To: Eric Osterling, General Manager and Greater Kaweah GSA Board
From: Kathie Shannon- (Gist Family Partnership)
RE: 90-day Public Comments of Rules and Regulations

First of all, thank you for the work that you all have put into these plans, and for allowing us all the opportunity to comment.

I have a few concerns and a couple have already been mentioned in other comments. So, I will just say that I too am concerned when attending outreach meetings at the divide that seems to exist between surface water users and those who only have a groundwater option. I thought we were all farmers and in this together, but it doesn’t seem like it anymore.

I understand there will be need to change rules as we move forward. In regard to Section 1.05, I would hope that even if changes are made to the rules at any time, that if at all possible, they only be implemented at the start of a new water year.

Aside from those concerns, I would like to address confusion I have that affects our personal situation and maybe others but they are not even aware. I hope I can present this clearly. I do realize as of now we are looking at a draft, and outreach is being done based on that draft. I just hope that once the R&R are finalized it will be clearer.

Regarding the Workshop on January 5: Slide 1 of 8 was presented at about the 28-minute mark. The last item on that slide states “All assessed acreage under this regulation is treated equally.” My trusted American Dictionary of the English Language defines All as “every one, or the whole number of particulars. The whole quantity, extent, duration, amount, quality or degree: as all the wheat, all the land……
Near the end of the workshop a question was asked pertaining to allocation, and I apologize, but I did not write it down, and cannot understand it on the video. However, the second half of the answer seemed to imply that not all land is treated equally. If I understood it correctly, grazing land will not receive the transitional tier allocation. But then a comment was included that if a portion of the parcel is in ILRP, the parcel will receive the entire allocation. The video sound is very grainy and I want to be sure I am understanding it. I am also looking at Section 4.03B in trying to understand this.

So as an example: If our assessed acreage is 71 acres, and 50 is in the ILRP will we receive allocation for the entire 71 acres that includes the transitional tiers? Or does it mean any grazing land will not receive full allocation regardless? If the latter is true, is there a difference in "grazing" and "pasture with permanent irrigation"? If there is land that has always been irrigated, but is not in the ILRP, (even though someone may have attempted to include it in the ILRP), will there be a small window of time to enroll those acres in ILRP? I have watched this video more times than I care to admit. I am assuming when she refers to any portion of the parcel is in the ILRP, it means just that, ANY portion and not necessarily that the acres of permanently irrigated pasture would need to be in the ILRP, but would still receive allocation for tiered water.

Thank you all again for taking the time to review our comments and concerns.

Kathie Shannon
Gist Family Partnership