



**GREATER KAWEAH
GROUNDWATER
SUSTAINABILITY
AGENCY**

www.GreaterKaweahGSA.org

Greater Kaweah GSA Combined RCC & SC Meeting

Tuesday, January 14, 2020

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ITEM 2: ANNOUNCEMENTS

ITEM 3: MINUTES

ITEM 4: SC BOARD NOMINATIONS

- a. SC Director
- b. SC Alternate Director

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ITEM 5: GSP Public Review Draft Schedule Update

- GKGSA Board approved Public Review Draft GSP schedule on September 9th and released the Draft to the Public September 16th
- 90-day notice issued for public hearing on December 16th
- Combined RCC/SC meeting December 17. Management Team Committee, 2-3 Combined RCC/SC and 2-3 Board meetings in January
- Adoption and submission to DWR week of January 20th
- DWR is required to establish its own GSP public comment period of no less than 60 days for an adopted plan
- A GSP that is determined to be incomplete after the deadline may be revised and resubmitted to DWR within 180 days from the date DWR issues the assessment

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ITEM 5: GSP Public Review Draft Review of Public Comments

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|---------------------------------|-------------------------------------|
| • City of Visalia | • The Nature Conservancy |
| • Exeter ID and LSID | • Ag Innovations |
| • Kings River Water Association | • City of Woodlake |
| • Westchester Group | • Tulare County Farm Bureau |
| • Wonderful Citrus | • Mr. Del Strange |
| • Self-Help Enterprises | • Ms. Karen Yohannes |
| • Leadership Council | • Ms. Carole Combs (public hearing) |
| • CDFW | |

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ITEM 5: GSP Public Review Draft Review of Public Comments

- 14 comment letters
- 6 comments received during public hearing, most restating written comments received
- All comments parsed out in Excel spreadsheet into 336 individual comments
- Comments categorized into batches
 - Batch A: 198 comments
 - Batch B: 113 comments
 - Batch C: 24 comments
- Duplicate comments consolidated – Multiple Comment Response (MCR) coded
- Batch A comments handled administratively, most Batch B and C presented to committees and Board for direction
- Public Comment Summary report prepared by Stantec

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- City of Woodlake requests GKGSA consider metering all agriculture wells to reduce uncertainty in extraction amounts and to better implement policies that reduce and restrict groundwater pumping.

✓ Recommended Response:

Metering has not yet been determined by the GSA to be the most cost effective means of measurement and conservation incentivizing. The GSP includes a Groundwater Extraction Measurement Program as a MA and will evaluate metering among other measurement alternatives. This MA will be one of the first to be implemented by the GSA.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA requests the GSA immediately commit to a concrete plan for designing, funding and implementing an impaired well assistance/drinking water protection program. Ensure that program design is heavily lead by residents in disadvantaged communities.

- ✓ Recommended Response:

The GSP includes an Assistance for Impaired Wells Program as a MA. Specifics of the Program have not yet been developed. This MA will be one of the first to be implemented by the GSA and input from the public will be solicited.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA comment that residents in Ivanhoe are concerned that the GSP may not account for all of their present and future water needs. Residents want the GSA to prioritize supplying clean and sufficient groundwater supply for their current and future drinking water needs, for their community park, and to expand housing and development of services and amenities in the communities. We ask the GSA to clarify whether these needs will be guaranteed by the water budget and goals proposed in the plan.

- ✓ Recommended Response:

The GSP and Coordination Agreement present a water budget, SMC and Projects and MAs that seek to achieve a goal of sustainability by 2040 which includes reliability of drinking water supplies. However, MAs in the GSP such as Fee & Incentive Program, Urban Water Conservation Program, and Groundwater Allocation Program have yet to be defined.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA comment that the means by which the GSA states it will achieve the Sustainability Goal, through a “glidepath” approach, is geared towards protecting agricultural interests, and is likely to have severe impacts on the drinking water resources of domestic well users.

- ✓ Recommended Response:

SGMA defines a period of 20 years to achieve sustainability which suggests a “glidepath”. The schedule for implementing necessary Projects and MAs is designed to be as protective of all beneficial users and uses of groundwater, not just agriculture.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA comment that in order to protect drinking water users, the GSAs should place the minimum threshold at a level above where the shallowest domestic well is screened in each Threshold Area.

- ✓ Recommended Response:

Absent a goal of achieving sustainability in the first year of GSP implementation, setting MTs at such a level is not consistent with the “glidepath” approach and would trigger State intervention. MTs will continue to be evaluated and adjusted as necessary over the course of the sustainability period.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA comment that Ivanhoe residents are particularly concerned with ensuring that the GSA's activities and policies do not cause increased contamination for their drinking water systems or surrounding domestic wells. For example, the proposed timeline for implementation of demand reduction may allow for continued pumping which may create an increase in naturally occurring contaminants and/or migration of contaminant plumes.

- ✓ Recommended Response:

The monitoring network will continue to be improved and data gaps prioritized and addressed in alignment with the schedule for Projects and MAs implementation. Impacts of each Project and MA will be thoroughly evaluated by the GSA prior to and following implementation.

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- ✓ Recommended Response:

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- LCJA comment that they strongly recommend against a groundwater market in the GSA area, and Ivanhoe residents also ask the GSA to remove this from the list of potential management actions.

- ✓ Recommended Response:

As with other MAs described in the GSP, the Groundwater Market MA is intended to begin as an alternative analysis/pilot to help inform a decision by the Board as to whether or not it's an appropriate path forward for the GSA. Cost/benefit, and economic and environmental impacts will be studied and considered.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- Several comments received from NGOs regarding the GSAs approach to funding Projects and MAs. Suggest that grant funding is over relied upon and local funding needs to be developed, and express concern that this burden may be applied disproportionately impacting small communities and residential well owners.

- ✓ Recommended Response:

The GSA intends to conduct a Prop 218 acreage-based assessment election in the first half of 2020 to cover ongoing administrative overhead and some study and planning that benefit all residents of the GSA. Projects and MAs that benefit only a portion of groundwater users in the GSA will be funded in a more proportionate manner.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- Comment from Del Strange that the dewatering of our groundwater aquifer due to over-pumping or extraction of water can result in a permanent reduction in its storage capacity, leading to land surface subsidence and the resultant infrastructure damage or collapse. Such inelastic irrecoverable subsidence is of major concern in areas of active groundwater extraction.

- ✓ Recommended Response:

The GSA TAC worked with technical consultants and other well known experts in the field of hydrogeology to map, graph, project and identify correlations that were used to inform the development of subsidence elements in the GSP. Critical infrastructure damage and permanent dewatering were strongly considered. Kaweah Subbasin has one of the most robust subsidence monitoring programs in the state, and the majority of projects contained in the GSP are located in or near subsiding areas.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- Comment from Del Strange that a truly sustainable water supply must be found that can meet the needs of this over-populated arid valley of Central California far into the future.

- ✓ Recommended Response:

The GSA is committed to exploring all options, and to minimizing the impact of SGMA-required actions on the region.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- Comment from Del Strange that the GSP assumes that there will always be some subsidence and leaves the door open to justifying its continued occurrence. He goes on to ask if we can stop subsidence now, or is it inevitable?

- ✓ Recommended Response:

The GSA TAC and other experts in the field of hydrogeology have concluded that subsidence can be caused by factors other than groundwater pumping, and that even complete curtailment of pumping may not arrest continued subsidence in certain areas. Better understanding cause and effect with respect to subsidence is a significant informational gap that is a priority for the GSA to address.

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ITEM 5: GSP Public Review Draft Review of Public Comments (Batch B)

- Comment from Tulare County Farm Bureau discouraging exportation of waters out of the sub-basin where it would negatively impact local landowners.

- ✓ Recommended Response:

GKGSa is working closely with county governments, surface water appropriators and well owners to better understand impacts of exportation and any unintended consequences that may result from policies intended to prevent it.

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