



BOARD MEETING AGENDA

Thursday, August 20, 2026, Convenes at 2:00 p.m.

<http://www.portervilleid.org> / PIDGSA@ocsnet.net

22086 Avenue 160, Porterville, CA 93257

Web Meeting Attendance Available for Interested Parties:

Join Zoom Meeting

<https://us06web.zoom.us/j/84319138554>

Meeting ID: 843 1913 8554

Passcode: Hu9n5p

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AGENDA

Action items are listed in **bold**.

1. CALL TO ORDER

Roll Call, Flag Salute

All items on this agenda, whether or not expressly listed for action, may be deliberated upon and may be subject to action by the Board of Directors. The Board of Directors may consider agenda items in any order. Materials related to an item on this agenda submitted to the Board of Directors after distribution of the agenda packet are available for public inspection at the Porterville Irrigation District, 22086 Avenue 160, Porterville, CA 93257, during regular business hours.

2. PUBLIC COMMENT

At this time, members of the public may comment on any item not appearing on the agenda. Under state law, matters presented under this item cannot be discussed or acted upon by the Board at this time. For items appearing on the agenda, the public is invited to provide comments at the time the Board considers the item. Any person addressing the Board will be limited to a maximum of three (3) minutes, or at the Chairman's discretion. At all times, please state your name for the record.

3. ANNOUNCEMENTS

- a. Notice from the State Water Board Regarding GEARS Reporting Annual Fee Invoice Mailing for Tule Subbasin.

4. CONSENT CALENDAR

- a. **Consideration and Approval of August 11, 2026, GSA Special Board Meeting Minutes (Action).**

5. PUBLIC HEARING

- a. Staff Report on Groundwater Extraction Fee
- b. Public Hearing on Groundwater Extraction Fee. Written protests by individuals will be accepted up until the end of the Hearing. Protests submitted after the Hearing has concluded will not be considered.
- c. Close Public Hearing, report on Status of Written Protest.
- d. **Consider Approval of Draft Resolution 2026-08-xx, setting Groundwater Extraction Fee (Action).**

6. ADMINISTRATION

- a. No Items for Discussion.

7. REPORTS FROM COMMITTEES

- a. Provide a report to Board Members on meetings conducted to facilitate the Tule Subbasin Multi-GSA efforts and progress.

7. CLOSED SESSION:

- 1. **Government Code Section 54956.9(d)(4) – Conference with Legal Counsel – Anticipated Litigation – Initiation of Litigation: One (1) case.**

8. CLOSED SESSION ITEMS:

- a. Report Action Taken in Closed Session Required by Government Code 54957.1

9. NEXT MEETING DATE

- a. Next Regular Meeting – Thursday, September 17, 2026, at 2:00 p.m.

10. ADJOURNMENT

A person with a qualifying disability under the Americans with Disabilities Act of 1990 may request that the PIDGSA provide a disability-related modification or accommodation to participate in any public meeting. Such assistance includes appropriate alternative

formats for the agendas and agenda packets used for any public meetings of the GSA. Requests for such assistance and for agendas and agenda packets shall be made in person, by telephone, facsimile, or written correspondence to the General Manager of the Porterville Irrigation District GSA at (559) 782-6321, at least 48 hours before a public meeting.

CONSENT CALENDAR

Staff Report to the Porterville Irrigation District GSA Board of Directors

Subject: CONSENT CALENDAR / Consideration and approval of August 11, 2026, GSA Special Board Minutes (Action).

Submitted By: General Manager



**MINUTES OF THE
SPECIAL GSA BOARD OF DIRECTORS
MEETING HELD AUGUST 11, 2026**

At approximately 11:17 a.m. on August 11, 2026, at the Porterville Irrigation District Board Room, President Eric Borba called to order the Special meeting of the Board of Directors of the Porterville Irrigation District Groundwater Sustainability Agency ("PIDGSA"). The meeting was also conducted remotely for members of the public.

Members Present: Eric Borba, David Gisler
 Brett McCowan Timothy Witzel

Members Absent:

Others Present: Michael Knight, *GSA Manager*
 Sean Geivet, *District Manager*
 Aubrey Mauritsen, *District Legal Counsel*
 Nick Keller, *District Engineer*
 Jeff Row, *District Secretary-Treasurer*

List of signed-in attendees:

Terry Schuler	Brandon Sargent	Joe Hughes
Mike George	Adam Mendoza	Jarmi Howe
Nick Gatti	Jason Guthrie	

Additional members of the public were present in person and via Zoom.

1. CALL TO ORDER

President Eric Borba called the meeting to order at 11:17 a.m.
Flag salute: Michael Knight

2. PUBLIC COMMENT

President Borba opened the floor for public comment.
No public comments were received.

3. ANNOUNCEMENTS

a. Status of Prop 218 Extraction Fee Public Outreach.

The GSA General Manager reminded the Board and public that a public hearing regarding the proposed groundwater extraction fee was scheduled for August 20, 2026, at 2:00 p.m.

b. Report Back on Meeting with State Board Member Nicole Morgan and Staff on July 16, 2026

The GSA General Manager provided an update regarding the July 16, 2026, meeting between representatives of the Tule Subbasin GSAs, State Water Resources Control Board Member Nicole Morgan, and State Board staff.

State Board staff identified land subsidence, particularly along the Friant-Kern Canal, as the primary concern driving the development of a potential Interim Plan for the Tule Subbasin.

Staff reported that the State Board was considering a phased Interim Plan. The first phase could focus on the Friant-Kern Canal and include a moratorium on groundwater pumping within a defined distance of the canal. Distances ranging from approximately one to three miles had been discussed, with a two-mile corridor receiving significant consideration. No final boundary or restriction had been established.

The anticipated State schedule included preparing a draft Interim Plan in January 2027, notifying affected groundwater extractors in February, preparing a final draft in March, and possible State Board consideration in April 2027.

Staff emphasized that the State Board indicated there remained an opportunity for the Tule Subbasin GSAs to develop and implement a coordinated local management program as an alternative to portions of the proposed State Interim Plan. Any local alternative would need to include aggressive implementation, measurable groundwater-management actions, accountability, and demonstrated protection of the Friant-Kern Canal.

The Board and attendees discussed groundwater-elevation management and the development of critical-head elevations intended to prevent additional inelastic land subsidence. Staff explained that critical-head elevations vary throughout the Subbasin and must be evaluated based on local groundwater and geologic conditions.

Discussion included the preliminary understanding that groundwater levels in certain areas may need to recover approximately 100 to 120 feet from current elevations. Staff clarified that critical-head determinations remain under technical review and would vary by location.

c. State Water Board GEARS Annual Fee Invoices.

Staff advised that the State Water Resources Control Board had begun mailing Groundwater Extraction Annual Reporting System fee invoices to groundwater extractors in the Tule Subbasin.

Staff reported receiving inquiries from groundwater users and assisting individuals with questions regarding the invoices, reporting requirements, and available State Board processes. Staff encouraged affected groundwater users to contact the PID GSA office for assistance and indicated that many questions could be addressed by telephone.

4. CONSENT CALENDAR

- a. Consideration and Approval of July 14, 2026, GSA Special Board Meeting Minutes (Action). The Board considered approval of the July 14, 2026, GSA Special Board Meeting Minutes.

Action: Motion by Director McCowan, seconded by Vice President Gisler, to approve the GSA Special Board Meeting Minutes of July 14, 2026. Motion carried unanimously.

5. ADMINISTRATION

- a. Consideration and Approval of First Amended Rules and Regulations (Action).

The GSA General Manager presented the proposed First Amended Rules and Regulations. Staff explained that the amendments were intended to clarify implementation procedures, update technical language, and add administrative provisions based on experience implementing the groundwater accounting program. The Board discussed the proposed amendments and provided direction to staff by motion.

Action: Motion by Director McCowan, seconded by Vice President Gisler, to approve the First Amended Rules and Regulations as presented. Motion carried unanimously.

6. REPORTS FROM COMMITTEES

- a. Provide a report to Committee Members on meetings conducted to facilitate the Tule Subbasin Multi-GSA efforts and progress.

Tule Subbasin Multi-GSA Coordination and Progress:

The GSA General Manager reported on Tule Subbasin coordination and the development of a locally controlled land-subsidence management approach for the Friant-Kern Canal.

Staff reported that the Tule Subbasin GSAs were working toward a coordinated Friant-Kern Canal Land Subsidence Urgency Plan. Potential measures under consideration included:

- Groundwater-pumping limitations or pumping caps;
- Mandatory well registration and metering;
- Increased groundwater-level and land-subsidence monitoring;
- Development of critical-head elevations and groundwater-level recovery targets;
- Mitigation funding and commitments;
- Enforcement and backstop provisions; and
- Management-area boundaries extending approximately two to three miles from the canal.

Staff noted that these concepts remain in development and had not been formally adopted. Staff emphasized that significant policy, technical, and legal questions remained unresolved. Additional coordination among the Tule Subbasin GSAs, irrigation districts, groundwater users, consultants, and legal counsel would be necessary if the State moved forward with a full pumping moratorium.

7. CLOSED SESSION: The Board did not convene into closed session.

The Board adjourned to Closed Session pursuant to:

1. Government Code Section 54956.9(d)(4) - Conference with Legal Counsel – Anticipated Litigation – Initiation of Litigation: One (1) case.

8. CLOSED SESSION ITEMS:

1. Government Code Section 54956.9(d)(4) – Conference with Legal Counsel – Anticipated Litigation – Initiation of Litigation: One (1) case.

- a. Report Action Taken in Closed Session Required by Government Code 54957.1

There was no reportable action pursuant to Government Code Section 54957.1.

9. NEXT MEETING DATE

The next regular meeting of the Porterville Irrigation District Groundwater Sustainability Agency Board of Directors is scheduled for Thursday, August 20, 2026, at 2:00 p.m.

10. ADJOURNMENT

There being no further business before the Board, President Borba adjourned the meeting at 11:45 a.m.

Respectfully submitted,

Michael Knight, GSA General Manager

ADMINISTRATION

Staff Report to the Porterville Irrigation District GSA Board of Directors

Subject: PUBLIC HEARING / Staff Report on Groundwater Extraction Fee. (Conduct a public hearing and consider adoption of Resolution No. 2026-08-XX establishing a groundwater extraction fee to fund PID GSA operations and implementation of the Sustainable Groundwater Management Act) (Action).

Submitted By: General Manager

Conduct a public hearing and consider the adoption of Draft Resolution No. 2026-08-XX establishing a groundwater extraction fee to fund PID GSA operations and implementation of the Sustainable Groundwater Management Act (SGMA).

The Porterville Irrigation District Groundwater Sustainability Agency (PID GSA) is responsible for implementing SGMA and groundwater sustainability activities within its jurisdictional boundary. These responsibilities include GSA administration, groundwater monitoring, technical analysis, groundwater accounting and data management, compliance and enforcement activities, professional and legal services, and implementation of groundwater sustainability programs.

Water Code Section 10730.2 authorizes a GSA that has adopted a Groundwater Sustainability Plan to impose fees on groundwater extraction to fund groundwater management activities. Fees imposed pursuant to this authority are subject to the applicable requirements of Article XIII D, Section 6 of the California Constitution.

To provide a dedicated funding mechanism for PID GSA operations and SGMA implementation, staff developed a proposed groundwater extraction fee based upon the Agency's anticipated 2026 costs and Native Sustainable Yield allocation.

PROPOSED FEE

The proposed 2026 PID GSA budget identifies \$785,343 in costs associated with GSA operations and groundwater sustainability activities.

For purposes of the proposed fee calculation, PID GSA has identified approximately 15,500 acres and a Native Sustainable Yield allocation of 0.15 acre-foot per acre, resulting in approximately 2,325 acre-feet of Native Sustainable Yield within the PID GSA.

The proposed fee calculation is:

$\$785,343 \div 2,325 \text{ AF} = \$337.78 \text{ per acre-foot}$

Applied to the Native Sustainable Yield allocation:

$1 \text{ acre} \times 0.15 \text{ AF/acre} \times \$337.78/\text{AF} = \$50.67 \text{ per acre}$

Accordingly, the proposed groundwater extraction fee is \$337.78 per 0.15 AF/acre Native Sustainable Yield allocation, resulting in an annual equivalent charge of approximately \$50.67 per 0.15 per/acre for the 2025/2026 Extraction Fee calculation.

REVENUES

Revenue generated by the proposed fee would be restricted to the reasonable and necessary costs associated with PID GSA operations and SGMA implementation, including:

- GSA administration;
- Legal, engineering, consulting, and other professional services;
- Groundwater monitoring and technical analysis;
- Groundwater accounting and data management;
- Compliance assistance and enforcement support;
- Public outreach; and
- Implementation of groundwater sustainability programs.

The proposed Draft Resolution would expressly provide that fee revenues are to be used solely for these groundwater management and SGMA implementation purposes.

PUBLIC NOTICE AND PROTEST PROCESS

In accordance with the applicable Proposition 218 procedures, PID GSA identified affected parcels and property owners and provided written notice describing the proposed fee, the basis for its calculation, the reason for the fee, and the date, time, and location of the public hearing.

The District mailed notice to affected property owners at least 45 days before the public hearing. Public notice was also published in the Porterville Recorder on July 24, 2026, and August 7, 2026, and notices were posted on the Irrigation District website. Supporting budget and rate information was made available for public review.

In today's (August 20th 2026) public hearing, the Board should receive and consider all oral testimony, written comments, and timely written protests. Following the close of the Public Hearing, written protests will be tabulated to determine whether a majority protest exists.

If a majority protest exists, the proposed fee may not be imposed. If a majority protest does not exist, the Board may proceed with consideration of Draft Resolution No. 2026-08-XX.

BILLING AND IMPLEMENTATION

If adopted, the groundwater extraction fee would apply to affected lands and groundwater extraction subject to the PID GSA fee program. The Resolution provides for billing for the

applicable 2025–2026 period, including the period beginning October 2025, and thereafter as authorized by the Board and consistent with the adopted methodology and applicable law.

The Draft Resolution would further authorize PID GSA staff to administer, calculate, invoice, collect, and account for the fee and authorize the GSA Manager to make necessary administrative corrections to parcel, acreage, groundwater accounting, and billing information.

The adoption of the proposed annual groundwater extraction fee is intended to recover approximately \$785,343 in anticipated PID GSA operational and SGMA implementation costs based upon the proposed 2026 budget and fee methodology.

The proposed rate is \$337.78 per 0.15 acre-foot of Native Sustainable Yield, equivalent to approximately \$50.67 per acre when applied to the 0.15 AF/acre Native Sustainable Yield allocation.

The proposed groundwater extraction fee provides PID GSA with a dedicated funding mechanism to carry out its groundwater management responsibilities and implement SGMA. The proposed fee was calculated based upon the Agency's identified costs and the Native Sustainable Yield available within the PID GSA.

After the public hearing and protest tabulation, and provided a majority protest does not exist, staff recommends that the Board consider adopting Draft Resolution No. 2026-08-XX establishing the 2026 groundwater extraction fee.

RECOMMENDATION:

Staff recommends that the Board of Directors:

1. Open and conduct the duly noticed public hearing regarding the proposed groundwater extraction fee;
2. Receive and consider public testimony and written protests;
3. Close the public hearing and direct staff to complete the tabulation of written protests;
4. Determine whether a majority protest exists in accordance with applicable law; and
5. If a majority protest does not exist, consider adoption of Draft Resolution No. 2026-08-XX, establishing the 2026 groundwater extraction fee.

ADMINISTRATION

Staff Report to the Porterville Irrigation District GSA Board of Directors

Subject: REPORTS FROM COMMITTEES / Provide a report to Board Members on meetings conducted to facilitate the Tule Subbasin Multi-GSA efforts and progress.

Submitted By: General Manager

This report provides an update on recent Tule Subbasin coordination meetings, technical working group activities, policy discussions, and preparation. The ongoing work supports development of the Tule Subbasin Multi-GSA Single Groundwater Sustainability Plan and the implementation of coordinated measures intended to achieve groundwater sustainability and address identified State Water Board concerns.

Period: July 8 - August 6, 2026

July 8 - Tule Groundwater Quality Technical Working Group

Key Topics: State Board comments on Attachment 5; undesirable results; domestic well protection.

- Conducted an expedited review of State Board comments regarding the Tule Subbasin Groundwater Quality approach.
- Discussed revisions to the undesirable-result methodology and representative monitoring network.
- Simplified indicator-constituent sampling triggers to provide a more defensible and implementable monitoring approach.
- Technical team continued preparation of an updated response matrix and revised groundwater-quality materials for future State Board consultation.

July 9 - Tule Subbasin Southern Land Subsidence Study Area TWG

Key Topics: Groundwater model calibration; critical head; attribution scenarios.

- Groundwater model calibration continued using PEST, with initial calibration runs underway.
- Two approaches to establishing critical head surfaces remain under development: an interpolated approach and a physically informed statistical approach.
- Key policy questions remain regarding the appropriate historical baseline for attribution and the relationship between pumping locations and observed subsidence.

July 10 - Tule Groundwater Quality TWG

Key Topics: Groundwater quality SMCs; domestic wells; mitigation funding.

- Continued development of groundwater-quality undesirable-result criteria and the representative monitoring network.
- Domestic well mitigation capacity and funding assumptions were reviewed.
- Coordination between the GSAs and Tule Basin Water Foundation remains necessary to establish a documented mitigation/testing framework acceptable to the State Board.

July 14 - PID GSA Board Meeting

Key Topics: 2026 extraction fee; State Board coordination; well registration.

- Public hearing for the proposed 2026 GSA extraction fee scheduled for **August 20 at 2:00 p.m.**
- Proposed GSA budget totals approximately **\$785,343**, resulting in a calculated fee of approximately **\$50.67 per .15 extracted**.
- State Board records request concerning surface water stored underground and subsequent extractions remained underway.
- Well registration implementation continued, with registration through BasinSafe required.

Major Regulatory and Tule Subbasin Developments

July 16 - State Water Board / Tule Subbasin Executive Coordination Meeting

Key Topics: Tule probation; State Interim Plan; Friant-Kern Canal pumping restrictions; local-control pathway.

This was the most consequential meeting of the reporting period.

- State Water Board staff stated that **subsidence remains the central concern** and that current GSP deficiencies and deteriorating conditions are driving development of an Interim Plan.
- Staff described a potential **Phase 1 Interim Plan focused on the Friant-Kern Canal**, including a groundwater pumping moratorium within an approximately two-mile corridor around the canal. The State presentation identified exceptions associated with human health and safety.
- The proposed accelerated State schedule contemplates release of a draft Phase 1 Interim Plan in **January 2027**, notice to pumpers in February, a final draft in March, and a State Board adoption hearing in April.
- State staff indicated that the Interim Plan has fewer management tools than GSAs and would therefore rely heavily on pumping restrictions.
- Importantly, State staff confirmed there remains an opportunity for the GSAs to develop **locally adopted restrictions or an alternative management program** capable of avoiding or replacing portions of the State's proposed approach.
- State staff emphasized that any local alternative must demonstrate aggressive implementation, coordinated action, measurable results, and accountability.
- The State requested a formal coordination schedule describing future technical meetings, materials to be submitted, technical representatives attending, and whether verbal or

written feedback is requested.

- The Subbasin committed to increased coordination and development of a unified approach.

PID Significance: The meeting substantially increased the urgency of establishing a coordinated local subsidence-management program. Maintaining local control will depend heavily on the Subbasin demonstrating credible implementation before the State's proposed Phase 1 Interim Plan advances.

July 20 - Tule Subbasin Policy Coordination Group

Key Topics: State Board response; Friant-Kern Canal corrective action; unified approach.

- Policy representatives reviewed the July 16 meeting and agreed to develop a coordinated Friant-Kern Canal Land Subsidence Management Strategy rather than relying on independent GSA approaches.
- The goal is to submit sufficient local management actions before State adoption of a Friant-Kern Canal Interim Plan.
- Policy discussions focused on defining significant and unreasonable impacts, determining whether management should apply to specific reaches or the entire canal corridor, and establishing appropriate mitigation and attribution standards.
- The group continued emphasizing a unified Subbasin message and coordinated technical engagement with State staff.

July 31 - DWR Tule Basin Subsidence Meeting

Key Topics: DWR Subsidence BMP; critical head; monitoring; Sustainable Management Criteria.

- DWR reviewed its Subsidence Best Management Practices with the Tule Subbasin and emphasized that groundwater-level and subsidence monitoring should be sufficiently dense to understand the cause, rate, and extent of subsidence.
- DWR identified monthly or more frequent groundwater-level monitoring as a best practice, particularly to capture seasonal lows when groundwater elevations may fall below critical head.
- DWR emphasized establishment of critical head as an important tool for relating groundwater-level management to subsidence.
- DWR also emphasized that minimum thresholds should protect critical infrastructure and that, where infrastructure is damaged, even a single threshold exceedance could potentially constitute an undesirable result.
- Tule presented its existing subsidence framework, including infrastructure vulnerability, subsidence minimum thresholds, groundwater-level SMCs, and ongoing evaluation of critical head.
- Current monitoring shows that subsidence conditions vary significantly across the Subbasin; several representative sites remain near or above established subsidence-rate trajectories and therefore require continued attention.

PID Significance: DWR's feedback reinforces the need for PID and the Subbasin to connect

pumping restrictions and groundwater management directly to groundwater elevations, critical head, and measurable subsidence response rather than relying solely on basin-wide allocation quantities.

August 3 - Tule Subbasin Policy Coordination Group

Key Topics: Friant-Kern Canal Urgency Plan; pumping caps; well registration; monitoring and mitigation.

- State Board, DWR, and Friant discussions have increasingly pointed toward the need for **one coordinated Friant-Kern Canal management approach**.
- The proposed Land Subsidence Urgency Plan is intended to establish management actions less restrictive than the State's proposed blanket pumping moratorium while still producing an equivalent protective outcome.
- Measures under consideration include:
 - coordinated pumping caps;
 - mandatory well registration and meter reporting;
 - expanded groundwater-level and subsidence monitoring;
 - groundwater-level recovery targets;
 - funded mitigation commitments; and
 - enforcement/backstop measures if subsidence continues.
- Policy questions remain regarding a two- versus three-mile managed corridor, pumping depth restrictions, treatment of sustainable-yield and recharge credits, groundwater-credit transfers, and increasingly restrictive management triggers. These remain discussion items and have not yet been adopted.
- The group also discussed aggressive implementation timelines and the need for support from both Friant Water Authority and State Board staff.

August 4 - Tule Subbasin Managers Meeting

Key Topics: State coordination schedule; Unified GSP; Friant-Kern Canal Urgency Plan.

- Managers reviewed the July 31 DWR meeting, August 3 Policy Group direction, and development of the formal SWRCB technical coordination schedule.
- Continued work on the **Unified Tule Subbasin GSP**, including funding and fiscal-agent procedures.
- Lower Tule is expected to serve as fiscal agent for the Unified Plan effort, with quarterly calls for funds and monthly financial reporting.
- Managers continued review of the Friant-Kern Canal policy questions, including well registration, metering, pumping caps, management-area boundaries, critical-head evaluation, groundwater credits, and potential depth-specific pumping restrictions.
- Technical Working Groups continue parallel work on Basin Setting, monitoring, land subsidence, groundwater quality, Projects and Management Actions, and other components of the Unified GSP.

Current Direction / Items to Watch

The most important issues for the Board going forward:

- **Friant-Kern Canal:** The Subbasin is attempting to develop a locally controlled Land Subsidence Urgency Plan before the State proceeds with its proposed Phase 1 pumping moratorium.
- **Early implementation:** Well registration, metering, increased monitoring, pumping limits, and enforcement mechanisms are being evaluated for implementation ahead of completion of the Unified GSP.
- **Critical head:** Technical work is increasingly focused on establishing the groundwater elevations necessary to prevent additional inelastic subsidence.
- **State coordination:** A formal technical coordination process is being established so major portions of the new GSP can receive State Board staff review as they are developed rather than waiting for the completed plan.
- **Unified GSP:** The Tule GSAs have moved toward a much more coordinated planning structure, with Policy, Managers, and Technical Working Groups feeding into a unified plan.
- **Schedule:** The current coordination schedule targets State review of the Drinking Water Well Mitigation Plan beginning in September 2026; review of the Friant-Kern Canal Urgency Plan in November; implementation of the Tule-FKC plan in January 2027; and completion/adoption of the Unified GSP during summer 2027.

Overall Assessment

The principal change over the last 30 days is that discussions have moved from **general GSP correction and State coordination into an implementation-driven regulatory timeline**. The State's proposed Friant-Kern Canal pumping moratorium creates a near-term deadline for the Tule GSAs. At the same time, State Board staff have indicated that a credible, coordinated, and aggressively implemented local alternative could provide a pathway to maintain local control.

For PID, the priority should therefore remain active participation in development of the **Friant-Kern Canal Urgency Plan**, while ensuring that any pumping restrictions, critical-head criteria, or subsidence attribution methods ultimately imposed on PID are technically supported and appropriately account for aquifer depth, pumping location, groundwater conditions, and actual contribution to subsidence.