

Eric Osterling  
General Manager  
Greater Kaweah Groundwater Sustainability Agency  
2975 N. Farmersville Blvd.  
Farmersville, CA 93223

VIA EMAIL: [easterling@greaterkaweahgsa.org](mailto:easterling@greaterkaweahgsa.org)

**Re: Comments on Draft Rules and Regulations**

Dear Mr. Osterling,

Family Tree Farms (Family Tree) appreciates the opportunity to comment on the Draft Rules and Regulations for the Greater Kaweah Groundwater Sustainability Agency (GKGSA). Our family has been farming in the Central Valley for four generations, so we have a vested interest in seeing our groundwater managed sustainably so that future generations will have the resources necessary to maintain this way of life. We understand the challenges in implementing these groundwater rules, so the aim of our comments is to allow our operation time to adjust to these new limitations.

**Article II, Section 2.01 – Well Registration**

1. Family Tree would encourage GKGSA to remove this requirement for well registration. Tulare County will continue to issue well permits and they can collect this information for the GSA.

**Article II, Section 2.02 – Groundwater Use Measurement**

1. Family Tree recommends removing the meter requirement for groundwater credit transfers. Our operation needs time to adapt, and we want maximum flexibility to transfer our groundwater credits between ranches.


**Article IV, Section 4.03 – Greater Kaweah Agricultural Management Area**

1. Family Tree recommends removing the carryover loss provisions for both Sustainable Yield and Tier 1 and Tier 2. The Rules as proposed will serve to encourage pumping of the groundwater credits before they are lost and is not consistent with the surrounding GSAs in the Kaweah Subbasin.
2. Family Tree recommends removing the three-mile limit on transfers of Sustainable Yield and Tier 1 and Tier 2. We need this flexibility during the first few years of implementation, GKGSA should develop Management Areas instead of arbitrarily assigning a certain radius for transfers.
3. Family Tree encourages the GKGSA to work with the other GSAs in the Kaweah Subbasin to align these carryover and transfer rules. Ultimately, we would like to see a flexible water market that will allow growers time to work with these groundwater extraction limits.

We appreciate your consideration of these comments and recommendations. Please contact the undersigned if you have any questions.

Sincerely,

Daniel Jackson

A handwritten signature in black ink, appearing to read 'Daniel Jackson', with a long horizontal line extending to the right.