Methods</b> .....	<i>3</i>
12	<b>3.1 Groundwater level</b> .....	<i>3</i>
13	<b>3.2 Well Completion Reports (WCRs)</b> .....	<i>4</i>
14	<b>3.4 Projected groundwater management</b> .....	<i>4</i>
15	<b>3.3 Classification of failing wells and cost estimate</b> .....	<i>4</i>
16	<b>4. Results</b> .....	<i>6</i>
17	<b>4.1 Groundwater levels</b> .....	<i>6</i>
18	<b>4.2 Well inventory and characteristics</b> .....	<i>7</i>
19	<b>4.3 Well impacts: location, count, and cost</b> .....	<i>10</i>
20	<b>5. Discussion</b> .....	<i>14</i>
21	<b>6. Conclusion</b> .....	<i>15</i>
22	<b>7. References</b> .....	<i>16</i>
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## 24 **1. Executive Summary**

25 Groundwater planning under the Sustainable Groundwater Management Act (SGMA)  
26 aims to curb the chronic lowering of groundwater levels, which may impact shallow,  
27 vulnerable wells and cause dewatering or failure. Relatively shallow residential,  
28 agricultural, and public wells (henceforth “vulnerable wells”) in the Sierra Valley  
29 Subbasin (SV) are beneficial uses of groundwater identified by stakeholders in the SV  
30 groundwater sustainability plan (GSP) working group. Residents and water users in the  
31 SV that rely on drinking water obtained from private domestic wells are considered  
32 beneficial users of groundwater. The GSP aims to halt the chronic groundwater level  
33 decline that can lead to significant and unreasonable impacts to vulnerable wells that  
34 hamper access to water for drinking, irrigation, and municipal/industrial use.

35 Although shallow wells in the SV provide beneficial uses of groundwater, the SV lacks a  
36 comprehensive well census (i.e., inventory) for domestic wells and understanding of  
37 how sustainable management criteria (SMC) may impact vulnerable wells in the SV.  
38 These knowledge gaps motivate this memorandum, which aims to provide a well  
39 inventory based on best available data, and well protection analysis to inform critical  
40 decision-making in support of unsustainable groundwater management in the SV.

41 No wells in the SV were reported dry during the past 2012-2016 drought. Herein, we  
42 assess potential impacts to vulnerable wells that may result during the SGMA planning  
43 and implementation period (2022-2042). First, we take inventory of wells in the SV using  
44 publicly available, digitized well completion reports to describe the location and depths  
45 of different types of wells (e.g., domestic, public, agricultural). Next, we analyze  
46 historical groundwater elevation trends in the SV from 2000-2020. Then, we combine  
47 well construction data and modeled groundwater levels to assess the count and location  
48 of impacted wells assuming different groundwater level scenarios (i.e., a return to the  
49 fall 2015 low, and established groundwater level minimum thresholds, or MTs). Finally,  
50 we advance recommended sustainable management criteria that mitigate impacts to  
51 vulnerable wells.

52 Results suggest that the most common well types with direct beneficial uses are  
53 domestic ( $n = 540$ ), agricultural ( $n = 105$ ), public ( $n = 22$ ) and industrial ( $n = 6$ ) wells<sup>1</sup>,  
54 although the actual number of “active” wells today is likely less due to ageing and well  
55 retirement. Assuming 31 to 40 year retirement ages (based on Pauloo et al, 2020), and  
56 that wells with pumps above initial groundwater level conditions are inactive, the  
57 number of assumed active wells in the SV is much lower: domestic ( $n = 325 - 450$ ),  
58 agricultural ( $n = 57 - 61$ ), public ( $n = 14 - 21$ ), and industrial ( $n = 1$ ). An ongoing well  
59 “census” would supersede these data, but in its absence, this approach provides a  
60 reasonable approximation of the count and location of active wells.

61 During fall of 2015, groundwater levels reach a [modern] historical low in the SV after  
62 four consecutive years of drought and excess pumping to augment lost surface water

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<sup>1</sup> At the time of writing (2021-09-12), these are the well counts provided by the online well completion report database. Note that “public” wells are municipal wells, and “domestic” wells are private residential wells.

63 supply. Data from the DWR and Cal OPR suggests that during this time, no wells in the  
64 SV were reported dry, in contrast to more than two thousand wells reported dry across  
65 California (Pauloo et al, 2020)<sup>2</sup>. Thus, a return to Fall 2015 groundwater level lows is  
66 unlikely to result in catastrophic and widespread well impacts, which we confirm via  
67 modeling described in this memorandum.

68 For the purposes of this study, we assume significant and undesirable results to occur  
69 when 5% or more of wells of any type (domestic, agricultural, public, industrial) are  
70 impacted. Thus, well impact analysis under projected groundwater level conditions was  
71 evaluated to assess impacts assuming a return to historic Fall 2015 lows, and projected  
72 groundwater level MTs. Results suggest that even assuming a worst-case scenario  
73 where all representative monitoring points (RMPs) reach MTs at the same time, only  
74 domestic wells are impacted on the order of 2% (n = 6 - 10). Thus, all well types are  
75 highly unlikely to be impacted at the 5% undesirable result threshold.

76 Well protection analysis thus informed and validated minimum thresholds (MTs) which  
77 avoid significant and unreasonable impacts to wells in the basin. Possible well  
78 protection measures may include a combination of regional groundwater supply and  
79 demand management (e.g., managed aquifer recharge and pumping curtailments that  
80 increase or maintain groundwater levels); well protection funds to internalize well  
81 refurbishment and replacement costs; domestic supply management, (e.g., connecting  
82 rural households to more reliable municipal water systems); and proactive community-  
83 based monitoring that acts as an early warning systems to anticipate impacts at the  
84 level of individual wells.

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<sup>2</sup> Outage data analyzed by Pauloo et al (2020) was provided via an agreement between Cal OPR and the authors, but has since been released by the DWR at MyDryWaterSupply:  
<https://mydrywatersupply.water.ca.gov/report/publicpage>.

## 85 1 Introduction

86 Around 1.5 million Californians depend on private domestic wells for drinking water,  
87 about one third of which live in the Central Valley (Johnson and Belitz 2016). Many  
88 fewer wells are found in the Sierra Valley Subbasin (SV), and these wells tend to be in  
89 mixed agricultural-residential land. Private domestic wells are more numerous than  
90 other types of wells (e.g., public or agricultural), and tend to be shallower and have  
91 smaller pumping capacities, which makes them more vulnerable to groundwater level  
92 decline (Theis 1935; Theis 1940; Sophocleous 2020; Greene 2020; Perrone and  
93 Jasechko 2019). During previous droughts in California, increased demand for water  
94 has led to well drilling and groundwater pumping to replace lost surface water supplies  
95 (Hanak et al 2011; Medellín-Azuara et al 2016). Increased pumping lowers groundwater  
96 levels and may partially dewater wells or cause them to go dry (fail) altogether. During  
97 the 2012–2016 drought, 2,027 private domestic drinking water wells in California’s  
98 Central Valley were reported dry (Cal OPR 2018). Notably, zero dry wells were reported  
99 in the SV, which suggests a combination of relatively stable groundwater levels and  
100 more favorable well construction properties (e.g., deeper wells and pump locations).  
101 Moreover, this observation implies that a return to 2015 low groundwater levels would  
102 not cause widespread and catastrophic well failure in the SV.

103 Until recently, few solutions and data products existed that addressed the vulnerability of  
104 shallow wells to drought and unsustainable groundwater management (Mitchell et al. 2017;  
105 Feinstein et al. 2017). A lack of well failure research and modeling approaches can largely be  
106 attributed to the fact that well location and construction data (well completion reports, or WCRs)  
107 were only made public only in 2017. Released digitized WCRs span over one hundred years in  
108 California drilling history and informed the first estimates of domestic well spatial distribution and  
109 count in the state (Johnson and Belitz 2015; Johnson and Belitz 2017). Since then, these  
110 WCRs, provided in the California Online State Well Completion Report Database (CA-DWR  
111 2018), have been used to estimate failing well locations and counts (Perrone and Jasechko  
112 2017), and domestic well water supply interruptions during the 2012–2016 drought due to  
113 overpumping and the costs to replenish lost domestic water well supplies (Gailey et al 2019). A  
114 regional aquifer scale domestic well failure model for the Central Valley was developed by  
115 Pauloo et al (2020) that simulated the impact of drought and various groundwater management  
116 regimes on domestic well failure. More recently, Bostic and Pauloo et al (2020), EKI (2020), and  
117 Pauloo et al (2021), estimated the impact of reported groundwater level minimum thresholds in  
118 critical priority basins on domestic wells across California’s Central Valley and found that  
119 thousands of domestic wells were potentially vulnerable.

120 California’s snowpack is forecasted to decline by as much as 79.3% by the year 2100 (Rhoades  
121 et al 2018). Drought frequency in parts of California may increase by more than 100% (Swain et  
122 al 2018). A drier and warmer climate (Diffenbaugh 2015; Cook 2015) with more frequent heat  
123 waves and extended droughts (Tebaldi et al 2006; Lobell et al 2011) will coincide with urban  
124 development and population growth, land use change, conjunctive use projects, and  
125 implementation of the Sustainable Groundwater Management Act (SGMA 2014), in which  
126 groundwater sustainability plans (GSPs) will specify groundwater level minimum thresholds  
127 (MTs) that among other outcomes, protect vulnerable wells.

128 In this technical memorandum, we analyze how projected hydrologic conditions may impact  
129 vulnerable wells in the SV, and acknowledge that results are limited by the uncertainty on the



130 actual number and/or construction information available for domestic wells in the SV. In  
131 Section 3, the methodology is explained, followed by the results in Section 4, and a discussion  
132 of the results in terms of how they impact sustainable groundwater management in Section 5.  
133 This memorandum closes with a discussion of future actions and SGMA management  
134 recommendations.

## 135 2 Methods

136 Key data that inform this analysis include seasonal groundwater level measurements  
137 taken by various state-level and local sources, and well completion reports (WCRs)  
138 from the California Department of Water Resources (CA-DWR 2018).

### 139 2.1 Groundwater level

140 Historic and present-day groundwater conditions were analyzed using all available data from the  
141 California Department of Water Resources (DWR) Periodic Groundwater Level Database. Most  
142 groundwater level data is collected biannually in spring and fall and intended to capture  
143 seasonal variation – notably due to winter recharge and pumping and recharge during the dry  
144 growing season.

145 Duplicate measurements between data sources were reconciled by comparing monitoring site  
146 identification codes and position (latitude and longitude).

147 Groundwater levels were assessed at biannual seasonal intervals during the period from spring  
148 2000 to fall 2020 and encompass what can be considered “historic”<sup>3</sup> to approximately “present-  
149 day” seasonal conditions. This temporal range was selected because poor data density prior to  
150 spring 2000 and after fall 2020 prohibits meaningful analysis. “Spring” was defined as the  
151 months of March, April, and May and “fall” was defined as the months of August, September,  
152 and October.

153 At each monitoring location, the average groundwater level measured during spring and fall was  
154 computed by taking the grouped mean of observations in each spring and fall respectively.  
155 Next, to improve spatial data density and ascertain long-term regional trends, data were  
156 arranged in 4-year running seasonal means. For example, the 2000-2003 spring level is defined  
157 as the average spring groundwater elevation in 2000, 2001, 2002, and 2003. A four-year sliding  
158 window was applied to data from 2000 to 2020, resulting in 36 seasonally averaged  
159 groundwater elevation conditions (e.g., spring 2000-2003, fall 2000-2003, ..., spring 2017-2020,  
160 fall 2017-2020). Windows of differing length (e.g., 1, 2, and 3-year long running means) were  
161 explored but resulted in larger groundwater level variance due to a lack of adequate spatial  
162 density, and hence, not used. By contrast, 4 year running means gave adequate regional spatial  
163 data density and were not so long in duration as to dampen the impact of significant dry periods  
164 such as the 2012-2016 drought.

165 After data were grouped into seasonal 4-year windows, ordinary kriging<sup>4</sup> (Journel A.G. and  
166 Huijbregts, 1978) was applied to groundwater elevation measurements to generate groundwater  
167 level surfaces across the SV at a 500 meter (0.31 mile) resolution. Groundwater level  
168 measurements were screened to include data from wells shallower than 300 feet in total  
169 completed depth to reflect conditions in the unconfined to semiconfined production aquifer.

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<sup>3</sup> Importantly, this period contains the recent 2012-2016 drought.

<sup>4</sup> An exponential variogram model was used, and results did not appreciably differ from linear or spherical models. Stationarity across the unconfined to semiconfined aquifer is a reasonable assumption in the unconsolidated, alluvial aquifer-aquitard system that spans Sierra Valley. Data outliers were controlled by removing tails of the distribution above and below the 97.5<sup>th</sup> and 2.5<sup>th</sup> percentiles respectively. Groundwater elevations were approximately normal in distribution, thus log-transformation and exponentiation after kriging was not required.

## 170 **2.2 Well Completion Reports (WCRs)**

171 The well completion report database (CA-DWR, 2020) was used to filter and clean WCRs within  
172 the SV. Similar well types were grouped into categories (e.g., “domestic”, “private residential”,  
173 and “residential” were all grouped together) to enable analysis of wells by type. The majority of  
174 wells are accurate to the centroid of the nearest section in the PLSS Survey system (1 square  
175 mile grid cells). All wells reviewed in the SV had a total completed depth.

## 176 **2.3 Projected groundwater management**

177 Well impacts are characterized in terms of historical data and future, anticipated hydrology.  
178 Forward-simulated hydrologic conditions based on groundwater level MTs were assessed to  
179 ensure that MTs would not significantly and unreasonably impact wells.

180 Differences in groundwater level between each of the scenarios tested (i.e., fall 2015, and the  
181 MT scenario) and the “baseline” inform how wells in the basin may respond to historical drought  
182 projected groundwater management.

## 183 **2.4 Classification of failing wells and cost estimate**

184 The initial set of wells to consider are a subset of all domestic wells in the WCR  
185 database. Wells are removed based on the year in which they were constructed<sup>5</sup>, and  
186 their estimated pump location relative to the initial groundwater level condition prior to  
187 impact analysis. In other words, wells that are likely to be inactive, or already dry at the  
188 initial condition are not considered, and do not count towards the well impact count.

189 Next, we assign a “critical datum”<sup>6</sup> to each well, equal to 30 feet above the total  
190 completed depth, roughly 3 times the height of water column required to prevent  
191 decreased well function and cavitation as calculated by Pauloo et al 2020 using  
192 standard assumptions of pumping rate, net positive suction head, barometric pressure  
193 head, vapor pressure, and frictional losses (see Pauloo et al 2020, SI Appendix Section  
194 S2.3). If groundwater level scenarios imply a groundwater elevation below this critical  
195 datum, the well is considered “impacted” and may require pump lowering or well  
196 deepening to rehabilitate it (**Error! Reference source not found.**).

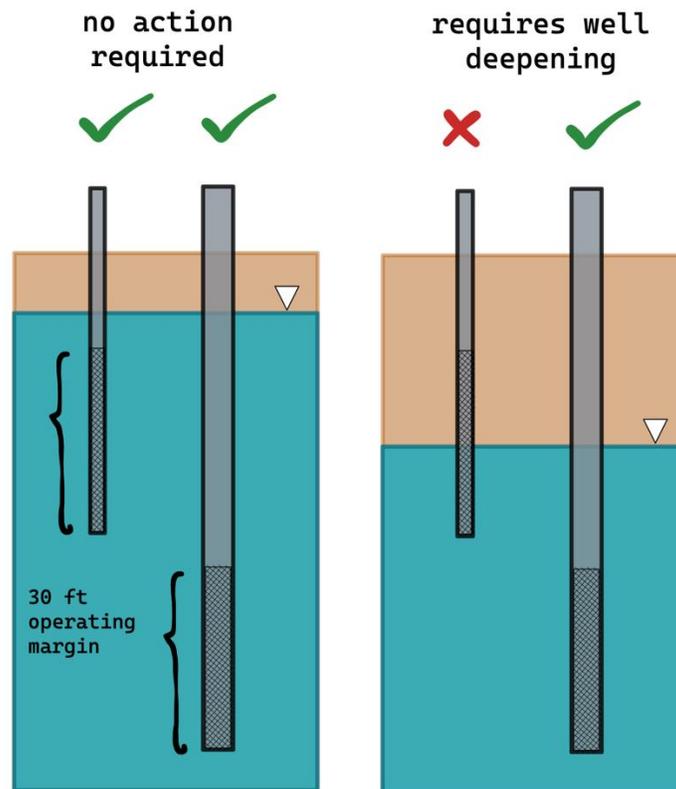
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<sup>5</sup> Two previous studies estimate well retirement ages at 28 years in the Central Valley (Pauloo et al 2020), and 33 years in Tulare county (Gailey et al 2019), thus, we use the average of these two studies and remove wells older than a retirement age of 31 years. To account for uncertainty in the well retirement age, we also consider another well retirement age of 40 years. Importantly, these numbers reflect mean retirement ages in the retirement age distribution. Although some wells in the population may be active for longer than 31 or 40 years, some will also retire before 31 or 40 years. Thus, results should be interpreted as an average estimate of well impacts.

<sup>6</sup> A standard approach for the choice of a critical datum is not well established. Other studies (e.g., Gailey et al, 2019; Pauloo et al, 2020; Bostic and Pauloo et al, 2020; Pauloo et al, 2021) estimate pump locations in different ways. Since considerable uncertainty exists in estimating pumps at a local scale, but WCR data for total completed depth is present and reliable for nearly all wells in the dataset, it is favored. An operating margin of 30 feet added to the bottom of each well’s total completed depth is a reasonable column of water necessary for the well to properly function, although wells with greater pumping capacities may require a longer water column.

197 In reality, wells dewater and experience reduced yield when the groundwater level  
 198 approaches the level of the pump. However, for the purposes of this study, we assumed  
 199 wells maintain the net positive suction head (Tullis 1989) required to provide  
 200 uninterrupted flow until groundwater falls below the critical datum. At this point, we  
 201 assume the well needs replacement (i.e., a well deepening event). Therefore, the well  
 202 impact estimates provided in this study should be interpreted as a worse-case scenario  
 203 wherein wells can no longer access reliable groundwater and are deepened. In most  
 204 cases, pumps will be able to be lowered into the 30 foot operating margin prior to a  
 205 deepening event – this is more affordable than a well deepening, so the impact estimate  
 206 is conservative in this sense.

207 **Figure A ##-1: Wells are assigned a 30 foot operating margin above the total competed depth.**  
 208 **When groundwater levels are above this “critical datum” at a well, the well is active (left), and the**  
 209 **well is impacted when the groundwater falls below the critical datum, which triggers a well**  
 210 **deepening event. Note that in reality, cones of depression form around active pumping wells, but**  
 211 **are not shown in the figure above for simplicity.**



212 **3 Results**

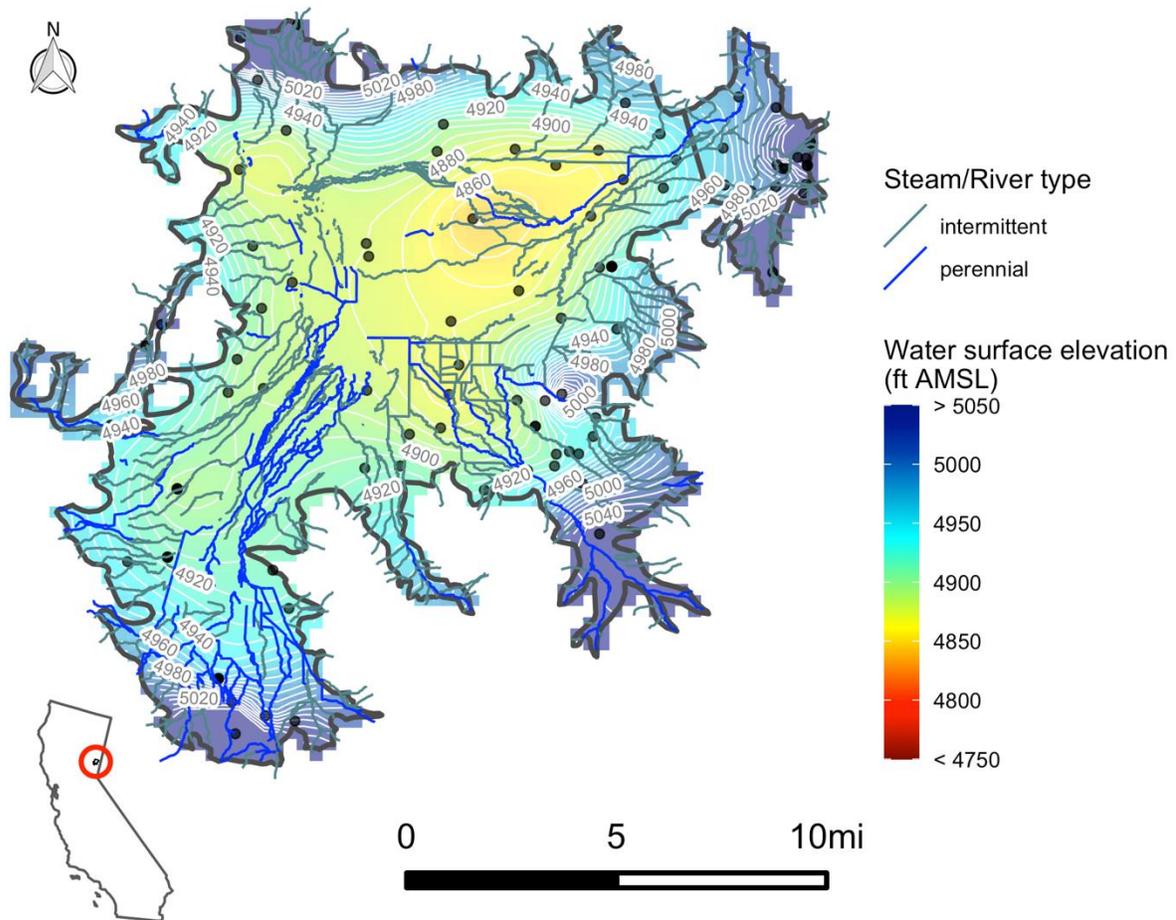
213 **3.1 Groundwater levels**

214 Groundwater level analysis in this memorandum is consistent with that conducted in Chapter 2  
 215 of the GSP. The lower and upper bookends of the groundwater level estimates (Figure A ##-2  
 216 and Figure A ##-3) demonstrate characteristic seasonal oscillation and increasing depth to  
 217 groundwater in the central portion of the basin used for agricultural purposes.

218 Key groundwater levels include the initial condition (average 2020 levels), and 2 boundary  
 219 conditions at which well impacts are evaluated. The first boundary condition is the Fall 2015 low,  
 220 and the other is the projected MT.

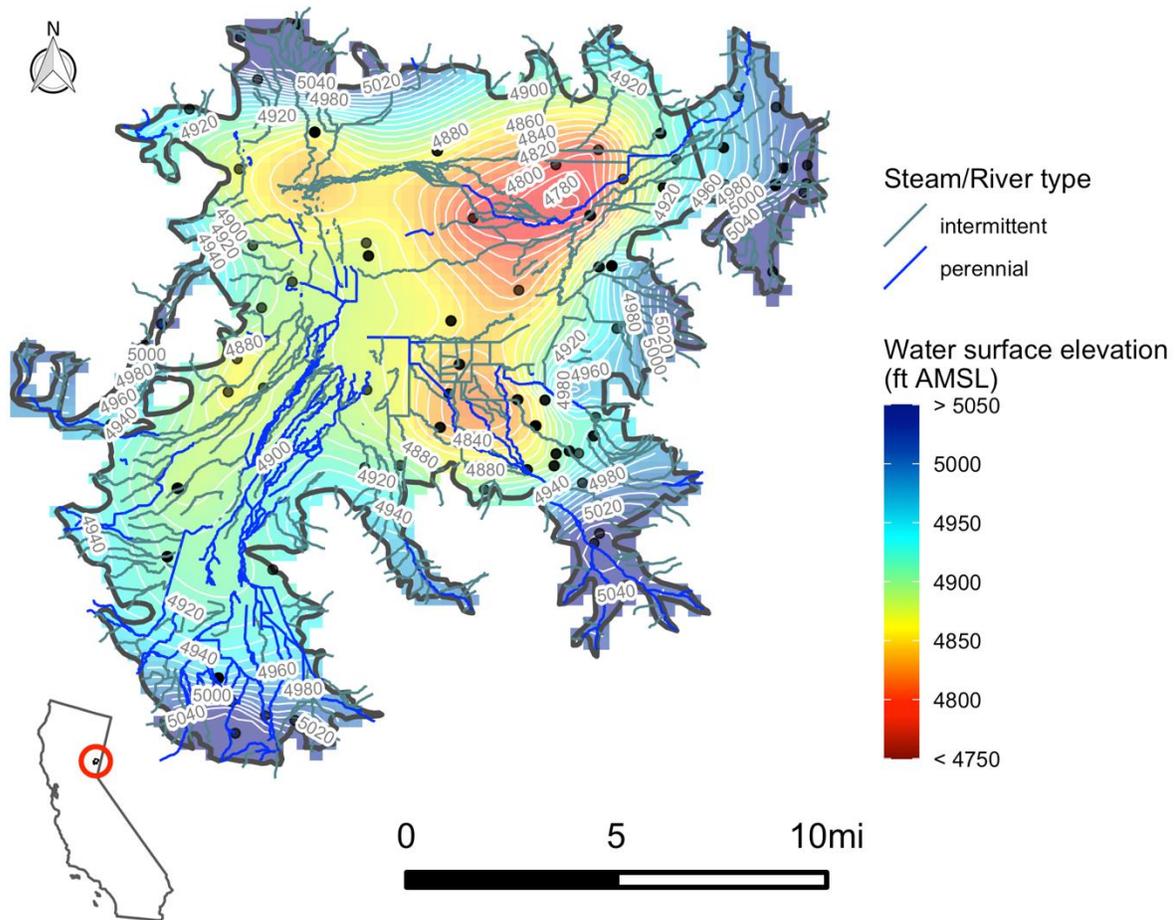
221 **Figure A ##-2: Estimated groundwater elevation for spring 2000 – 2003.**

**Average groundwater elevation, spring 2000 - 2003**



222 Figure A ##-3: Estimated groundwater elevation for fall 2017 – 2020.

### Average groundwater elevation, fall 2017 - 2020

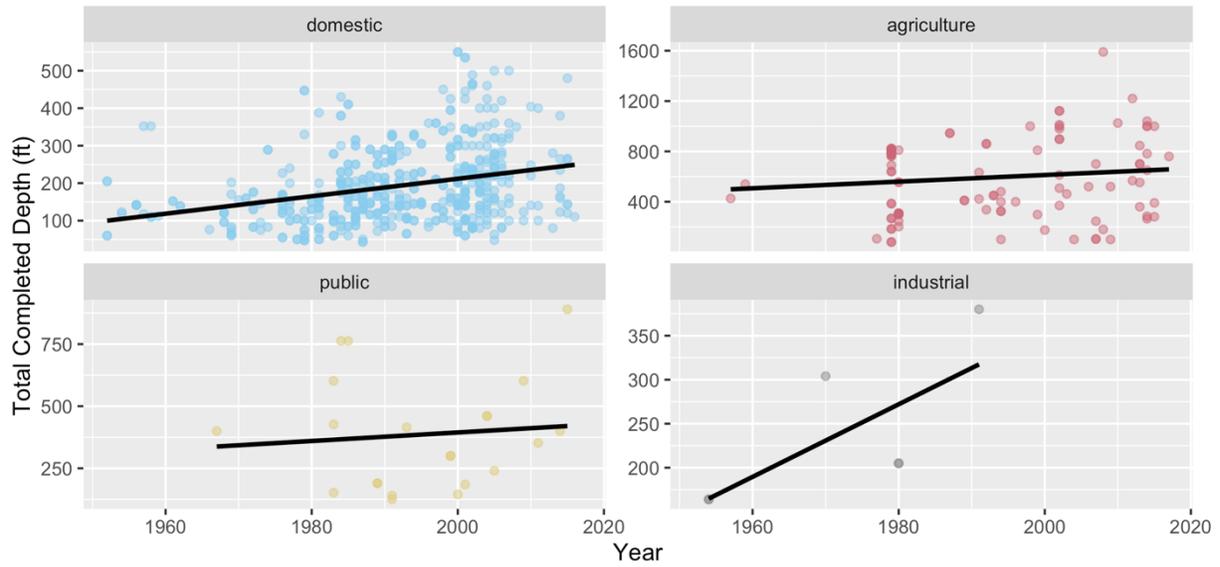


223

## 224 3.2 Well inventory and characteristics

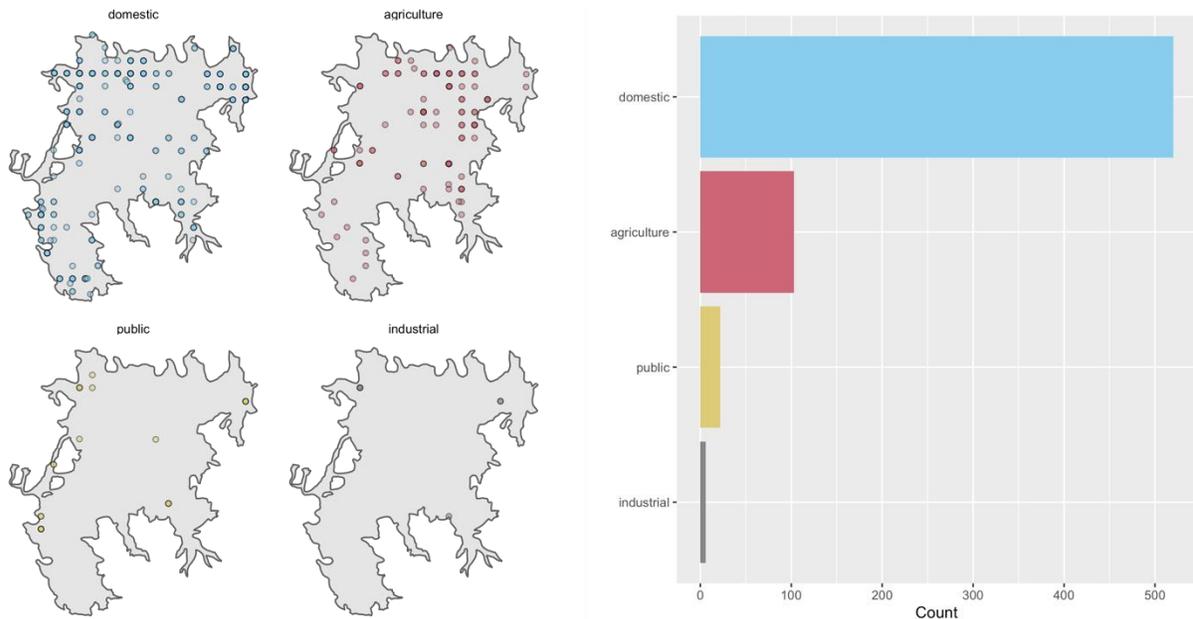
225 Results suggest that the most common well types (Figure A ##-3) with direct beneficial  
 226 uses are domestic (n = 540), agricultural (n = 105), public (n = 22) and industrial (n = 6)  
 227 wells, although the actual number of “active” wells today is likely less due to ageing and  
 228 well retirement. Assuming 31 to 40 year retirement ages (based on Pauloo et al, 2020),  
 229 and that wells with pumps above initial groundwater level conditions are inactive, the  
 230 number of assumed active wells in the SV is lower (Figure A ##-5): domestic (n = 325 -  
 231 450), agricultural (n = 57 - 61), public (n = 14 - 21), and industrial (n = 1).

232 Most wells are deeper than long-term average depths to groundwater in the SV (Figure A ##-6)  
 233 and newer wells tend to be deeper. Figure A ##-7: Total completed depth of wells has generally  
 234 increased over time for all well types.



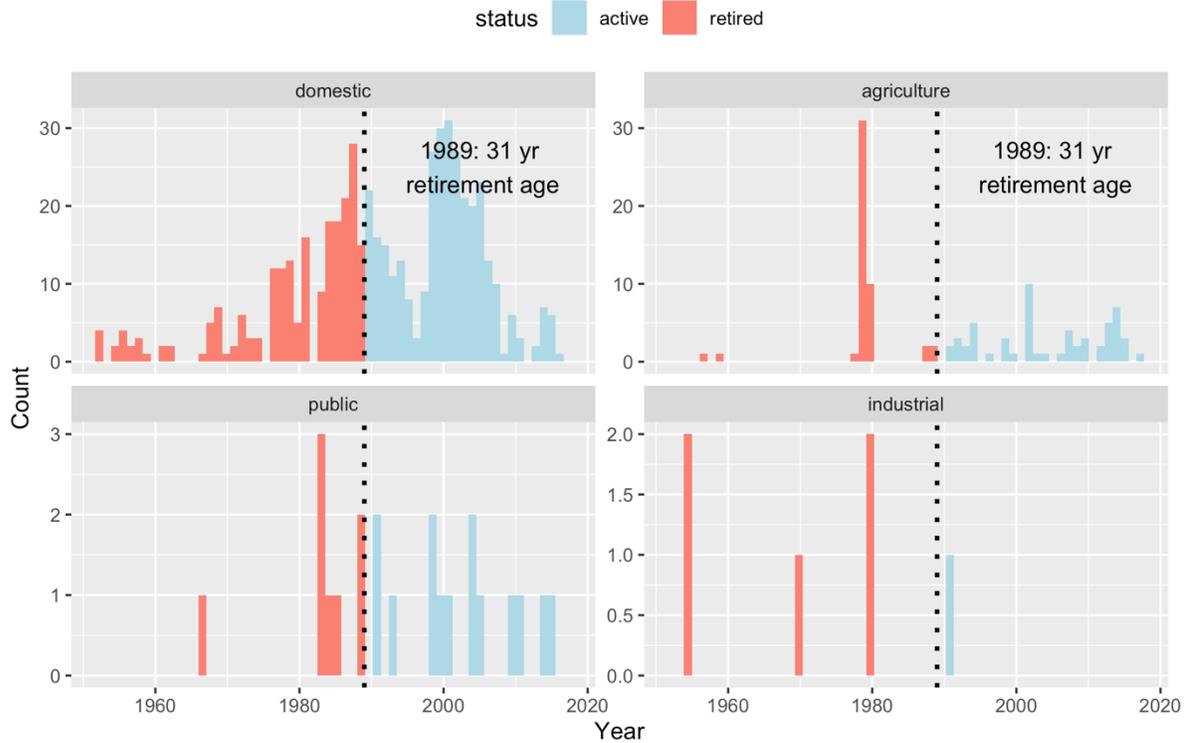
235  
236 ), which suggests a buffer against potential well impacts from declining groundwater levels,  
237 especially for newer wells. Wells are drilled deeper over time largely due to improvements in  
238 drilling technology and the need for deeper groundwater unimpacted by surface contaminants  
239 and with sufficient transmissivity to support well yield targets.

240 **Figure A ##-4: Estimated active well location (left) and count (right) in the Sierra Valley for major**  
241 **well types. Points are semi-transparent to improve visibility. Where points appear more opaque,**  
242 **this indicates multiple wells at the same section centroid.**

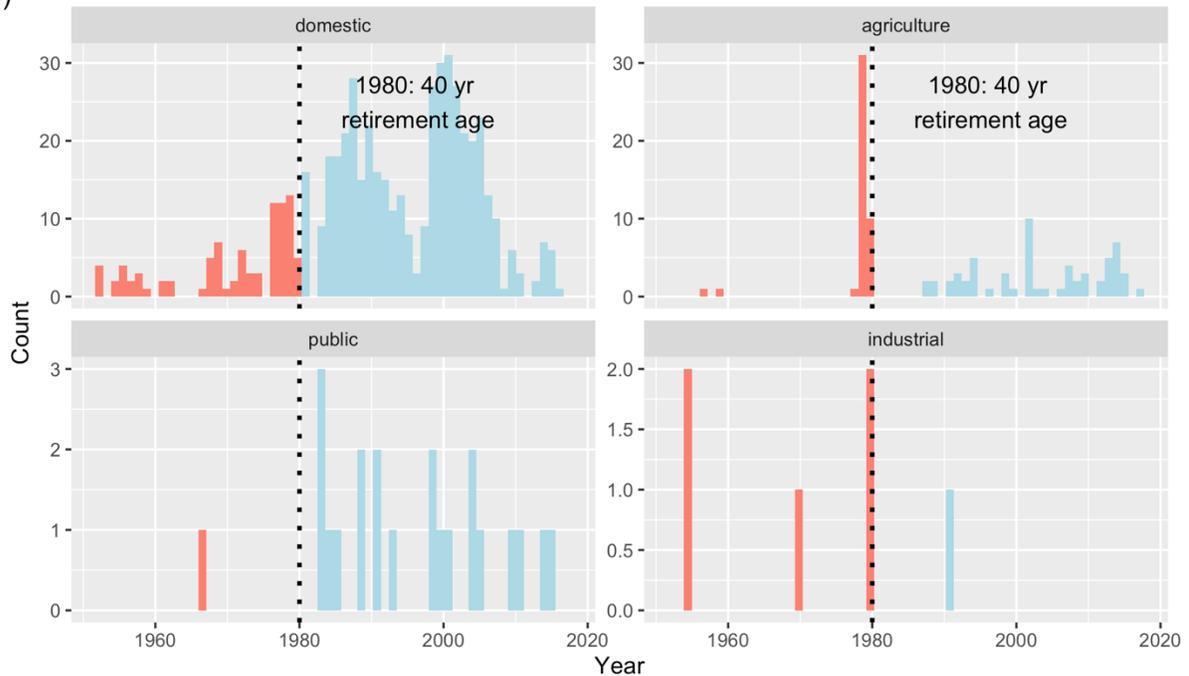


243 **Figure A ##-5: Well retirement ages of (A) 31 years and (B) 40 years were used to determine a**  
 244 **likely range of active wells in the basin. The effect of retirement age on the determination of active**  
 245 **wells depends on the count of wells drilled per year.**

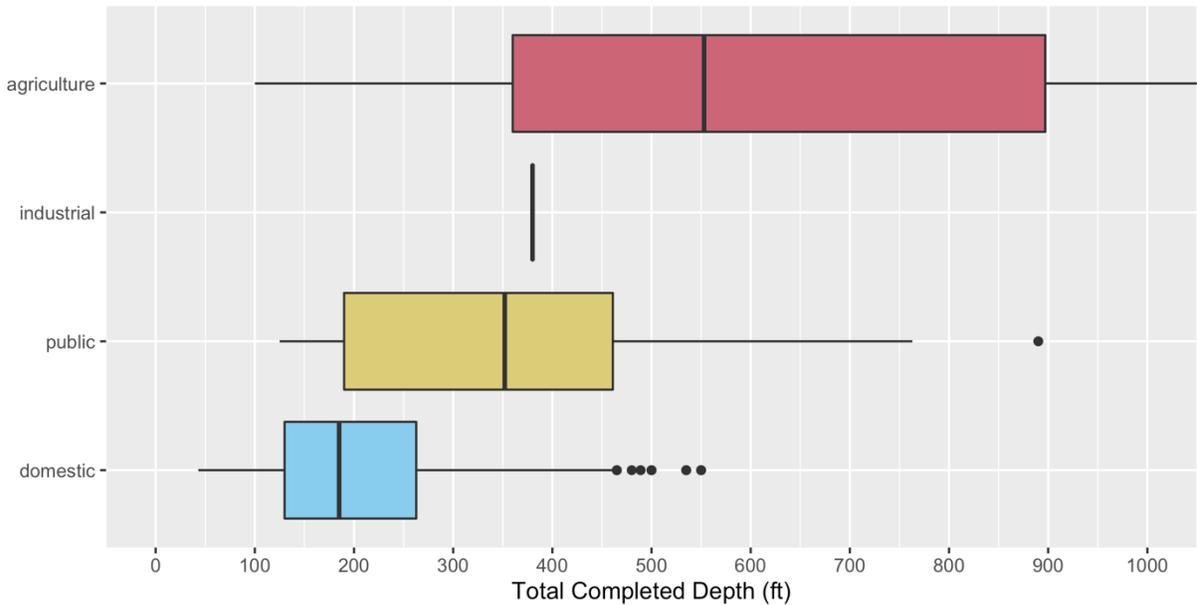
(A)



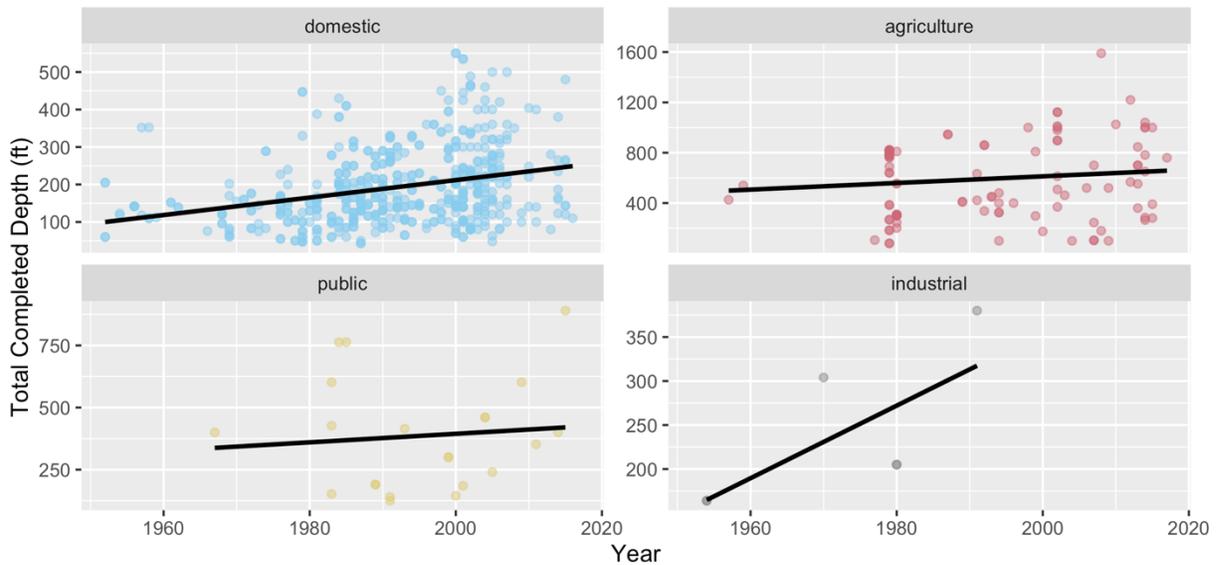
(B)



246 **Figure A ##-6: Total completed depth of active wells per well type. Agricultural wells tend to be the**  
 247 **deepest, followed by public and domestic wells. Very few industrial wells exist in the basin (n = 7)**  
 248 **and of these, only 1 is estimated to be active.**



249 **Figure A ##-7: Total completed depth of wells has generally increased over time for all well types.**



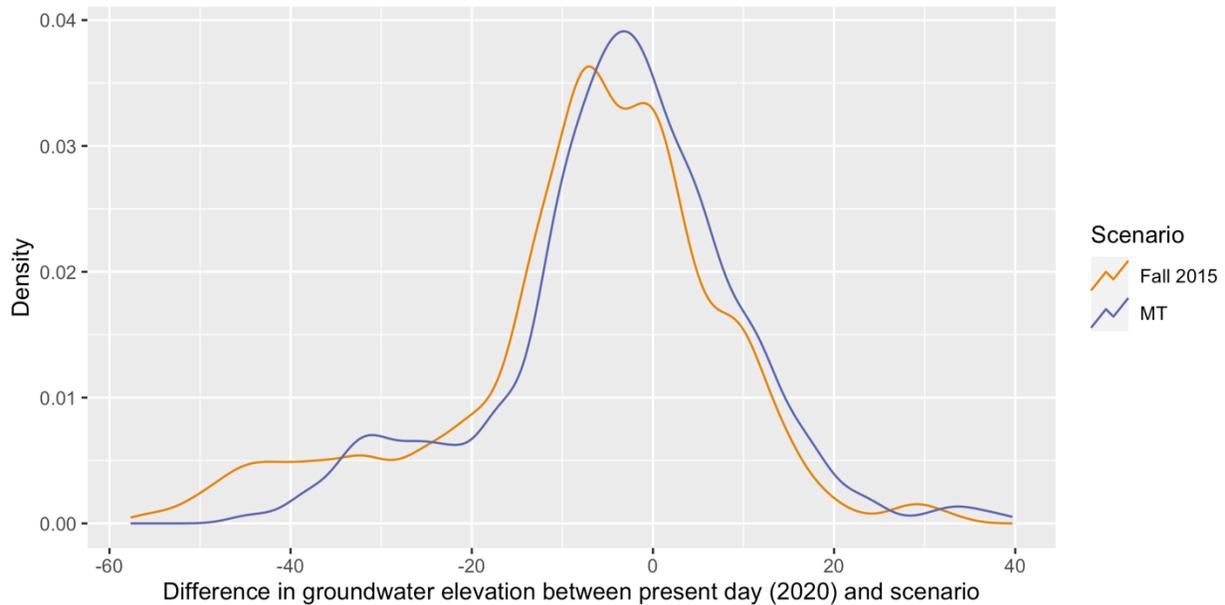
250 **3.3 Well impacts: location, count, and cost**

251 The difference between roughly present-day groundwater levels (average 2020 levels) and Fall  
 252 2015 lows is very similar the difference between present-day conditions and proposed MTs  
 253 (Figure A ##-8). Thus, a return to Fall 2015 levels, as well as those implied by MTs will likely  
 254 show little appreciable difference on well impacts. This observation is supported by the well

255 impact analysis, which finds that only 2% of domestic wells (n = 6 -10) are impacted at  
 256 groundwater level MTs, and that no other well types are impacted (Figure A ##-9 and  
 257 Table A ##-1). Moreover, the point patterns of estimated active and dry wells do not appreciably  
 258 differ when considering 31 and 40 year retirement ages, which suggests little dependence of  
 259 impact on retirement age (Figure A ##-9). Impacted wells are minimal and tend to occur near  
 260 basin boundaries where groundwater level data is most uncertain, suggesting possible model  
 261 artifacts.

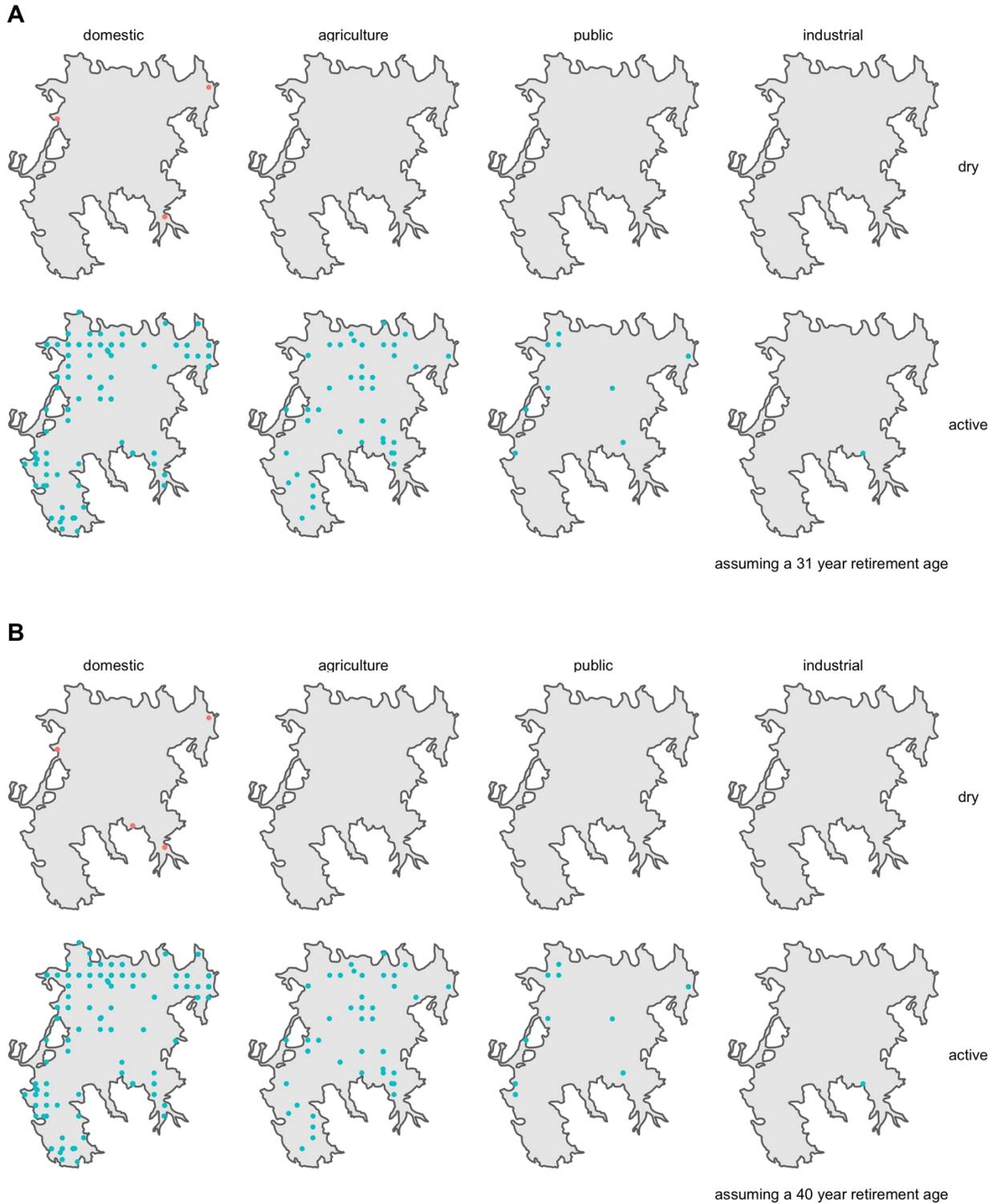
262 These results are unsurprising, as well depths are relatively deep compared to groundwater  
 263 elevations, and MTs do not begin to approach depths that intersect the critical datum of most  
 264 wells.

265 **Figure A ##-8: Groundwater level difference between a present day (2020) scenario and both the**  
 266 **Fall 2015 groundwater level (orange line) and the MT scenario (blue line) is roughly equivalent,**  
 267 **which suggests that groundwater levels do not vary considerably between these where MTs are**  
 268 **set and historically observed values.**



269  
270

**Figure A ##-9: Locations of estimated impacted wells assuming (A) 31 year retirement age, and (B) 40 year retirement age.**





271  
272  
273

**Table A ##-1: Well impact summary for all well types under 31 and 40 year retirement age assumptions do not exceed 2% relative to the number of initially active wells (n = 325 and n = 450 respectively).**

Well type	Impacted well count and percentage (31 yr retirement age)	Impacted well count and percentage (40 yr retirement age)
Domestic	6 (2%)	10 (2%)
Agriculture	0 (0%)	0 (0%)
Public	0 (0%)	0 (0%)
Industrial	0 (0%)	0 (0%)

## 274 **4 Discussion**

275 Vulnerable wells in the SV tend to be privately owned and adjacent to or within areas of  
276 concentrated groundwater extraction for agricultural and municipal use. Due to their relatively  
277 shallow depth, these wells may be vulnerable when water levels substantially decline due to  
278 drought or unsustainable management. With the passage of the Sustainable Groundwater  
279 Management Act, local groundwater sustainability agencies will develop sustainable  
280 management criteria including minimum thresholds and objectives, measured at monitoring  
281 networks that will chart progress towards, or deviance from, sustainability goals. Sustainable  
282 management criteria should identify vulnerable wells as beneficial users of groundwater, and  
283 hence, identify the quantitative thresholds at which they will be impacted by declining  
284 groundwater levels, and the percentages (or count) of impacts above which, local agencies  
285 deem significant and unreasonable. The GSP should then set groundwater level MTs according  
286 to these thresholds and manage groundwater levels above them to ensure that at MTs,  
287 significant and unreasonable impacts occur, and that at MOs, significant and unreasonable  
288 impacts are avoided.

289 Data from the DWR and Cal OPR suggests that during Fall 2015, no wells in the SV  
290 were reported dry, even though this period represents a [modern] historic groundwater  
291 level low. Results are consistent with this observation and suggest that a return to Fall  
292 2015 groundwater level lows is unlikely to result in catastrophic and widespread impacts  
293 to wells. Moreover, additional declines anticipated under projected MTs result in  
294 negligible impacts to wells, largely owing to the relatively deep total completed depth of  
295 wells compared to present day groundwater levels, and minimal to no groundwater level  
296 decline in most parts of the basin. The percentage of domestic wells impacted in the  
297 worst-case scenario assuming all RMPs reach MTs simultaneously is 2% (n = 6 - 10),  
298 even when considering 31 and 40 year retirement ages. No other well types are  
299 impacted.

300 Well protection analysis thus validates minimum thresholds (MTs) which avoid  
301 significant and unreasonable impacts to wells in the basin and allow the basin to  
302 achieve projected growth targets within a framework of regional conjunctive use and  
303 PMA.



## 304 **5 Conclusion**

305 Well completion reports and groundwater level data were analyzed to estimate groundwater  
306 thresholds at which different well types in the SV reach levels of impact deemed significant and  
307 unreasonable. Results suggest that projected groundwater MTs will not lead to widespread  
308 catastrophic well failure in the SV.

309 Well impact analyses depend on reliable data to determine the set of active wells to consider,  
310 and their critical datum (the vertical elevation at which a well is estimated to be impacted by  
311 declining groundwater levels). Reasonable assumptions are made for modeling purposes, but  
312 are not accurate to every well across the basin. Results are sensitive to well retirement age. A  
313 “well census” may improve understanding of well retirement and well vulnerability more  
314 generally. Such a census, if performed, should take place at the county level; results of the  
315 census may be attached to the parcel database used to better inform well protection and rates  
316 and fee schedules.

317 Top-down approaches like the analysis provided herein should be combined with bottom-up  
318 approaches. Localized, volunteer-based vulnerable well monitoring may empower point-of-use  
319 crowdsourced data and facilitate an early warning system to prioritize well rehabilitation  
320 measures before wells go dry. Truly, the best indication of well vulnerability will come from  
321 measurements at point-of-use wells. SGMA does not require this level of monitoring or provide  
322 guidance on how to achieve it, but GSAs may consider local monitoring programs outside of  
323 GSP RMP network to improve communication with well owners and take corrective actions as  
324 needed.

## 325 6 References

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