

Summary

The Long-Term Water Transfers Environmental Impact Statement/Environmental Impact Report Public Draft (henceforth referred to as the “EIR/EIS”) articulates an ambitious plan to transfer water within the state of California. But this ambition is not matched by a similar degree of technical merit, as the modeling components of the EIR/EIS are potentially inadequate, inaccurate, and insufficient to the task. Because of this shortcoming, the EIR/EIS fails to demonstrate that environmental impacts of these transfers will be acceptably small. In particular, the groundwater substitution components of the proposed water transfers are based on modeling assumptions that likely limit their practical accuracy, and on computational simulation techniques that cannot be trusted for their intended use without additional work.

The EIR/EIS as written fails to make a technically-persuasive case for these water transfers, and therefore the proposed transfers should be rejected until the various water transfer stakeholders can advocate more effectively for these transfers by using sound scientific principles instead of mere assertions of negligible impact on the environment.

Critique Overview

This critique concentrates on the groundwater modeling portions of the EIR/EIS, as those portions of the EIR/EIS provide the least technical information relative to the importance of this particular part of the transfer plans. Groundwater resources are seldom seen directly, but their influence is present throughout the hydrological cycle. When the water table sinks, streams dry up and fish die. And when that phreatic surface drops below the level available to domestic water-supply wells, families lose their water supply. Groundwater mining is an all-too-common source of environmental woes, including irreversible loss of aquifer capacity and subsidence observable at the surface of the ground. So accurate groundwater modeling is an essential component of any trustworthy assessment of potential negative environmental effects.

This critique focuses on four particular aspects of the groundwater modeling efforts outlined in the EIR/EIS, namely:

- the lack of a defensible technical basis for the use of the SacFEM2013 groundwater model in assessing man-made hazards due to groundwater substitution activities,
- the inherent assumptions and potential inaccuracies present in the SacFEM2013 model, including an exposition of how better groundwater modeling techniques could have been deployed to engender more trust in the computed results,
- the lack of any formal characterization of uncertainty in the model that might be used to assess the impact of those SacFEM2013 model inaccuracies, and
- some general comments on the EIR/EIS’s all-too-often inadequate technical treatment of aquifer mechanics.

Sins of omission and commission are thus found in the EIR/EIS, and this critique will attempt to guide the reader through a discussion of each, towards the goal of more accurate and technically-defensible modeling that would be required to support the proposed water transfers.

Professional Background

My professional experience has long been concentrated in the development and deployment of large-scale computational models for engineered and natural systems. I have worked in this professional field for well over thirty years, and have published refereed journal publications on subsurface mechanics and computational simulation of geological processes, as well as texts and related educational works on computational modeling in solid and fluid mechanics. I have served as a regular faculty member on the Civil Engineering faculties of two major U.S. research universities (the University of California, Davis, and the University of Oklahoma), as well as in leading-edge technical and administrative capacities at federal national laboratories. With my academic colleagues and graduate students, I have published journal articles and technical reports on aquifer mechanics, computational geomechanics, fluid-solid interaction, high-performance computing, and on the inherent limits to accuracy of computational modeling for complex systems in the presence of inherent uncertainties. I have earned M.S. and Ph.D. in Civil Engineering and a B.S. in Mathematics, all from the University of California, Davis. I have lived in Northern California for more than one-half of my adult life, and have long provided *pro bono* technical assistance on science and engineering topics of import to the quality of life for residents of California. My current work involves simulation of complex man-made and natural systems using some of the largest computers in the world, and so I am well-equipped to describe the state-of-the-art in predictive modeling for large-scale water transfers in California.

Overview of Technical Concerns

This review focuses primarily on the groundwater substitution aspects of the EIR/EIS, because those aspects are where my own expertise is deepest. The groundwater model utilized in the EIR/EIS has enough shortcomings to call into question the trustworthiness of the entire EIR/EIS, and until these shortcomings are remedied, such groundwater transfers should not be permitted. Some representative problems with the SACFEM2013 model are presented below.

Fundamental Technical Problems with the SacFEM2013 Model

In simplest terms, the EIR/EIS fails to make a compelling case for the use of the SacFEM2013 groundwater model in assessing man-made hazards due to groundwater substitution activities.

For example Appendix D of the EIR is provided to document the SacFEM2013 model, but this section of the EIR/EIS raises more questions than answers about the suitability of the model. Some of the assertions made in Appendix D are incorrect, while others are irrelevant to the purpose of the EIR/EIS. And the most fundamental problem with the information presented on the SacFEM2013 model is that Appendix D fails to provide enough technical context to justify the use of SacFEM2013. A technically-informed citizen interested in providing accurate public commentary on the EIR/EIS must search the literature and other open-source documents to find relevant information about the suitability of the SacFEM2013 model. Unfortunately, these searches prove fruitless, because there simply is not enough information provided in the EIR/EIS to perform a technically-defensible characterization of the suitability of SacFEM2013. Because of this, some of the my comments include qualifiers such as “appears to be” or “apparently”. These qualifiers do not imply any insufficiency in my own understanding: they are explicit reminders that the EIR/EIS fails to provide an adequate technical basis for use of SacFEM2013.

One example of incorrect modeling assertions in the EIR/EIS is the characterization¹ of SacFEM2013 and its parent code MicroFEM as “three-dimensional” and “high-resolution”. In fact, the SacFEM2013 model provides only a linked set of two-dimensional analyses², and would more charitably be described as “two-and-a-half dimensional” instead of possessing a fully-3D modeling capability. This limitation is not an unimportant detail, as a general-purpose 3D groundwater model could be used to predict many important physical responses, e.g., the location of the phreatic surface within an unconfined aquifer. For the SacFEM2013 model, this prediction is part of the data instead of part of the computed solution, and hence SacFEM2013 apparently has no predictive capability for this all-important aquifer response. Here is the relevant EIR/EIS content on this topic³:

The uppermost boundary of the SACFEM2013 model is defined at the water table. To develop a total saturated aquifer thickness distribution and, therefore, a total model thickness distribution, it was necessary to construct a groundwater elevation contour map and then subtract the depth to the base of freshwater from that groundwater elevation contour map. Average calendar year groundwater elevation measurements were obtained from the DWR Water Data Library. These measurements were primarily collected biannually, during the spring and fall periods; and these values were averaged at each well location to compute an average water level for each location. These values were then contoured, considering streambed elevations for the gaining reaches of the major streams included in the model, to develop a target groundwater elevation contour map for the year 2000.

Note that, in order to begin a SacFEM2013 analysis, the phreatic surface must be specified instead of predicted, and that this specification is based on past records of water table location instead of on verifiable accurate predictions of future groundwater resources. Since California is currently in an unprecedented drought, and because the assessment of similarly-unprecedented future large-scale groundwater transfers is the whole point of the EIR/EIS, it is technically inappropriate to use an averaged historical basis to locate the water table surface simply because the SacFEM2013 is unable to predict that important parameter from first principles!

A good example of an irrelevant assertion in the EIR/EIS is the list of reasons given⁴ why MicroFEM was chosen as the modeling platform. The first reason is true of *any* finite-element code used to model groundwater response, and the second and third arise from the existence of a graphical user interface for the model input and output data. Any modern computational tool (e.g., the word-processing application I’m using to write this critique) possesses such a user interface, so all three reasons apply equally well to any well-designed finite element application, yet they are used to motivate the choice of only one such application. Why this specific choice of MicroFEM was made is never developed in the EIR/EIS, but it should be, as with the choice of computational model comes a set of model constraints that can limit the model’s utility.

***Technical sidebar:** finite element models are particularly easy to develop and deploy graphical user interfaces for, because the interpolation scheme used to generate the finite element results provides uniquely-defined and easy-to-compute results for every point in the spatial domain. In addition to this readily-accessible supply of spatial data available for visual interpretation of results, these models also can produce results at regular time*

¹ EIR/EIS, Appendix D, Page 1

² S.A. Leake and P.A. Mock, “Dimensionality of Ground Water Flow Models”, *Ground Water*, Volume 35, Number 6, Page 930, 1997

³ EIR/EIS, Appendix D, Page 4

⁴ EIR/EIS, Appendix D, Page 1

intervals (e.g., monthly) that make it easy to generate animations of the spatial data. So the presence of a graphical user interface is a poor reason to choose a particular finite element application, as custom visualization tools are readily developed at low cost to support the use of the model, or public-domain visualization tools can be utilized instead.

Unfortunately for the results presented in the EIR/EIS, MicroFEM is a poor choice for such large-scale modeling. It is an old code that apparently utilizes only the simplest (and least accurate) techniques for finite-element modeling of aquifer mechanics, and MicroFEM (and hence SacFEM2013) embed serious limitations into the model that compromise the accuracy of the computed results. These limitations include, but are not limited to, the following:

- The model places a remarkably-low upper limit on problem resolution, i.e., 250,000 surface nodes are available to the modeler, but no more. This limit would appear to the technically-oriented reader to indicate that the advanced age of the MicroFEM program has constrained its software architecture so that high-resolution and high-fidelity models are beyond its capabilities. In particular, its MS/DOS origins might indicate an inability to address sufficient computer memory to support a higher-resolution model, or that its solver routines do not scale to support the multiple-processor capabilities available on virtually all current computers. If this is the case, then this problem should be explicitly noted in the EIR/EIS as a model limitation. If it is not the case, then some justification for this upper limit should be provided to aid in the impartial evaluation of the SacFEM2013 model.
- As mentioned above, the SacFEM2013 model is only partially predictive, in that some aquifer responses are entered as input data instead of being computed as predictive quantities. The most serious of these is the lack of ability to predict the location of the phreatic surface in the aquifer. This location is a natural candidate as the single the most important predicted quantity available for understanding near-surface environmental effects of groundwater motion, yet it is apparently not computed by SacFEM2013, which instead relies on its location via the a priori data-entry process quoted above.
- As mentioned earlier, the model is not a three-dimensional model, but instead estimates groundwater response via approximations involving a suite of two-dimensional layers with uniform horizontal permeabilities coupled via estimated leakage parameters that represent the actual three-dimensional flow fields of groundwater resources. The limitations of this self-induced model constraint are outlined in more detail below, but the summary is simple enough: the real-world complexities of California's groundwater aquifers are over-simplified by the SacFEM2013 model into no more than 25 available two-dimensional layers of uniform composition, and hence the model results are at best computational simplifications not necessarily representative of actual groundwater responses to pumping.

In addition to the model not being a true 3D model of the actual geometric nature of the state's groundwater resources, some other problems with the model include the following:

- The model requires considerable data manipulation to be used, and these manipulations are necessarily subject to interpretation. This fact implies that the model results depend on the choices made by the analyst, and are hence not necessarily reproducible. In other words, adjusting of the results (by accident or by design) is an inherent characteristic of the model, and that characteristic alone erodes trust in the model. There are technically-defensible ways to provide accurate assessments of how such adjustments might affect output results used in

decision-making (e.g., sensitivity analyses for these parameters), but these means for evaluating trust in the model are not mentioned in the EIR/EIS, and one can only conclude that they have never been performed.

- The model description in the EIR/EIS presents no validation results that can be used to provide basic quality-assurance for the analyses used in the EIR/EIS. The reader can seek information on the parent code MicroFEM, but precious little data is available on that code's capabilities, so the question of "can the results of this model be trusted?" is not answered by the EIR/EIS. An expert reviewing the EIR/EIS might seek to examine the MicroFEM code directly, but the underlying source code is not available, and the MicroFEM tool can only be purchased for a substantial fee (\$1500), so it is infeasible to gain informed public comment on the suitability of MicroFEM or SacFEM2013 without paying a substantial price.
- The model is not predictive in some aquifer responses (as mentioned above), so its results are a reflection of past data (e.g., streamflows, phreatic surface location, etc.) instead of providing a predictive capability for future events. Since accurate prediction of future environmental effects is the whole point of the EIR/EIS, the SacFEM2013 model is arguably not even suitable for use in the EIR/EIS, much less in real-world hydrological practice.

The problem of data manipulation mentioned in the first bullet above represents a serious limitation of the SacFEM2013 model. Model quality can be measured by standard quality-assurance processes utilized for software development, such as the CMM model⁵ widely used in software practice. The five stages of increasing quality in the CMM model are termed ad hoc (or chaotic), repeatable, defined, managed, and optimized, and the repeatable stage is generally accepted as the minimal level of quality appropriate for any critical analysis methodology. Since analyst intervention in data preparation creates an obvious risk of analyst dependencies in the output data used to set policy, the current SacFEM2013 workflow is likely only at the "ad hoc/chaotic" state of quality assurance for a model. This is simply not appropriate for critical analyses that are used in decision-making on such important resources as water in California.

A typical example of analyst intervention in data preparation can be found in Appendix D of the EIR/EIS⁶:

After a transmissivity estimate was computed for each location, the transmissivity value was then divided by the screen length of the production well to yield an estimate of the aquifer horizontal hydraulic conductivity (Kh). The final step in the process was to smooth the Kh field to provide regional- scale information. Individual well tests produce aquifer productivity estimates that are local in nature, and might reflect small-scale aquifer heterogeneity that is not necessarily representative of the basin as a whole. To average these smaller scale variations present in the data set, a FORTRAN program was developed that evaluated each independent Kh estimate in terms of the available surrounding estimates. When this program is executed, each Kh value is considered in conjunction with all others present within a user-specified critical radius, and the geometric mean of the available Kh values is calculated. This geometric mean value is then assigned as the representative regional hydraulic conductivity value for that location. The critical radius used in this analysis was 10,000 meters, or about six miles. The point values obtained by this process were then gridded using the kriging algorithm to develop a Kh distribution across the model domain. The aquifer transmissivity at each model node within each model layer was then computed using the geometric mean Kh values at that node times the thickness of the model layer. Insufficient data were available to attempt to

⁵ M.C. Paulk, C.V. Weber, B. Curtis, M.B. Chrissis, "Capability Maturity Model for Software (Version 1.1)". Technical Report, Software Engineering Institute, Carnegie Mellon University, 1993

⁶ EIR/EIS, Appendix D, Page 13

subdivide the data set into depth-varying Kh distributions, and it was, therefore, assumed that the computed mean Kh values were representative of the major aquifer units in all model layers. The distribution of K used throughout most of the SACFEM2013 model layers is shown in Figure D-4. During model calibration, minor adjustments were made to the Kh of model layer one east of Dunnigan Hills and in model layers six and seven in the northern Sacramento Valley based on qualitative assessment of Lower Tuscan aquifer test data in this area.

Note the presence of terms such as “adjustments”, “assumed”, “insufficient data”, and “representative”. What is being described in this paragraph is a potentially non-repeatable process that converts the three-dimensional permeability tensor into a homogenized number Kh that is then used to estimate conductivity in a plane parallel to the ground surface. Permeability is a local tensorial property of the aquifer (i.e., it varies from point to point in the 3D subsurface domain), but the resulting Kh is smeared across the domain to convert this tensor with six independent spatially-dependent components into a single number that is applied over a huge geographical area instead. And this conversion is subject to the judgment of each analyst, so the results depend on the skill (or lack thereof) of the particular analyst doing the modeling.

***Technical sidebar:** it is remarkably straightforward to perform accurate and technically-defensible computational analyses to assess the ultimate effect of these data adjustments. One of the most easily-deployed of these techniques is the use of a sensitivity analysis that measures how computed output results depend on adjustments to input parameters. Sensitivity analyses are readily grafted onto nearly any computational model, and while these computations require more effort than not using them, most of the additional effort can readily be offloaded to the computer, so that undue levels of human efforts are not required for their application. Formal sensitivity analyses can also be used to aid in the assessment of model uncertainty (see discussion below), so their omission in the EIR/EIS is a mystery to the technically-informed impartial reviewer of the EIR/EIS.*

And that’s only the tip of the larger iceberg of problems with these ad hoc techniques. It is actually quite easy to avoid all these adjustments and oversimplifications entirely, and treat the aquifer as it is, namely as a true three-dimensional physical body of large extent, with a time-varying location of the water table, and with accurate treatment of the complex hydraulic conductivity inherent to the subsurface conditions of California. It’s also remarkably simple to include poromechanical effects (see discussion below) in such a 3D model so that accurate local and regional estimates of environmental impacts such as subsidence and loss of aquifer capacity can be predicted and validated. All of this technology has been available for decades, but it is not utilized in the SacFEM2013 model. *The citizens of California clearly deserve a better model for decision-making involving one of their most precious resources!*

Regarding The Need to Characterize Uncertainty in Engineered and Natural Systems

Some discussion is warranted at this point on the difference between a natural and an engineered system, towards the goal of appreciating why characterizing uncertainty in any proposed water-transfer strategy is an essential goal of a well-considered EIR/EIS. An engineered system is designed entirely by humans, so each component of that system is reasonably well-understood *a priori*, and the uncertainties that are inherent in any system (natural or man-made) are limited to defined uncertainties such as materials chosen, geometric specifications, and conditions of construction and use. So an engineered system such as an automobile (or a groundwater-pumping facility) is uncertain in many aspects, but that uncertainty can in theory be constrained

by quality-control efforts or similar means of repeatability. Constraining these uncertainties comes at a price, of course: that is a large part of what we mean when we refer to *quality* in an engineered system such as in cars or consumer electronics.

A natural system has a much higher threshold for uncertainty, as we often do not even know of all the components of the system, much less their precise characterization (e.g., in a water-bearing aquifer, the materials that entrain the water are by definition unavailable for characterization, and the mere act of digging some of them up for laboratory inspection often changes their physical behaviors so that the tests we perform in the laboratory may not be entirely relevant to the response of the actual subsurface system). So when studying a natural system, a scientist or engineer must exercise due diligence in the examination and characterization of the system's response to stresses of operational use, and must consistently provide means to determine the presence and effect of these inherent uncertainties. To do otherwise is to risk visitation by Murphy's Law, i.e., "anything that can happen, will happen."

Thus one of the most obvious metrics for evaluating the quality of any environmental plan is to examine the plan's use of terms such as "uncertainty", as well its technical relatives that include "validation" (testing of models via physical processes such as laboratory experiments), "verification" (testing of models via comparison with other generally-accepted models), and "calibration" (tuning a model using a given set of physical data that will be used as initial conditions for subsequent verification, validation, and uncertainty characterization). These basic operations are fundamental characteristics of any computational model, and are used in everyday life for everything from weather prediction (where uncertainty dominates and limits the best efforts at forecasting) to the simple requirement that important components of infrastructure such as highway bridges be modeled using multiple independent analyses to provide verification of design quality before construction can begin.

Unfortunately, the EIR/EIS does not contain a formal characterization of model uncertainty, either for the SacFEM2013 application itself, or for the underlying data gathered to support the SacFEM2013 analyses. As described in previous sections, both the model and the input data contain simplifications that potentially compromise the model's ability to provide accurate estimates of real-world responses of water resources, and these idealizations create *more* need for uncertainty characterization, not less. And the all-important technical terms "validation" and "verification" do not appear in the EIR/EIS. The term "calibration" occurs twice⁷ with regard to groundwater models, but only in the context of ad-hoc "adjustments" of the model data.

Lack of Trust in the SacFEM2013 Model

In addition to generally-poor modeling assumptions inherent in the SacFEM2013 model, the all-important task of characterizing uncertainty in the model's implementation and data is neglected in the EIR/EIS. On page 19 of Appendix B, the reader is promised that model uncertainty will be described in Appendix D, but that promise is never delivered: the only mention of this essential modeling component occurs merely as an adjunct to discussion of deep percolation uncertainty.

⁷ EIR/EIS, Appendix D, Pages 10 and 13

This lack of any formal measure of uncertainty is not an unimportant detail, as it is impossible to provide accurate estimates of margin of error without some formal treatment of uncertainty. Many such formal approaches exist, but apparently none were deployed for the EIR/EIS modeling efforts. In simple terms, this lack of uncertainty characterization removes the basis for trust in the model results, and hence the entire groundwater substitution analysis presented in the EIR/EIS is not technically defensible. Until this omission is remedied, the EIR/EIS simply proposes that water interests in California trust a model that is arguably not worthy of their trust.

And it's even worse than this, as while the model is asserted to be "high-resolution", in fact the SacFEM2013 model is quite the opposite. The actual spatial resolution of the model is given in Appendix D as ranging from 125 meters for regions of interest, up to 1000 meters for areas remote from the transfer effects. Nodal spacing along flood bypasses and streams is given as 500 meters. No mention is made in the EIR/EIS of exactly what this means in terms of trust in the model, but in accepted computational modeling practice, this is not a particularly high resolution.

In fact, there are formal methods for characterizing the ability of a discretized model such as SacFEM2013 to resolve physical responses of interest. These methods are based on elementary aspects of information theory (e.g., the Nyquist-Shannon sampling theorem), and their practical result is that a discrete analog (i.e., a computer model) of a continuous system (i.e., the actual subsurface geological deposits that entrain the groundwater) cannot resolve any feature that is less than a multiple of the size of the discretization spacing. For regular periodic features (e.g., the waveforms that make radio transmission possible), that multiple can be as small as two, but for transient phenomena (e.g., the response of an aquifer), established practice in computational simulation has demonstrated that a factor of five or ten is the practical limit on resolution.

Thus the practical limit of the SacFEM2013 model to "see" (i.e., to resolve) any physical response is measured in kilometers! The model can compute results smaller than this scale, but those results cannot be implicitly trusted: they are potentially the computational equivalent of an optical illusion. For this reason alone, the SacFEM2013 model cannot be trusted without substantial follow-on work that the EIR/EIS gives no indication of ever having been performed. And thus any physical response asserted by the model's results has a margin of error of 100% if that response involves spatial scales smaller than a kilometer or more, i.e., there is little or no predictive power in the model for those length scales.

The additional verification effort required to gain some measure of trust in the model (i.e., refining the nodal spacing by a factor of two and four to create more refined models, and then comparing these higher-resolution results to gain assurance that no computational artifacts exist in the original model, i.e., no optical illusions are being used to set water transfer policy) is quite straightforward and is also standard practice in verifying the utility of a computational model. It is something of a mystery why this standard modeling quality-assurance technique is not presented in the EIR/EIS, but this omission provides yet-another sound technical reason to reject the results of the EIR/EIS until better modeling efforts are provided.

***Technical sidebar:** one important side benefit of performing verification studies by refining the finite element mesh in the spatial and temporal domains is that this extra effort provides important information as to whether the resolution of the model is sufficient. In practice, improving the resolution of a computer model is only a means to*

the desired end of gaining higher fidelity, i.e., a closer approximation to reality. So what we really desire from a computer model is not resolution, but fidelity, and while it is notoriously difficult to assess measures of fidelity, verification techniques based on refining the finite element mesh do provide some measure of trust in model results. One particularly simple verification measure involves plotting the computed results for a quantity of interest (e.g., groundwater flux at some point in the aquifer) as a function of model resolution (e.g., a metric indicating the number of the elements in the model, or a representative spatial scale used) for successive refinements of the finite-element mesh. Such plots help the analyst estimate whether the results at any given resolution yield an asymptotically-accurate estimate of the best results the model can provide given its inherent modeling assumptions. When combined with validation data (e.g., model predictions compared to real-world measured data), these verification-and-validation techniques provide a more sound basis for trust in the model than the minimal motivations found in the EIR/EIS.

It is likely that the SacFEM2013 model may be incapable of performing these more refined higher-resolution analyses because of its underlying assumptions (e.g., idealizing the three-dimensional subsurface domain as a set of coupled two-dimensional layers), and if that is the case, then the underlying groundwater model is simply not up to the requirements of accurate regional water transfer modeling. The underlying MicroFEM model is an old simulation tool, originally written for the MS/DOS platform, and it appears to be near the practical limit of its resolution at the stated size⁸ of 153,812 nodes (compared to the maximum nodal resolution in MicroFEM of 250,000 nodes cited above). But the current generation of desktop computers can easily handle many millions of nodes for such simulations, and enterprise computers well within the budgets of government agencies are routinely utilized to model systems with hundreds of millions of nodes, so if the SacFEM2013 model is already at its limit of resolution, then it's clear that a newer, better computational model should be used to replace it.

Inadequacy of Basic Aquifer Mechanics Principles in the EIR/EIS

In addition to all the fundamental problems inherent in the SacFEM2013 model, the EIR/EIS presents a biased view of basic principles of aquifer mechanics, and this bias serves to understate the risks of serious environmental problems that have long been a bane of water policy in California. In particular, the EIR/EIS simply understates the risk of these environmental effects, beginning with its executive summary and continuing throughout the rest of the document. Here's a representative sample of the problem at its first occurrence⁹:

Groundwater substitution would temporarily decrease levels in groundwater basins near the participating wells. Water produced from wells initially comes from groundwater storage. Groundwater storage would refill (or "recharge") over time, which affects surface water sources. Groundwater pumping captures some groundwater that would otherwise discharge to streams as baseflow and can also induce recharge from streams. Once pumping ceases, this stream depletion continues, replacing the pumped groundwater slowly over time until the depleted storage fully recharges.

⁸ EIR/EIS, Appendix D, Page 3

⁹ EIR/EIS, Executive Summary, Page 10

The use of the adverb “fully” implies that the original storage is entirely recovered, but this is not necessarily the case. The science of poromechanics demonstrates that irreversible loss of aquifer capacity can occur with groundwater extraction, and while this physical phenomenon is explained elsewhere in the EIS/EIR, it is apparently ignored by the SacFEM2013 model, and hence it is not predicted with any degree of accuracy for use in estimating this important environmental effect. California has seen many examples of the accumulation of this environmental risk, as the readily-observable phenomenon known as subsidence is the surface expression of this loss of aquifer capacity. The small strains induced in the aquifer skeleton by groundwater extraction accumulate over the depth of the aquifer, and are expressed by the slow downward movement of the ground surface. The EIR/EIS makes little connection between groundwater extraction process modeled by SacFEM2013 and the all-too-real potential for surface subsidence, and the attendant irreversible loss of aquifer capacity. It is remarkably simple to model these coupled fluid- and solid-mechanical effects using modern computers, and it is thus a fatal shortcoming of the EIR/EIS that such a rational science-based approach to estimating these environmental risks has not been undertaken.

The problem is especially important during drought years, when groundwater substitution is most likely to occur. In a drought, the aquifer already entrains less groundwater than normal, so that additional stresses due to pumping are visited upon the aquifer skeleton. This is exactly the conditions required to cause loss of capacity and the risk of subsidence. Yet the EIR/EIS makes scant mention of these all-too-real problems, and no serious modeling effort is presented in the EIR/EIS to assess the risk of such environmental degradation.

Taken together with the other problems catalogued above, it is clear that the EIR/EIS does not accurately estimate potential environmental risks due to groundwater extraction. And since this component of the water transfer process is only one aspect of how water might be moved within the state, the interested reader of the EIR/EIS can only wonder what other important environmental effects have not been accurately assessed in the EIR/EIS.

Conclusions

The current draft version of the EIR/EIS fails to accurately estimate environmental effects likely to occur during water transfers. The model used to predict groundwater resources is flawed by being based on old technology that is apparently not up to the task of accurate large-scale modeling as combined with requisite validation measures and uncertainty characterization efforts needed to justify the use of the model. The reasons given for the use of this model do not stand up even to the most rudimentary examination, and the model neglects important environmental effects that have long been observed in California. The proposed transfers should be rejected until a more sound scientific basis can be established for prediction of all substantial environmental effects, and established practices in the use of computational models are developed and deployed in all aspects of computational prediction of those effects.