

Name	Organization or Company Name	Email	Phone	Public Comment Field	Date
Leta Spencer	Westchester Group Investment Management	lspencer@wgimglobal.com	15594002748	On page 17, within the Transfer of Tier 1 and Tier 2 Allocations section, transferability requires an owner to elect to use a flow meter. If a landowner does not have a well, are they able to transfer their allocation? Being able to transfer water more than 3 miles should be acceptable to the GSA as long as the transfer is within the same GSA and is integral to the operation. Also, adoption of a Dutch-style auction as soon as possible would help to reduce groundwater overdraft in a fair and cost- effective way.	5/12/2022 16:17
Rolland Rosa	M.F. Rosa Dairy	rolland.rosa@rocketmail.com			5/12/2022 10:32
Dave Silveira		greatharvest@me.com	15598163283	The ground water pumping restrictions will significantly impact my farming operation. With the increased cost to pump water for all crops it will take away my ability to make a profit. I will have to fallow land which needs to be in production to earn a living for my family. Fallowing land comes at a cost. I lease the property so I will be paying rent to fallow land just for the water. I am not a large farmer that can absorb these costs. I need every acre I farm to make money not lose money. The pumping restrictions have an effect on all crops. It takes over 26-30" to grow tomatoes, 36" to grow cotton, I have soil monitoring systems in the trees to reduce water to 36". No crop is safe from the restrictions. Farmers do everything to conserve water! Everything I farm is on drip it's still not enough for the state. The States infrastructure was built based on 16-20million people living in California there is more than 40 million that we know of. We can't save enough water to make the system work! It's time to build more storage and increase the ability to transfer water from other districts not cut back. There is enough water for every industry it just needs to be managed properly.	5/12/2022 9:33
terry isheim	Farm owner	tishei@verizon.net	15597306725	Concern that Land IQ cannot discern home sites within farm footprint. Home sites with domestic wells that have vegetation, pool, etc. and produce measurable et. Again, accuracy is of most importance and accuracy can only be achieved by flow meters. I would like to comment on a couple of things: 1. Can the 3-4 mile transferability of water concept be applied to ground owned by the same owner but the parcels lie in 2 different GSA (in my case my GKGSA property has lots of surface water and no pumping) and another parcel lies less than 3 miles away in EKGSA and if 100 percent well water no surface.). Can the board consider some kind of transferability reciprocity between GSAs that does not require individuals sorting it out on their own? 2. If this concept is not acceptable, then how can a landowner who has excess surface water and or extra conservation credits be able to "bank" the credits and use in another Kaweah basin GSA. If the state took over the process they would treat the three Kaweah basin GSAs as a single entity and this transferability issue would not really exist. 3. As far as the tiers and the charges, I feel it is ok to charge for extra ground water to be extracted to keep trees and ranches going. I am against strict thresholds that require good ground to be taken out of production by an inflexible water extraction policy. We need to keep good productive ground going. In some cases, there was no surface water developed because there was good plentiful ground water that was used and nobody ever expected that the well production could be capped by the government! 4. Thank you for all of the hard work!	5/10/2022 12:21
Nancy Lange		nancyblange3@gmail.com	14157204920	I farm in two GSA's inside the Kaweah Basin. East and Greater Kaweah. I would appreciate the flexibility to move water pumping credits between the two sub basins. Will you be able to work this into your plan? Any plans that do not include actions against the state or and federal government for increased surface water deliveries are not worth considering. We must fight. This is useless as the state will eventually declare emergency and confiscate all water rights.	5/10/2022 11:23
David McEwen	Matt McEwen Farms	mattmcewenfarms@gmail.com	15592800015		5/4/2022 13:41
Greg Hughan		ghugh896@aol.com	15599015958		4/26/2022 7:20

terry isheim	tishei@verizon.net	15597306725	<p>Problem with Land IQ. Only accurate method to measure ground water pumping is through flow meters. ET measurements are fine for estimation only. In workshop of March 2022 Joel Kimmelshue admitted that "the results that we deliver are not intended for irrigation scheduling. They're intended for a kind of broad-based water management variation scheduling. That's not the purpose of the work we do. Full accounting of water in the sub-basin and groundwater billing, especially billing can only be achieved through flow meters. Therefore, billing based on Land IQ ET measurements will be swiftly disputed.</p> <p>I farm in two GSA's in Kaweah. Greater and East. It would be beneficial since we are the same basin to move our pumping credits to our other properties if needed. This would give us better flexibility with managing our scarce water resource.</p>	4/19/2022 16:53
Matt McEwen	mattmcewenfarms@gmail.com	15592800015	<p>APR 19, 2022</p>	4/19/2022 9:25

Eric Osterling  
 General Manager  
 Greater Kaweah GSA  
 2975 North Farmersville Blvd  
 Farmersville, CA 93223

Re: GKGSA Draft Rules and Regulations – Groundwater Pumping Cap  
 Mr. Osterling:

My name is Bo Champlin and I own and farmland within the boundaries of the Greater Kaweah GSA (GKGSA) and more specifically, my land is entirely within a white area. I am writing to provide my comments on GKGSA's draft Rules and Regulations that seek to allocate groundwater and place pumping caps on water rights holders.

My first comment relates to the 10% annual loss factor imposed on the carryover of Sustainable Yield and Tier 1 and Tier 2 Allocations (Sections 4.03(c)(i)(1) and 4.03(c)(ii)(1)). While reviewing the Rules and Regulations and other technical information prepared by GKGSA relating to this loss factor I do not find any sound technical basis for the imposition of an annual 10% loss factor. Many banking operations of which I am aware impose a loss factor or "leave behind" requirement, but typically the loss factor is only imposed one time (i.e., not annually) and is supported by a reasonable technical basis. Of course, groundwater banking operations involve one party voluntarily using the storage space of another party (rather than the direct regulation of groundwater rights by one party) and thus involve more discretion for the parties to agree to a loss factor. However, GKGSA's reduction of the groundwater allocations of vested water rights holders pursuant to a loss

Bo Champlin	Bo Champlin Farms	BOCHAMPLINFARMS@YAHOO.COM	15592800089	factor requires additional technical justification. Further, the loss factor as proposed will discourage us from	4/19/2022 9:23
Keith Freitas	Tend The Garden, Inc. Non-Profit 501 (c) 3	mykfed@gmail.com	15592861320	How does the new executive order from the state effect small farmers and their right to farm sustainably ?	4/15/2022 18:30

Mark Hoffman	Hoffman Farms	hoffmanfarms@reagan.com	15593581343	<p>I am a second generation farmer and have owned our current properties since 1970 or earlier. I am concerned about the transfer limit of 3 miles. This seems arbitrary and specifically penalizes those that have planned since the inception of the new SGMA law in 2014. In order to comply it is necessary to transfer water from farm to farm in the same GSA basin. I believe that my properties run along the same underground rivers, and from my rough analysis, removing a fixed amount of water from these rivers no matter what position along the river it is removed will make little long term effect. Mid Kaweah GSA is allowing water transfer between one owner's fields or ranches across the GSA. I understand that underground water flow is complicated but I believe a more reasonable transfer limit would be on the order of 10 miles or greater.</p>	4/11/2022 16:14
John Hamar	Hamar Farms	jihfarms@gmail.com	15596848568	<p>I appreciate all the work that has gone into formulating the GSA plan, but it seems extremely complicated. I think some of the monitoring programs need to be proven before implementing. We are in three different GSA's, it would be nice if they were all similar programs - we all pump from same aquifer. To implement a program and come up with cost sharing projects takes some thought and time. To simplify the process and get started soon I suggest a set aside program allowing farmers to fallow ground on a temporary / trial basis (to see if we can make a difference). I have read your reports and did some calculations - overall it looks like about 40 acres per section (640 acres) needs to be fallowed, the farmed ground then pays a fee and that will go to pay the set aside ground cost, keeping cost down and allowing time to develop a long-term plan. I am willing to explain in more detail if you would consider a program such as this. I know this seems simple, but it is a program that could be implemented this year as we are facing another dry year. Thank You for considering</p>	2/15/2022 7:08
Rick Pedro	Joe Pedro and Son Dairy	rocknbarp@gmail.com	15597306055	<p>I'm still wondering how your satellites will determine if water irrigating my fields are coming from ground water/ surface water, or lagoon waste water from our dairy? Some of our ground water pumps have hydraulic tests going back as far as 1983 and all our water usage is documented for the California water quality.</p>	2/7/2022 23:41
Rick Pedro	Joe Pedro and Son Dairy	rocknbarp@gmail.com	15597306055	<p>I'm still wondering how your satellites will determine if water irrigating my fields are coming from ground water/ surface water, or lagoon waste water from our dairy? Some of our ground water pumps have hydraulic tests going back as far as 1983 and all our water usage is documented for the California water quality.</p>	2/7/2022 14:43