

August 5, 2022

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:

After reading the current version of the Rules and Regulations I have many concerns that I would like to address.

The first item I would like to comment on has to do with the zones that have been created. These seem to me as an attempt get around the 3-mile limitation that was proposed initially. As I stated in my previous comments, “I am not aware of any information in the technical record to support the 3-mile limitation”. I believe the same regarding this new zone system. Given that the Kaweah Basin is an unconfined aquifer I don’t understand the logic behind these restrictions. As I said in my first letter and will state again, “Additionally, I am not aware of any information in the available technical record to support the three-mile limitation. If such legitimate information exists, it needs to be provided to the stakeholders”. I can’t support having to give up 10% of my water that is 2 miles away from where I may need to transfer it to just because I had to cross a random line that someone has drawn on a map. And lastly, for the record I still believe these limitations would improperly interfere with my water rights.

My second comment relates to the requirement to install flowmeters on any ranches involved in groundwater allocation transfers. I don’t see the logic here either. What does one have to do with the other? Are we to understand that on ranches where we elect to transfer water from or to, that we can no longer use ET Data for what our crops actually use and therefore have to use gross gallons pumped to come up with our usage? If so, this would not account for any

water that goes back into the aquifer and therefore our "Usage" would go up substantially, thus affecting the acreage we would be able to farm.

Another concern is regarding the provision which states that new wells must have a flow meter. This will be burdensome for the operator for many of the same reasons above and once again I don't understand the reasoning here.

I also believe the table for Tier1 and Tier 2 allocations over time is incorrect. For instance, for water years 2023-2025 the draft shows only 40% of Tier 1 and 50% of Tier 2 being available. I believe it should be 90% of each tier for a total of 90% of Tiered water.

I would like to see the Stakeholder committee be given ample time to review the corrected document. There is too much at stake here to not do our due diligence and create the best Plan for the entire Greater Kaweah.

Lastly, I would like to state that we shouldn't lose sight of what the goal is here, which is to get the basins usage down to the native yield by 2040. You already have a timetable which ramps our usage down to attain this. This entire plan doesn't have to be as complicated as it is currently written to achieve this goal. I know it is late in the process, but I would encourage the authors of this document to try and simplify it as much as possible.

Sincerely,

Bo Champlin

Bo Champlin Farms