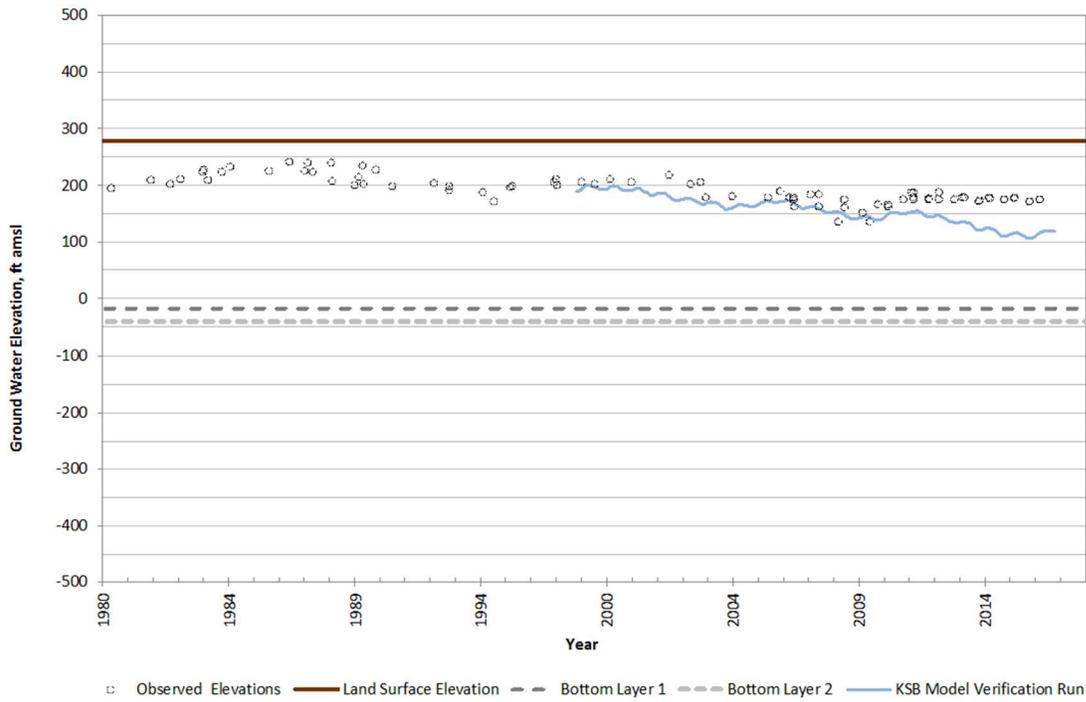
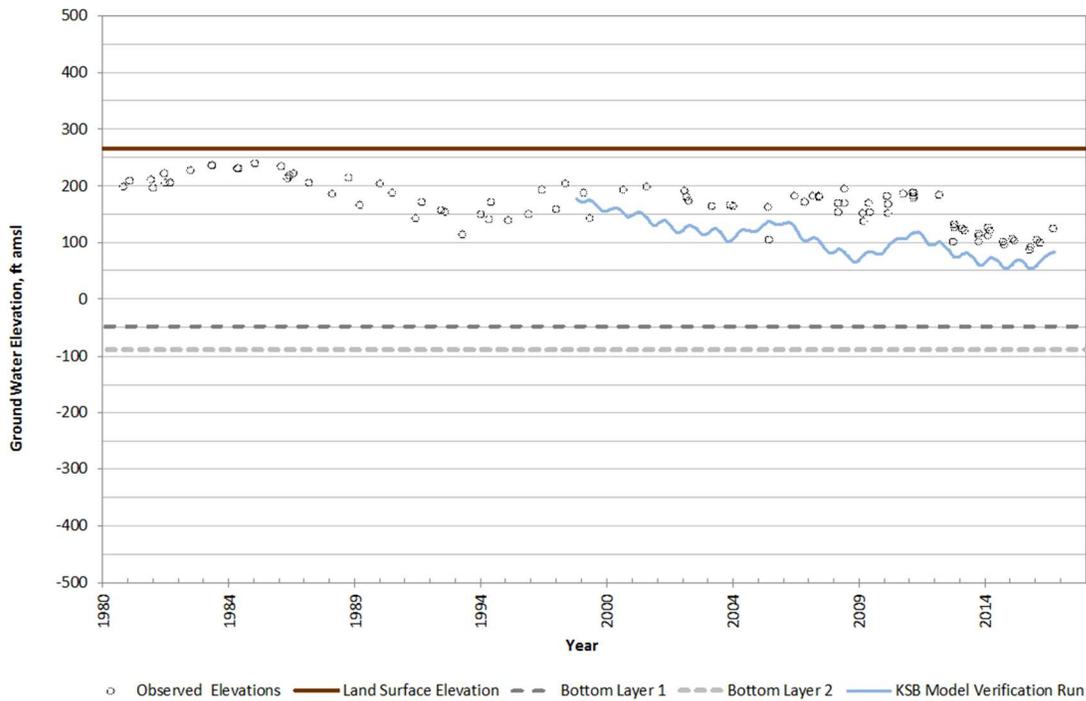


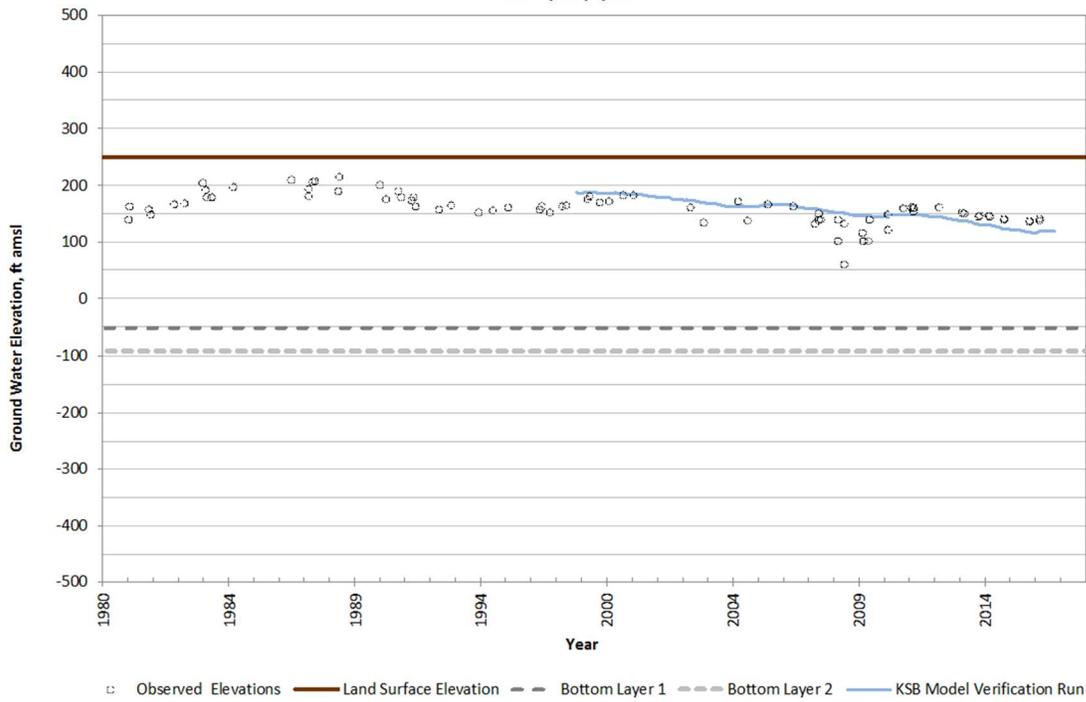
Well KSB-1214
Well ID: 18S23E02Q01M
Aquifer System: Unknown - Model Layer 1



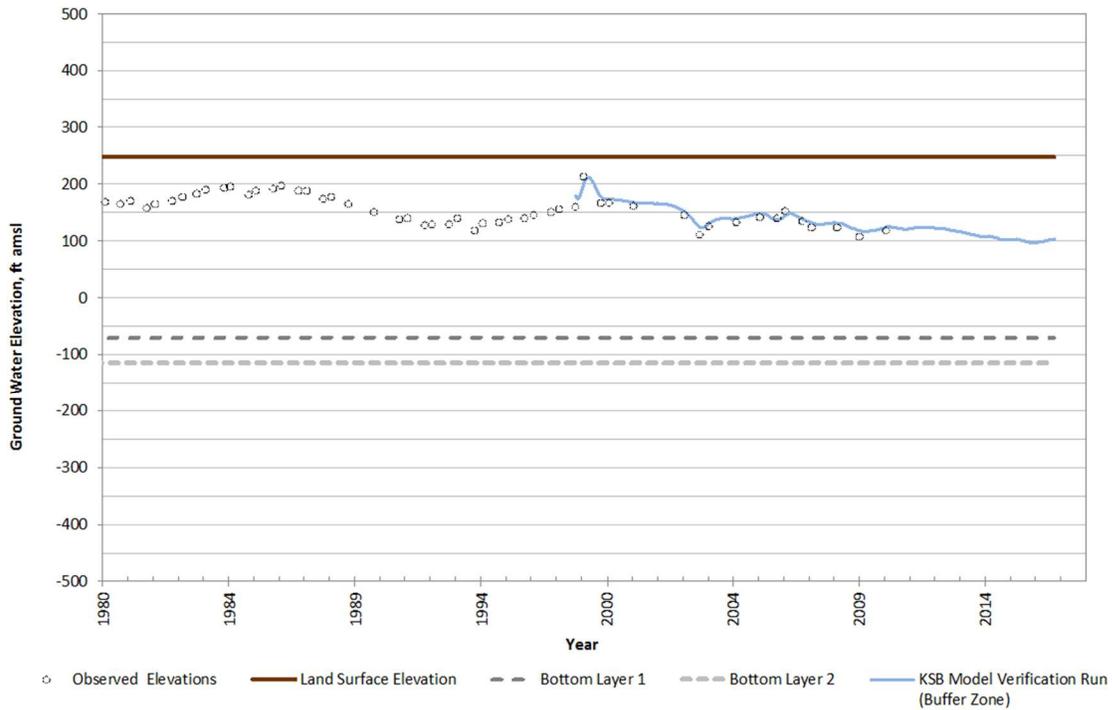
Well KSB-1226
Well ID: 19S23E35H01M
Aquifer System: Unknown - Model Layer 3

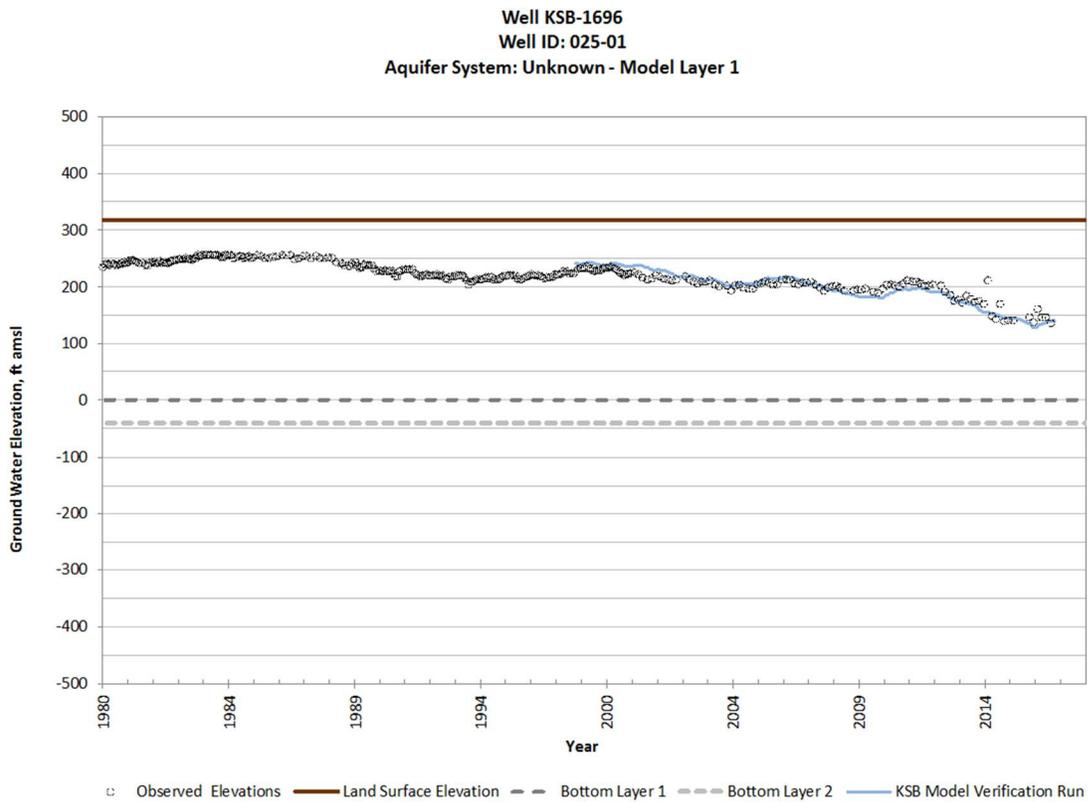
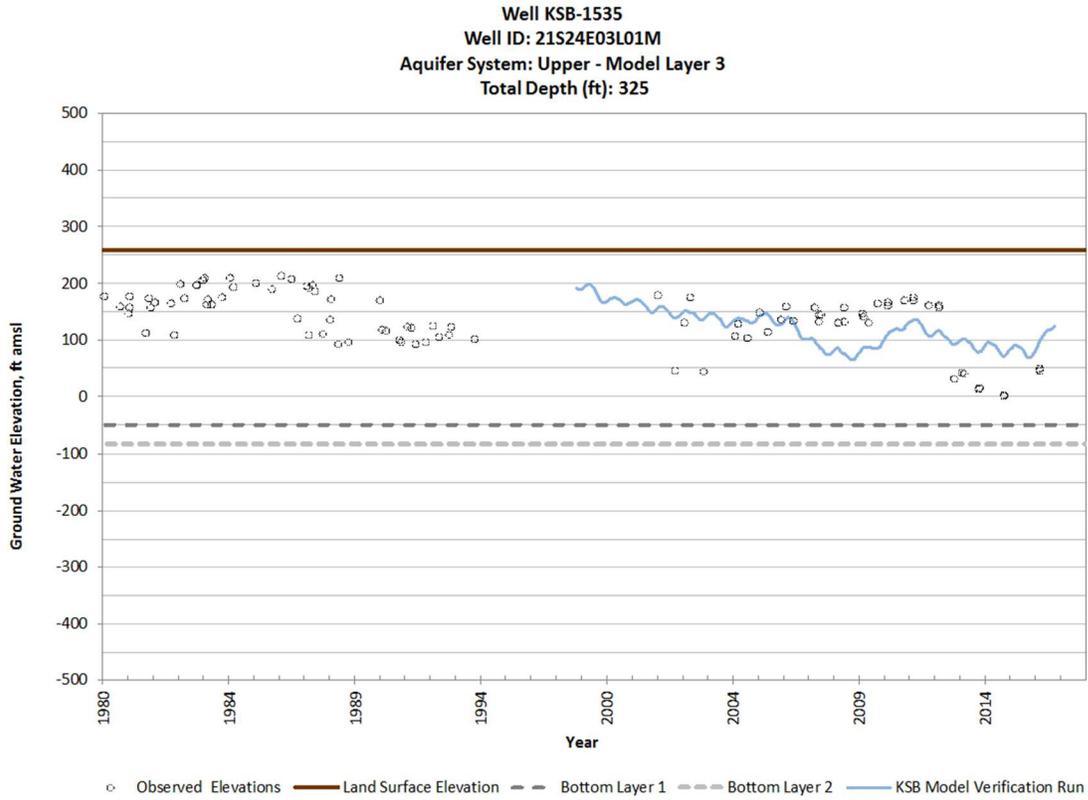


Well KSB-1425
Well ID: 21S24E08A01M
Aquifer System: Lower - Model Layer 1
Total Depth (ft): 520

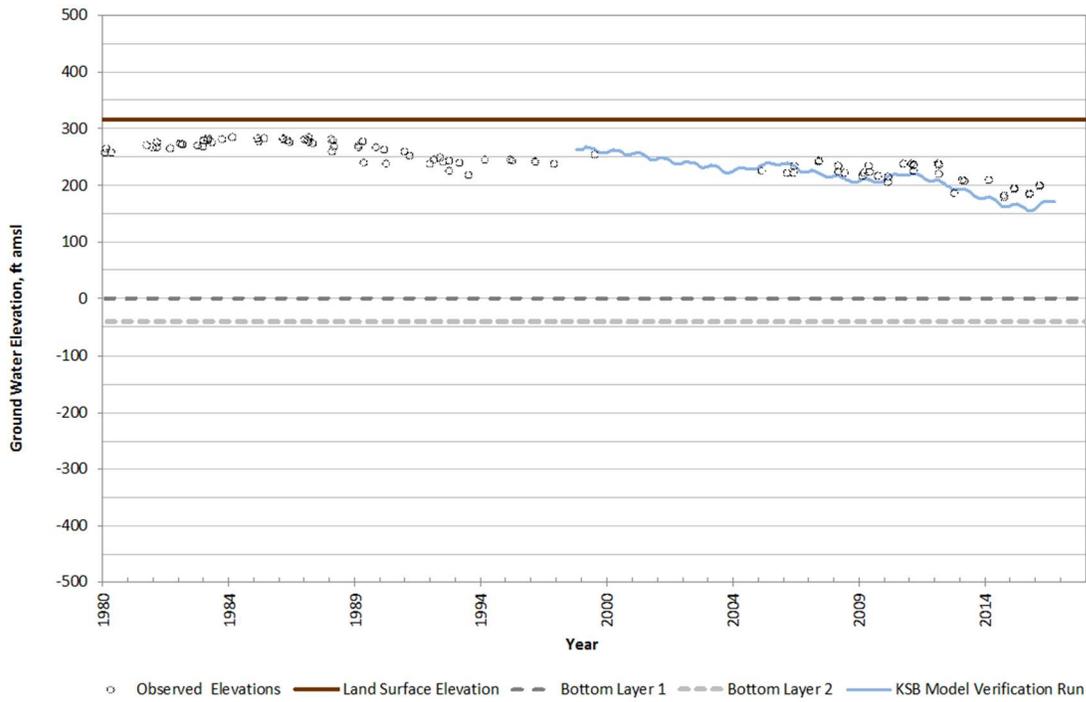


Well KSB-1490
Well ID: 21S24E33J01M
Aquifer System: Unknown - Model Layer 1

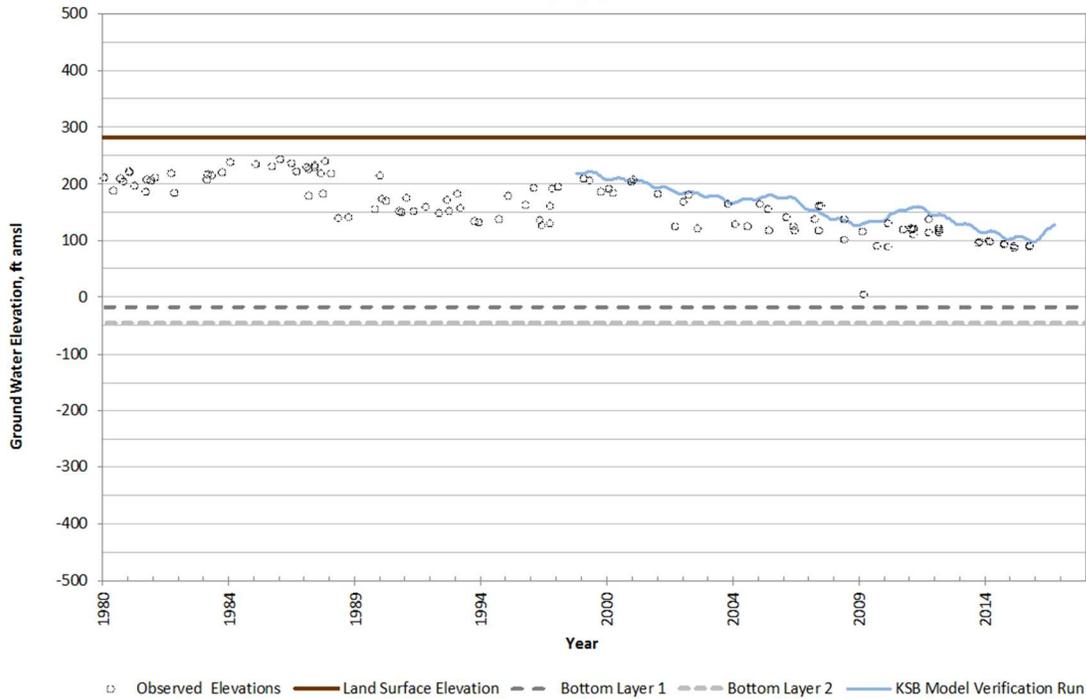




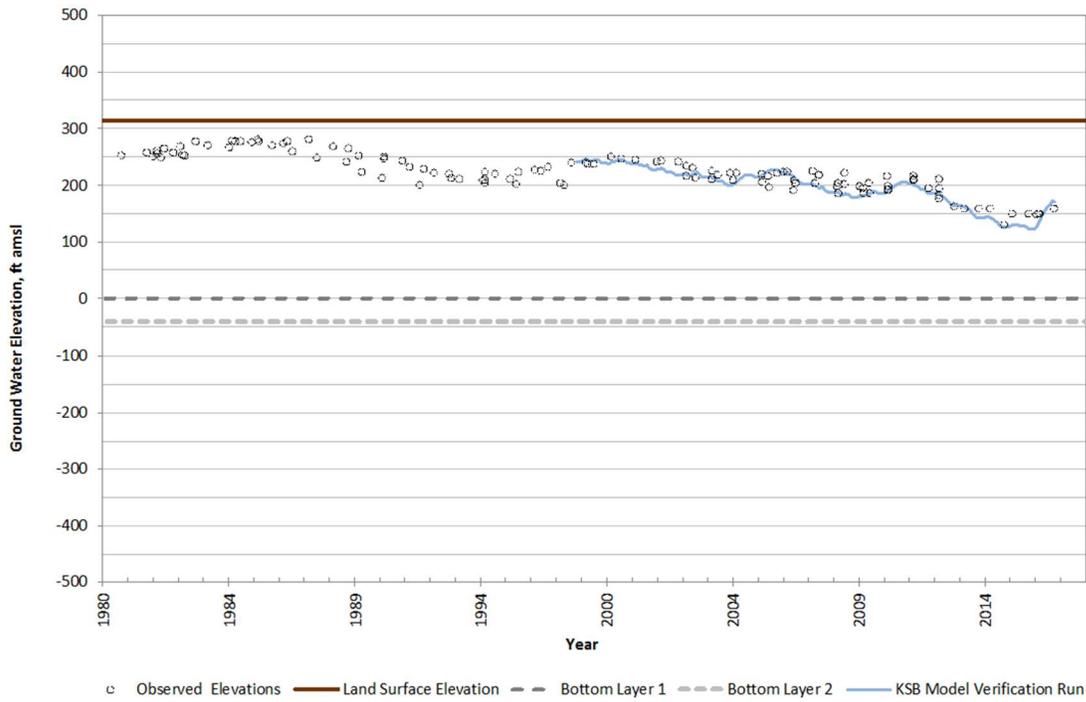
Well KSB-1775
Well ID: 17S24E36H03M
Aquifer System: Single - Model Layer 3



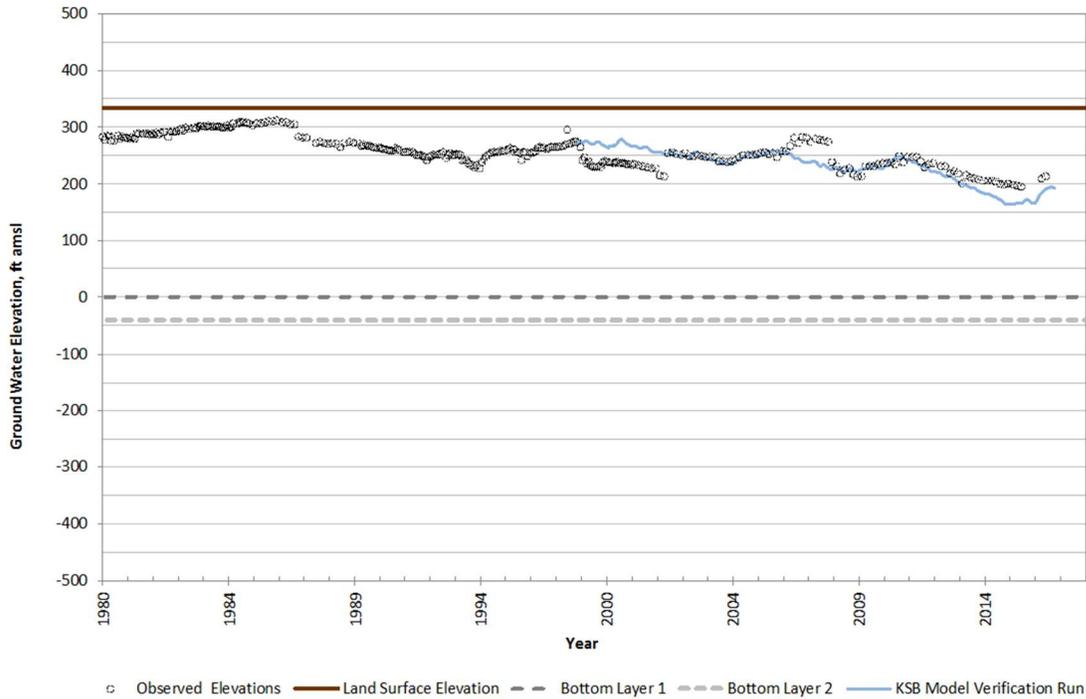
Well KSB-1783
Well ID: 20S24E24H01M
Aquifer System: Upper - Model Layer 3
Total Depth (ft): 355



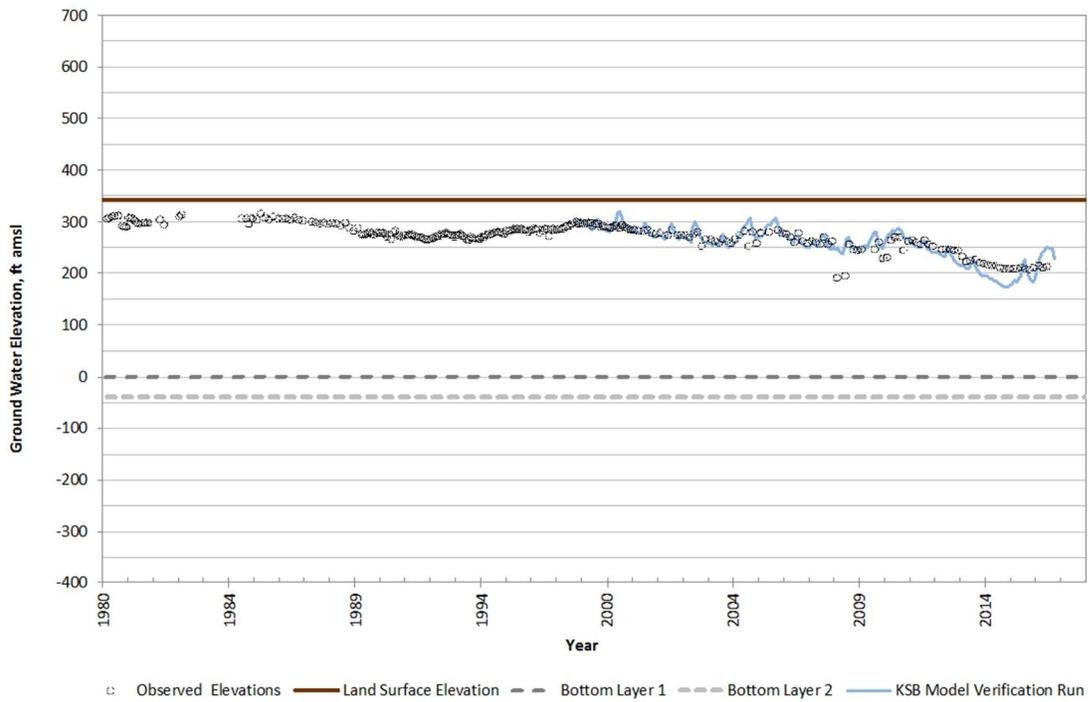
Well KSB-1830
Well ID: 19S25E30C01M
Aquifer System: Unknown - Model Layer 1



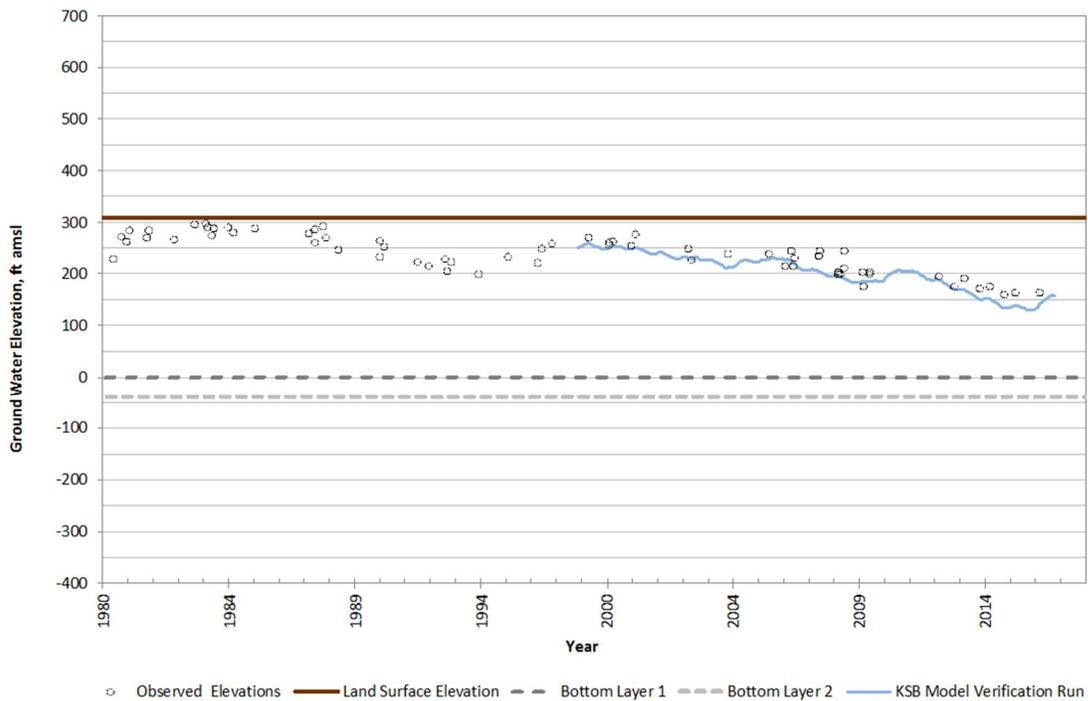
Well KSB-1884
Well ID: 036-01
Aquifer System: Single - Model Layer 1



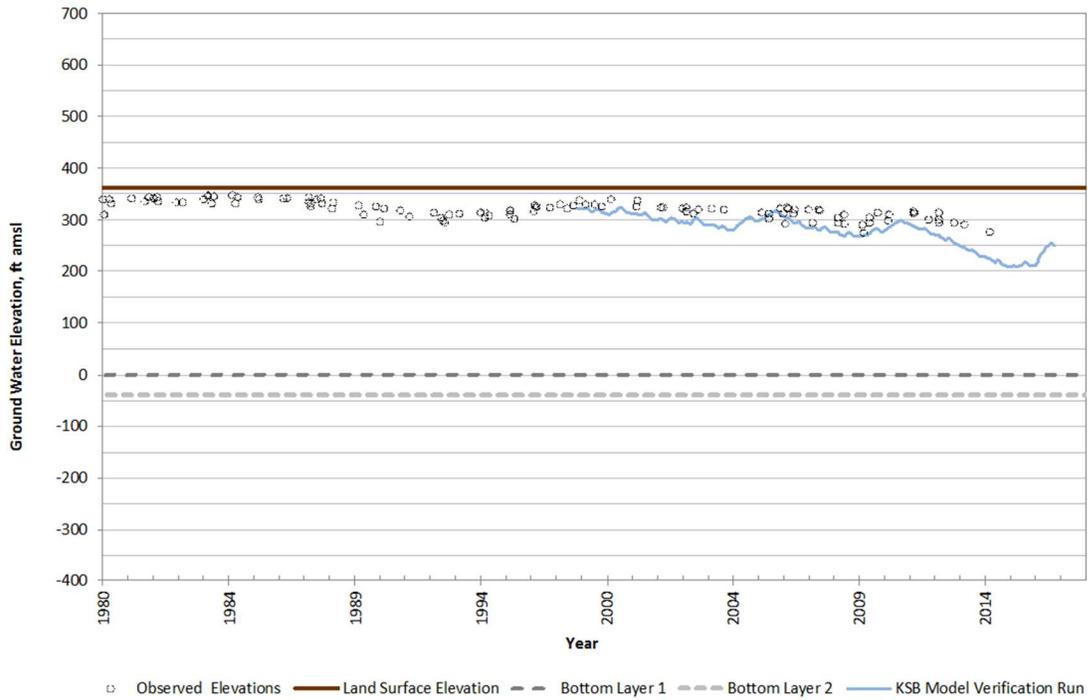
Well KSB-1977
Well ID: 053-01
Aquifer System: Single - Model Layer 1



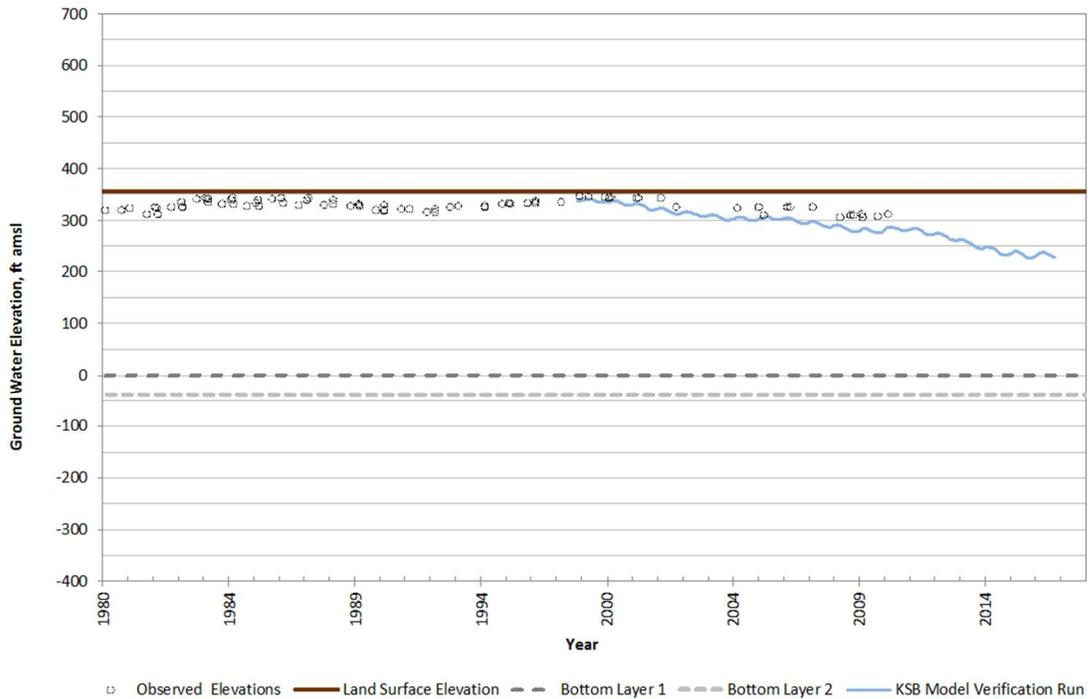
Well KSB-2095
Well ID: 20S25E03R01M
Aquifer System: Single - Model Layer 1



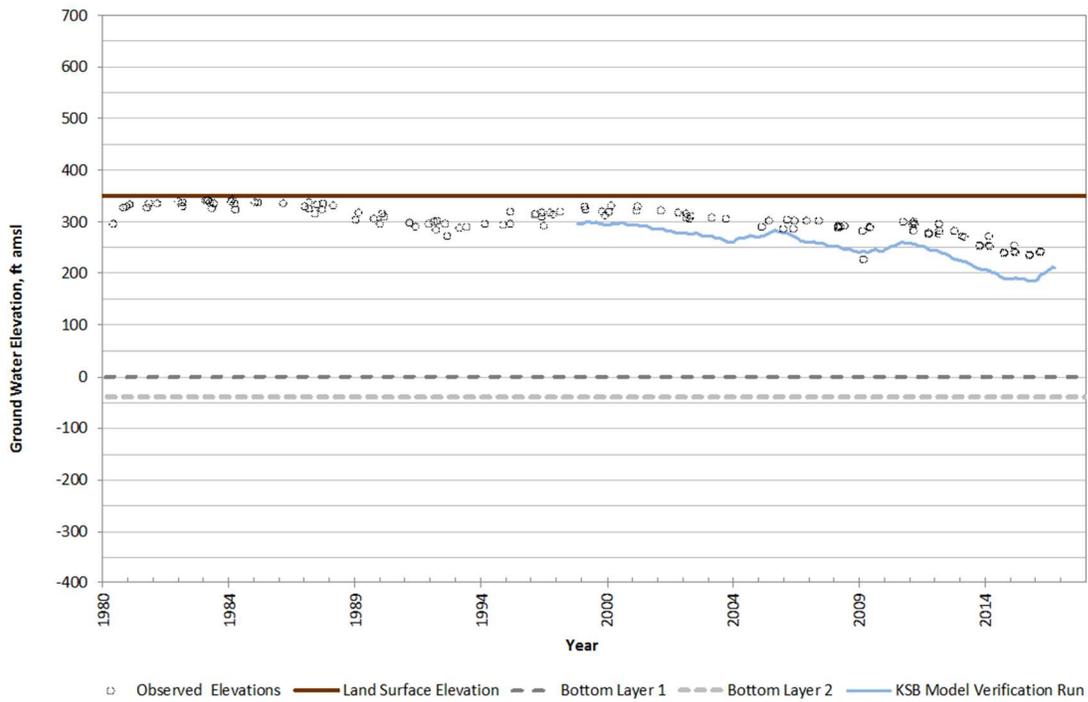
Well KSB-2147
Well ID: 18S25E23J01M
Aquifer System: Single - Model Layer 1



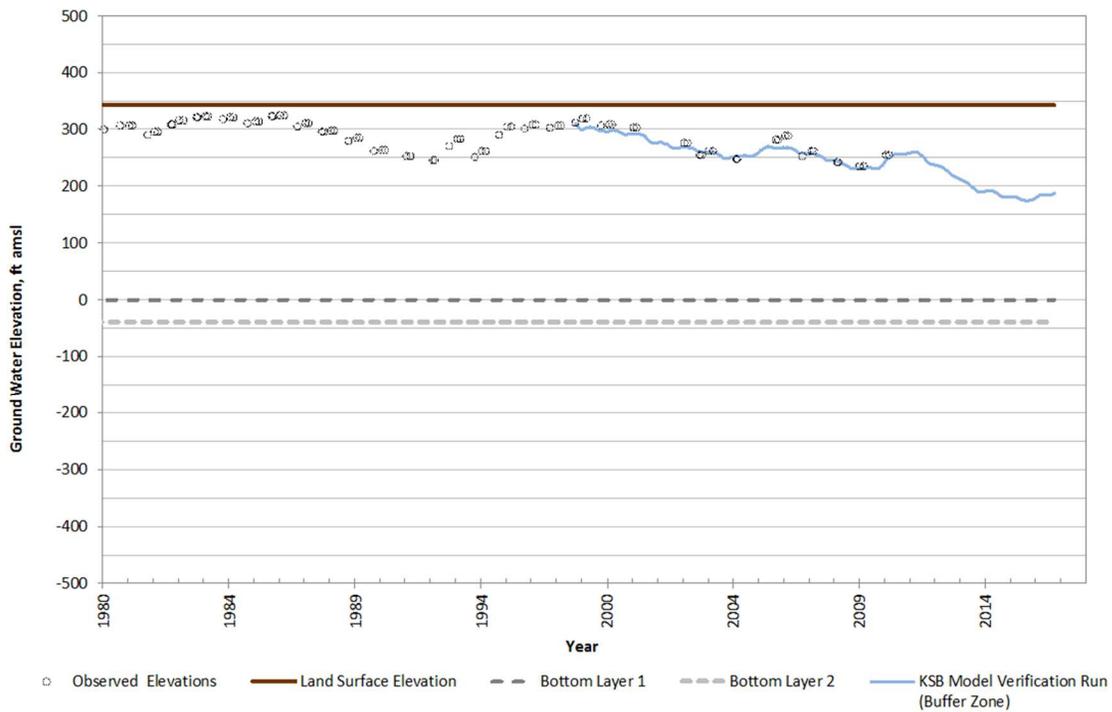
Well KSB-2175
Well ID: 17S25E01P01M
Aquifer System: Single - Model Layer 1



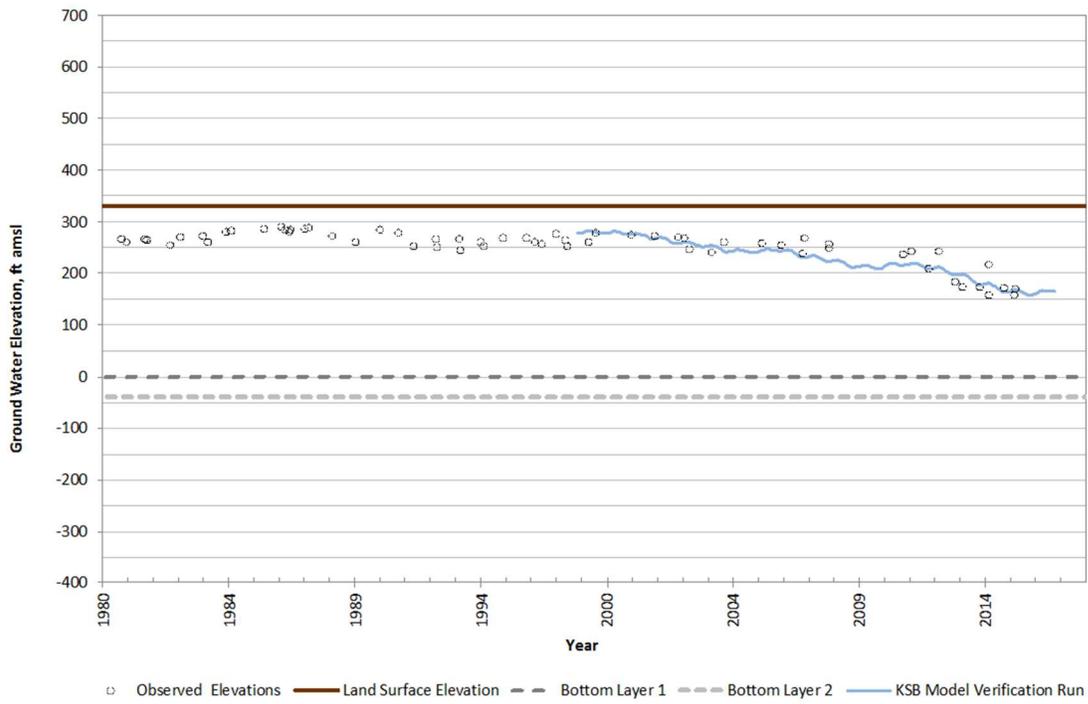
Well KSB-2200
Well ID: 19S25E13A02M
Aquifer System: Single - Model Layer 1



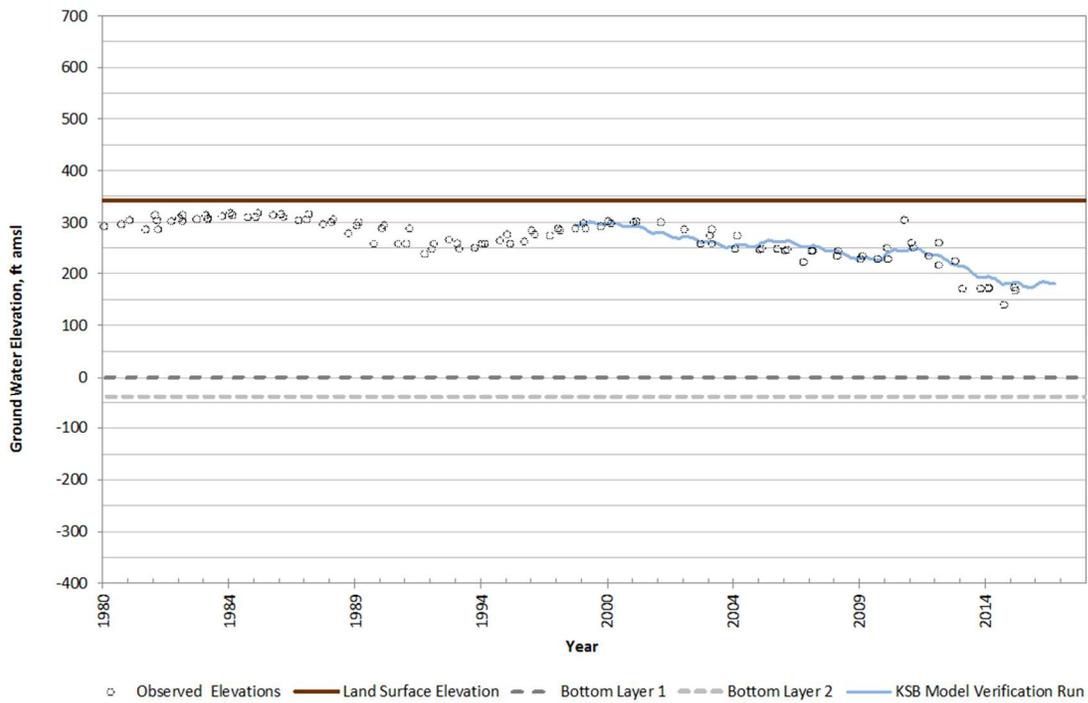
Well KSB-2314
Well ID: 21S26E09D01M
Aquifer System: Single - Model Layer 1



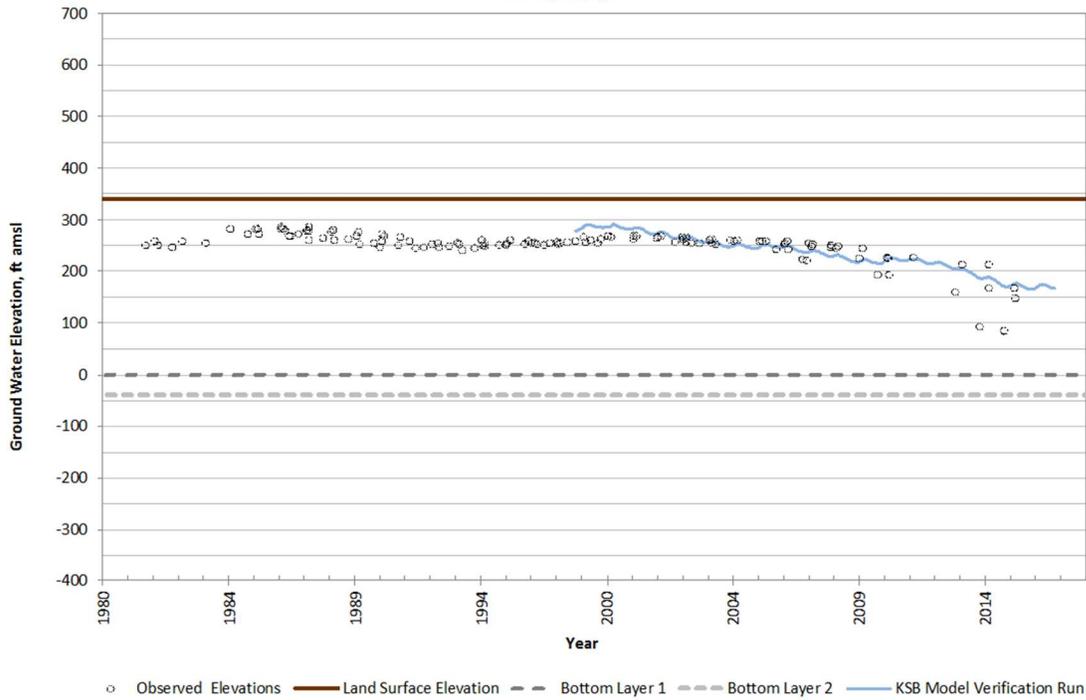
Well KSB-2333
Well ID: 20S26E08H01M
Aquifer System: Single - Model Layer 1



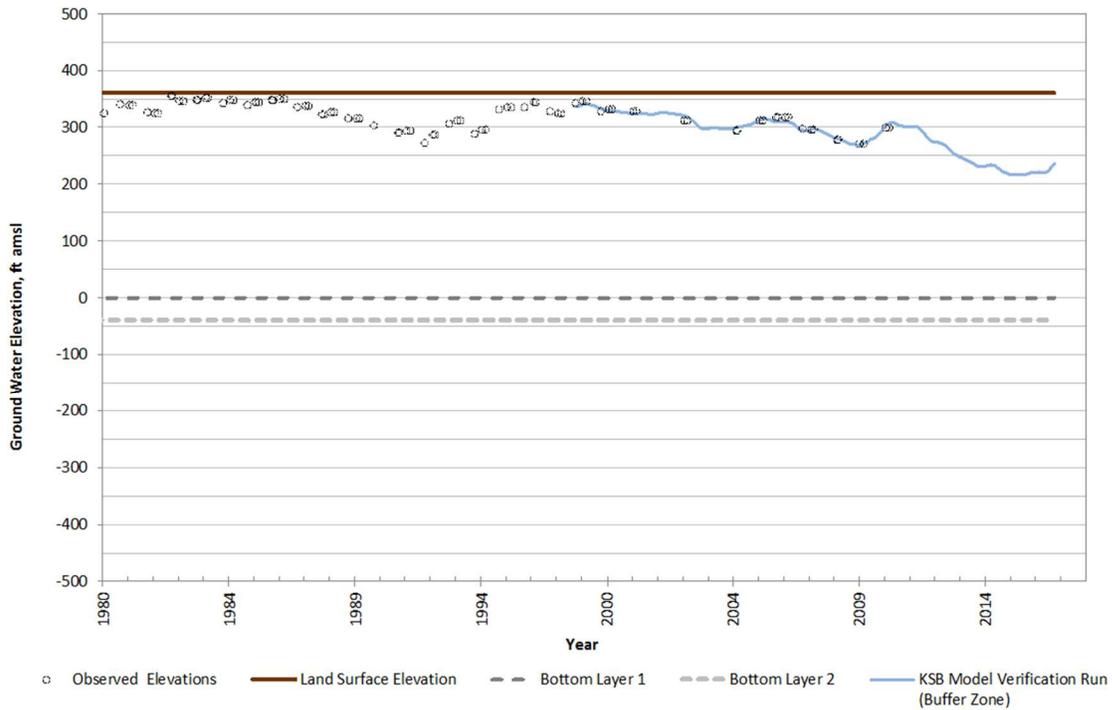
Well KSB-2345
Well ID: 21S26E04F01M
Aquifer System: Single - Model Layer 1

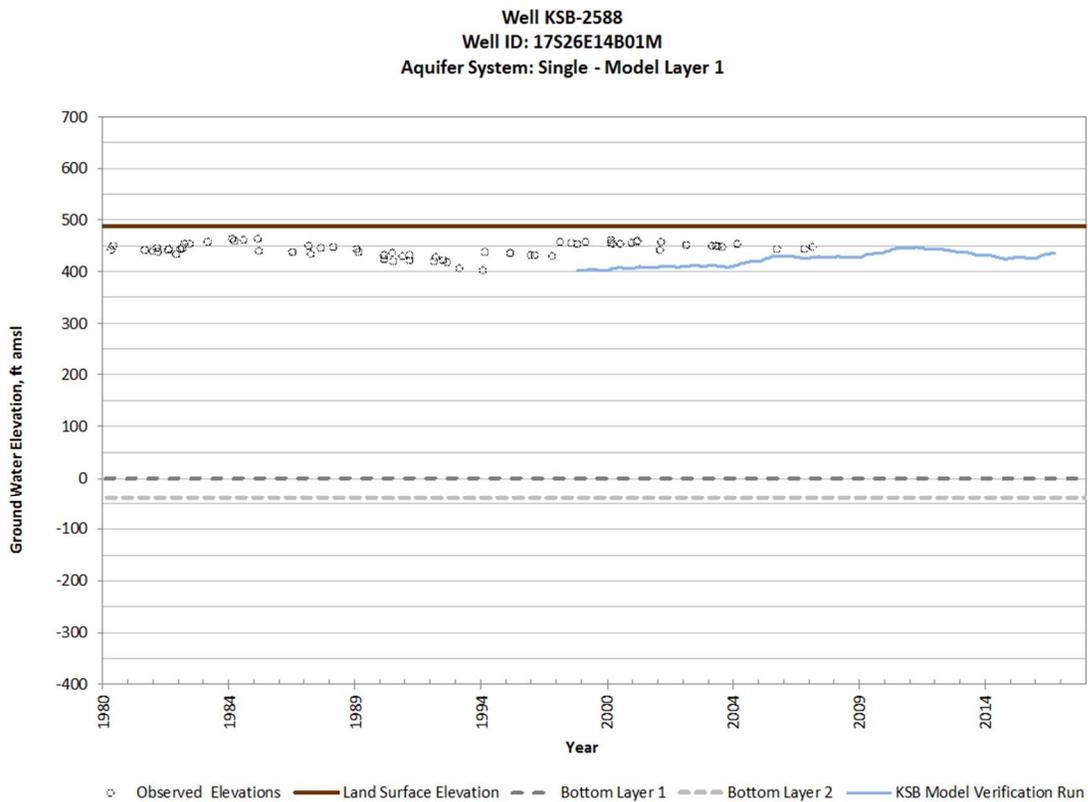
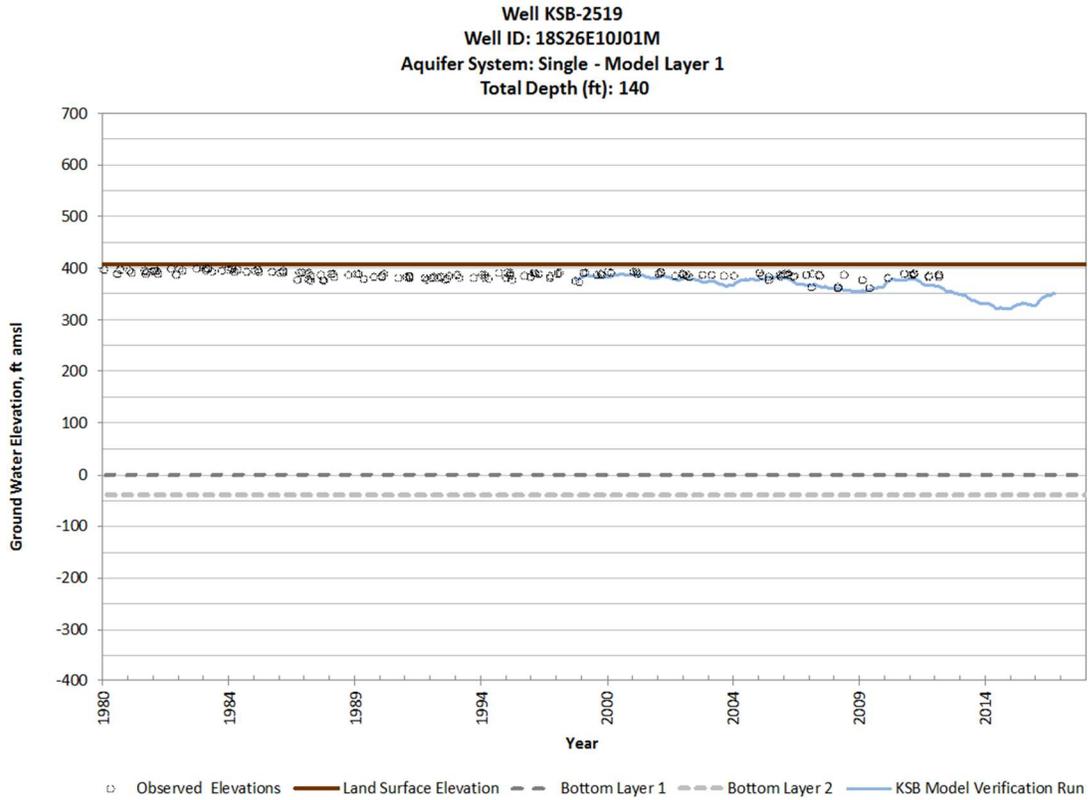


Well KSB-2405
Well ID: 20S26E16R01M
Aquifer System: Single - Model Layer 1
Total Depth (ft): 492

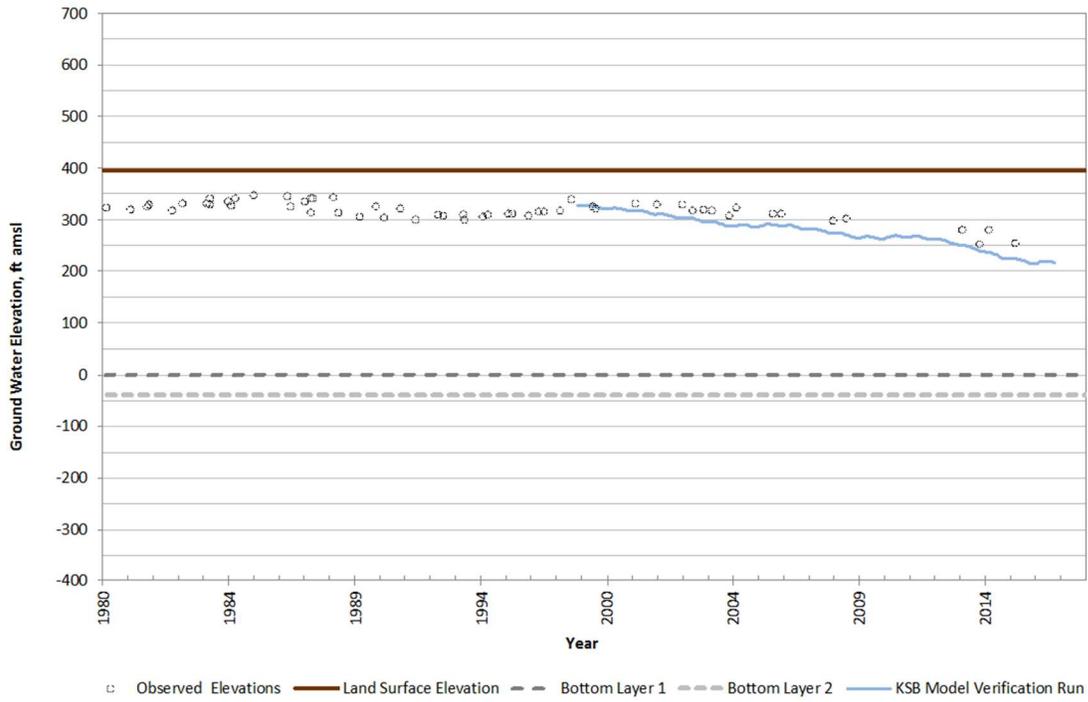


Well KSB-2440
Well ID: 21S26E15B02M
Aquifer System: Single - Model Layer 1

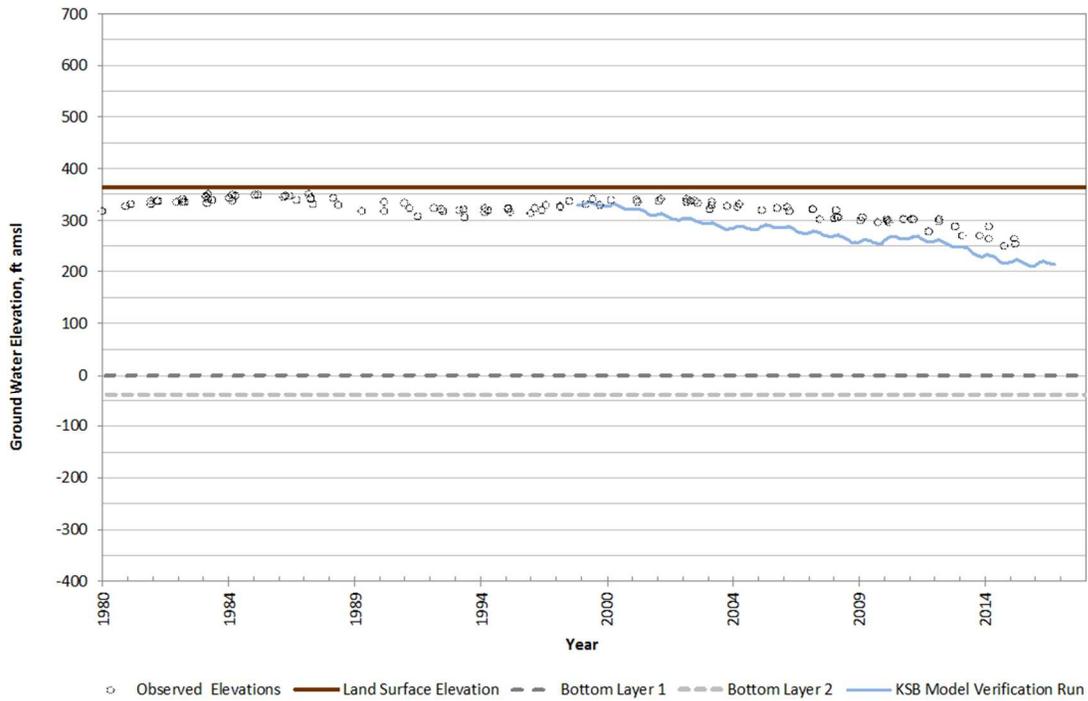




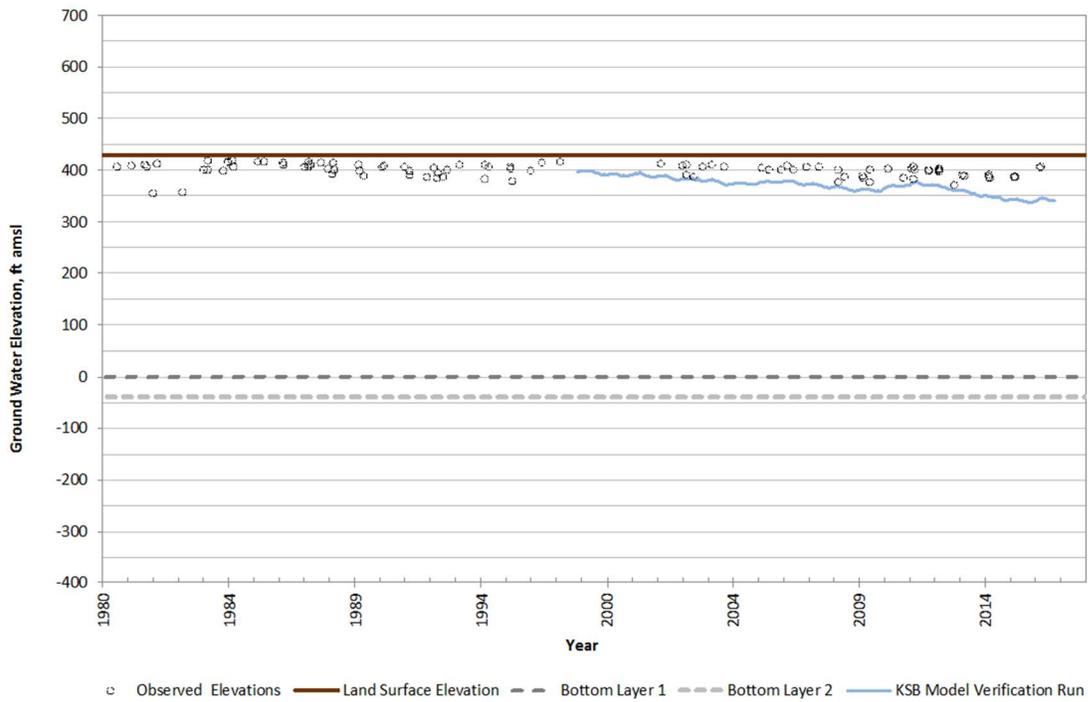
Well KSB-2593
Well ID: 19S26E11R01M
Aquifer System: Single - Model Layer 1



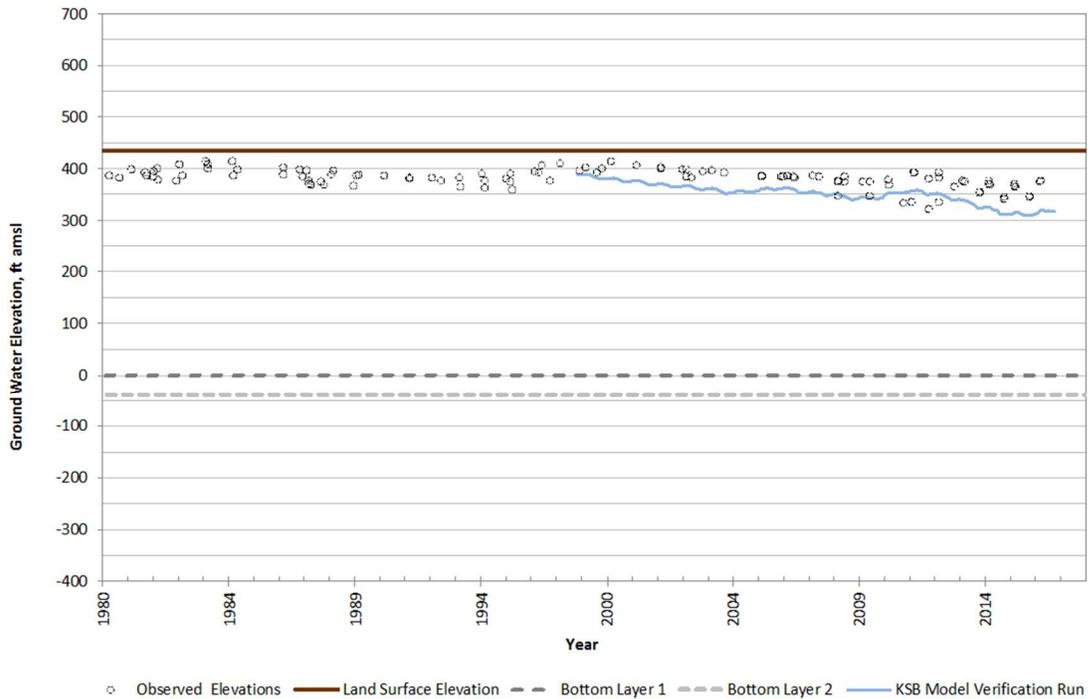
Well KSB-2618
Well ID: 20S26E35H01M
Aquifer System: Single - Model Layer 1



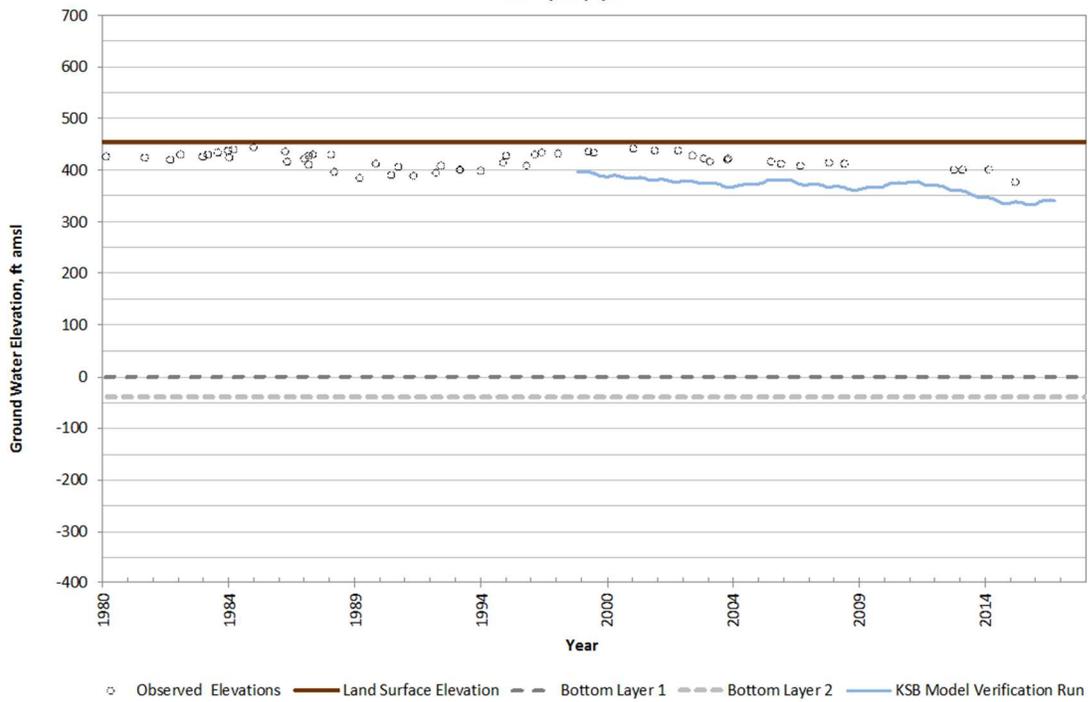
Well KSB-2690
Well ID: 17S26E36R01M
Aquifer System: Single - Model Layer 1



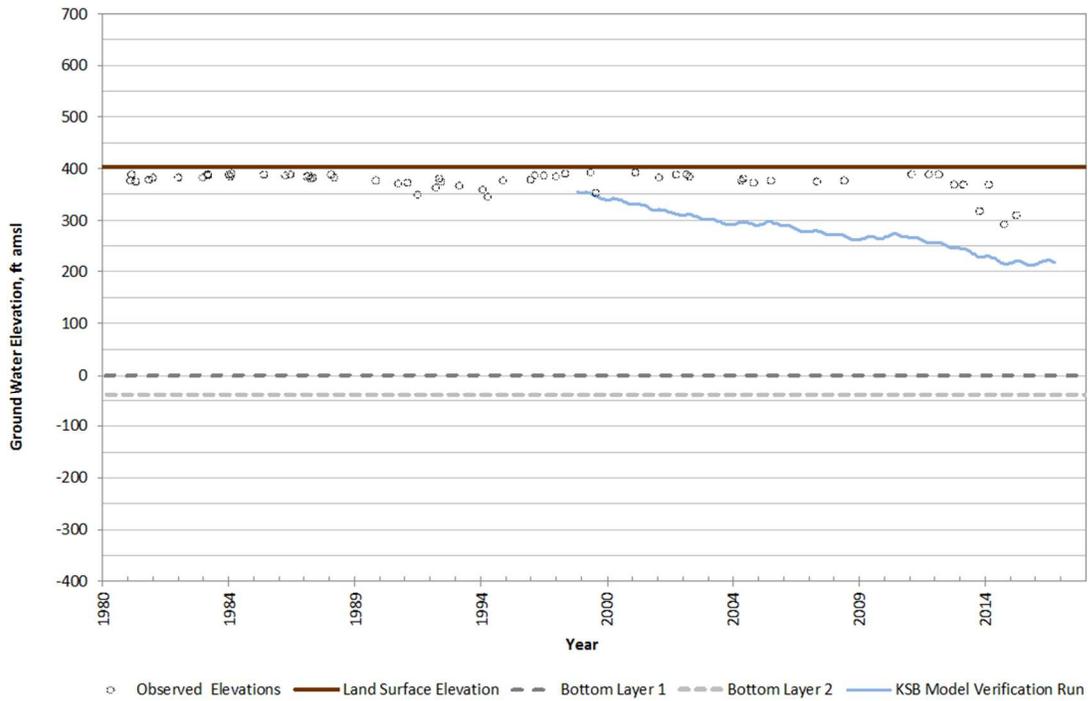
Well KSB-2696
Well ID: 18S26E24J03M
Aquifer System: Single - Model Layer 1

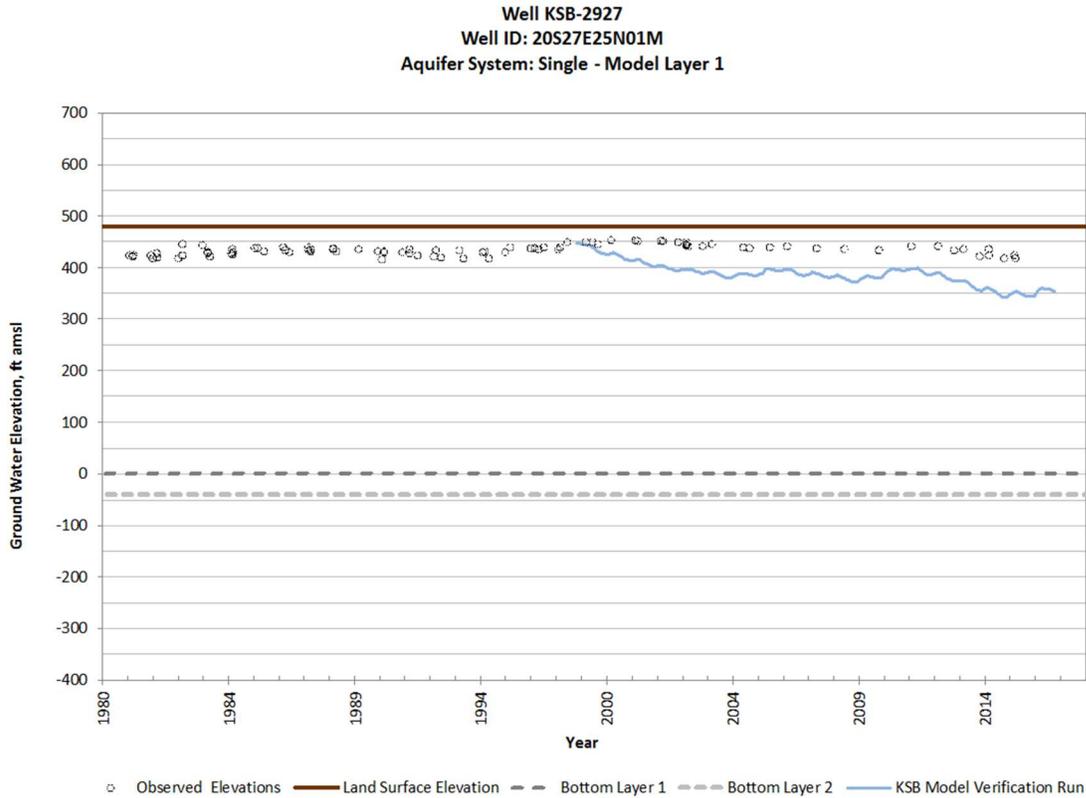


Well KSB-2773
Well ID: 18S27E30H01M
Aquifer System: Single - Model Layer 1
Total Depth (ft): 213



Well KSB-2826
Well ID: 20S27E08A01M
Aquifer System: Single - Model Layer 1





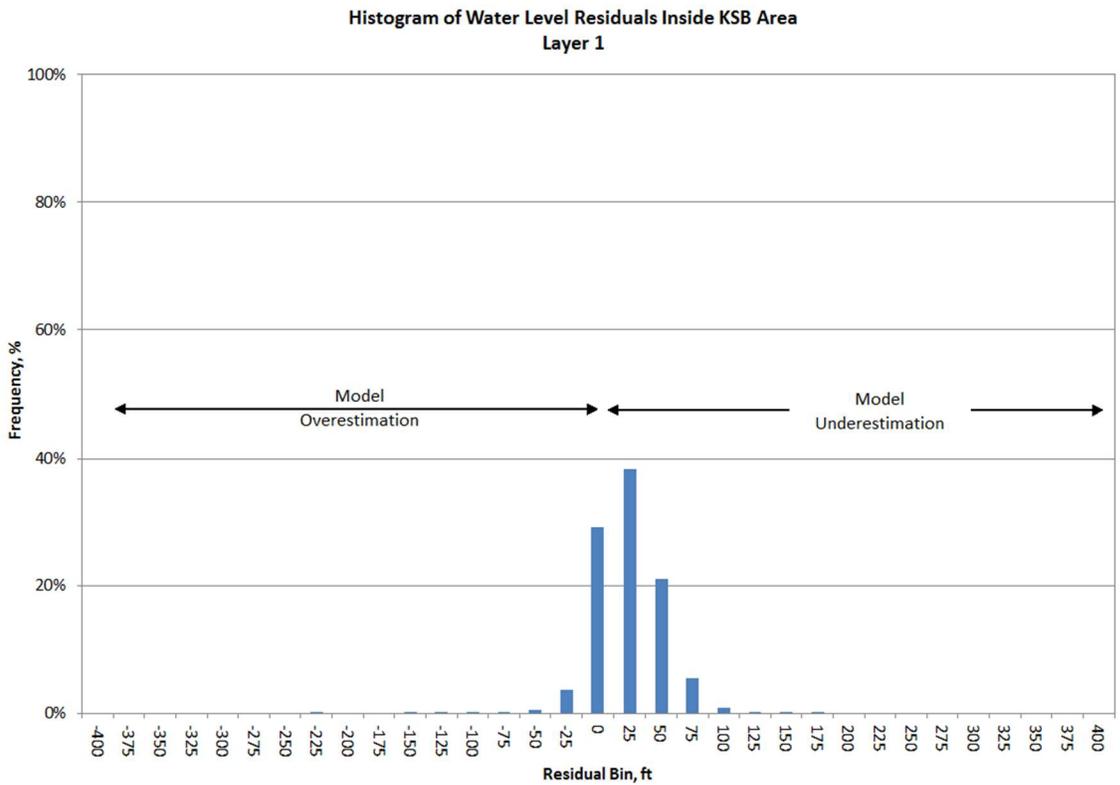
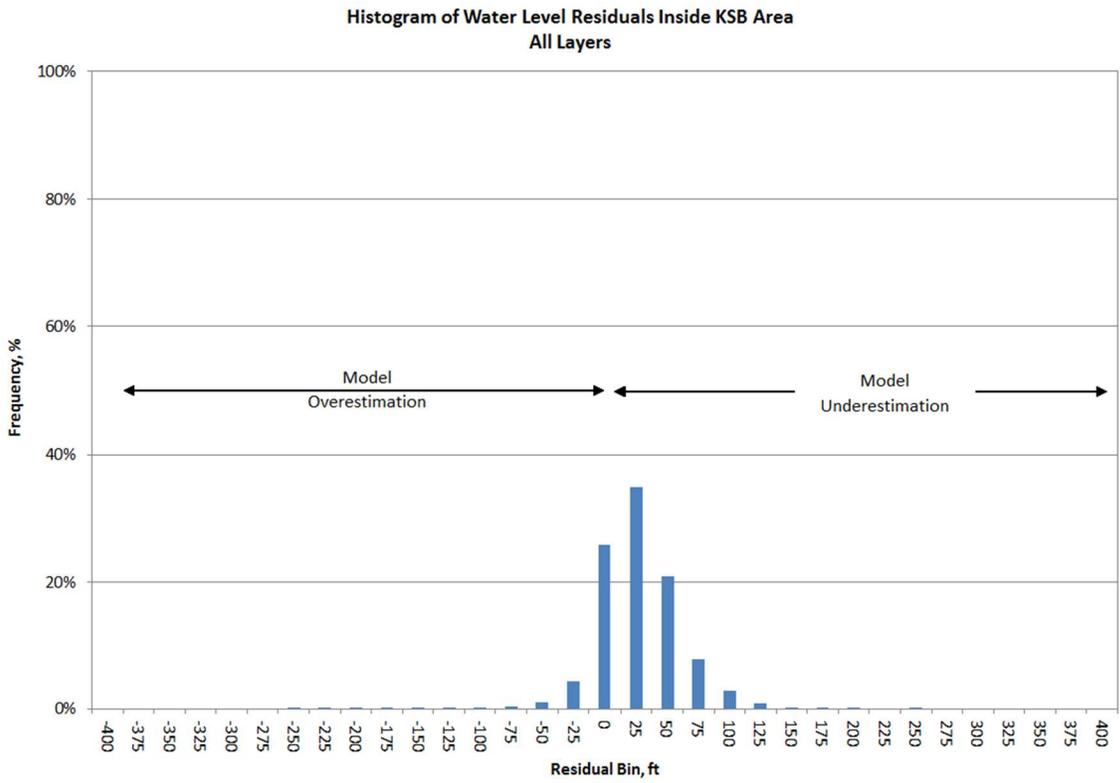
Model Statistics

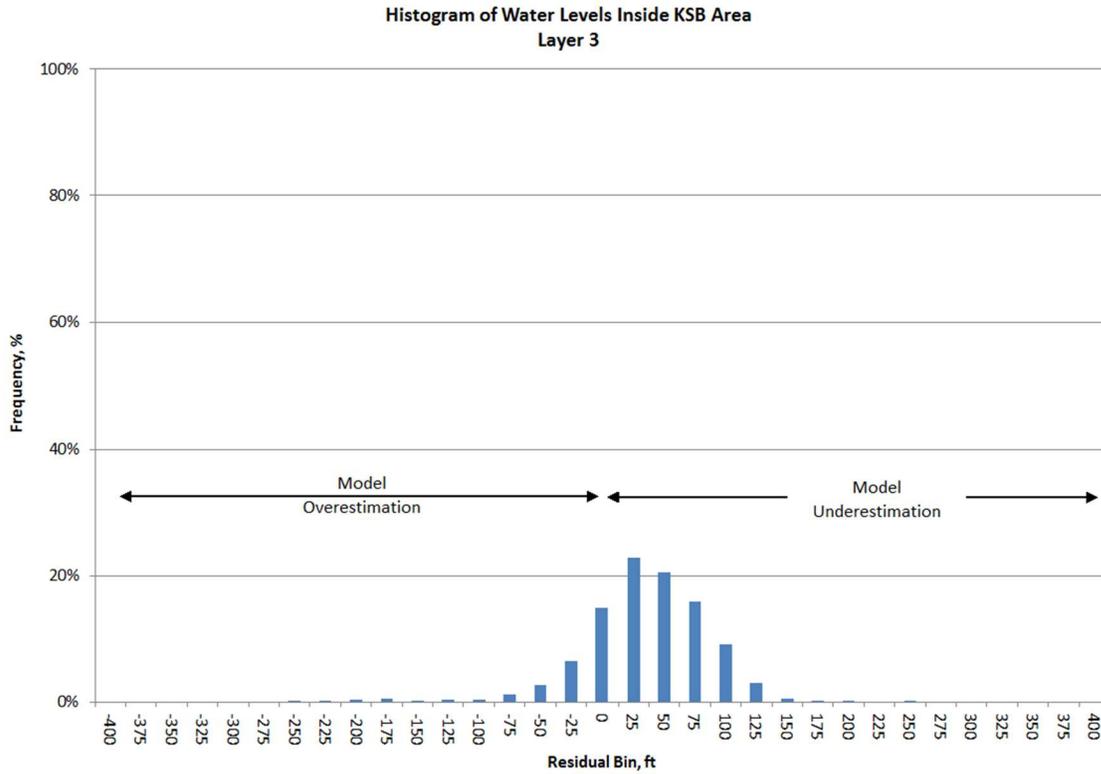
Wells in Kaweah Subbasin

The graphs below show trends and comparisons of the groundwater model data. The data is shown for All Layers (all wells), Layer 1 (wells in layer 1), and Layer 3 (wells in Layer 3). The three main graphs in each section are as follows:

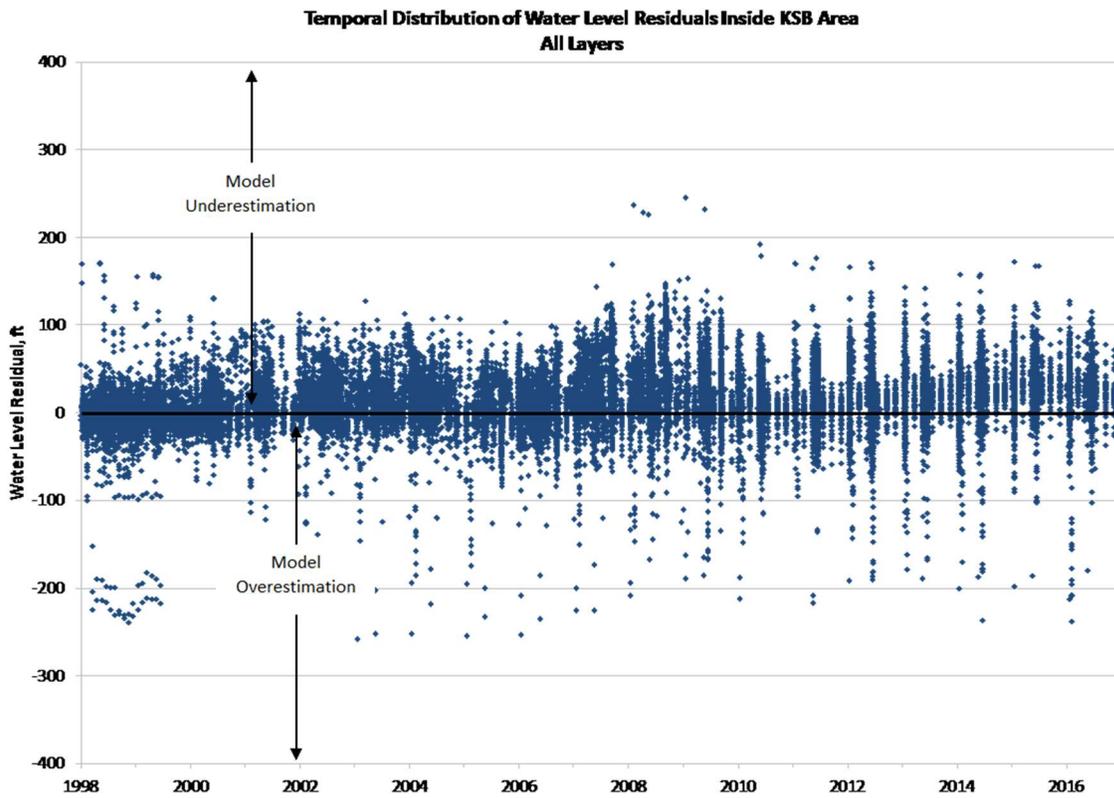
1. Histogram of Water Level Residuals
2. Temporal Distribution of Water Level Residuals
3. Measured vs Model- Calculated Water Levels

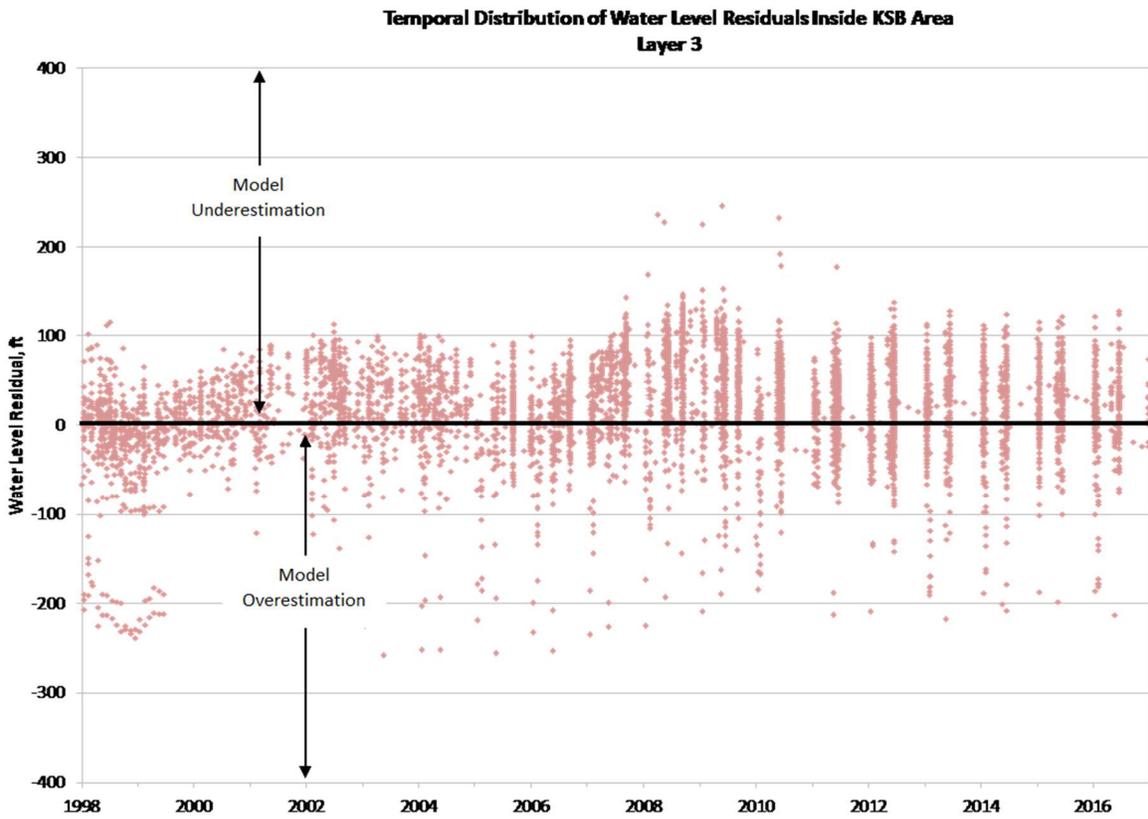
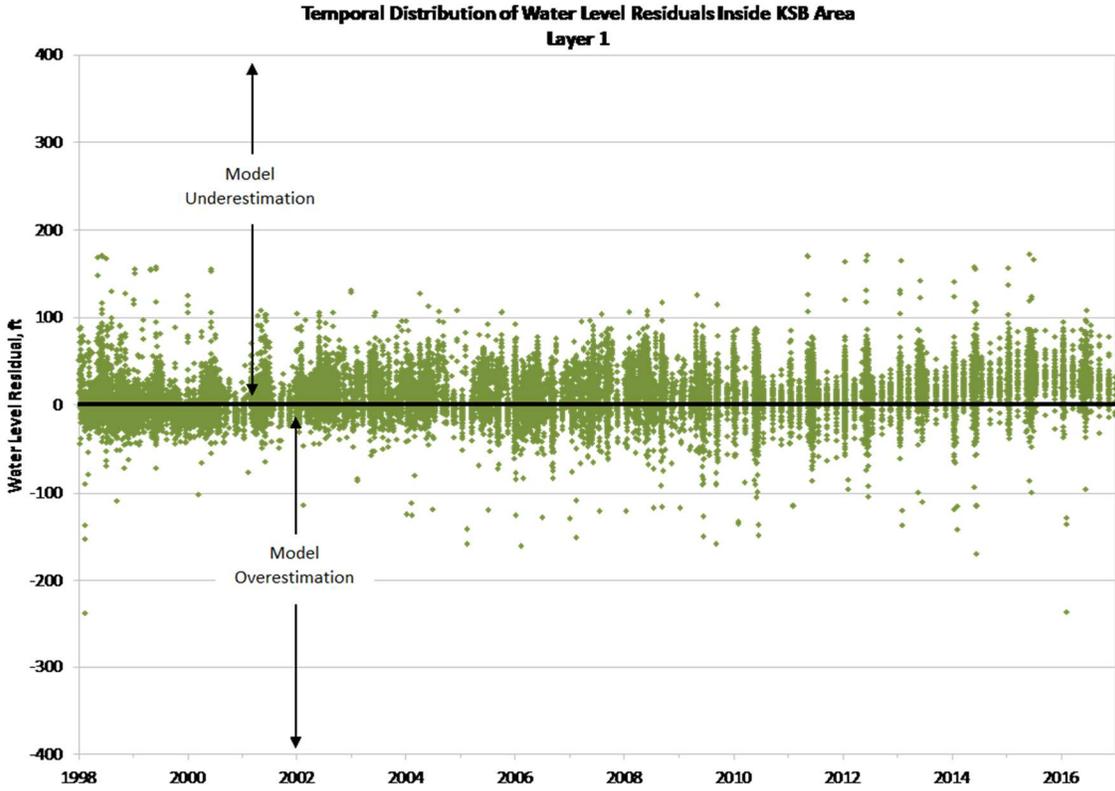
Histogram of Water Level Residual



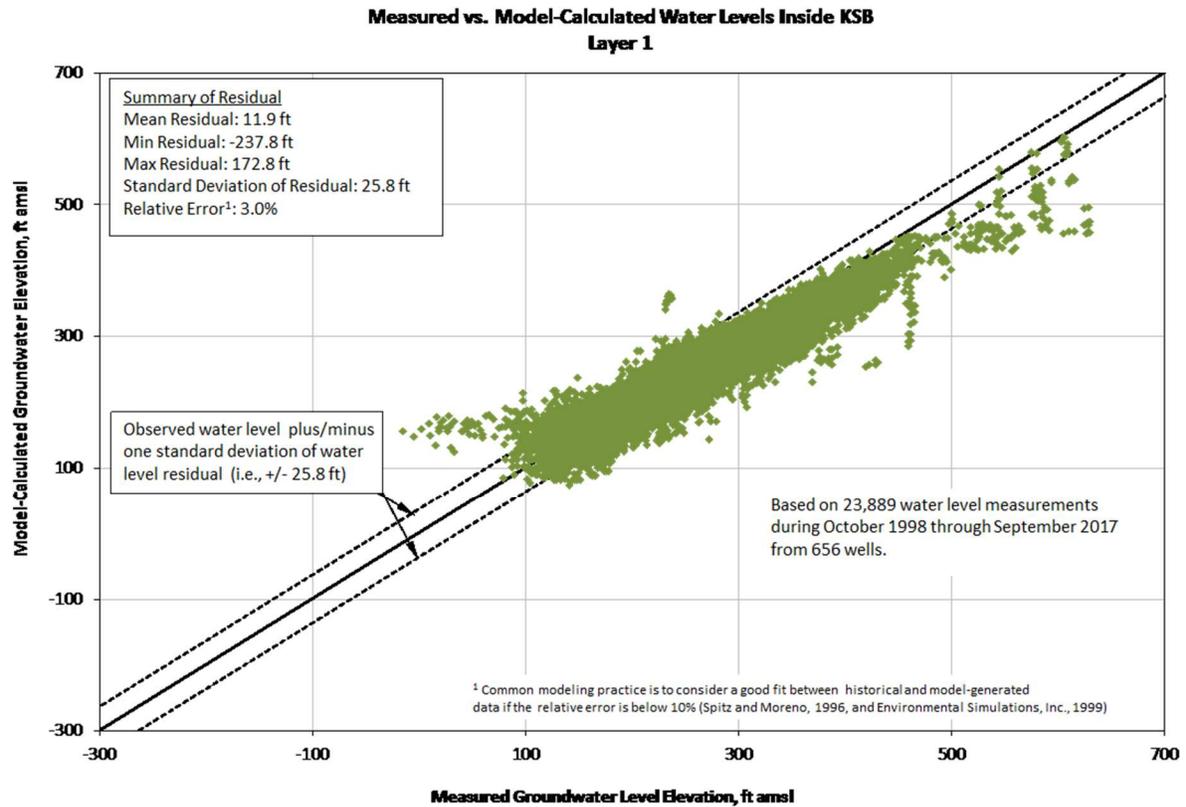
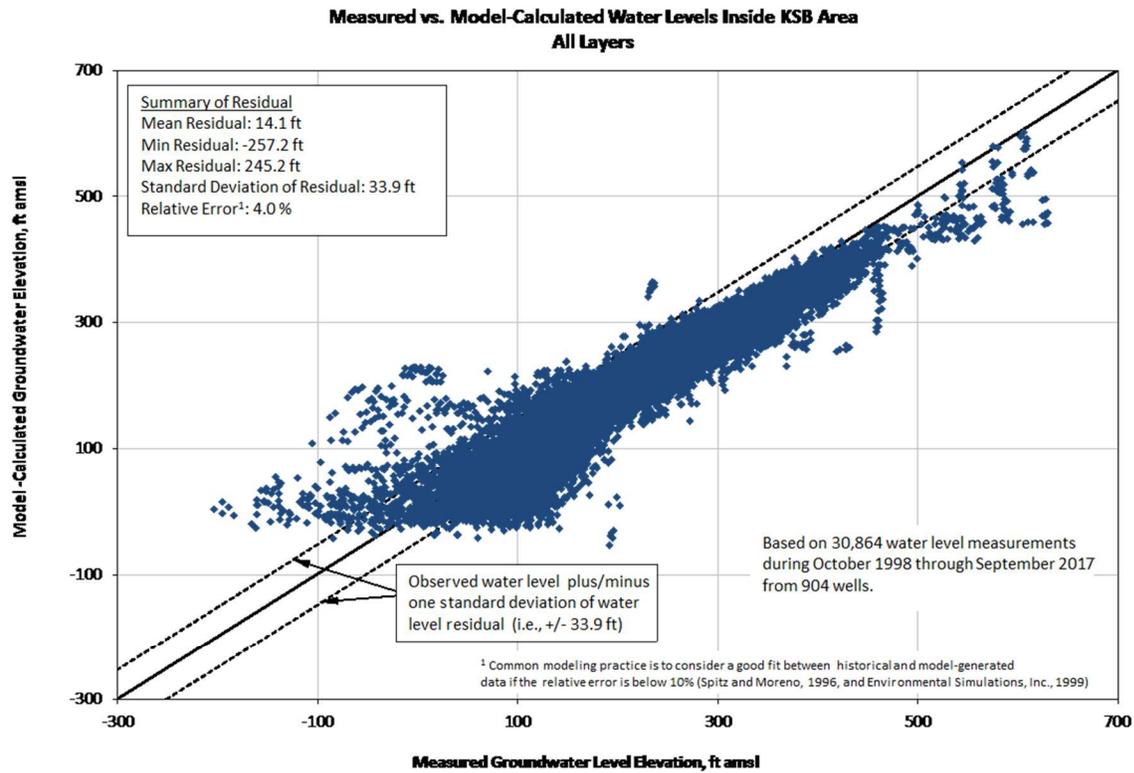


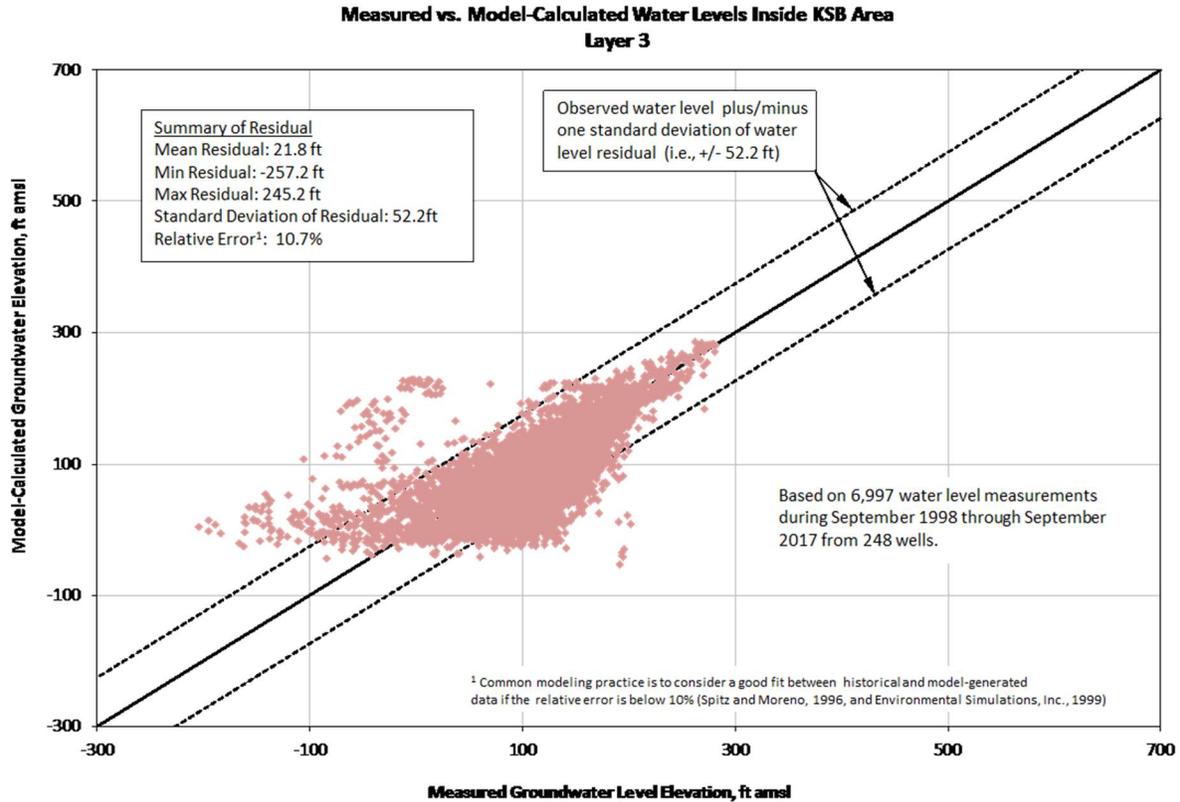
Temporal Distribution of Water Level Residuals





Measured vs Model-Calculated Water Levels





Comparing the Residual Layers

The residual from measured and modeling results are computed for 23,889 water level measurements from 656 wells between October 1998 through September 2017. Based on the values of relative error, we can conclude that there is a good fit between measured and model-generated data since the relative error is 3% in layer 1 and just over 10% in layer 3.

Summary of Residual	KSB Layer 1	KSB Layer 3	All Layers
Mean Residual (ft)	11.9	21.8	
Min Residual (ft)	-237.8	-257.2	
Max Residual (ft)	172.8	245.2	
Standard Dev. of Residual (ft)	25.8	52.2	
Relative Error (%)	3.0	10.7	

**Note common modeling practice is to consider a good fit between historical and model-generated data if the relative error is below 10%. (Spitz and Moreno, 1996, and Environmental Simulation, Inc., 1999)*

Appendix 2: Full Kaweah Subbasin Results

Full Results for Case 1: Base Case of Future with Averaged Conditions and No Projects

Water Year	Inflow (Acre-Feet/Year)			Outflow (Acre-Feet/Year)					Storage	
	Recharge	Underflow Buffer to KSB	Total Inflow	Ag Pumping	Aquifer Discharge to Streams	Non-Ag Pumping	Underflow KSB to Buffer	Total Outflow	Change in Storage (Acre- Feet/Year)	Cumulative Change in Storage (Acre-Feet)
2020	676,105	185,429	861,534	726,105	0	101,360	60,420	887,886	-26,352	-26,352
2021	673,620	203,678	877,298	732,860	0	103,682	59,393	895,935	-18,637	-44,989
2022	673,620	205,414	879,035	739,458	0	106,216	61,291	906,965	-27,930	-72,920
2023	673,620	206,638	880,258	747,097	0	108,525	62,616	918,238	-37,980	-110,900
2024	676,105	208,646	884,751	755,303	0	110,849	63,749	929,901	-45,151	-156,050
2025	673,620	210,193	883,814	761,862	0	113,133	64,127	939,122	-55,309	-211,359
2026	673,620	212,602	886,222	768,886	0	115,649	64,536	949,071	-62,849	-274,208
2027	673,620	215,400	889,020	776,094	0	118,164	64,784	959,042	-70,022	-344,230
2028	676,105	218,919	895,024	782,900	0	120,927	65,156	968,984	-73,960	-418,189
2029	673,620	221,930	895,550	791,008	0	123,195	64,942	979,145	-83,595	-501,784
2030	673,620	225,496	899,117	797,556	0	125,708	64,967	988,231	-89,114	-590,899
2031	673,620	229,677	903,297	800,937	0	127,891	64,713	993,540	-90,244	-681,142
2032	676,099	233,290	909,388	801,646	0	130,418	65,071	997,136	-87,747	-768,890
2033	673,608	236,093	909,701	803,611	0	132,652	64,880	1,001,142	-91,441	-860,330
2034	673,606	239,534	913,140	806,077	0	135,154	64,870	1,006,100	-92,960	-953,291
2035	673,599	242,693	916,292	806,308	0	137,524	64,955	1,008,787	-92,495	-1,045,786
2036	676,068	246,934	923,002	811,192	0	138,989	65,077	1,015,258	-92,256	-1,138,041
2037	673,581	249,855	923,436	812,030	0	139,192	64,817	1,016,039	-92,603	-1,230,644
2038	673,578	253,266	926,844	813,739	0	141,351	64,797	1,019,887	-93,044	-1,323,688
2039	673,572	256,382	929,954	813,325	0	143,285	64,862	1,021,472	-91,518	-1,415,206
2040	676,029	260,125	936,154	815,379	0	142,321	65,149	1,022,849	-86,695	-1,501,901
Average 2020-2040	674,316	226,771	901,087	783,970	0	124,580	64,056	972,606	-71,519	-650,990

Full Results for Case 2: Future with Interannual Variability and No Projects

Water Year	Inflow (Acre-Feet/Year)			Outflow (Acre-Feet/Year)					Storage	
	Recharge	Underflow Buffer to KSB	Total Inflow	Ag Pumping	Aquifer Discharge to Streams	Non-Ag Pumping	Underflow KSB to Buffer	Total Outflow	Change in Storage (Acre-Feet/Year)	Cumulative Change in Storage (Acre-Feet)
2020	927,137	157,959	1,085,096	503,909	0	94,915	68,183	667,008	418,089	418,089
2021	1,186,432	212,662	1,399,094	450,049	44	97,438	47,322	594,852	804,242	1,222,330
2022	602,179	212,753	814,933	635,499	1,805	92,423	37,741	767,469	47,464	1,269,794
2023	688,052	195,456	883,509	677,926	548	92,275	56,153	826,902	56,607	1,326,401
2024	509,897	198,662	708,559	800,353	205	104,082	76,157	980,797	-272,239	1,054,163
2025	563,000	210,854	773,854	838,657	2	112,096	72,617	1,023,371	-249,517	804,646
2026	596,378	211,899	808,276	762,498	74	113,199	86,234	962,005	-153,729	650,917
2027	474,937	220,772	695,709	913,175	282	127,425	80,387	1,121,269	-425,560	225,356
2028	914,170	208,284	1,122,455	549,253	0	113,285	49,995	712,533	409,922	635,278
2029	820,036	183,763	1,003,799	564,464	0	119,950	47,269	731,683	272,116	907,394
2030	462,915	193,897	656,812	1,039,718	791	145,966	96,036	1,282,511	-625,700	281,694
2031	597,824	195,972	793,796	894,045	0	149,384	107,367	1,150,796	-357,000	-75,306
2032	514,239	219,117	733,356	951,074	102	148,989	105,343	1,205,508	-472,152	-547,458
2033	774,102	230,418	1,004,520	658,256	3	140,618	82,814	881,690	122,830	-424,628
2034	950,150	240,907	1,191,058	573,989	0	131,217	53,043	758,248	432,809	8,181
2035	496,704	243,265	739,969	972,719	959	147,809	91,836	1,213,323	-473,354	-465,173
2036	569,699	264,392	834,091	1,106,537	120	151,409	101,256	1,359,323	-525,232	-990,405
2037	407,524	274,466	681,990	1,185,193	99	144,434	80,170	1,409,897	-727,907	-1,718,312
2038	390,111	279,092	669,202	1,110,319	0	130,837	74,606	1,315,762	-646,559	-2,364,871
2039	536,273	259,803	796,076	822,968	15	125,676	82,866	1,031,525	-235,449	-2,600,320
2040	1,190,394	292,662	1,483,056	502,512	43	126,799	69,085	698,439	784,616	-1,815,704

Average 2020-2040	674,864	224,146	899,010	786,339	242	124,297	74,594	985,472	-86,462	-104,663
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Full Results for Case 3: Future with Interannual Variability Reversed and No Projects

Water Year	Inflow (Acre-Feet/Year)			Outflow (Acre-Feet/Year)					Storage	
	Recharge	Underflow Buffer to KSB	Total Inflow	Ag Pumping	Recharge	Non-Ag Pumping	Underflow KSB to Buffer	Total Outflow	Change in Storage (Acre- Feet/Year)	Cumulative Change in Storage (Acre-Feet)
2020	1,191,324	173,864	1,365,188	507,156	43	143,667	103,103	753,969	611,219	611,219
2021	536,675	139,383	676,058	825,712	15	138,916	128,162	1,092,805	-416,747	194,472
2022	390,020	204,314	594,334	1,111,323	0	134,171	86,604	1,332,097	-737,764	-543,292
2023	407,240	252,324	659,565	1,185,336	99	145,928	73,509	1,404,873	-745,308	-1,288,600
2024	569,142	293,988	863,131	1,106,310	120	152,440	77,974	1,336,844	-473,714	-1,762,313
2025	496,017	328,383	824,400	972,217	959	144,469	59,633	1,177,277	-352,877	-2,115,190
2026	949,363	307,692	1,257,054	573,330	0	127,457	40,626	741,413	515,641	-1,599,549
2027	773,345	238,922	1,012,267	657,424	3	135,945	85,382	878,754	133,513	-1,466,036
2028	513,644	247,525	761,169	949,938	102	142,955	91,055	1,184,050	-422,881	-1,888,917
2029	596,916	276,709	873,624	892,780	0	141,484	73,496	1,107,761	-234,136	-2,123,053
2030	462,063	335,951	798,013	1,036,097	791	140,731	53,233	1,230,852	-432,839	-2,555,892
2031	818,253	341,336	1,159,589	559,479	0	115,896	30,396	705,771	453,818	-2,102,074
2032	912,126	287,218	1,199,344	544,284	0	109,023	43,026	696,332	503,011	-1,599,063
2033	473,254	287,541	760,795	905,896	282	123,092	66,352	1,095,623	-334,828	-1,933,891
2034	594,562	305,782	900,344	755,785	74	109,375	61,840	927,074	-26,730	-1,960,621
2035	560,653	319,746	880,399	831,448	2	110,548	48,648	990,645	-110,247	-2,070,868
2036	507,841	332,929	840,771	792,976	205	103,656	50,825	947,661	-106,890	-2,177,758
2037	684,705	338,231	1,022,937	670,552	548	91,453	36,860	799,412	223,524	-1,954,233
2038	600,005	328,445	928,450	628,835	1,805	91,473	26,874	748,988	179,462	-1,774,771
2039	1,183,943	215,572	1,399,515	443,711	44	94,145	75,152	613,051	786,464	-988,307
2040	924,327	165,600	1,089,927	498,108	0	91,431	100,732	690,270	399,657	-588,650
Average 2020-2040	673,591	272,450	946,042	783,271	242	123,250	67,309	974,073	-28,031	-1,508,923

Full Results for Case 4: Altered Future with Management Actions

Water Year	Inflow (Acre-Feet/Year)			Outflow (Acre-Feet/Year)					Change in Storage	
	Recharge	Underflow Buffer to KSB	Total Inflow	Ag Pumping	Recharge	Non-Ag Pumping	Underflow KSB to Buffer	Total Outflow	Change in Storage (Acre-Feet/Year)	Cumulative Change in Storage (Acre-Feet)
2020	681,104	184,922	866,026	722,860	0	101,360	60,625	884,845	-18,819	-18,819
2021	678,620	202,314	880,934	726,854	0	103,682	59,930	890,466	-9,533	-28,351
2022	678,620	203,514	882,134	733,956	0	106,216	62,002	902,174	-20,041	-48,392
2023	678,620	203,884	882,504	737,608	0	108,525	63,549	909,682	-27,178	-75,570
2024	681,103	205,774	886,877	749,801	0	110,849	64,740	925,390	-38,513	-114,083
2025	678,619	206,575	885,194	749,246	0	113,133	65,350	927,730	-42,536	-156,619
2026	678,619	206,752	885,371	743,893	0	115,649	66,298	925,840	-40,469	-197,088
2027	678,619	208,208	886,826	750,498	0	118,164	66,838	935,499	-48,673	-245,761
2028	681,103	210,711	891,814	756,665	0	120,927	67,448	945,041	-53,226	-298,988
2029	678,619	212,763	891,381	764,160	0	123,195	67,480	954,835	-63,454	-362,441
2030	678,619	215,014	893,632	761,110	0	125,708	67,757	954,574	-60,942	-423,384
2031	678,619	215,454	894,073	744,144	0	128,224	68,307	940,675	-46,602	-469,986
2032	681,103	216,576	897,680	744,268	0	130,665	69,183	944,117	-46,437	-516,423
2033	678,619	217,589	896,208	745,654	0	132,652	69,351	947,657	-51,450	-567,872
2034	678,619	219,522	898,140	747,494	0	135,154	69,585	952,233	-54,092	-621,965
2035	678,619	220,782	899,400	735,676	0	137,654	69,988	943,317	-43,917	-665,881
2036	681,103	219,464	900,567	711,641	0	140,439	71,296	923,376	-22,809	-688,691
2037	678,617	218,732	897,349	711,957	0	142,655	71,750	926,363	-29,014	-717,705
2038	678,617	219,591	898,208	712,953	0	144,381	72,133	929,467	-31,259	-748,964
2039	678,617	220,552	899,169	711,698	0	145,124	72,518	929,340	-30,171	-779,135
2040	681,102	222,282	903,384	713,679	0	147,871	73,135	934,686	-31,301	-810,436

Average 2020-2040	679,328	211,951	891,280	736,944	0	125,344	67,584	929,872	-38,592	-407,455
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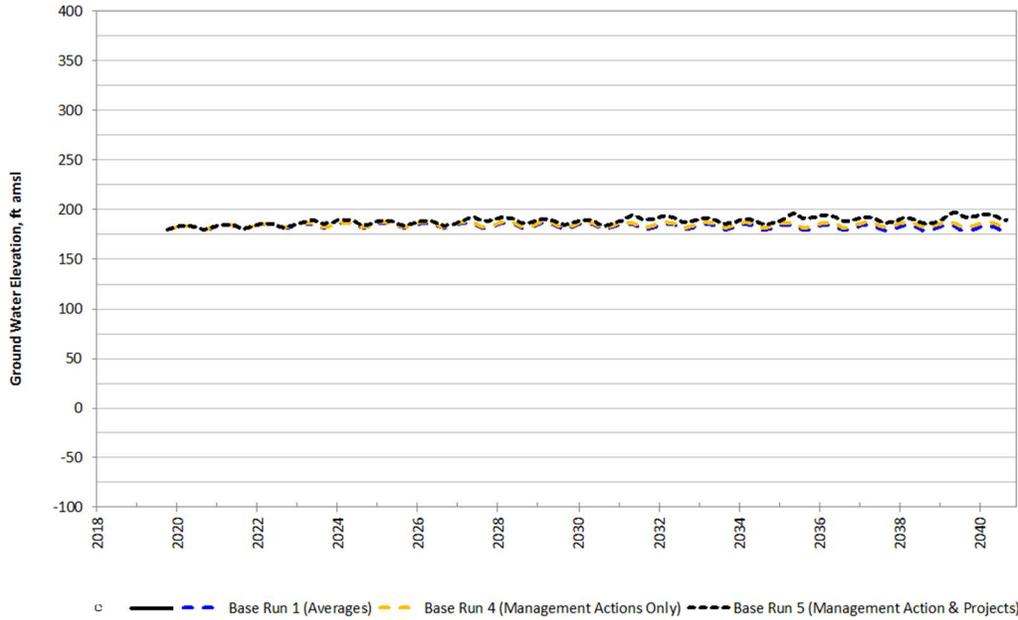
Full Results for Case 5: Altered Future with Management Actions and Projects

Water Year	Inflow (Acre-Feet/Year)			Outflow (Acre-Feet/Year)				Change in Storage (Acre-Feet/Year)	
	Recharge	Underflow Buffer to KSB	Total Inflow	Ag Pumping	Non-Ag Pumping	Underflow KSB to Buffer	Total Outflow	Change In Storage (Acre-Feet/Year)	Cumulative Change in Storage (Acre-Feet)
2020	693,019	184,909	877,928	722,860	102,029	60,664	885,553	-7,625	-7,625
2021	692,081	201,840	893,921	726,854	103,847	60,091	890,792	3,129	-4,496
2022	695,135	202,679	897,814	733,956	106,285	62,280	902,522	-4,708	-9,203
2023	754,786	195,768	950,555	737,608	108,573	66,823	913,005	37,550	28,347
2024	700,811	197,706	898,518	749,801	110,894	66,641	927,335	-28,817	-470
2025	703,322	200,034	903,356	752,178	113,174	66,866	932,218	-28,862	-29,332
2026	712,321	200,571	912,892	747,271	115,688	67,844	930,802	-17,911	-47,243
2027	785,165	194,160	979,325	754,312	118,204	73,946	946,461	32,864	-14,379
2028	714,945	196,846	911,791	760,919	120,970	71,326	953,215	-41,424	-55,803
2029	712,463	201,420	913,883	768,855	123,239	70,436	962,530	-48,646	-104,449
2030	717,464	204,861	922,324	771,713	125,753	70,521	967,988	-45,663	-150,112
2031	801,229	197,492	998,722	755,179	128,271	78,944	962,394	36,328	-113,784
2032	720,097	198,739	918,836	755,733	131,062	74,994	961,789	-42,952	-156,737
2033	717,619	202,972	920,591	757,560	133,316	73,816	964,691	-44,100	-200,837
2034	717,626	206,231	923,858	759,855	135,482	73,658	968,996	-45,138	-245,975
2035	811,166	200,103	1,011,270	756,425	137,733	83,881	978,039	33,231	-212,744
2036	720,276	199,062	919,338	732,921	140,537	78,918	952,376	-33,038	-245,782
2037	717,812	202,242	920,054	733,653	142,773	77,386	953,812	-33,758	-279,540
2038	717,828	204,926	922,753	735,098	145,291	77,091	957,480	-34,727	-314,267
2039	814,808	199,028	1,013,835	734,198	147,012	88,871	970,081	43,754	-270,513
2040	720,268	200,596	920,864	736,631	147,962	82,129	966,721	-45,857	-316,370

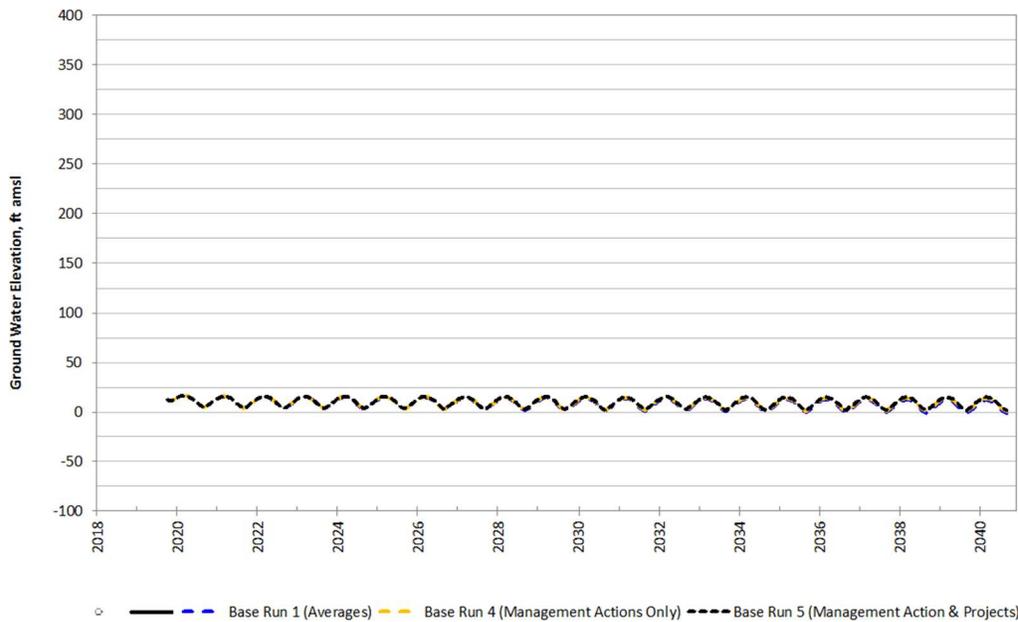
Average 2020-2040	730,488	199,628	930,116	746,837	125,624	72,720	945,181	-15,065	-131,015
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Appendix 3: Modeling Results for Monitoring Wells

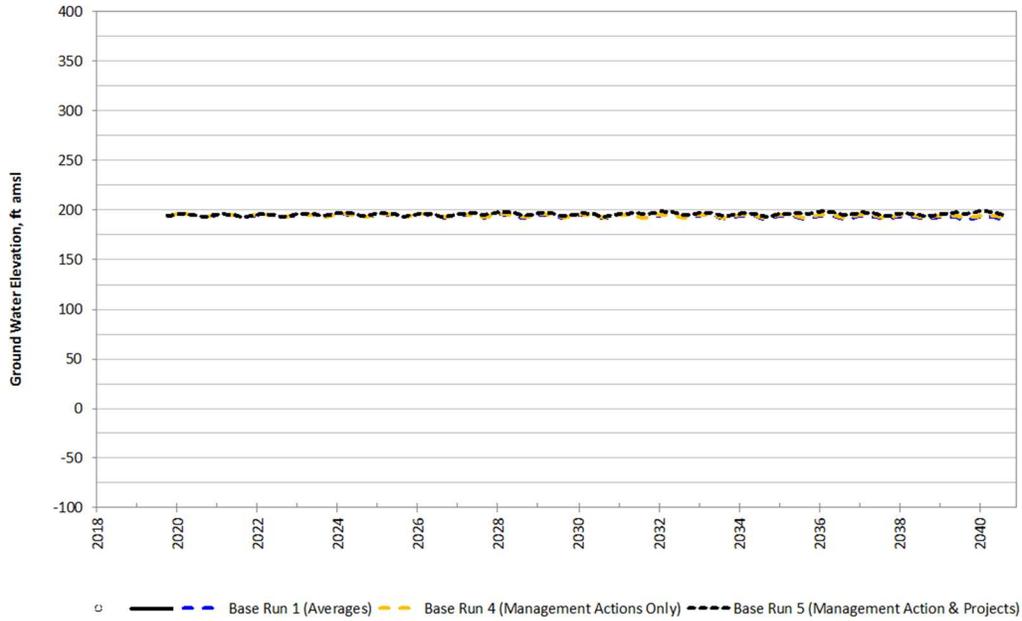
Well KSB-0388
Greater Kaweah GSA
Well ID: 19S22E07K01M
Aquifer System: Upper - Model Layer 3
Top of Screen Depth (ft): 380; Bottom of Screen Depth(ft): 77.940855;



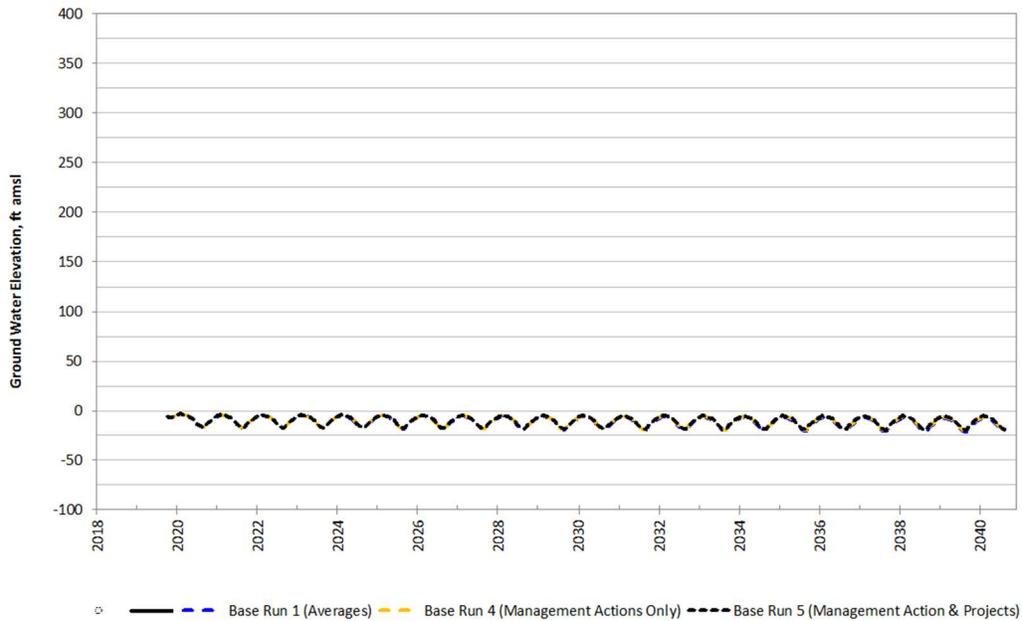
Well KSB-0399
Greater Kaweah GSA
Well ID: 20S22E07A02M
Aquifer System: Unknown - Model Layer 3



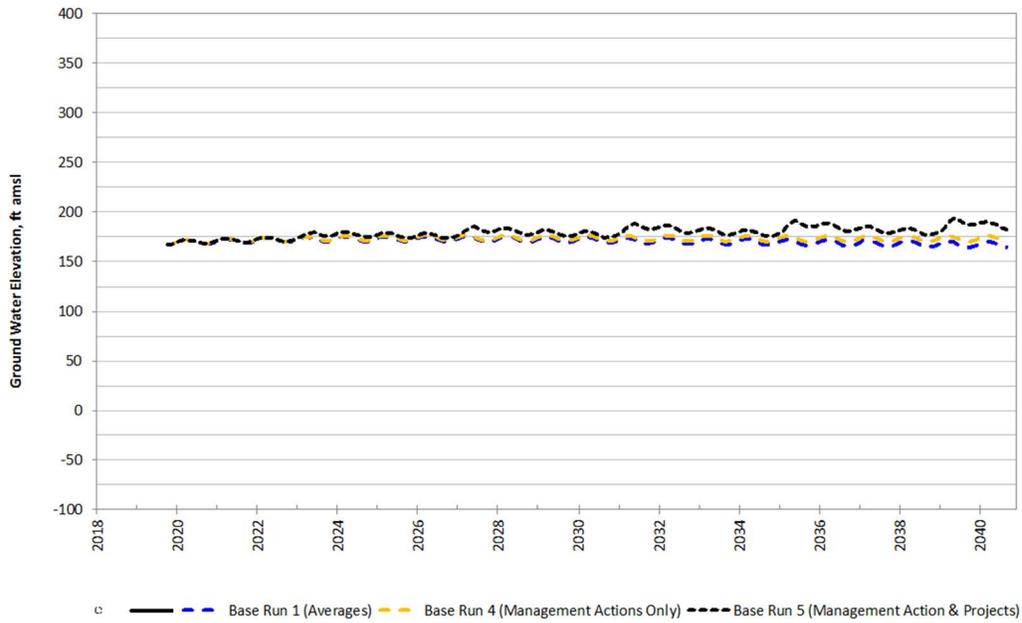
Well KSB-0446
Greater Kaweah GSA
Well ID: 20S22E07A03M
Aquifer System: Upper - Model Layer 3
Top of Screen Depth (ft): 421; Bottom of Screen Depth(ft): 37.667616; Total Depth (ft): 421



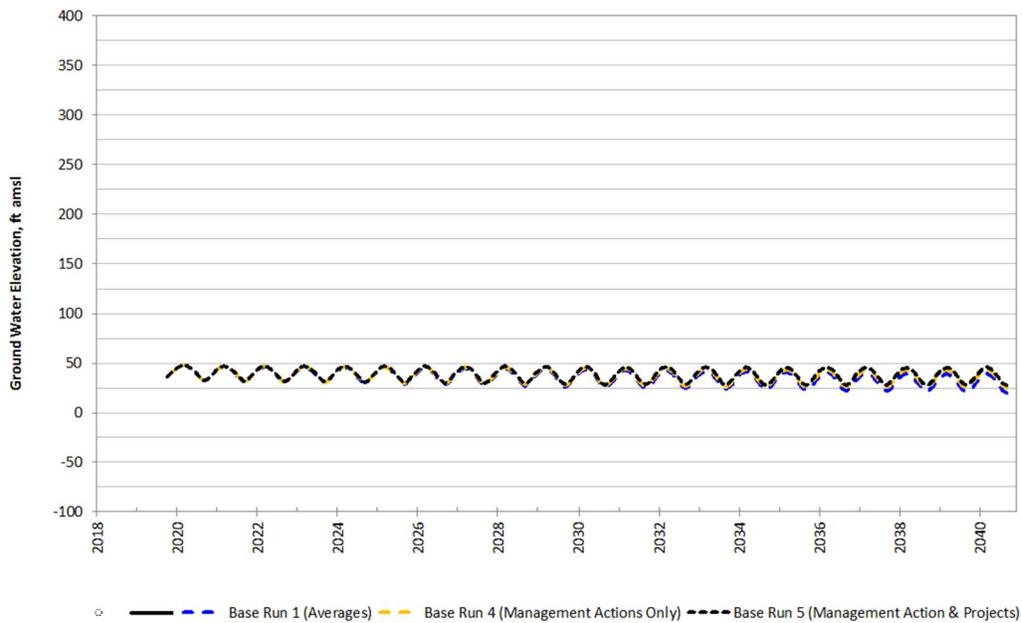
Well KSB-0459
Greater Kaweah GSA
Well ID: 20S22E07A04M
Aquifer System: Unknown - Model Layer 3



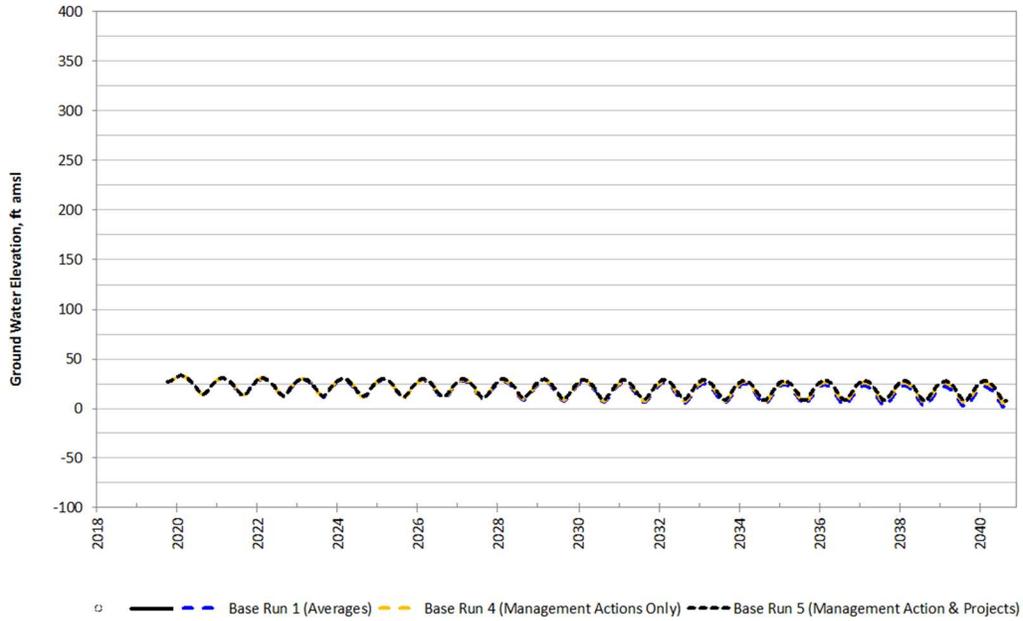
Well KSB-0519
Greater Kaweah GSA
Well ID: 19S22E18H01M
Aquifer System: Unknown - Model Layer 3



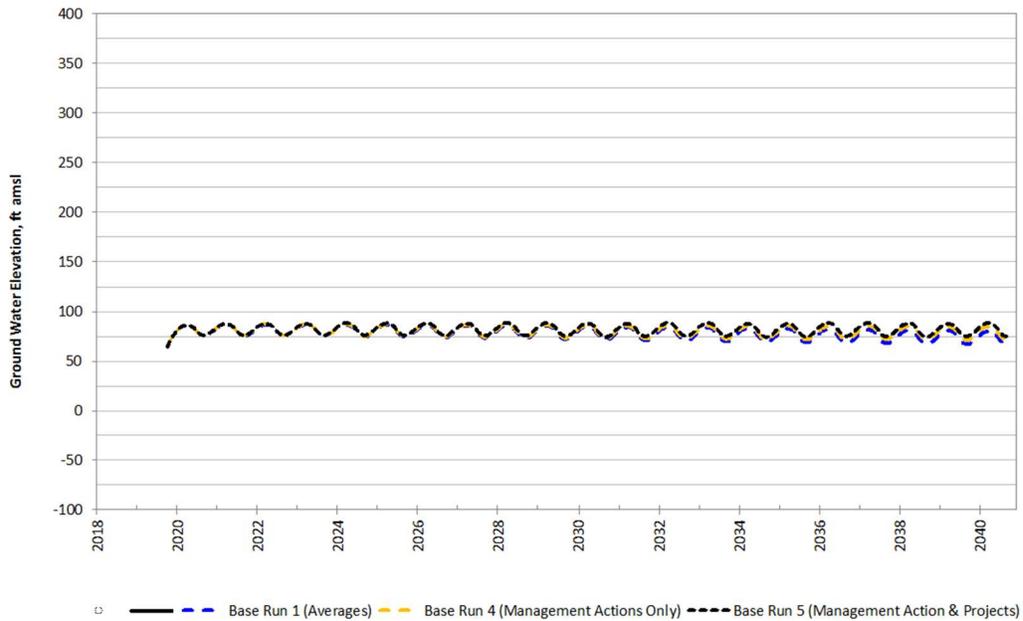
Well KSB-0531
Greater Kaweah GSA
Well ID: 20S22E06H01M
Aquifer System: Unknown - Model Layer 3



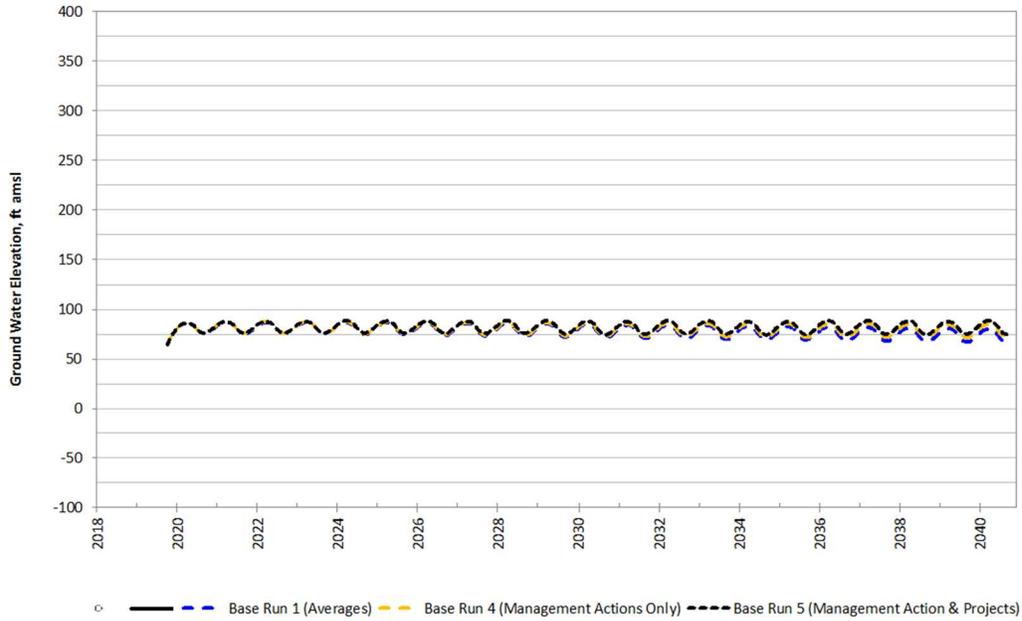
Well KSB-0550
Greater Kaweah GSA
Well ID: 19S22E17E01M
Aquifer System: Unknown - Model Layer 1



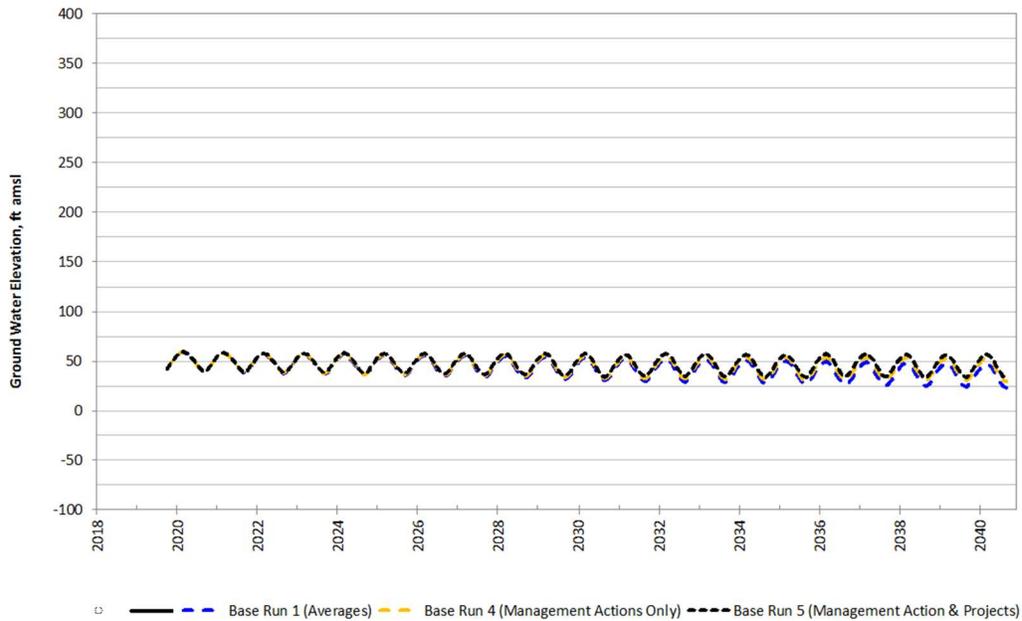
Well KSB-0560
Greater Kaweah GSA
Well ID: 19S22E29D01M
Aquifer System: Unknown - Model Layer 3



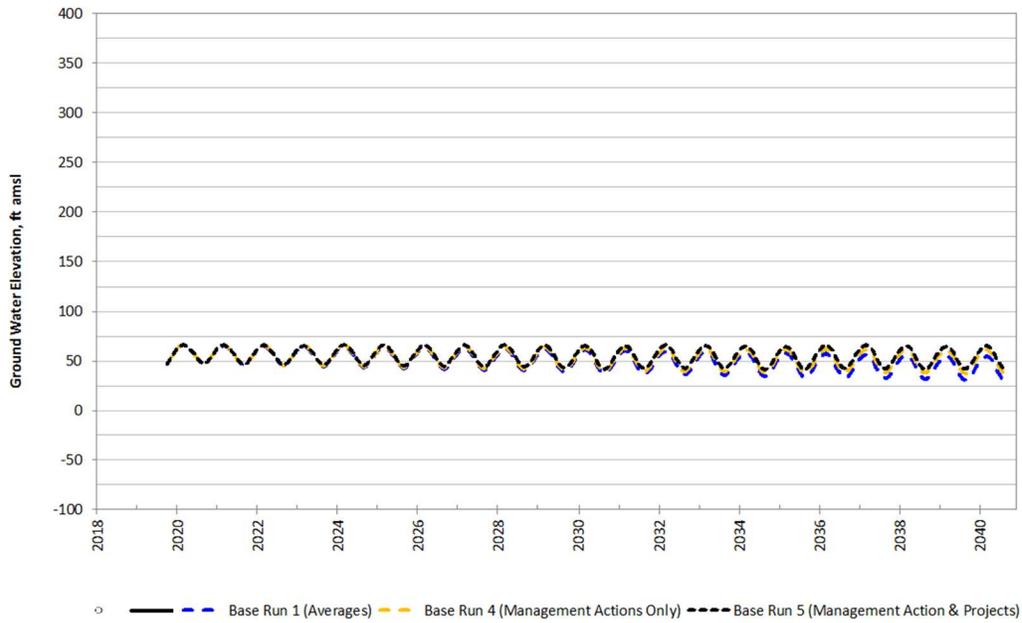
Well KSB-0561
Greater Kaweah GSA
Well ID: 19S22E32D01M
Aquifer System: Unknown - Model Layer 3



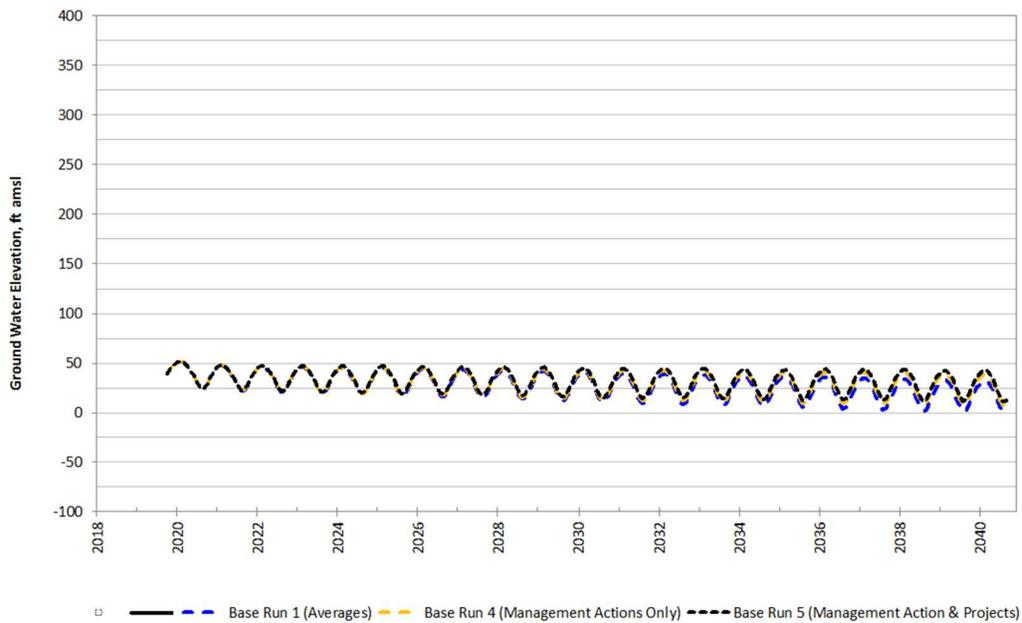
Well KSB-0616
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Well ID: 19S22E17L01M
Aquifer System: Unknown - Model Layer 1



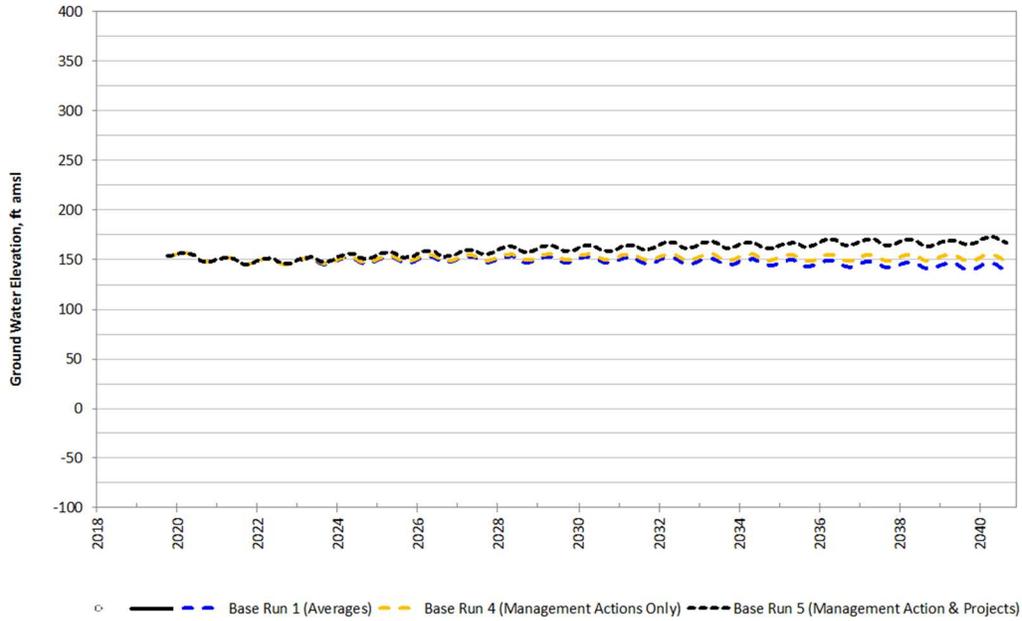
Well KSB-0636
Greater Kaweah GSA
Well ID: 20S22E05L01M
Aquifer System: Unknown - Model Layer 3



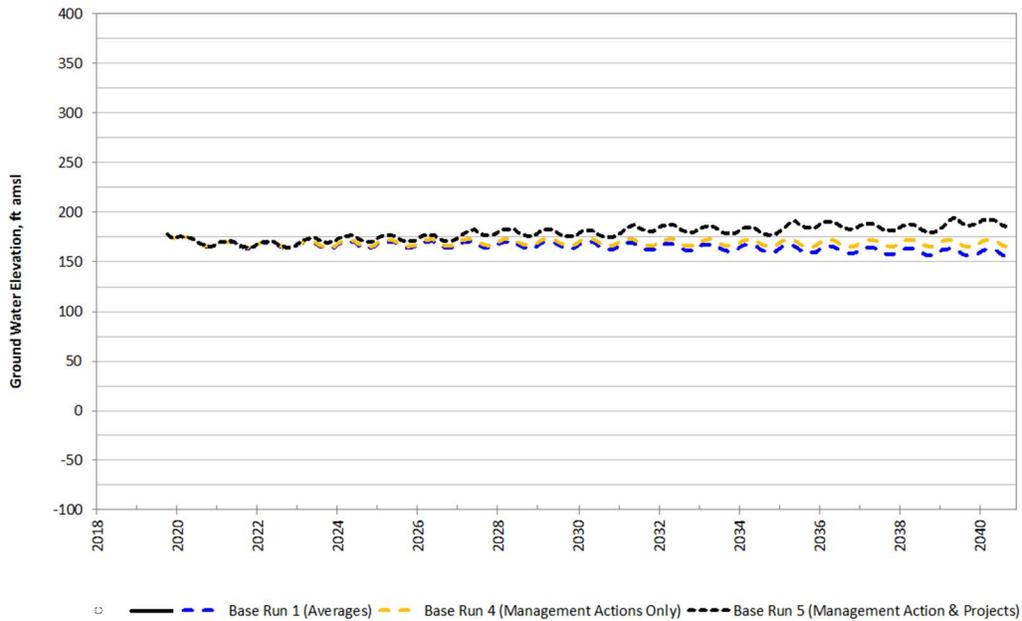
Well KSB-0718
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Well ID: 19S22E17A01M
Aquifer System: Unknown - Model Layer 3



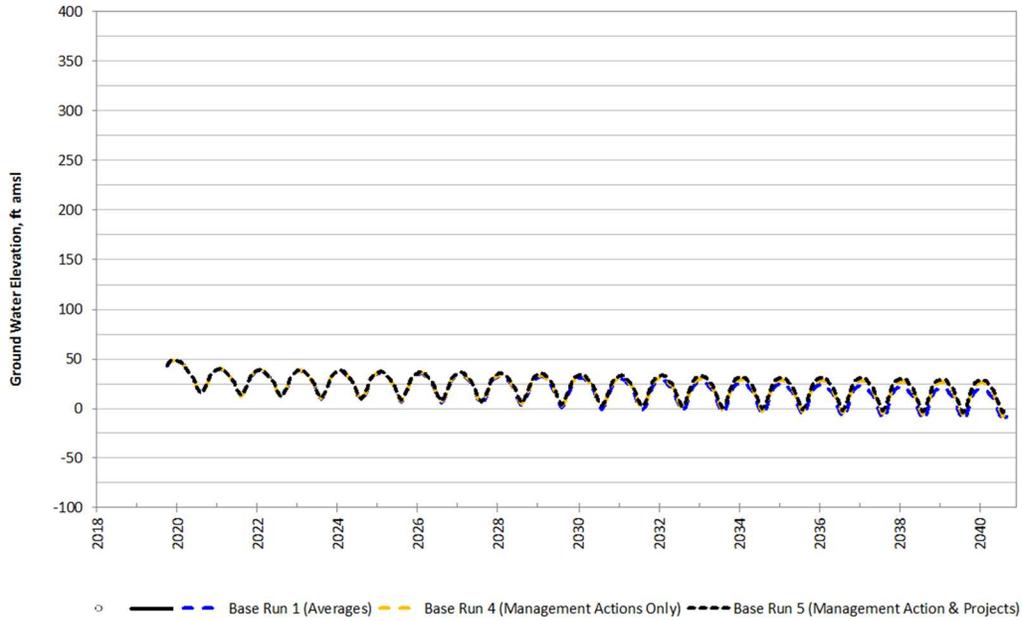
Well KSB-0721
Greater Kaweah GSA
Well ID: 19S22E20A01M
Aquifer System: Unknown - Model Layer 3



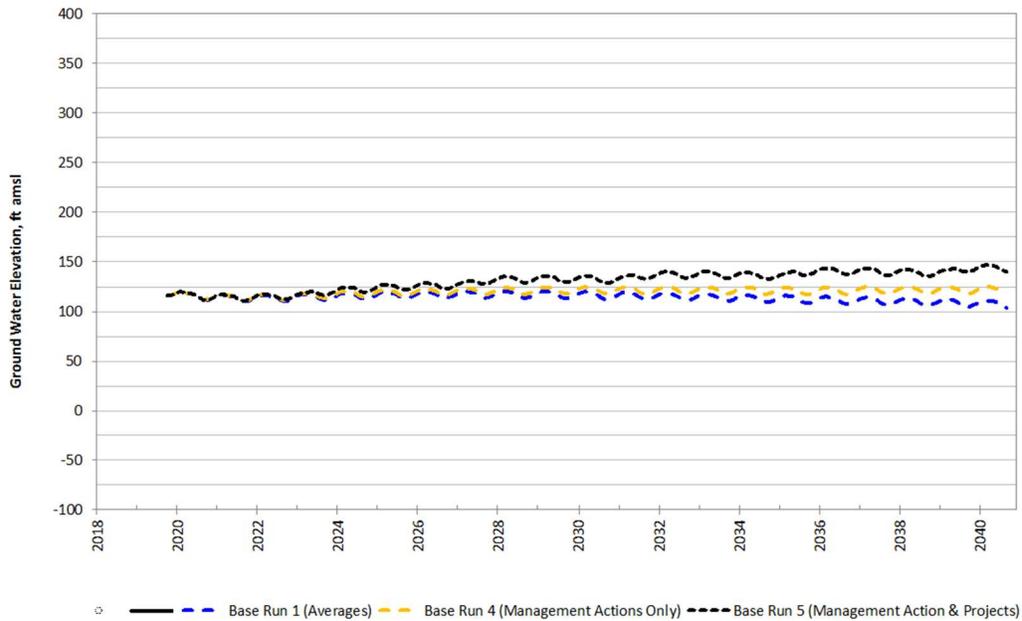
Well KSB-0742
Greater Kaweah GSA
Well ID: 20S22E08A02M
Aquifer System: Unknown - Model Layer 3



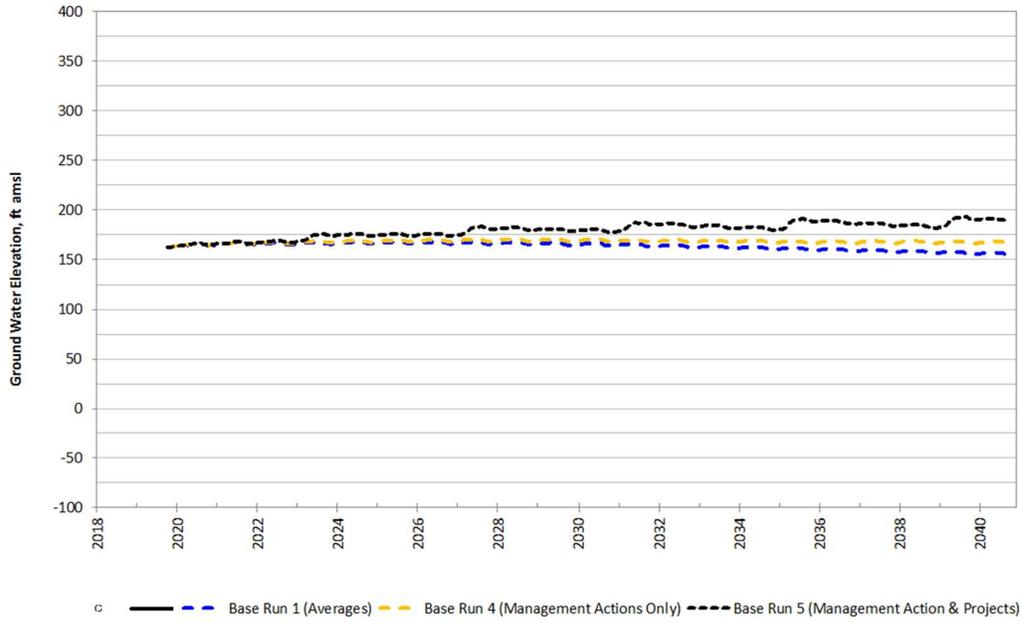
Well KSB-0791
Greater Kaweah GSA
Well ID: 20S22E08J01M
Aquifer System: Unknown - Model Layer 3



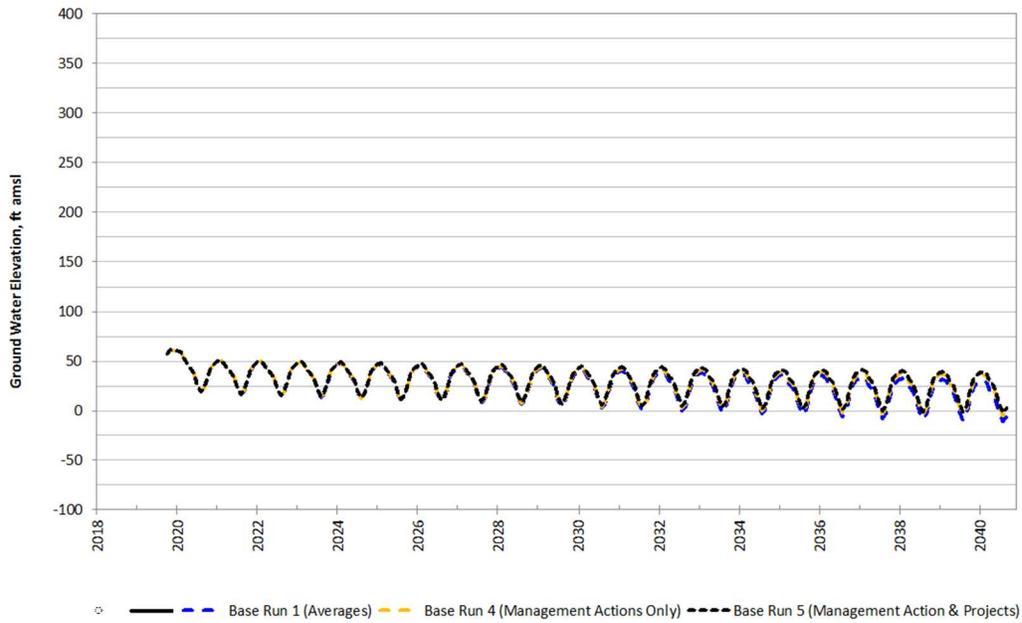
Well KSB-0818
Greater Kaweah GSA
Well ID: 19S22E28D01M
Aquifer System: Upper - Model Layer 3
Top of Screen Depth (ft): 360; Bottom of Screen Depth(ft): 42.369663; Total Depth (ft): 362



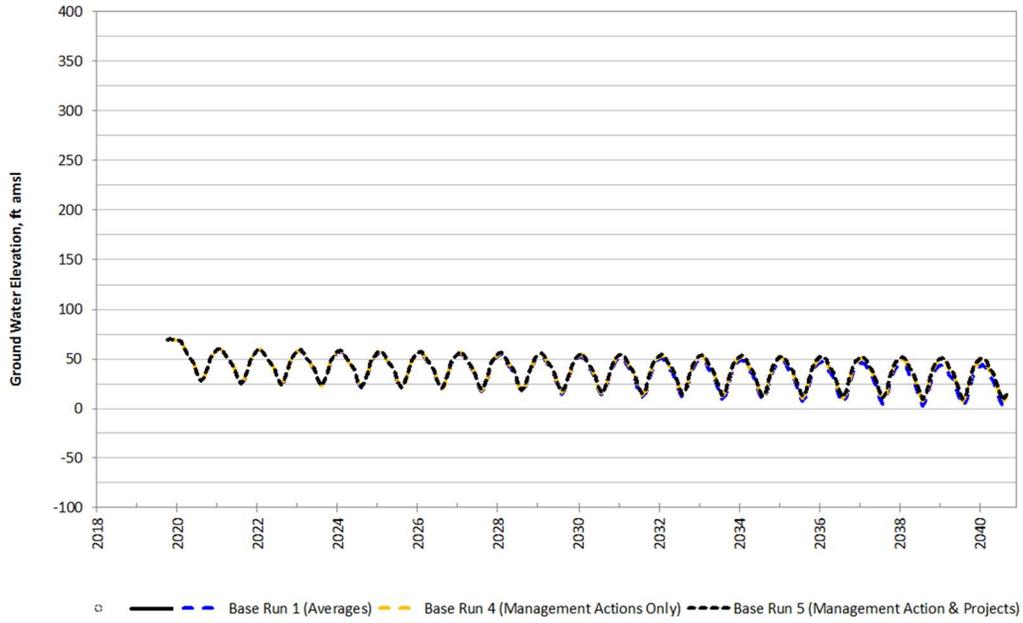
Well KSB-0856
Greater Kaweah GSA
Well ID: 20S22E04D02M
Aquifer System: Unknown - Model Layer 3



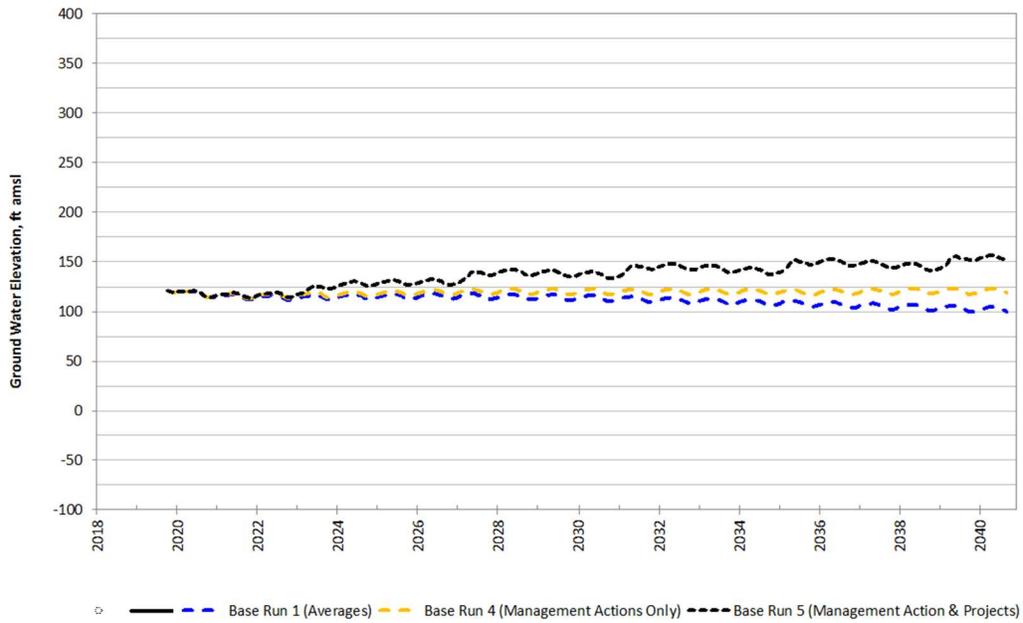
Well KSB-0889
Greater Kaweah GSA
Well ID: 20S22E04D01M
Aquifer System: Unknown - Model Layer 3



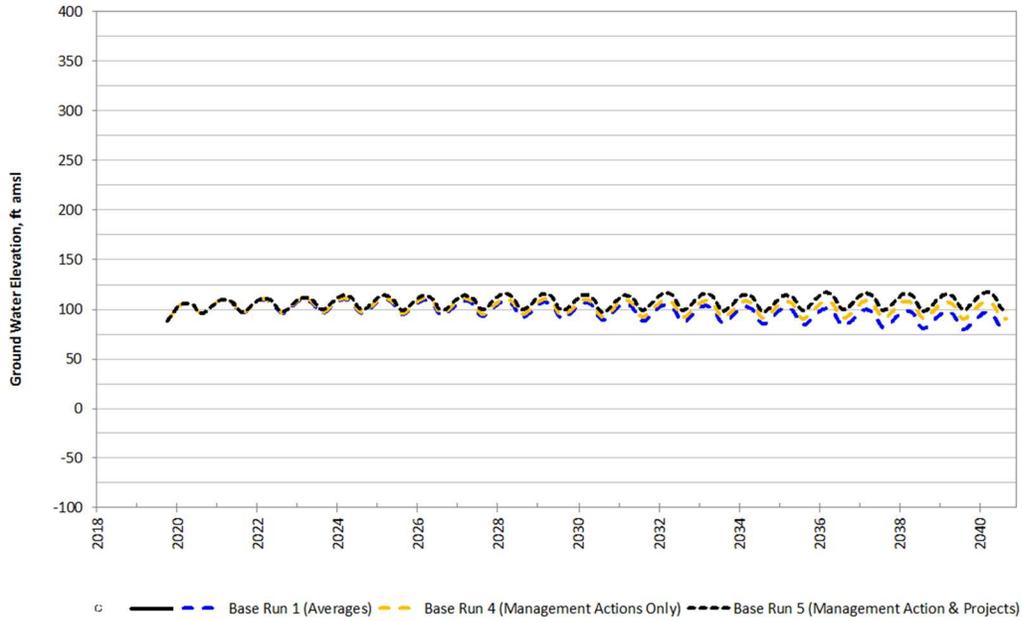
Well KSB-0890
Greater Kaweah GSA
Well ID: 19S22E28C01M
Aquifer System: Unknown - Model Layer 3



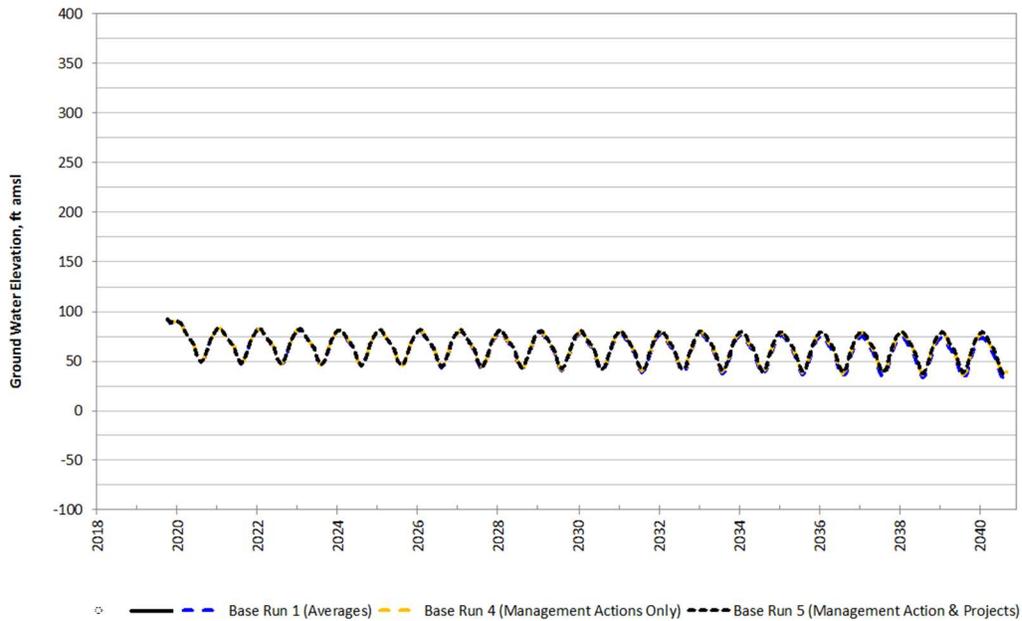
Well KSB-0903
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Well ID: 19S22E21C01M
Aquifer System: Unknown - Model Layer 3



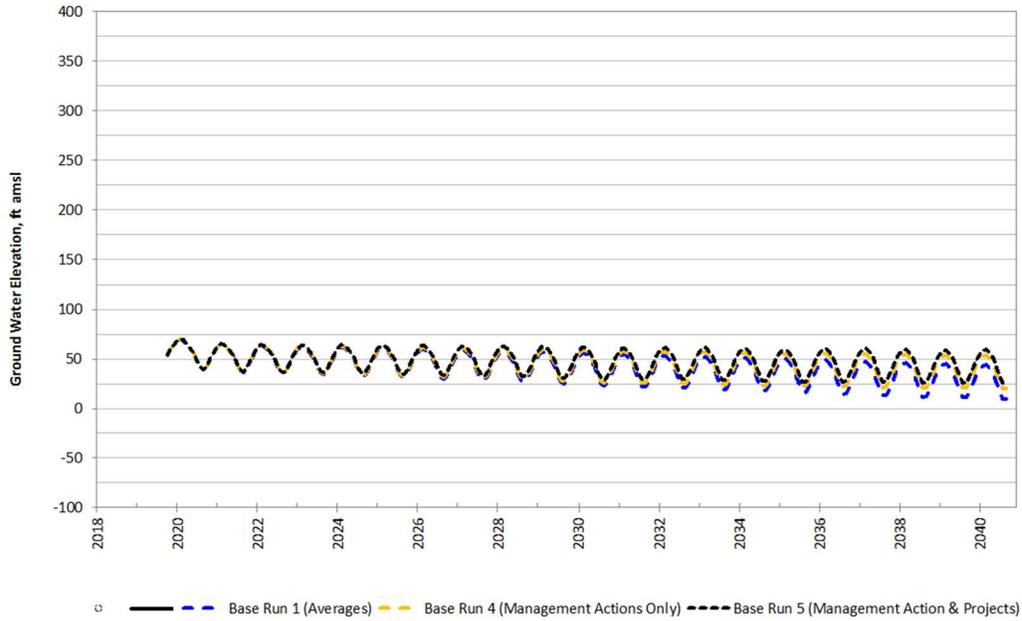
Well KSB-0905
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Well ID: 20S22E04C01M
Aquifer System: Unknown - Model Layer 3



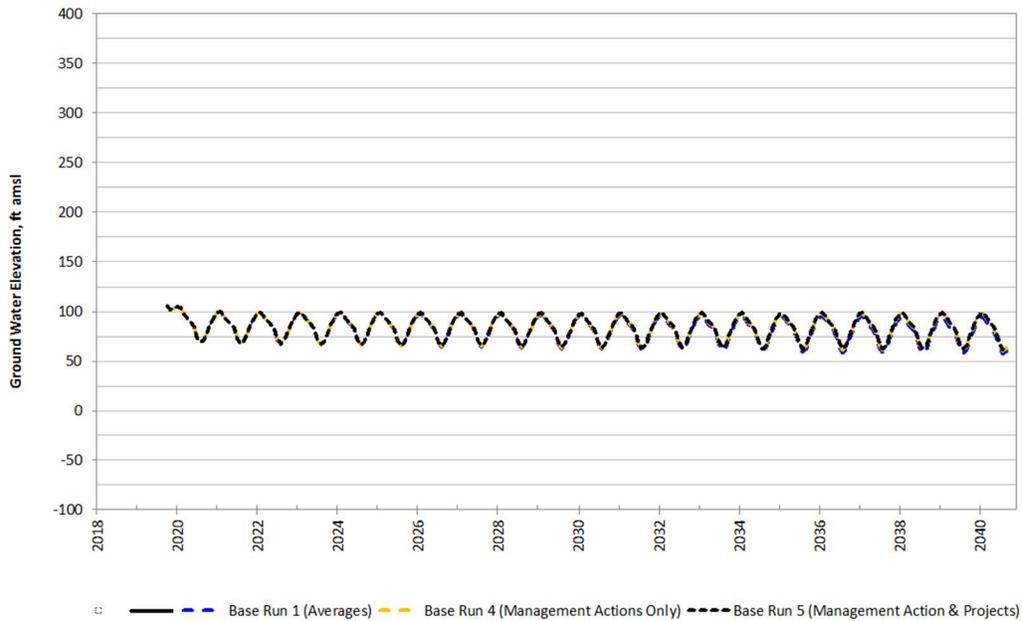
Well KSB-0922
Mid Kaweah GSA
Well ID: CID_038
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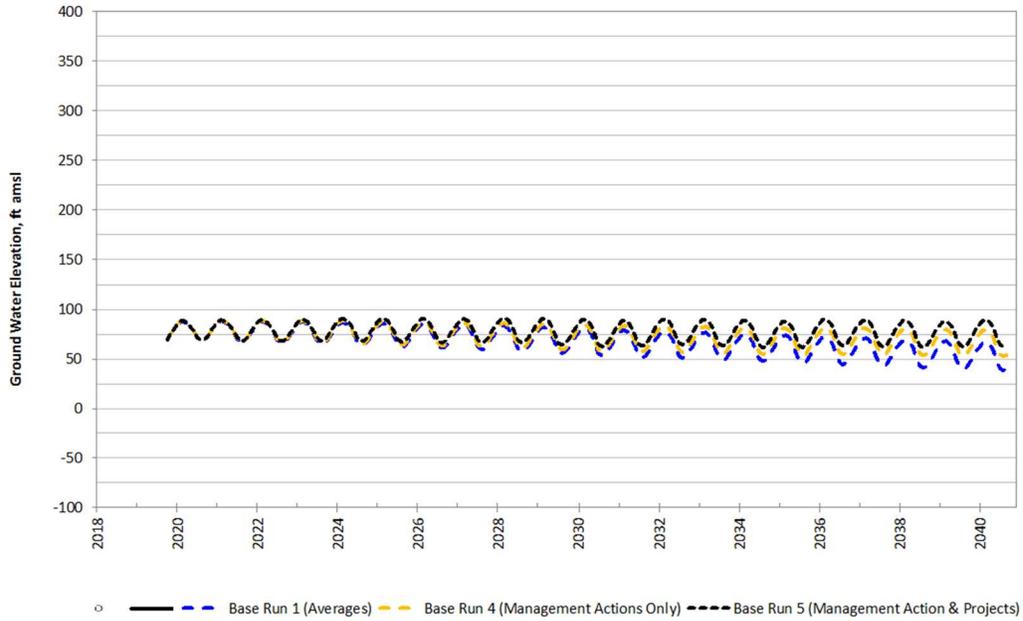
Well KSB-0946
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Well ID: CID_053
Aquifer System: Unknown - Model Layer 3



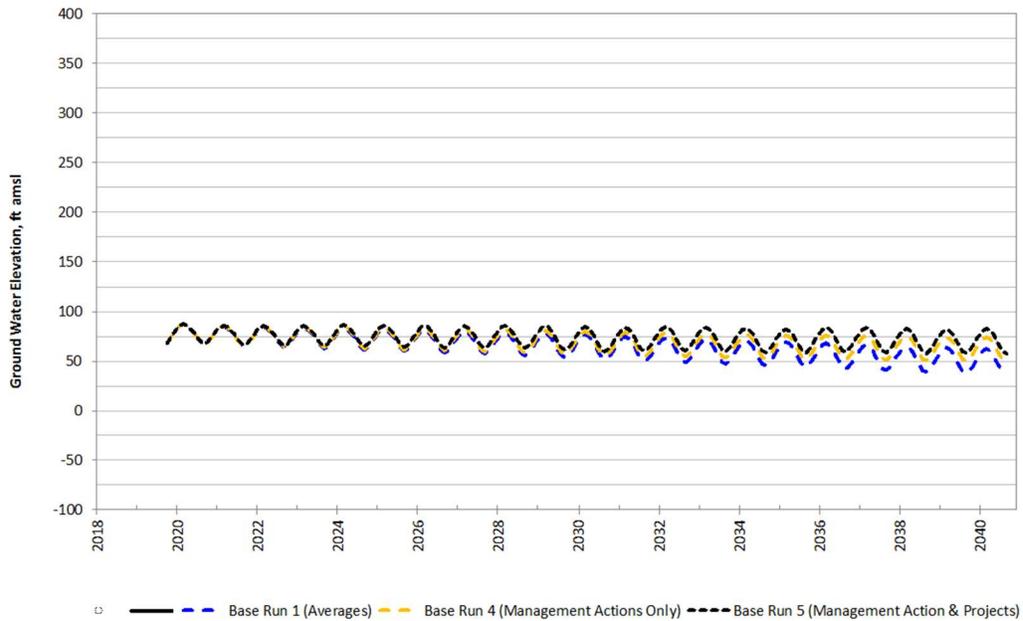
Well KSB-1031
Greater Kaweah GSA
Well ID: 19S22E33B01M
Aquifer System: Unknown - Model Layer 3



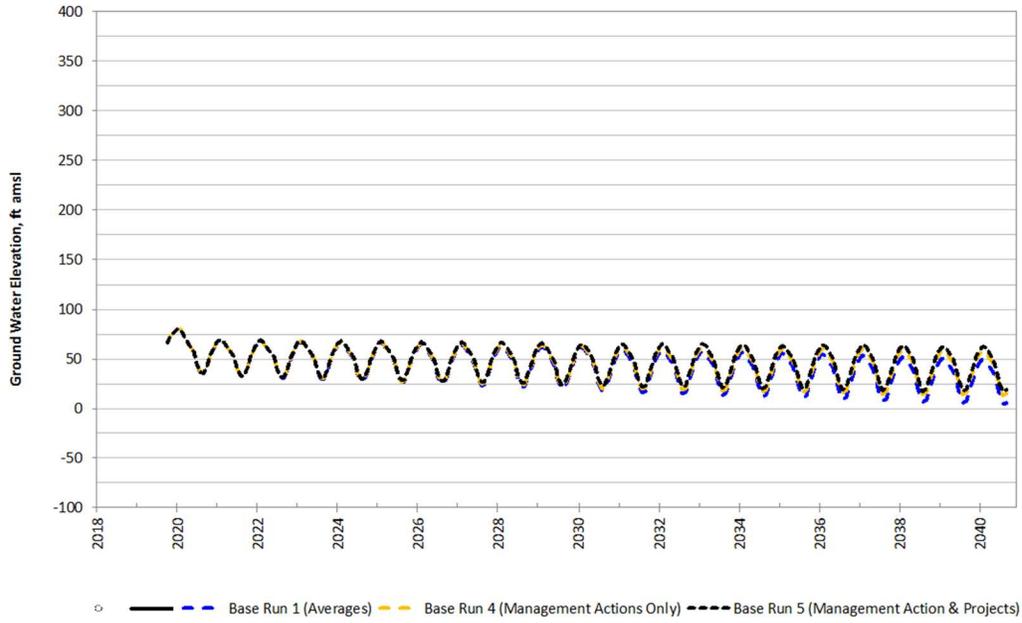
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Well ID: 20S22E09H01M
Aquifer System: Unknown - Model Layer 3



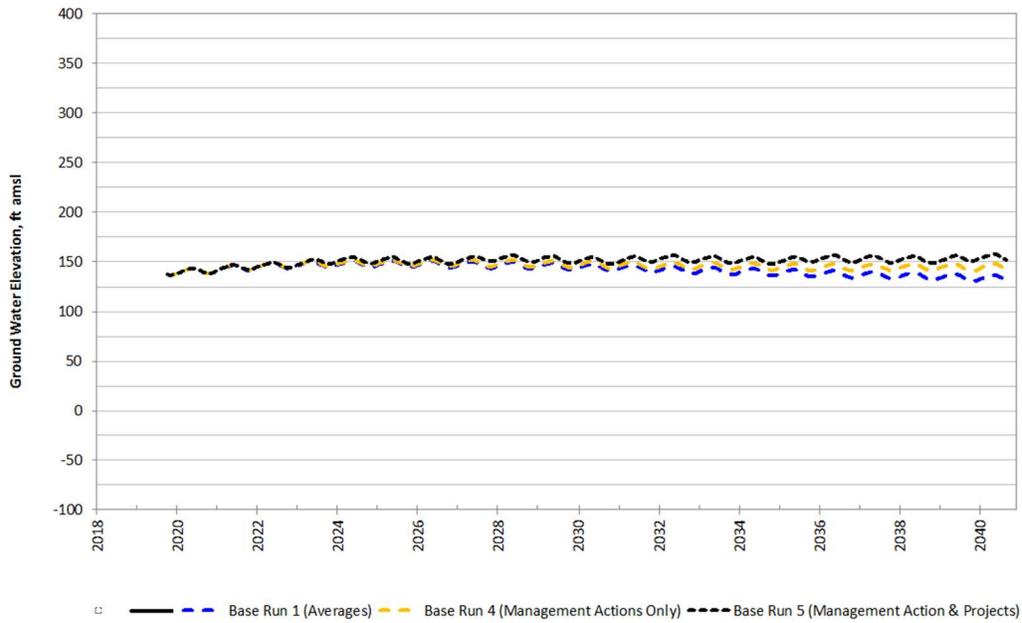
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Mid Kaweah GSA
Well ID: CID_066
Aquifer System: Unknown - Model Layer 3



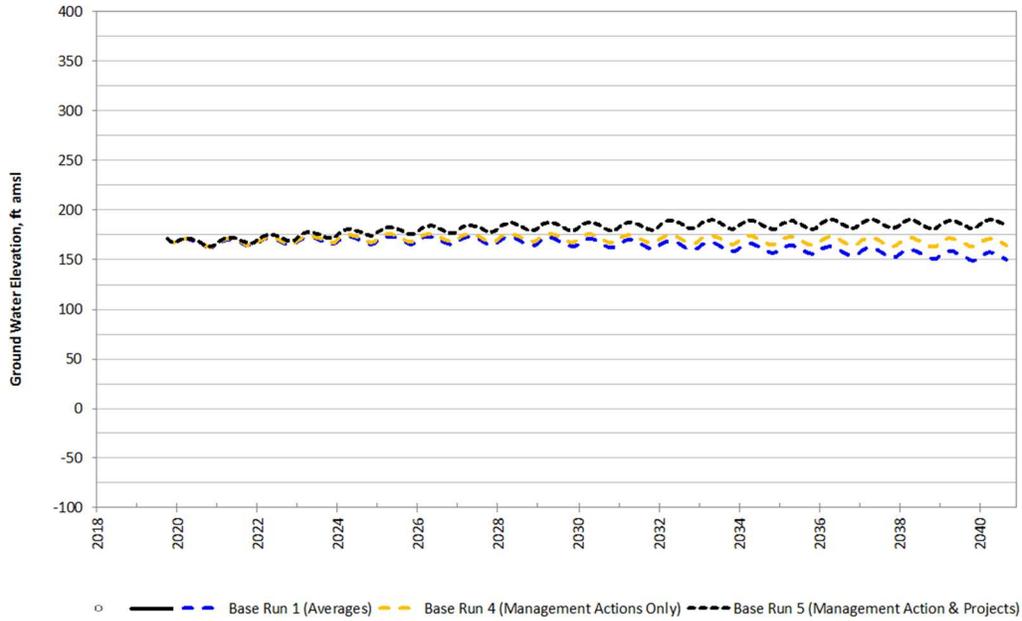
Well KSB-1071
Mid Kaweah GSA
Well ID: 19S22E01D01M
Aquifer System: Unknown - Model Layer 1



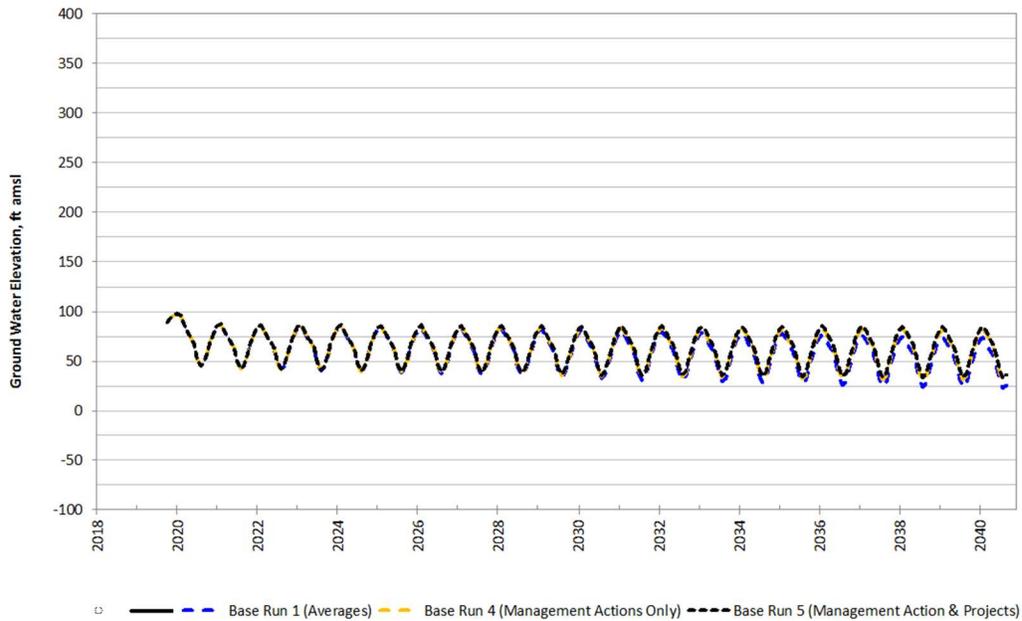
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Well ID: 19S22E09J01M
Aquifer System: Unknown - Model Layer 1



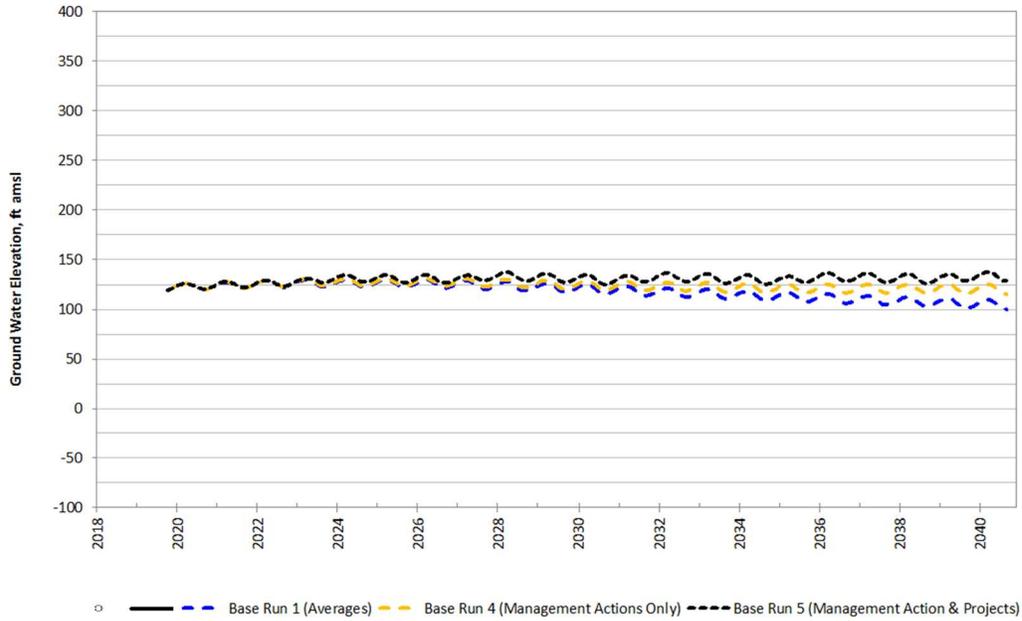
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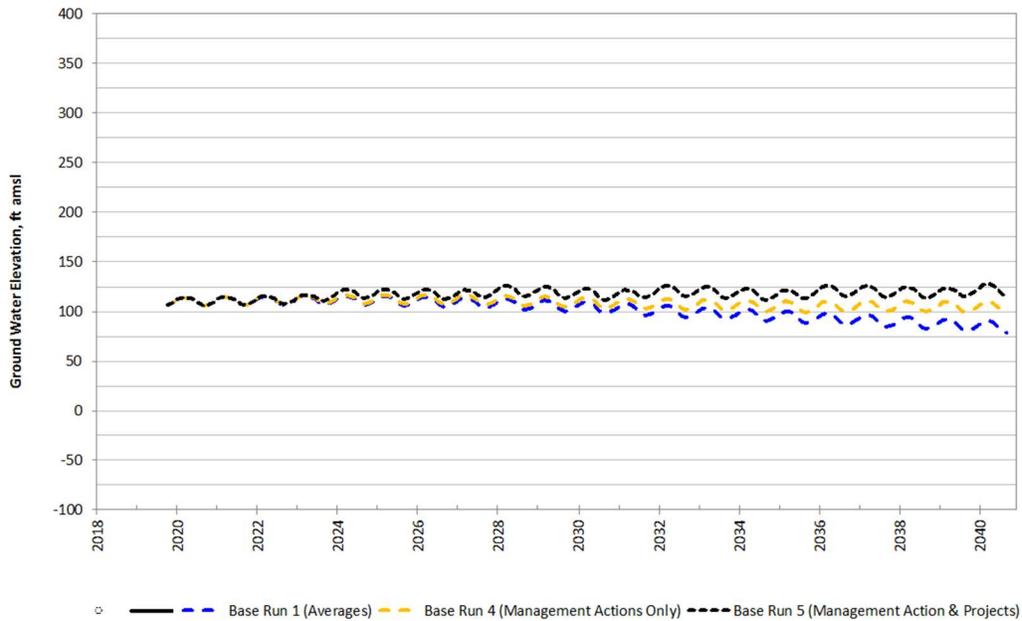
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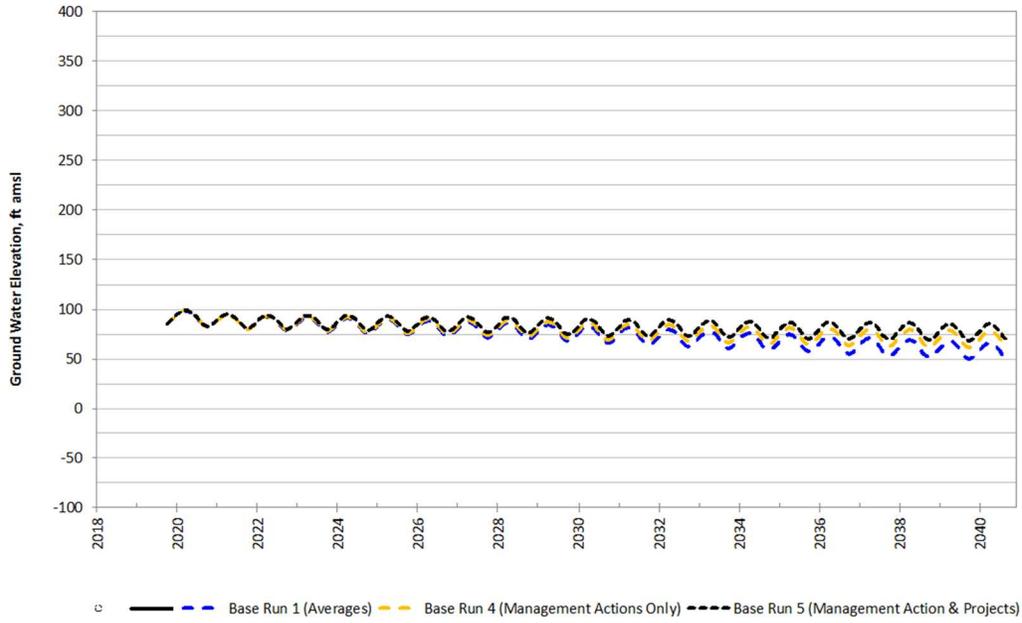
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Aquifer System: Unknown - Model Layer 3



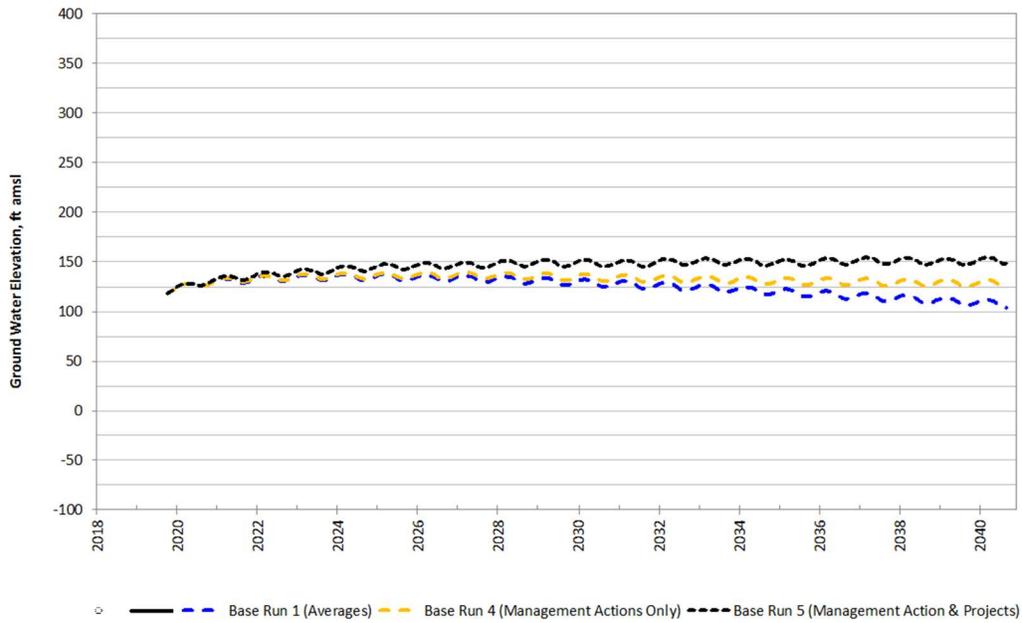
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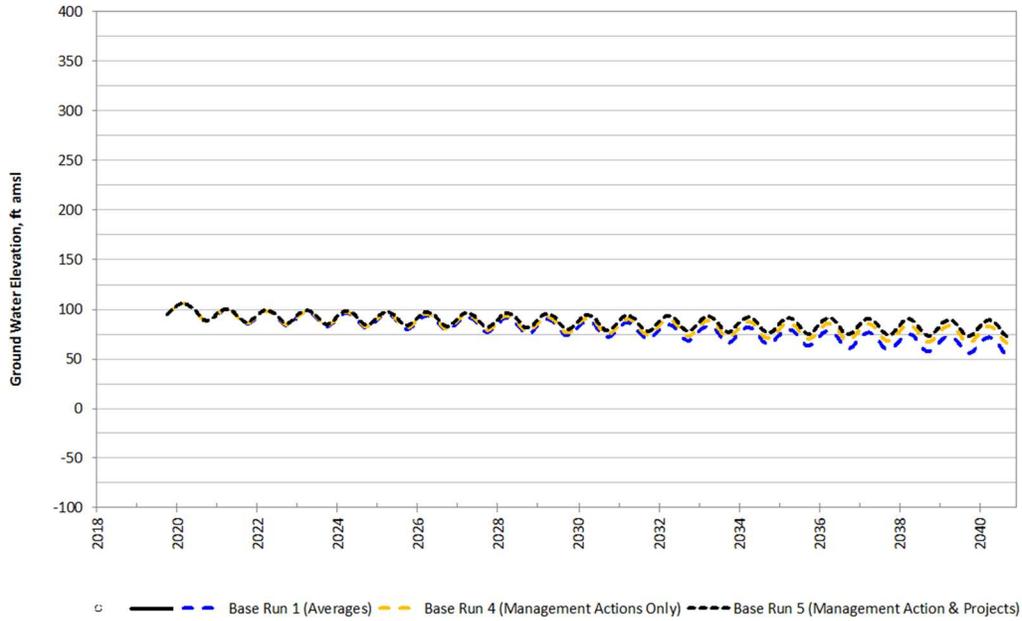
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Mid Kaweah GSA
Well ID: CID_027
Aquifer System: Unknown - Model Layer 3



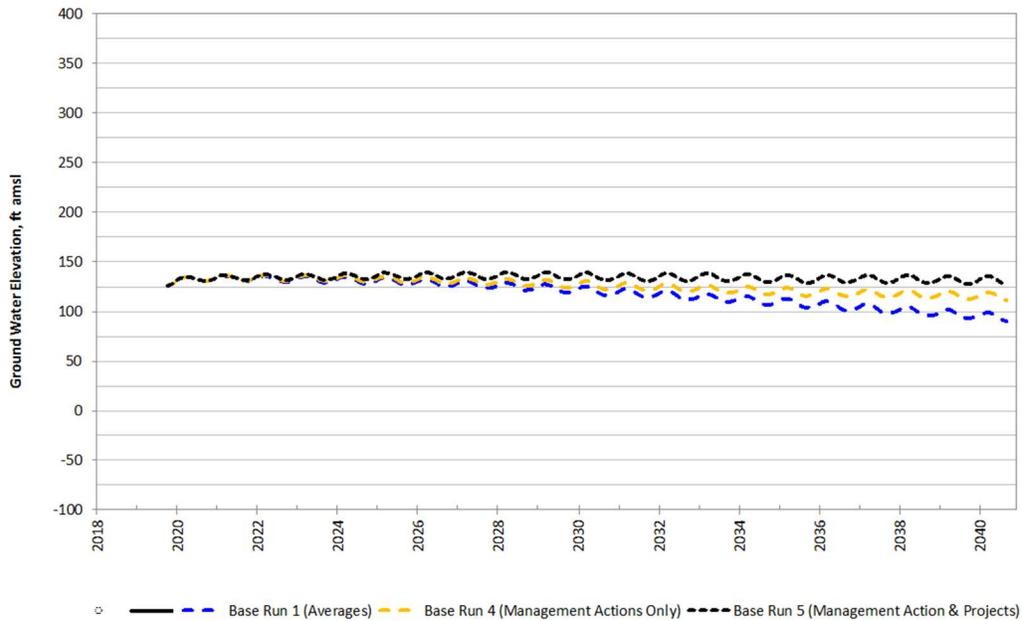
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Well ID: 19S22E15M01M
Aquifer System: Unknown - Model Layer 3



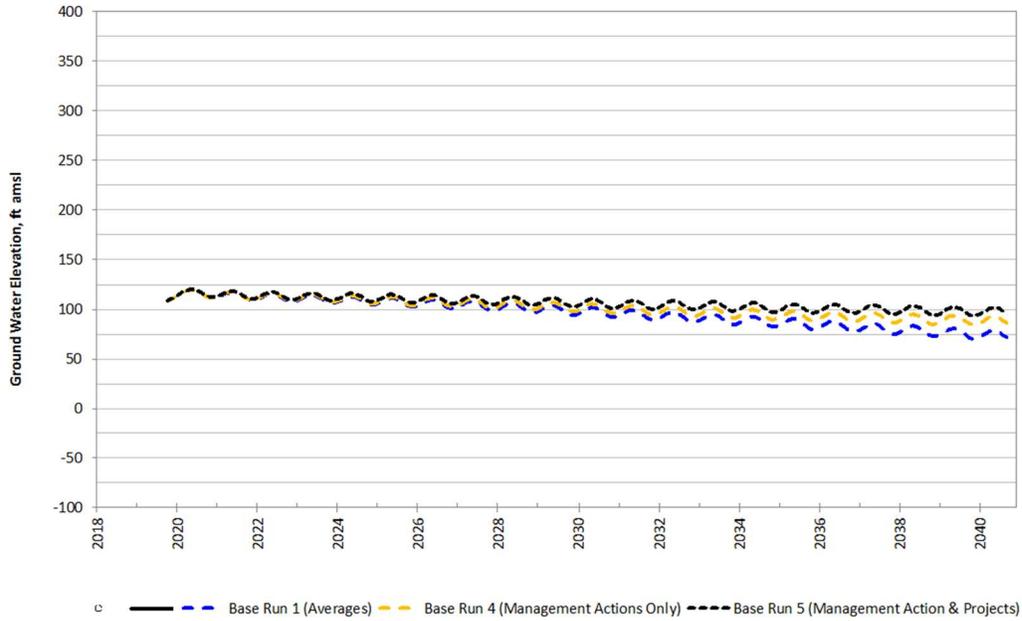
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Mid Kaweah GSA
Well ID: CID_068
Aquifer System: Unknown - Model Layer 3



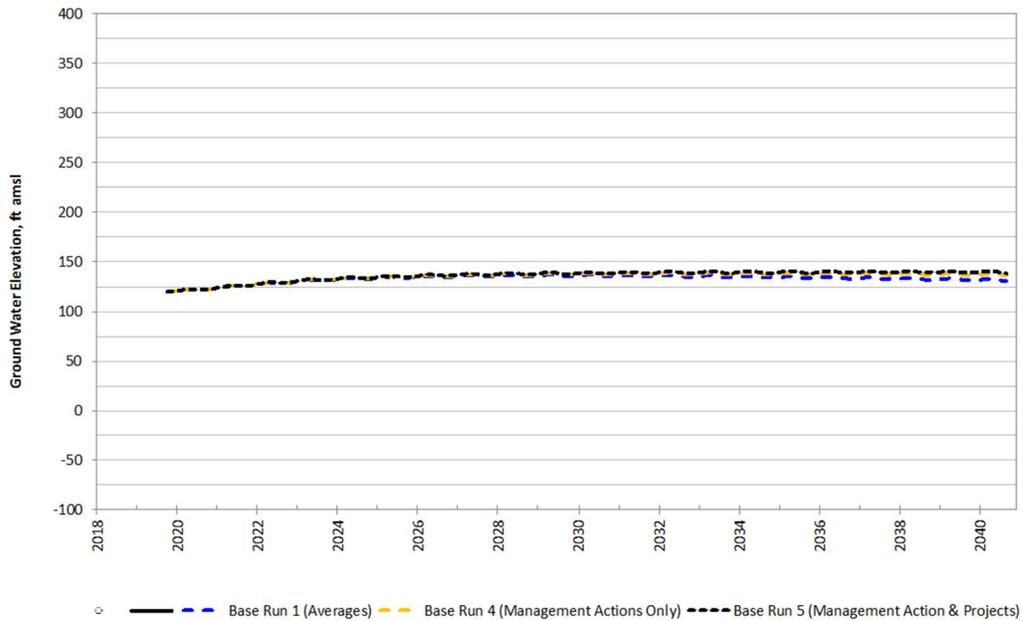
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Greater Kaweah GSA
Well ID: 362000N1195800W001
Aquifer System: Unknown - Model Layer 3



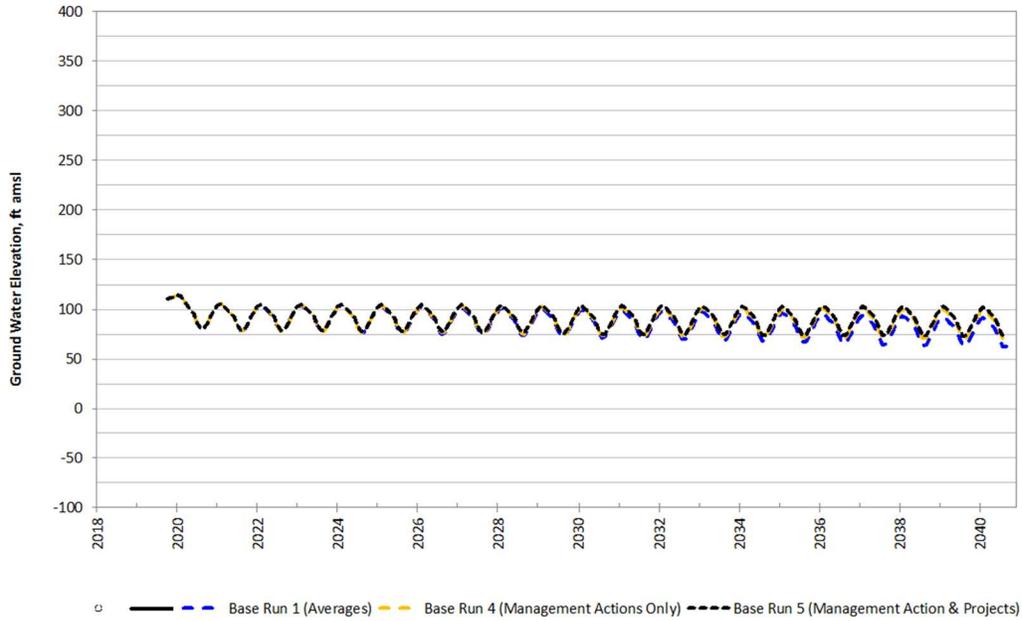
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Well ID: CID_076
Aquifer System: Unknown - Model Layer 3



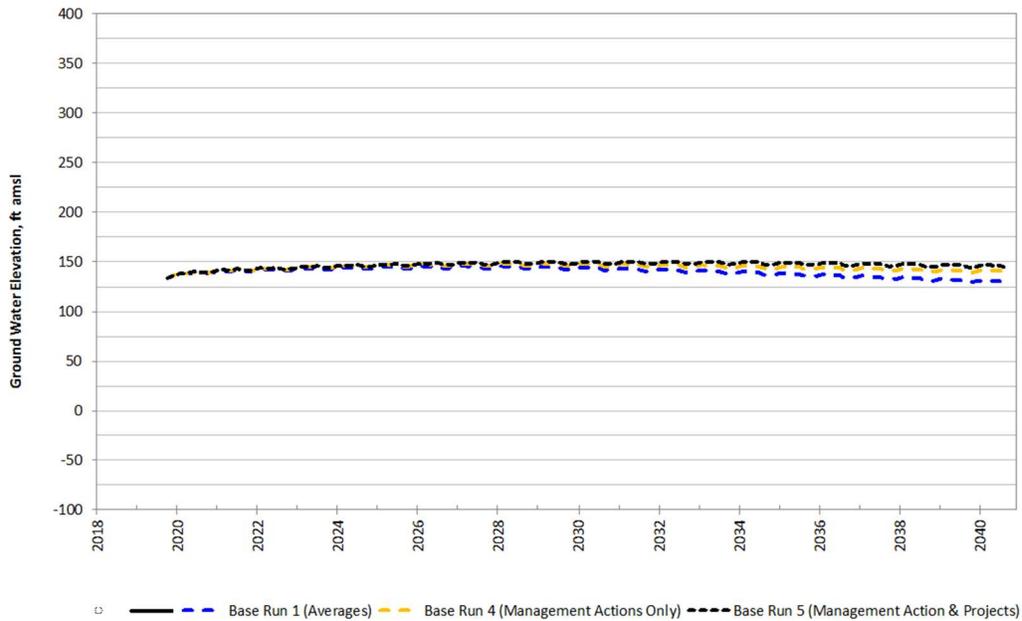
Well KSB-1425
Greater Kaweah GSA
Well ID: 20S22E03C02M
Aquifer System: Upper - Model Layer 3
Total Depth (ft): 200



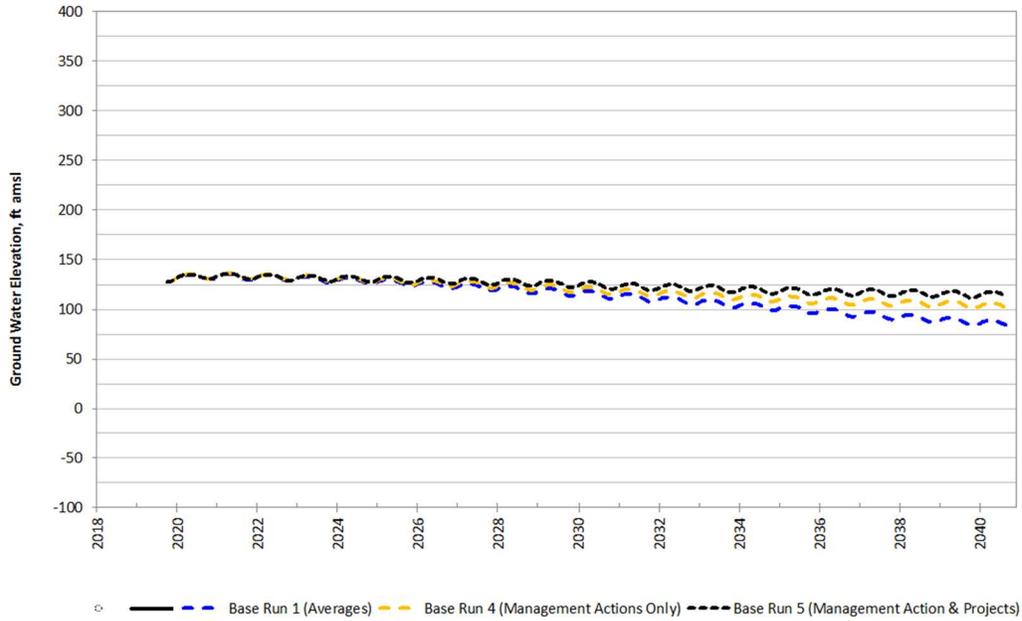
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Greater Kaweah GSA
Well ID: 20S22E03P01M
Aquifer System: Unknown - Model Layer 3



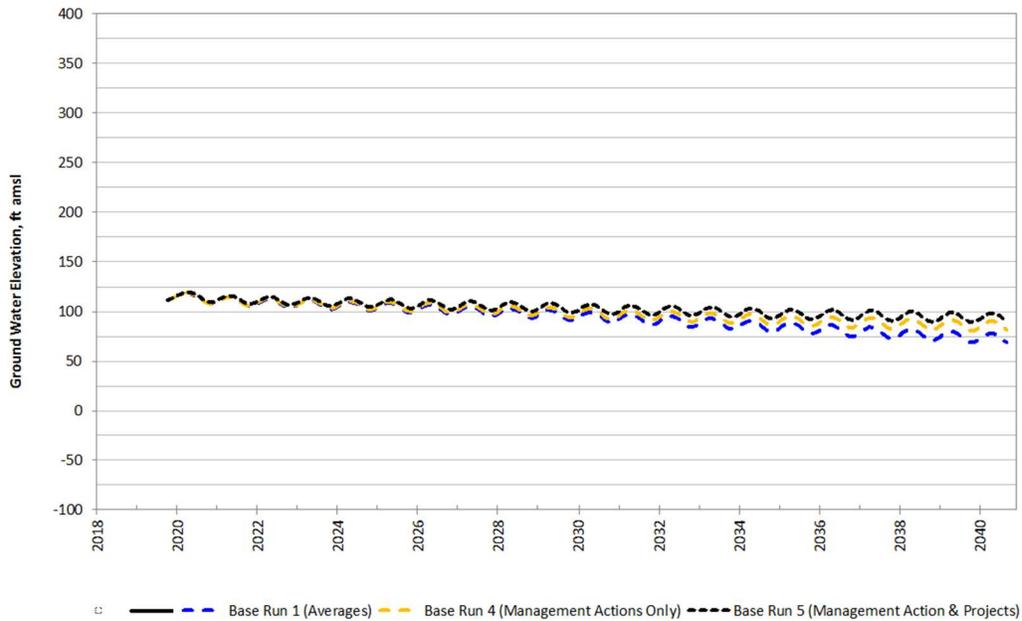
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Mid Kaweah GSA
Well ID: 20S22E13C02M
Aquifer System: Unknown - Model Layer 3



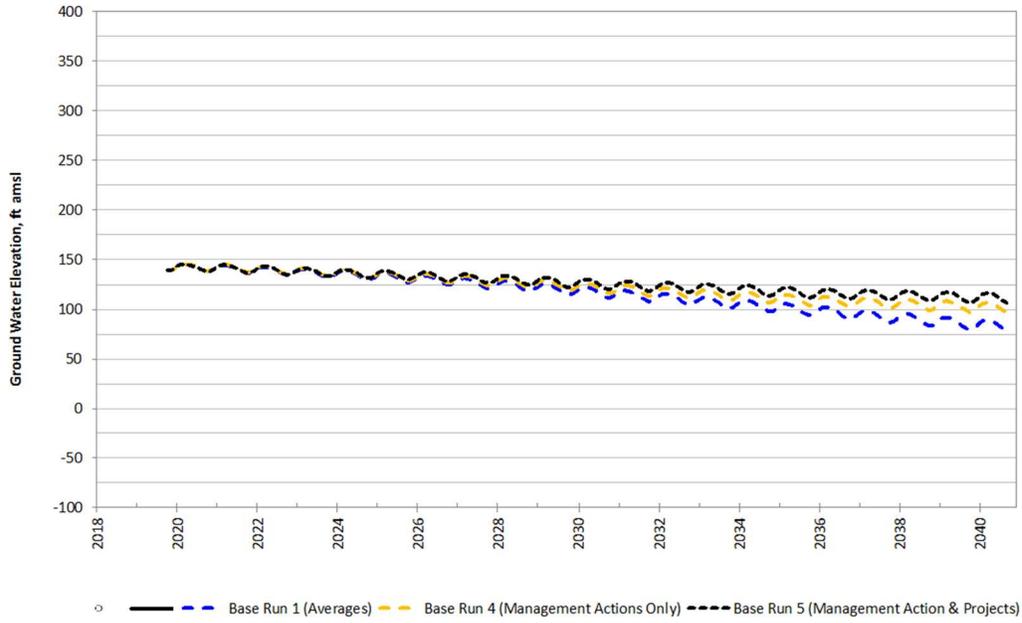
Well KSB-1447
Mid Kaweah GSA
Well ID: 19S22E24B01M
Aquifer System: Upper - Model Layer 1
Total Depth (ft): 160



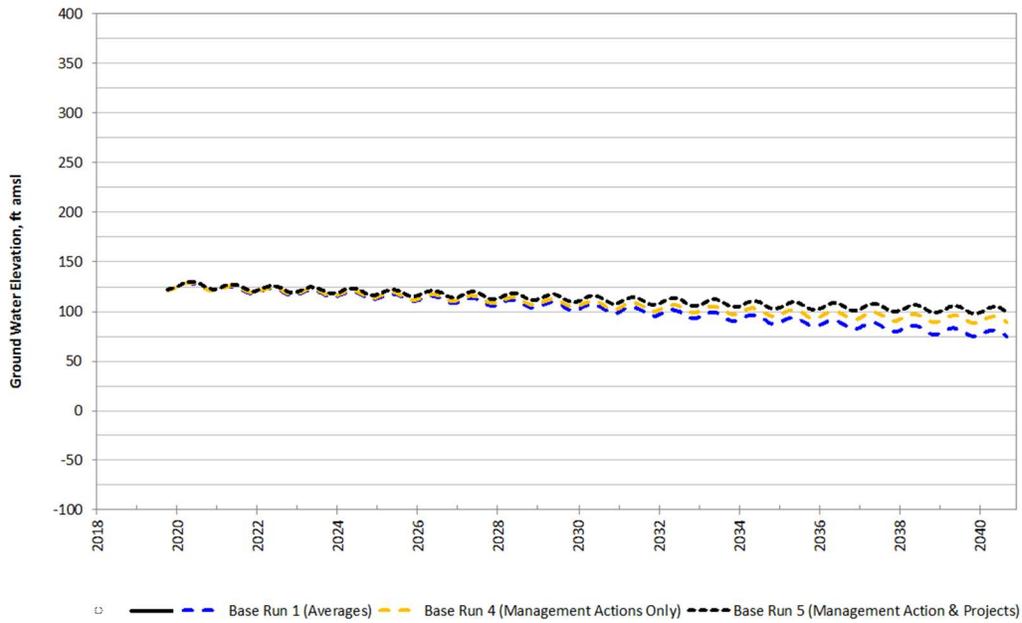
Well KSB-1506
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Well ID: CID_024
Aquifer System: Unknown - Model Layer 3



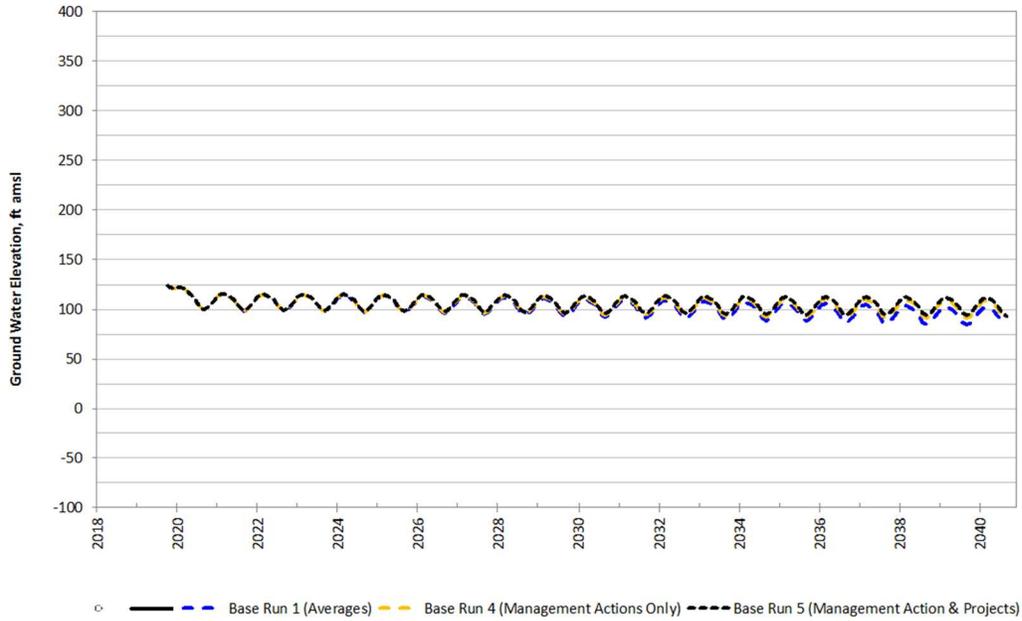
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Mid Kaweah GSA
Well ID: CID_037
Aquifer System: Unknown - Model Layer 3



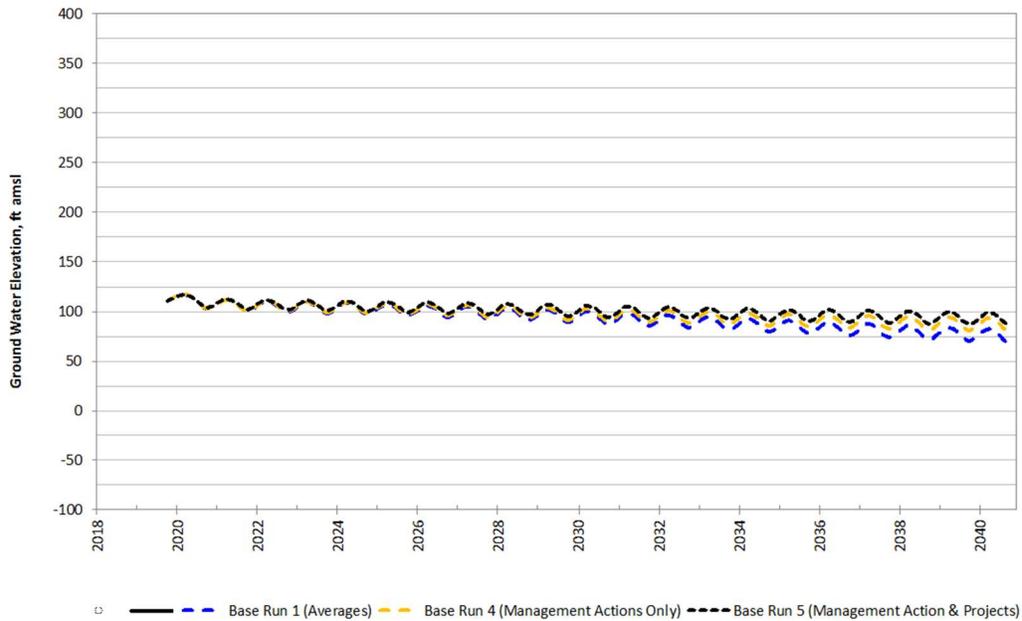
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Mid Kaweah GSA
Well ID: CID_052
Aquifer System: Unknown - Model Layer 3



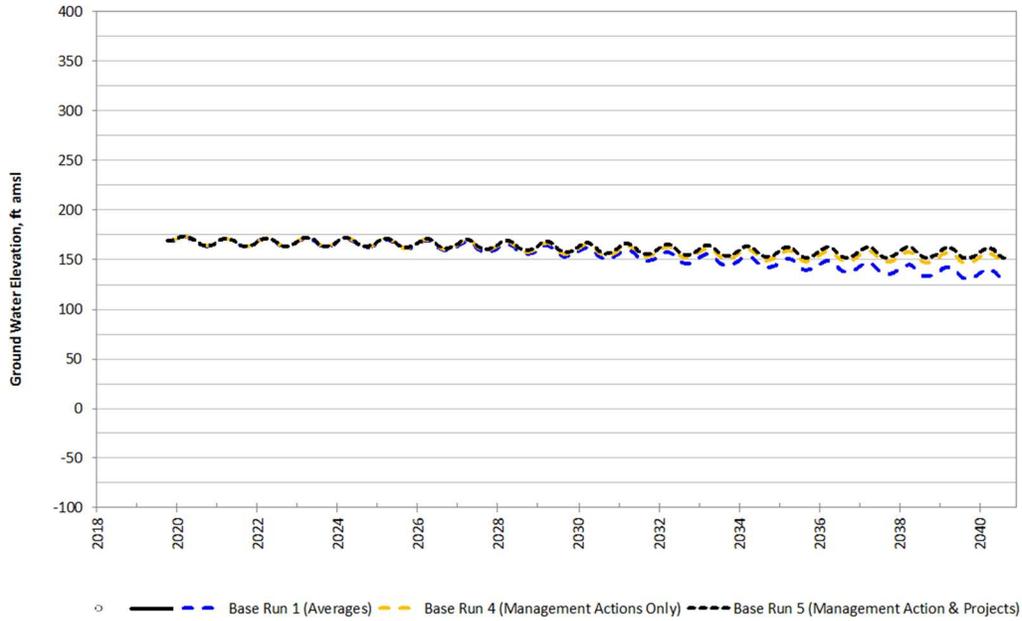
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Greater Kaweah GSA
Well ID: 19S22E27C01M
Aquifer System: Unknown - Model Layer 3



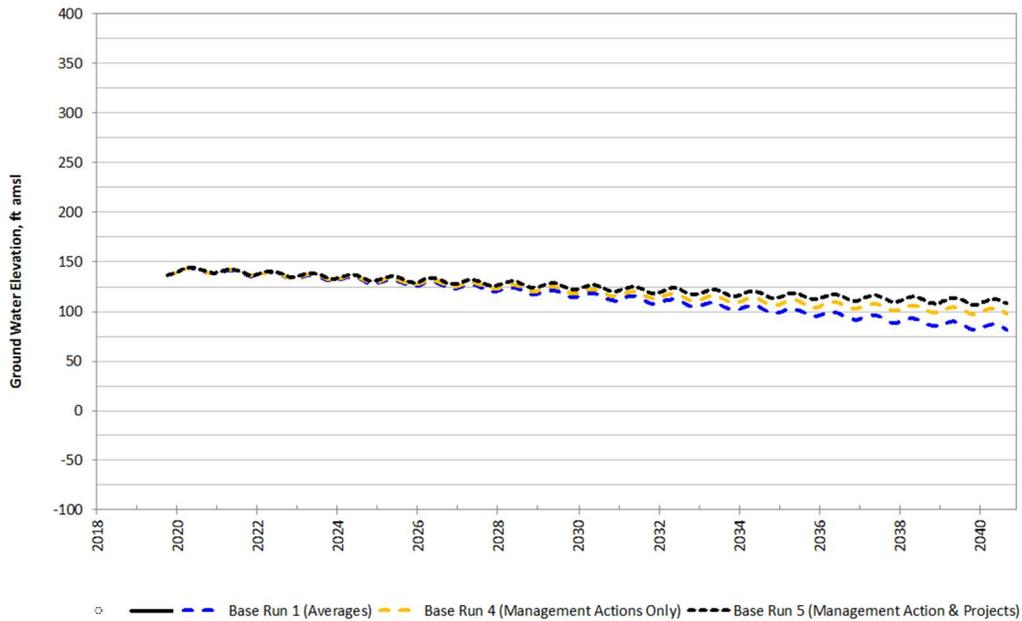
Well KSB-1538
Mid Kaweah GSA
Well ID: 18S22E01C01M
Aquifer System: Unknown - Model Layer 1



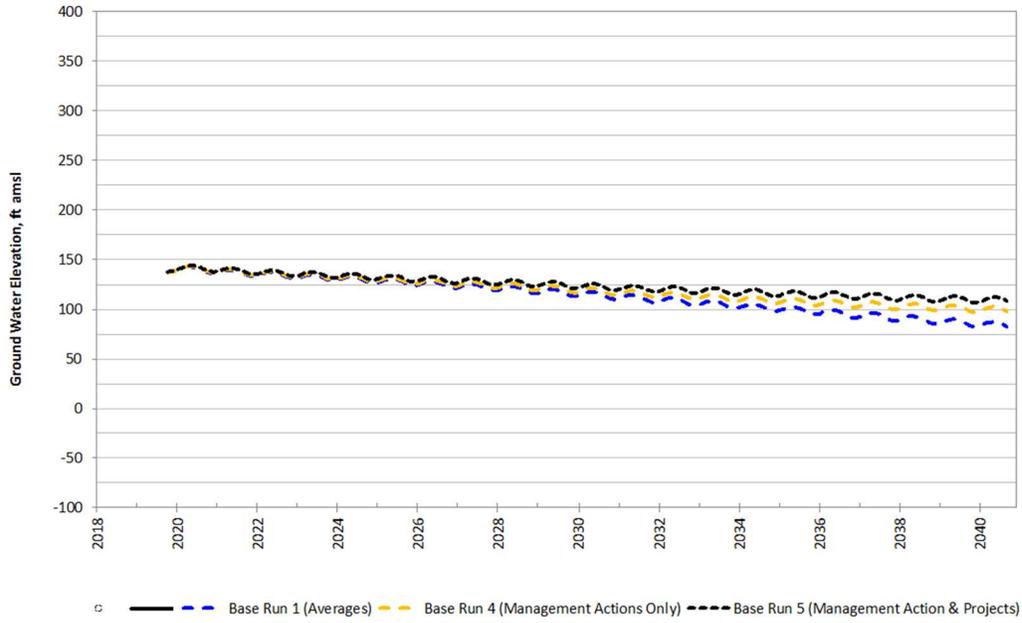
Well KSB-1580
Greater Kaweah GSA
Well ID: 19S22E34L01M
Aquifer System: Unknown - Model Layer 3



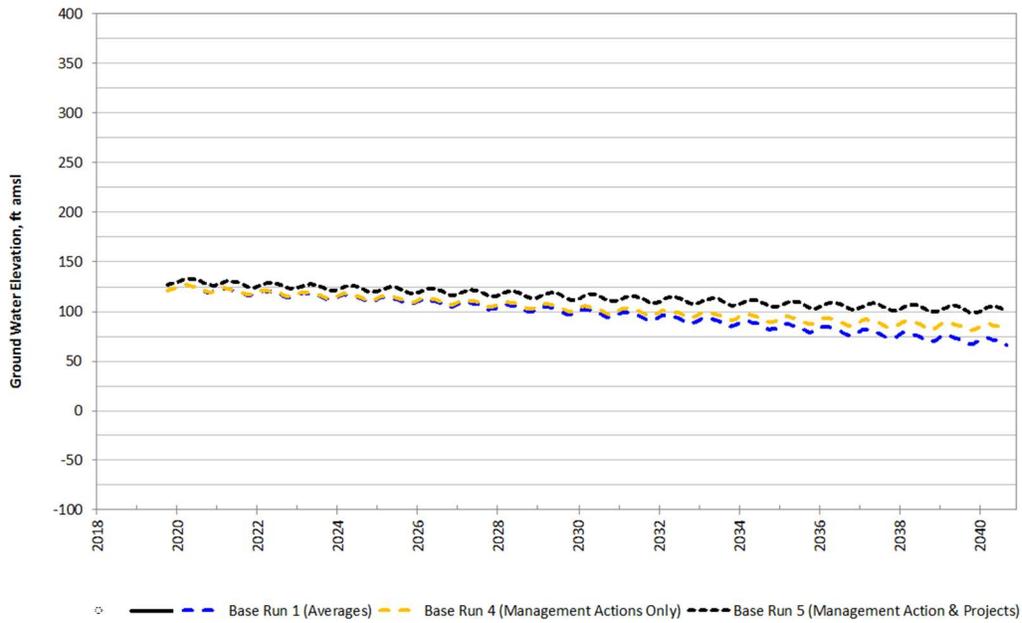
Well KSB-1585
Greater Kaweah GSA
Well ID: 20S22E03G01M
Aquifer System: Unknown - Model Layer 3



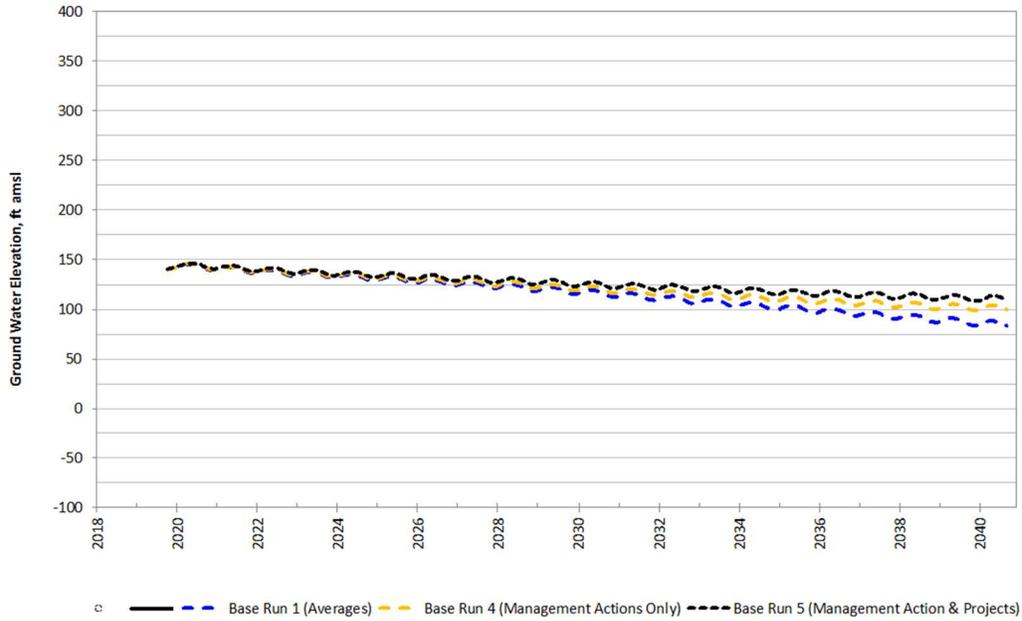
Well KSB-1613
Mid Kaweah GSA
Well ID: 20S22E01Q01M
Aquifer System: Unknown - Model Layer 3



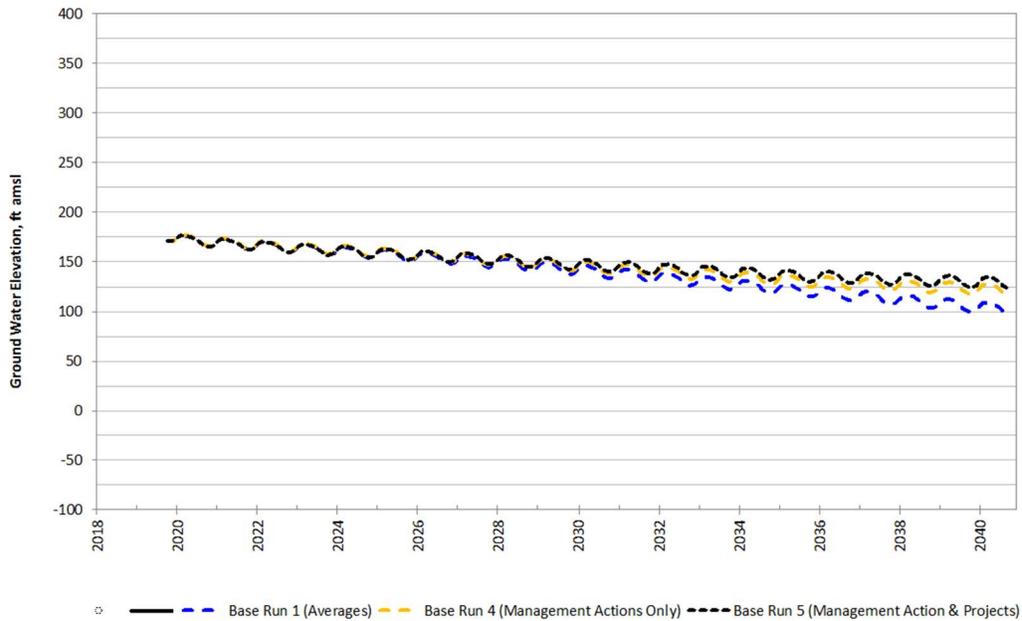
Well KSB-1628
Mid Kaweah GSA
Well ID: CID_078
Aquifer System: Unknown - Model Layer 3



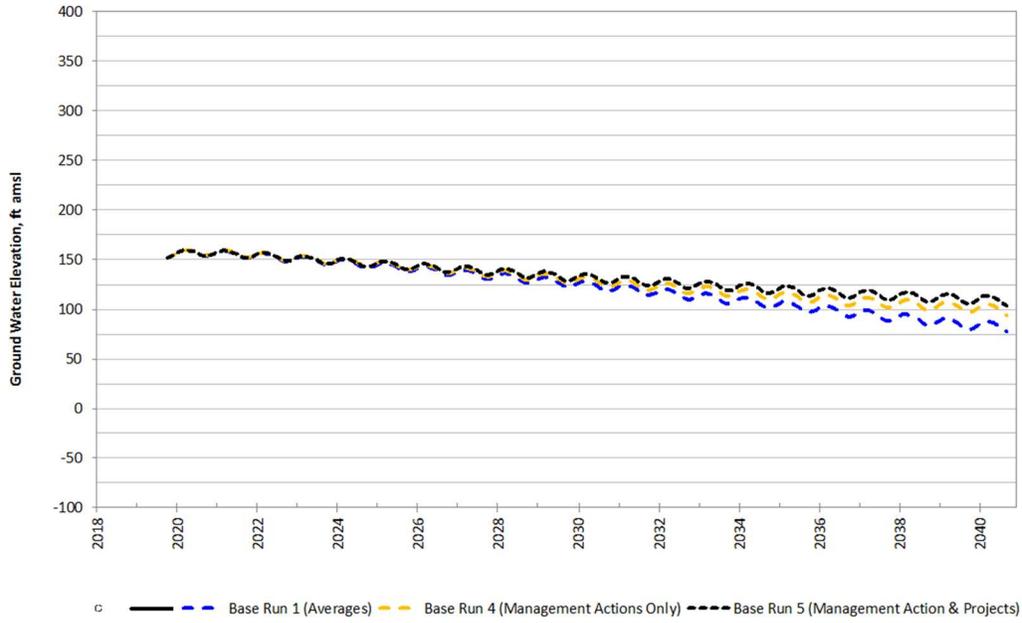
Well KSB-1634
Mid Kaweah GSA
Well ID: CID_079
Aquifer System: Unknown - Model Layer 3



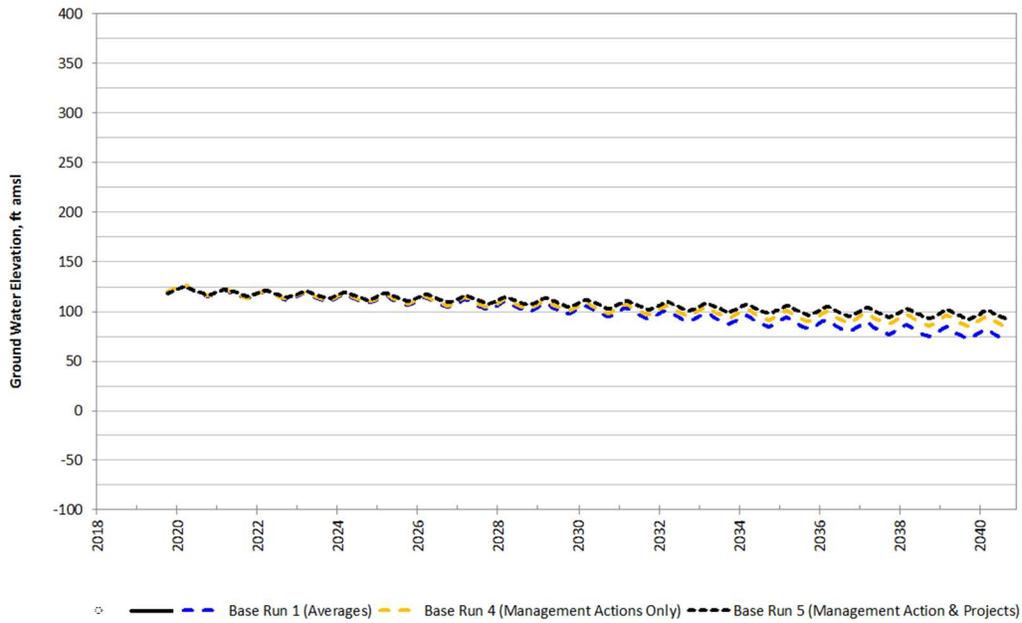
Well KSB-1689
Mid Kaweah GSA
Well ID: CID_080
Aquifer System: Unknown - Model Layer 3



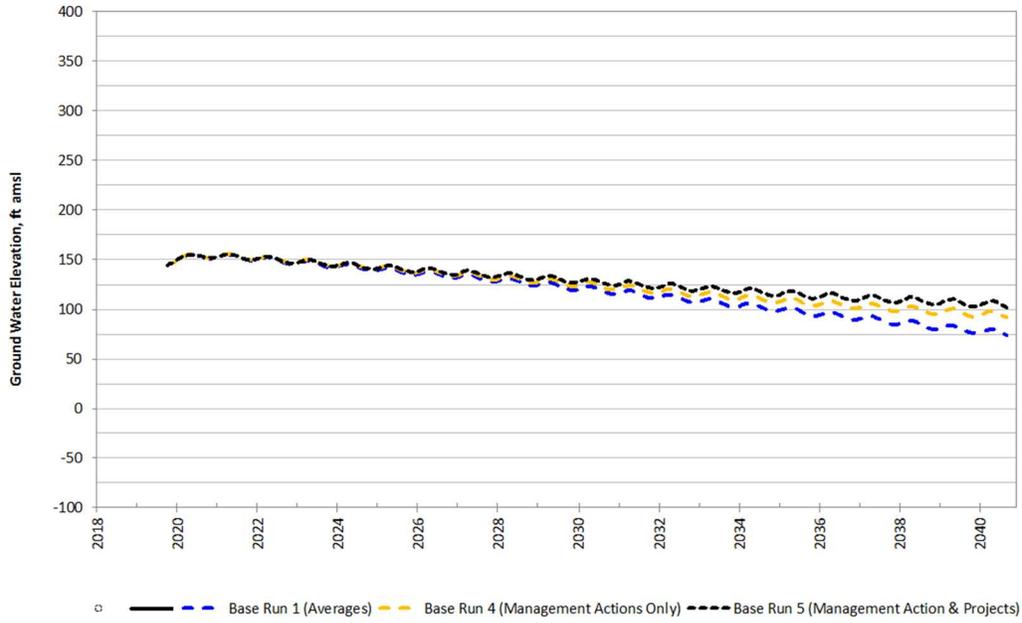
Well KSB-1690
Mid Kaweah GSA
Well ID: CID_081
Aquifer System: Unknown - Model Layer 3



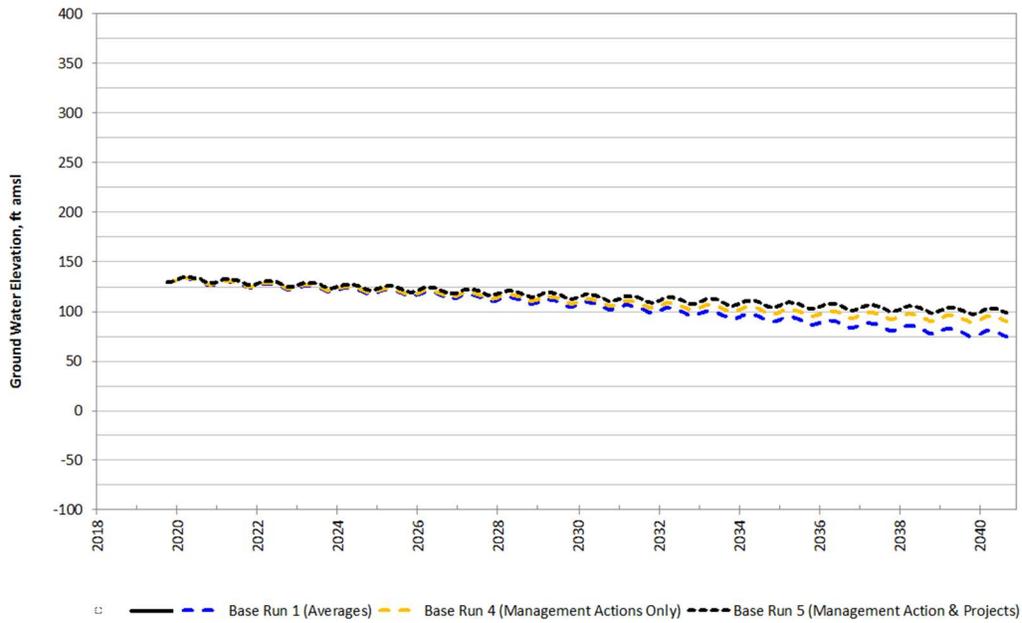
Well KSB-1695
Mid Kaweah GSA
Well ID: CID_085
Aquifer System: Unknown - Model Layer 3



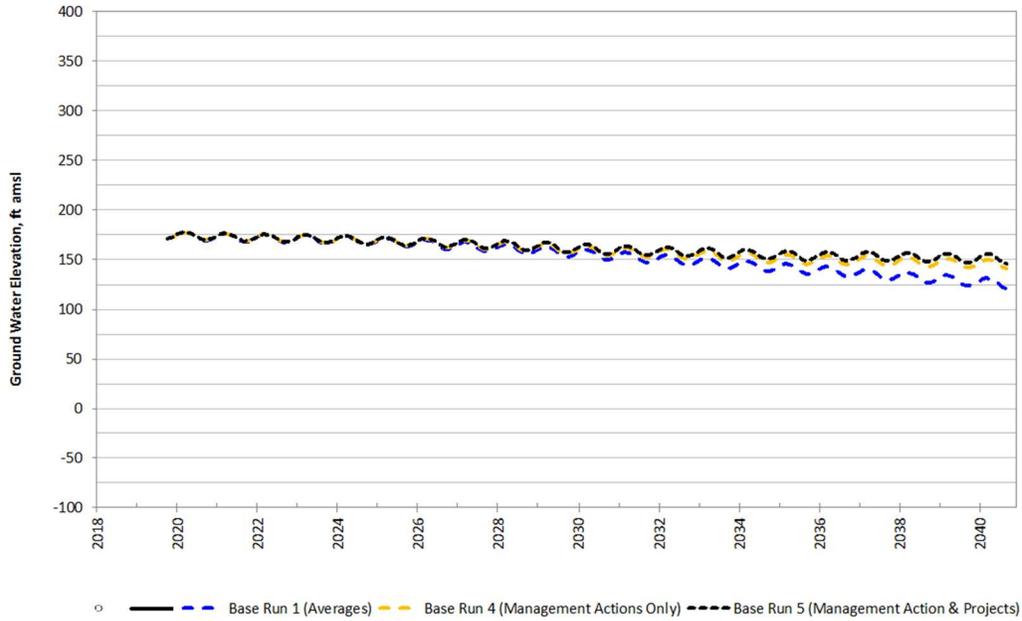
Well KSB-1696
Mid Kaweah GSA
Well ID: 21S23E18N02M
Aquifer System: Unknown - Model Layer 3



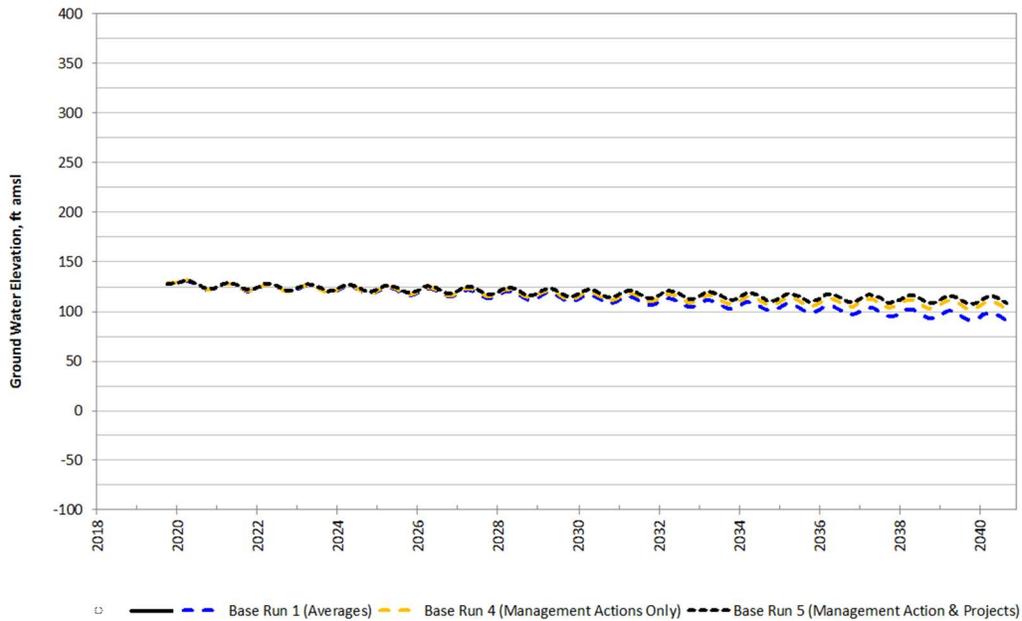
Well KSB-1770
Mid Kaweah GSA
Well ID: 21S23E18N01M
Aquifer System: Unknown - Model Layer 1



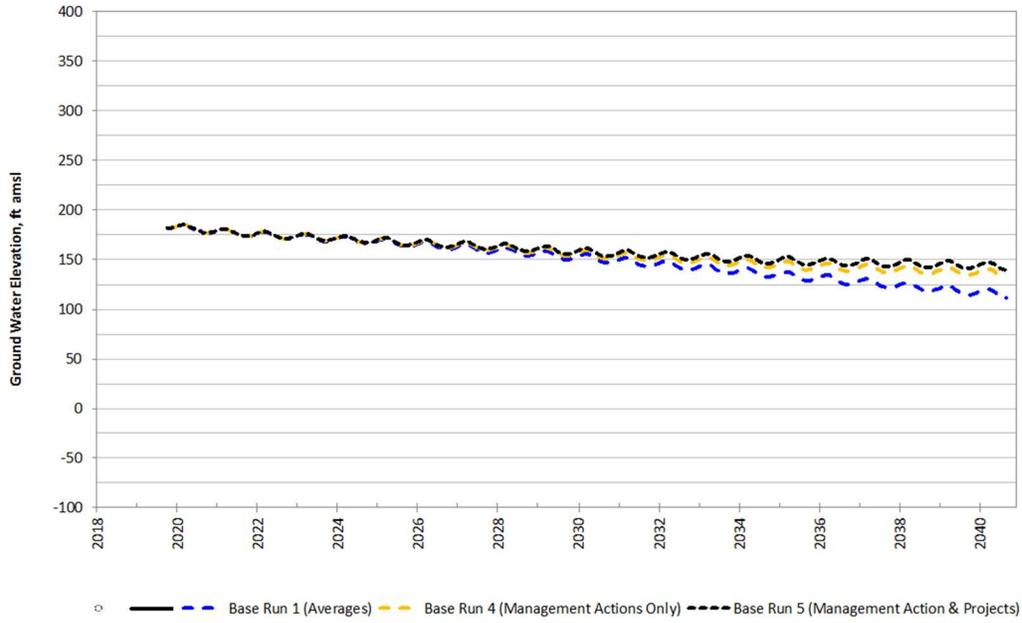
Well KSB-1775
Greater Kaweah GSA
Well ID: 20S22E03K01M
Aquifer System: Unknown - Model Layer 3



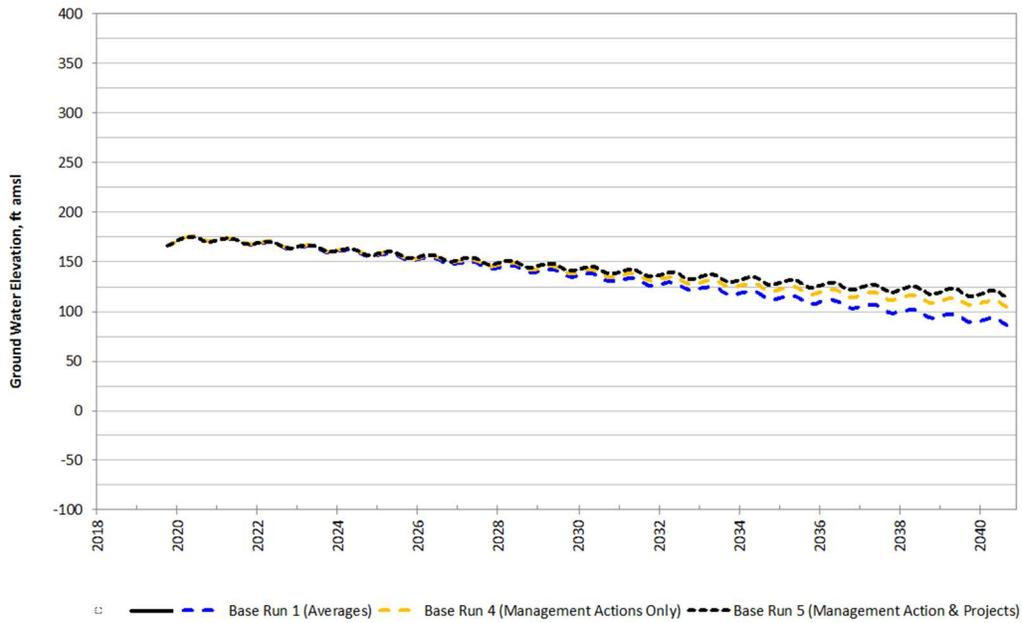
Well KSB-1783
Greater Kaweah GSA
Well ID: 20S22E03B01M
Aquifer System: Unknown - Model Layer 3



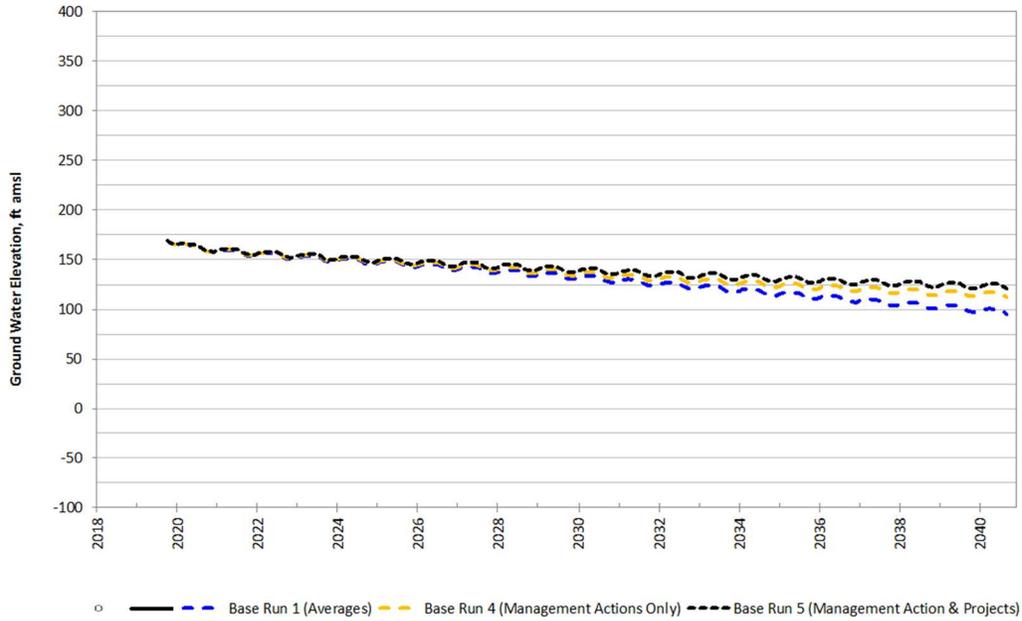
Well KSB-1809
Greater Kaweah GSA
Well ID: 19S22E27A01M
Aquifer System: Unknown - Model Layer 3



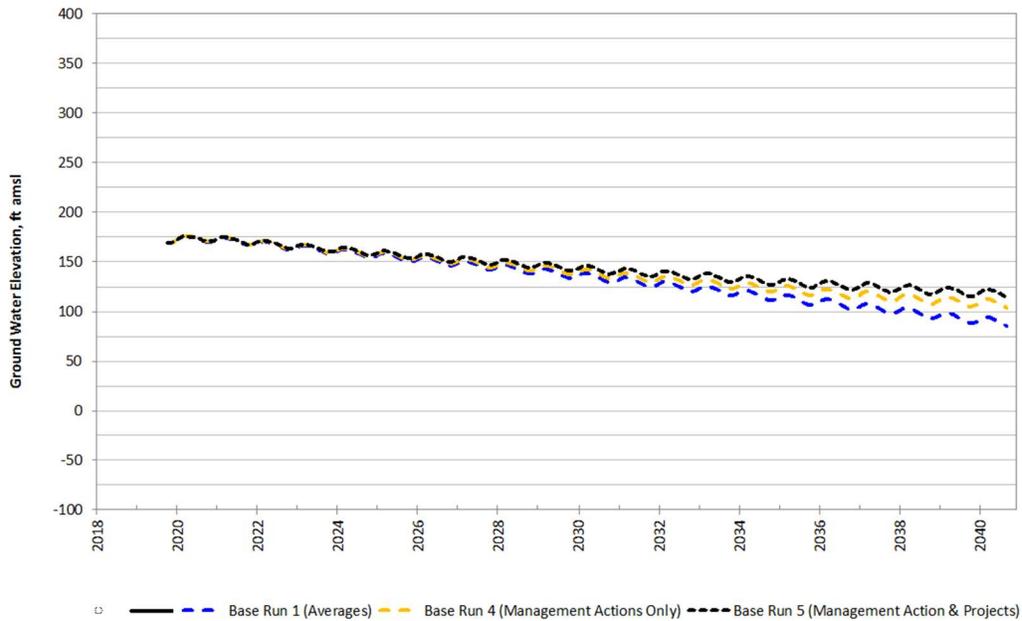
Well KSB-1819
Mid Kaweah GSA
Well ID: 20S22E01H01M
Aquifer System: Unknown - Model Layer 3



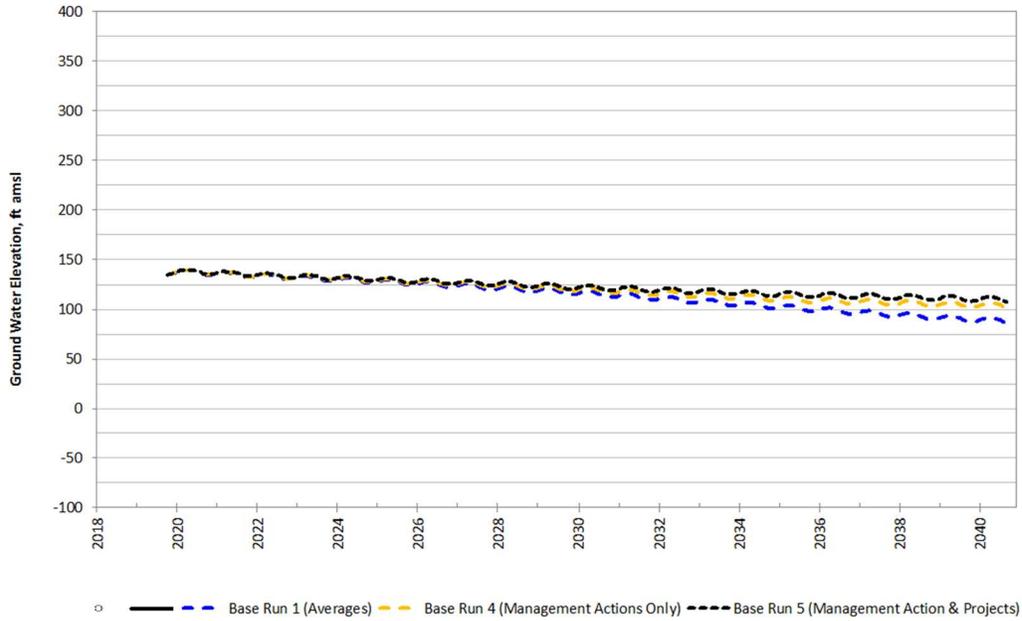
Well KSB-1830
 Mid Kaweah GSA
 Well ID: CID_017
 Aquifer System: Unknown - Model Layer 3



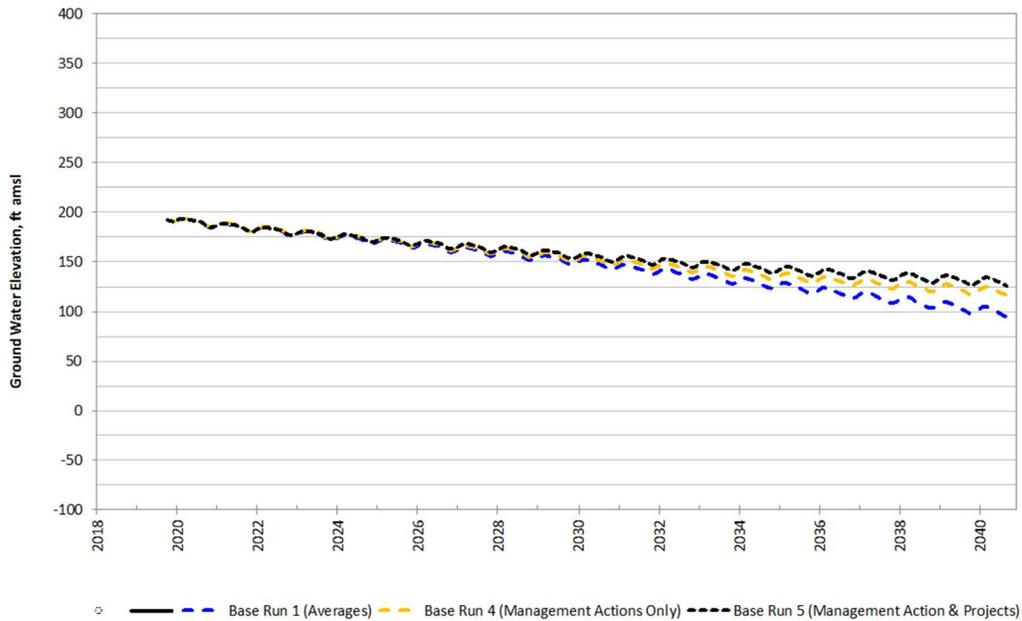
Well KSB-1862
 Mid Kaweah GSA
 Well ID: 20S22E24R01M
 Aquifer System: Upper - Model Layer 3
 Top of Screen Depth (ft): 204; Bottom of Screen Depth(ft): 31.347479; Total Depth (ft): 332



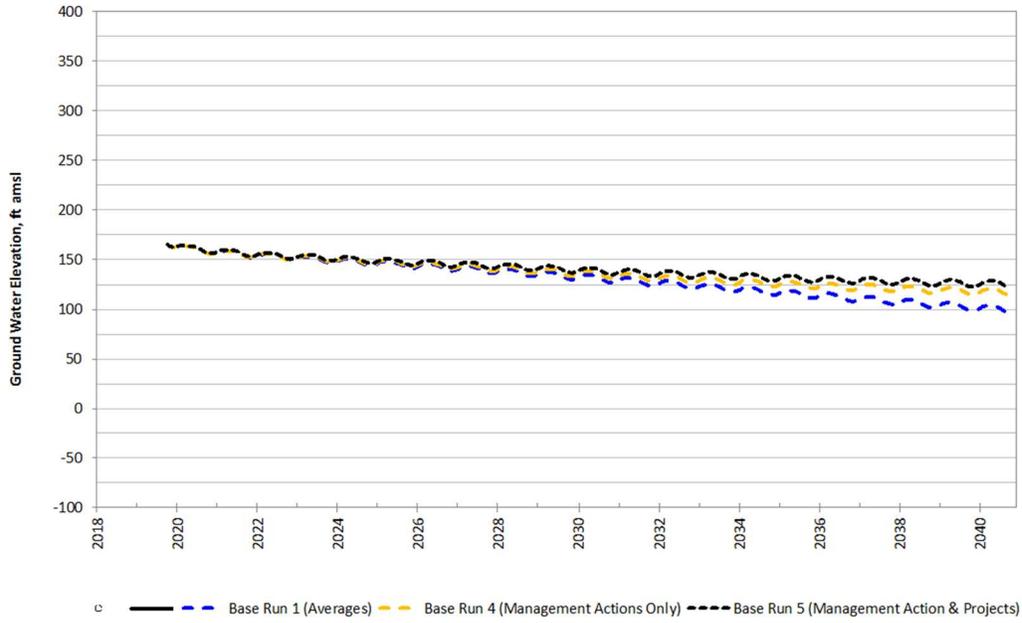
Well KSB-1873
 Greater Kaweah GSA
 Well ID: CID_033
 Aquifer System: Unknown - Model Layer 3



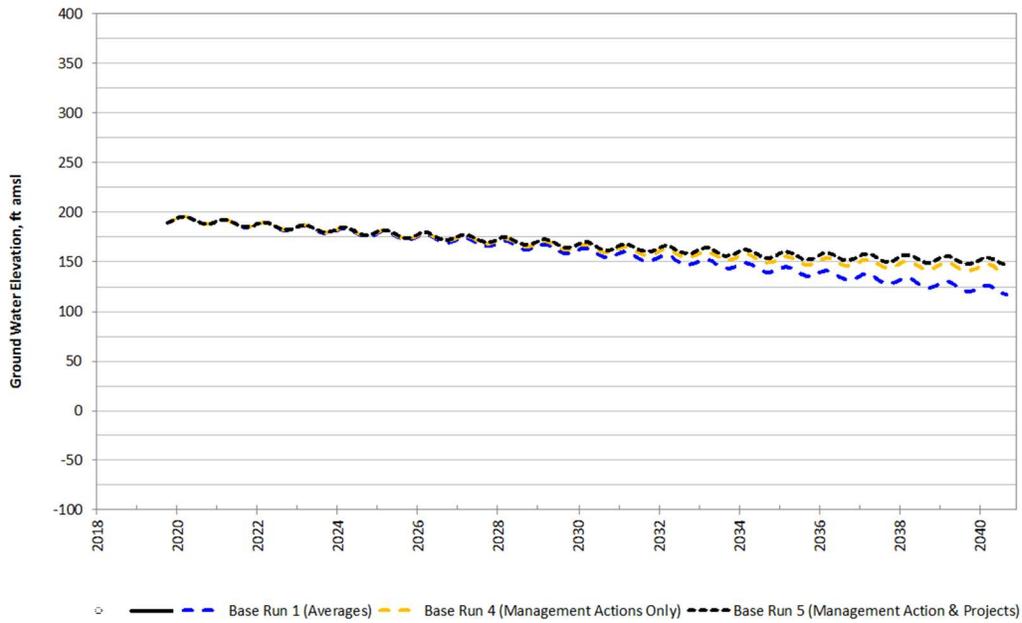
Well KSB-1884
 Mid Kaweah GSA
 Well ID: 20S22E36A01M
 Aquifer System: Upper - Model Layer 3
 Top of Screen Depth (ft): 206; Bottom of Screen Depth(ft): 68.51899; Total Depth (ft): 210



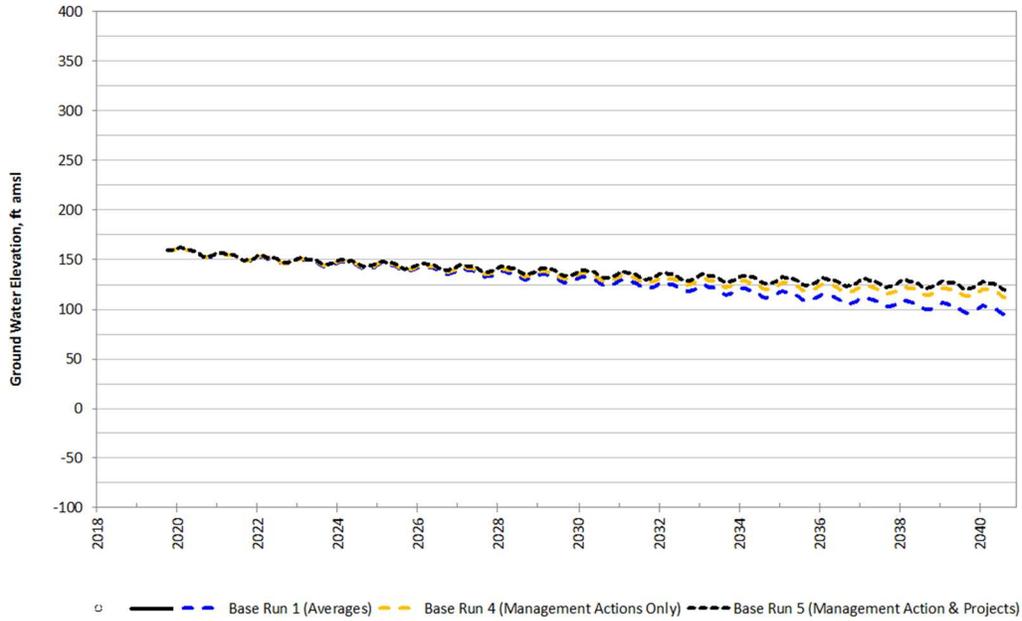
Well KSB-1903
Mid Kaweah GSA
Well ID: 20S22E36H01M
Aquifer System: Unknown - Model Layer 3



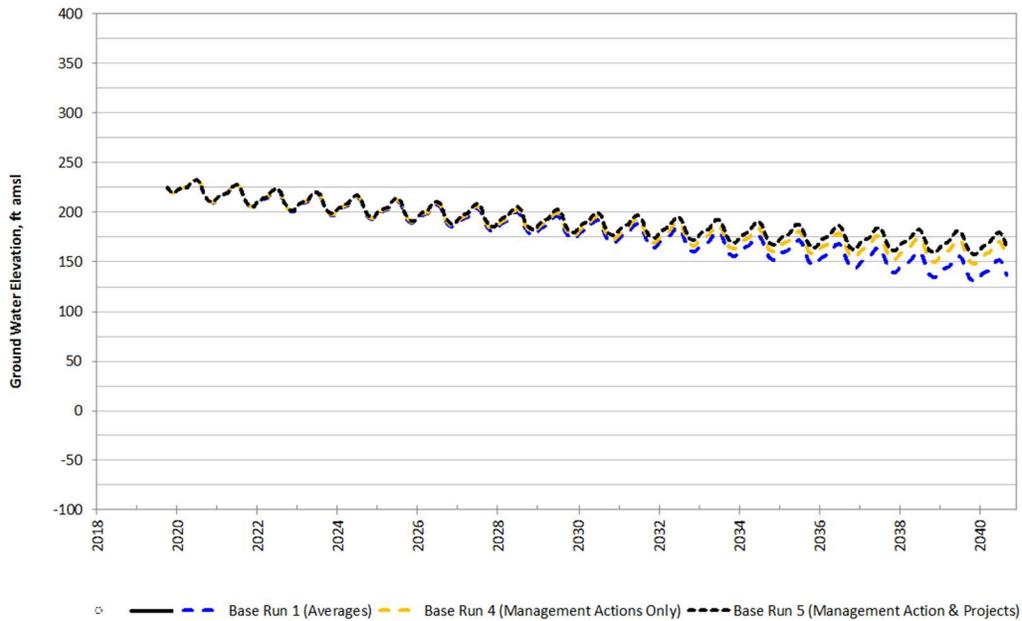
Well KSB-1936
Greater Kaweah GSA
Well ID: CID_084
Aquifer System: Unknown - Model Layer 3



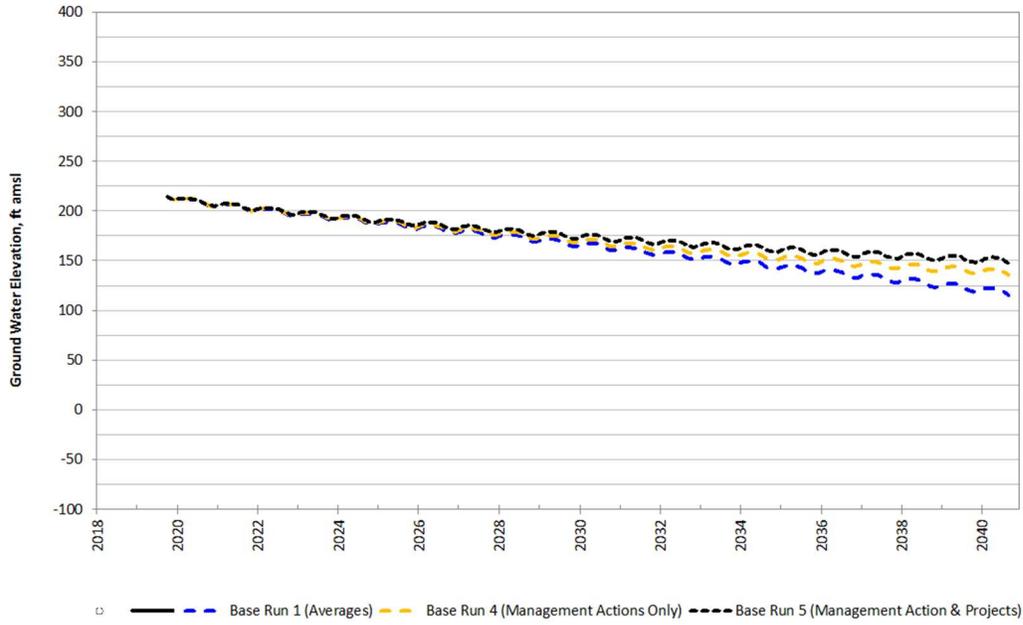
Well KSB-1937
Greater Kaweah GSA
Well ID: 19S22E22A01M
Aquifer System: Unknown - Model Layer 1



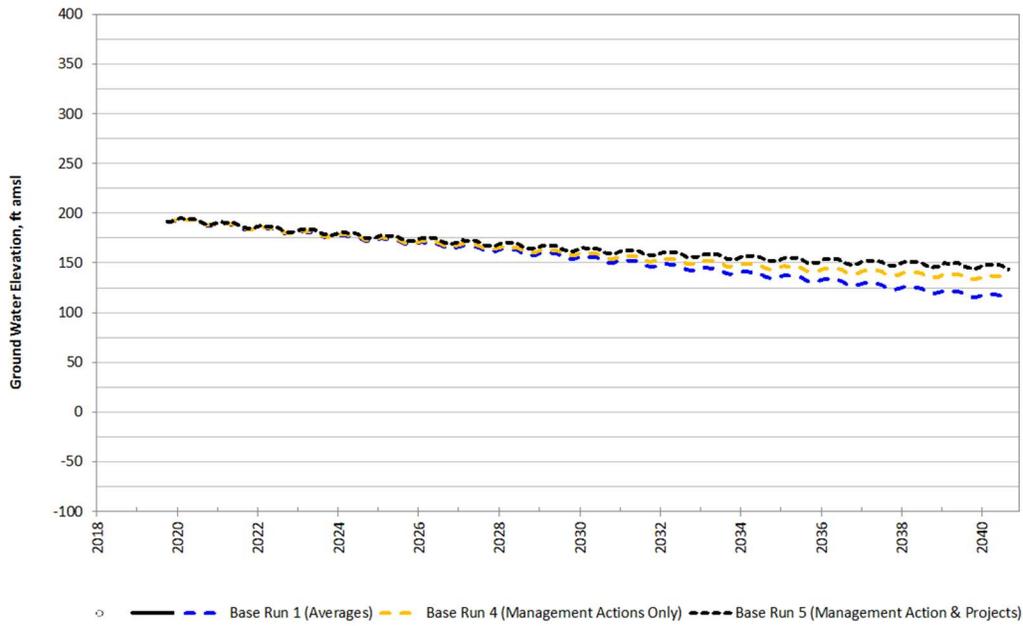
Well KSB-1977
Mid Kaweah GSA
Well ID: 20S22E25R01M
Aquifer System: Unknown - Model Layer 3



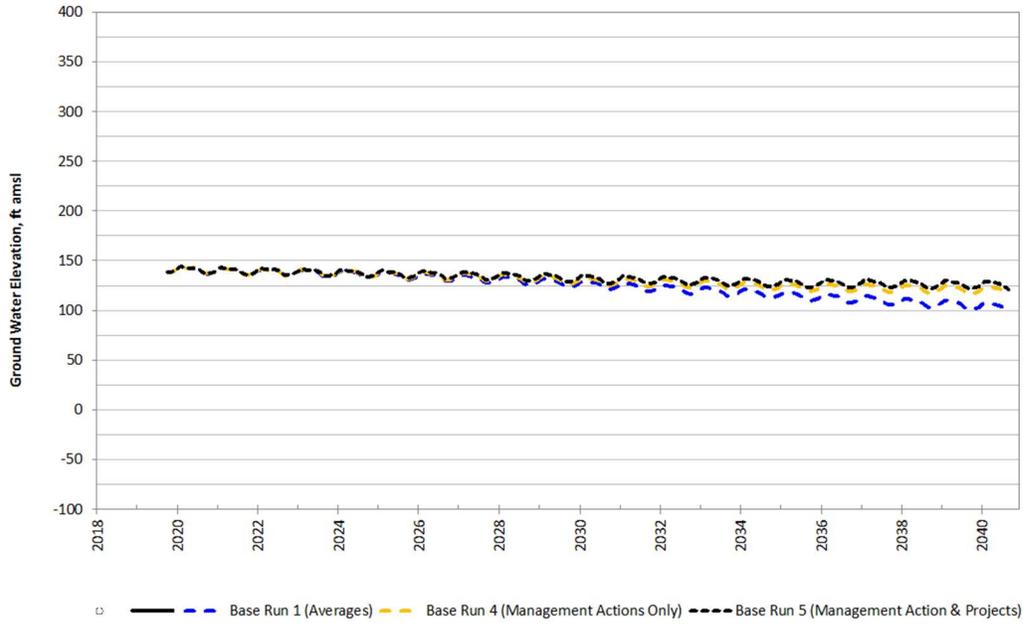
Well KSB-2014
Mid Kaweah GSA
Well ID: CID_028
Aquifer System: Unknown - Model Layer 3



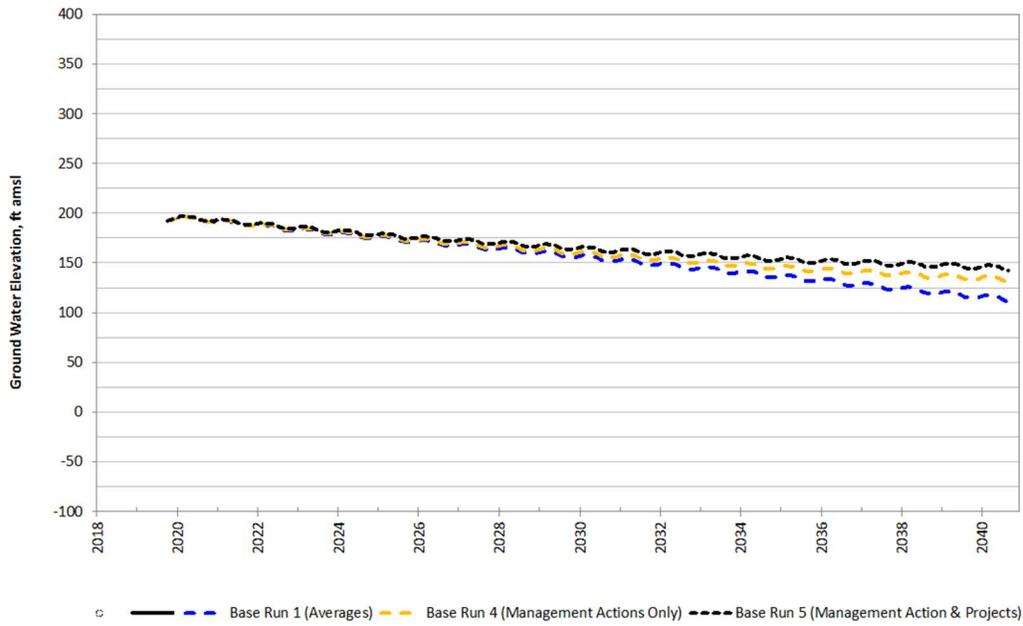
Well KSB-2015
Greater Kaweah GSA
Well ID: CID_023
Aquifer System: Unknown - Model Layer 1



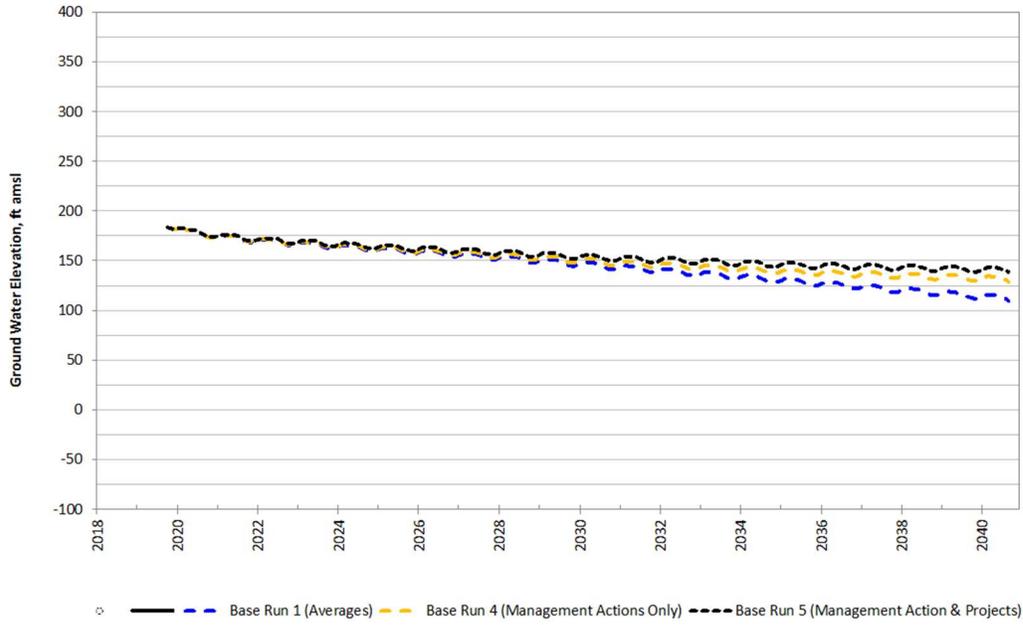
Well KSB-2016
Greater Kaweah GSA
Well ID: CID_082
Aquifer System: Unknown - Model Layer 3



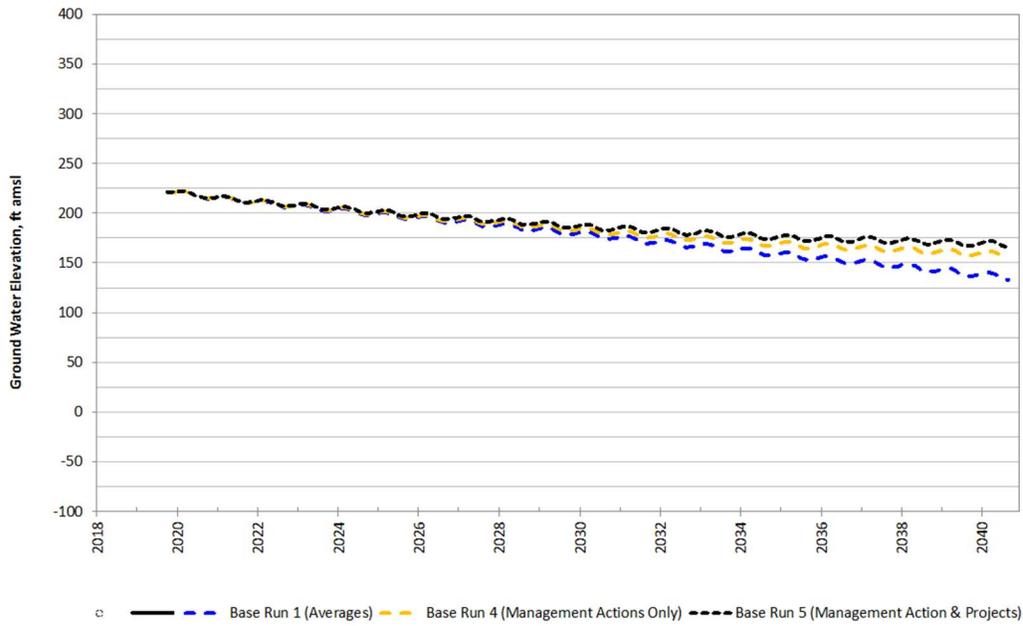
Well KSB-2017
Greater Kaweah GSA
Well ID: 20S22E10J01M
Aquifer System: Unknown - Model Layer 3



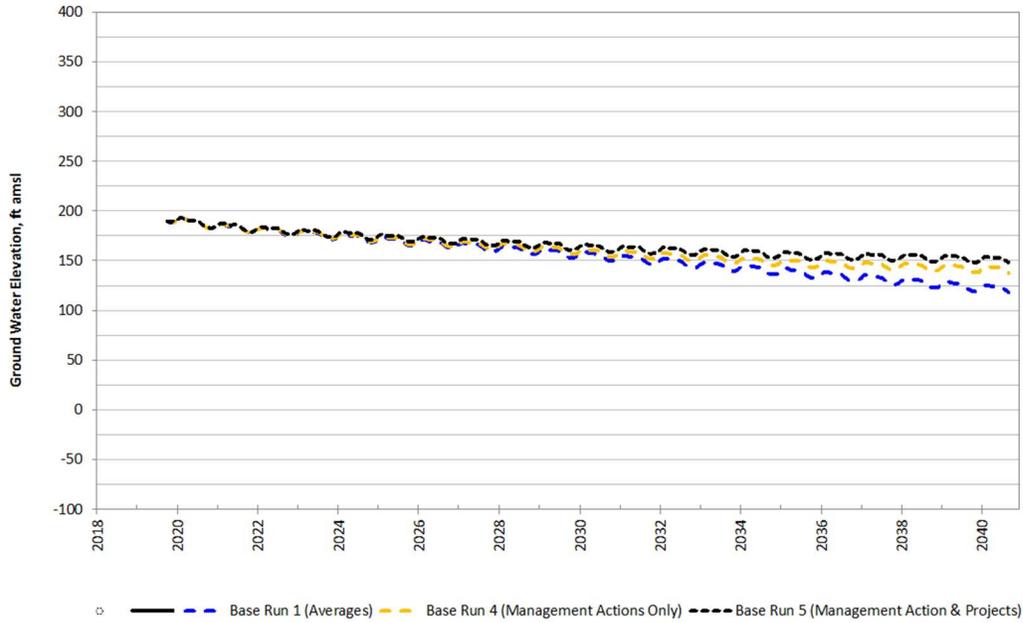
Well KSB-2021
Greater Kaweah GSA
Well ID: 19S22E10R02M
Aquifer System: Unknown - Model Layer 1



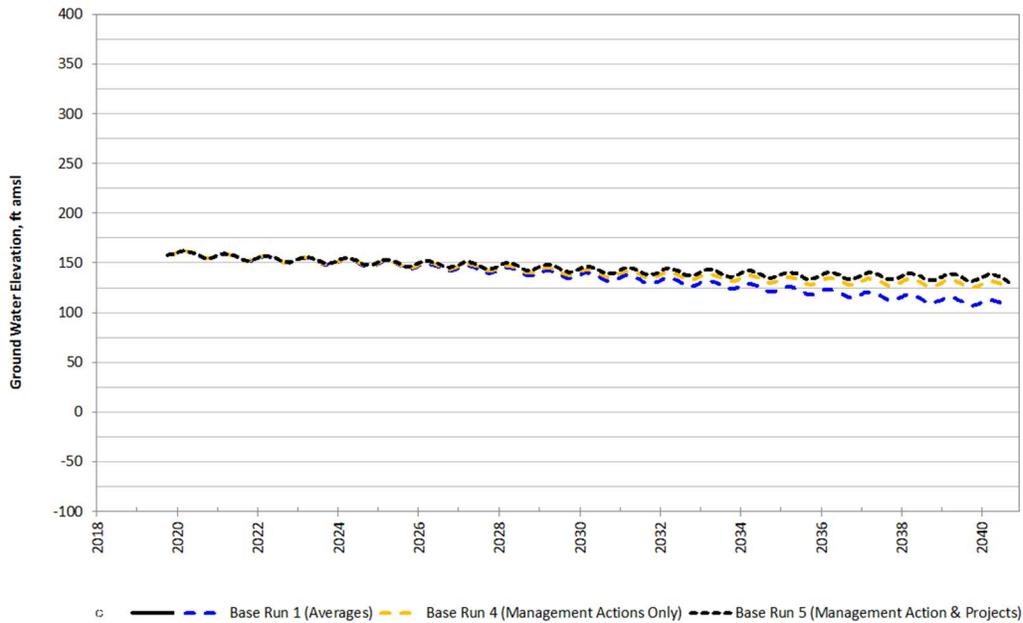
Well KSB-2058
Greater Kaweah GSA
Well ID: 19S22E14N01M
Aquifer System: Unknown - Model Layer 3



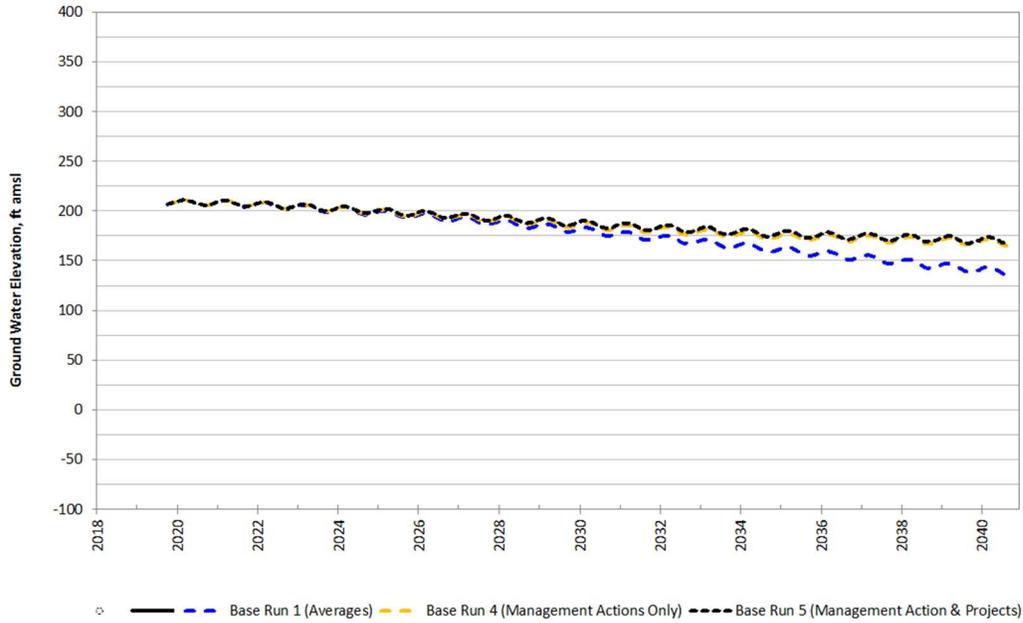
Well KSB-2089
Greater Kaweah GSA
Well ID: CID_042
Aquifer System: Unknown - Model Layer 3



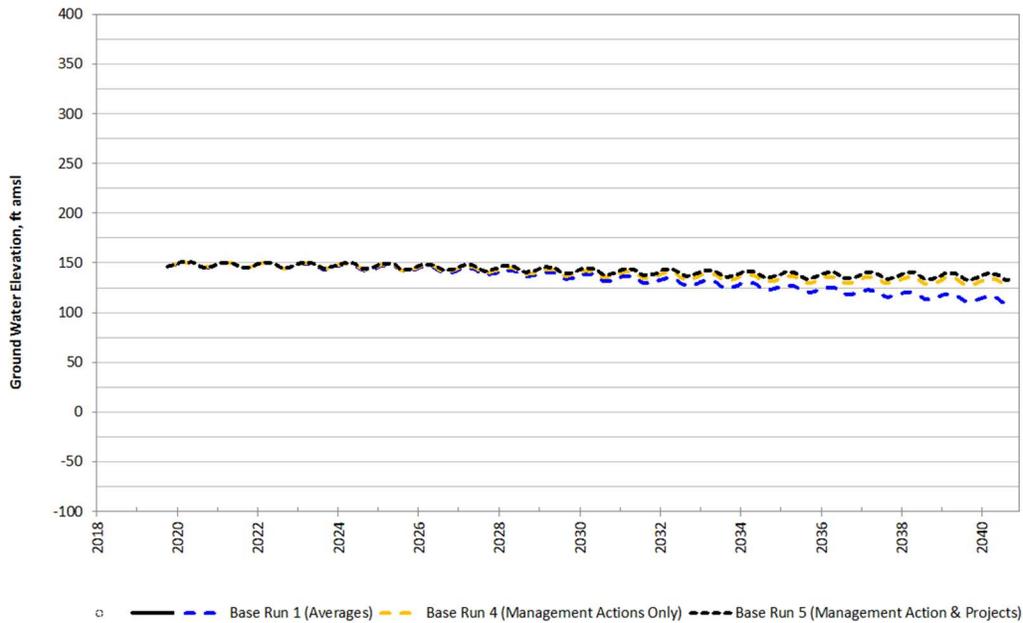
Well KSB-2095
Greater Kaweah GSA
Well ID: 19S22E14M01M
Aquifer System: Unknown - Model Layer 3



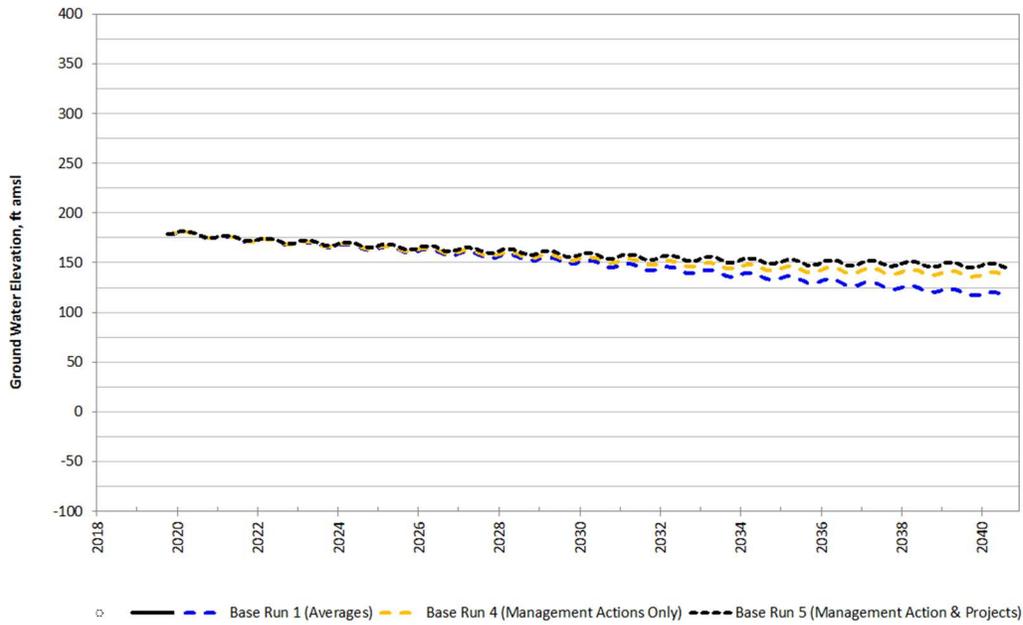
Well KSB-2107
East Kaweah GSA
Well ID: 19S21E15R01M
Aquifer System: Unknown - Model Layer 1



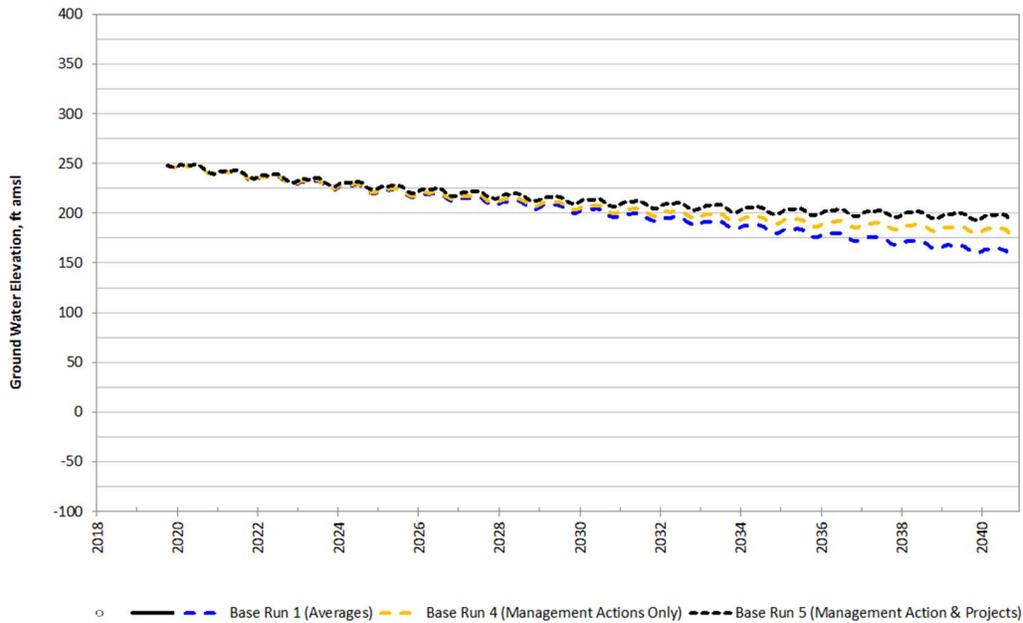
Well KSB-2114
Greater Kaweah GSA
Well ID: CID_025
Aquifer System: Unknown - Model Layer 3



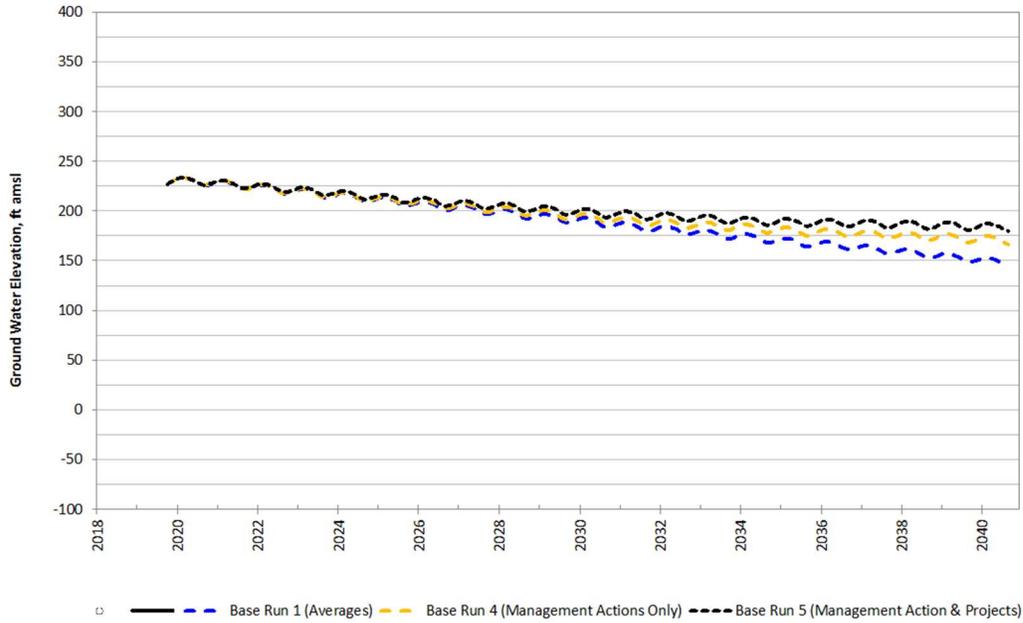
Well KSB-2139
Greater Kaweah GSA
Well ID: 20S22E02C01M
Aquifer System: Unknown - Model Layer 3



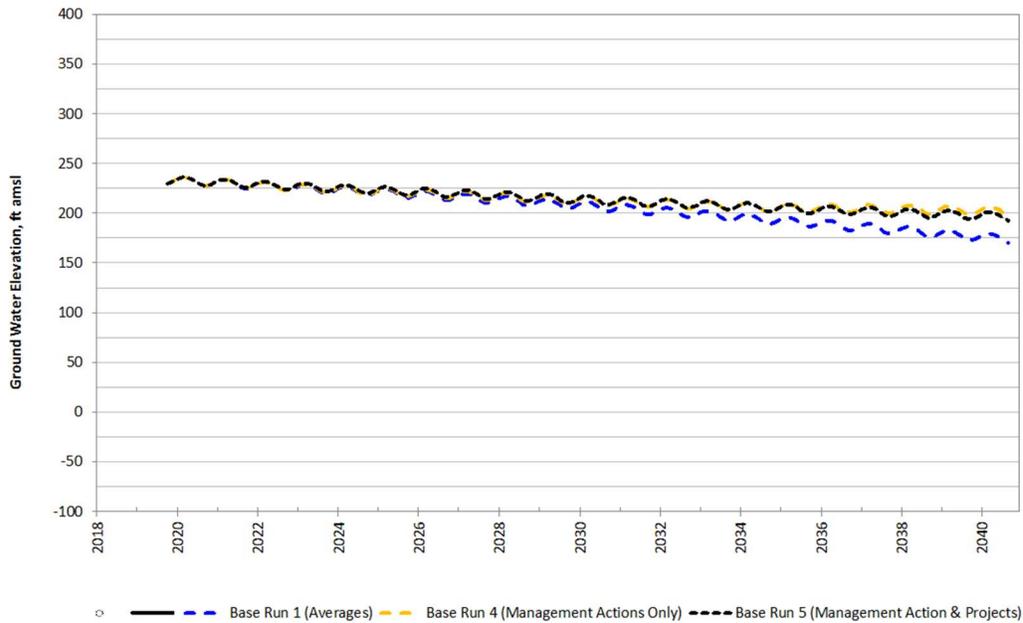
Well KSB-2147
Greater Kaweah GSA
Well ID: 20S22E14C01M
Aquifer System: Lower - Model Layer 3
Top of Screen Depth (ft): 1600; Bottom of Screen Depth (ft): -96.127631;



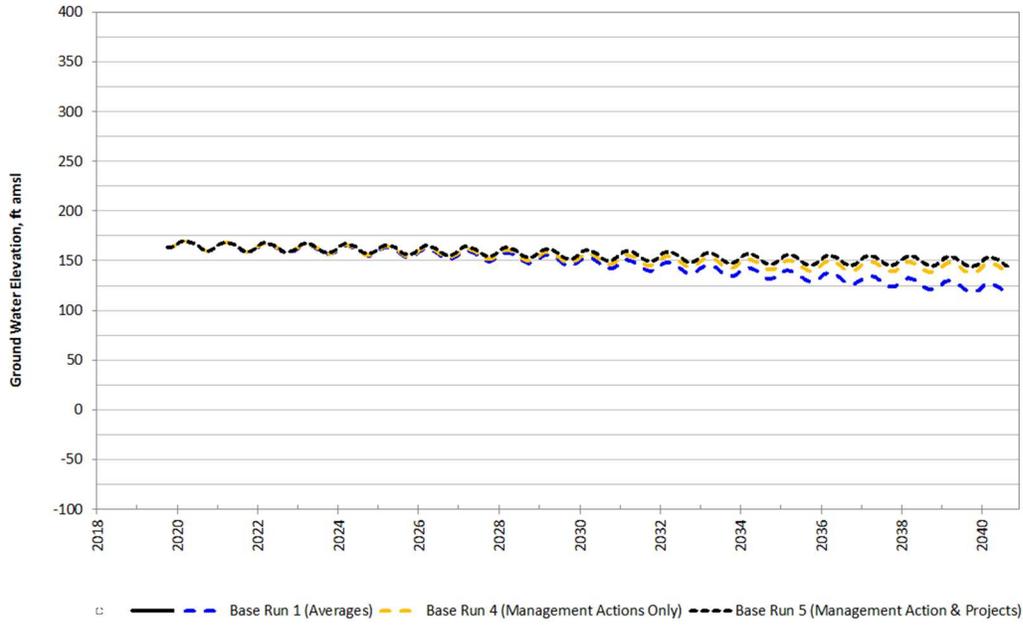
Well KSB-2149
Greater Kaweah GSA
Well ID: CID_046
Aquifer System: Unknown - Model Layer 3



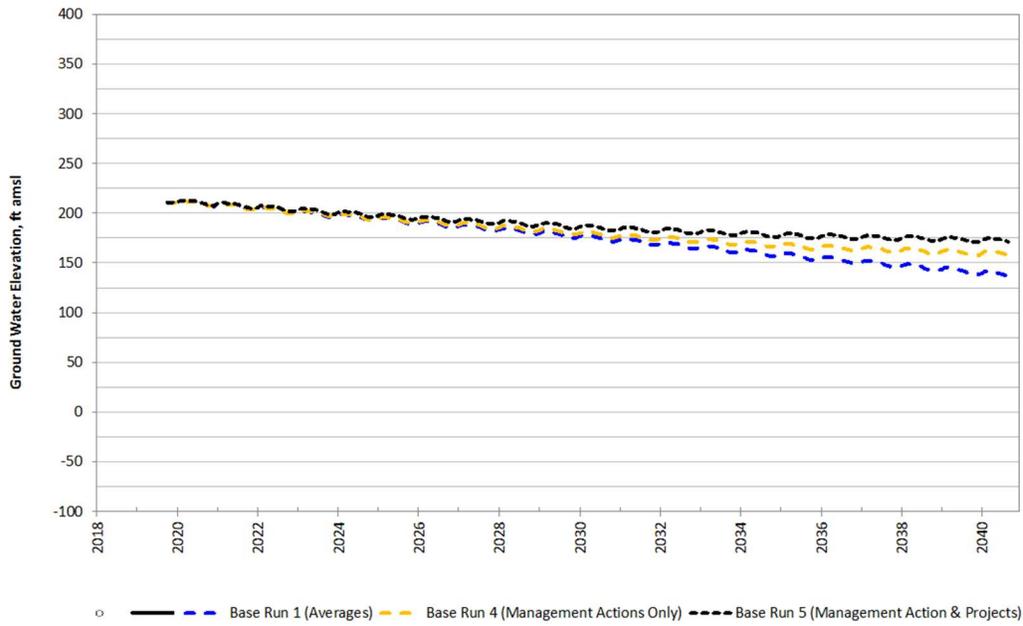
Well KSB-2175
East Kaweah GSA
Well ID: 19S21E35D01M
Aquifer System: Unknown - Model Layer 1



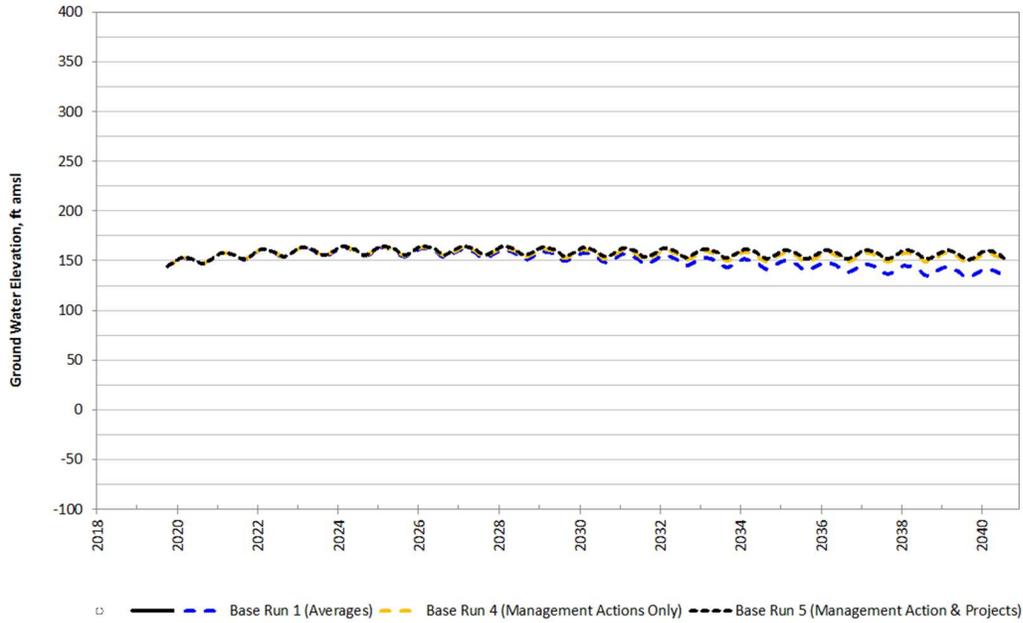
Well KSB-2197
Greater Kaweah GSA
Well ID: 19S22E02K01M
Aquifer System: Unknown - Model Layer 1



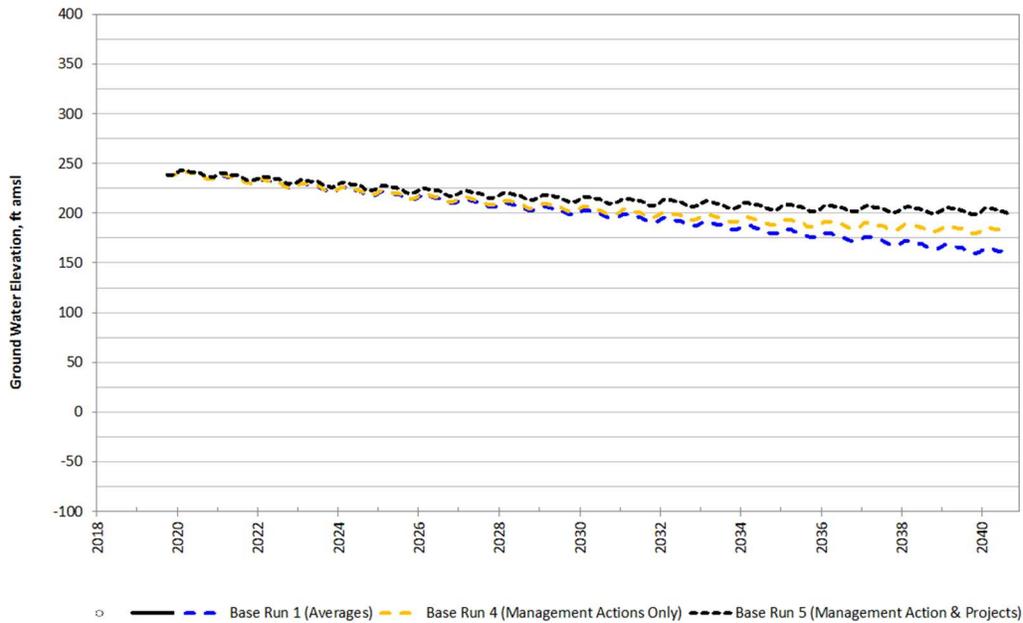
Well KSB-2200
Greater Kaweah GSA
Well ID: CID_040
Aquifer System: Unknown - Model Layer 3



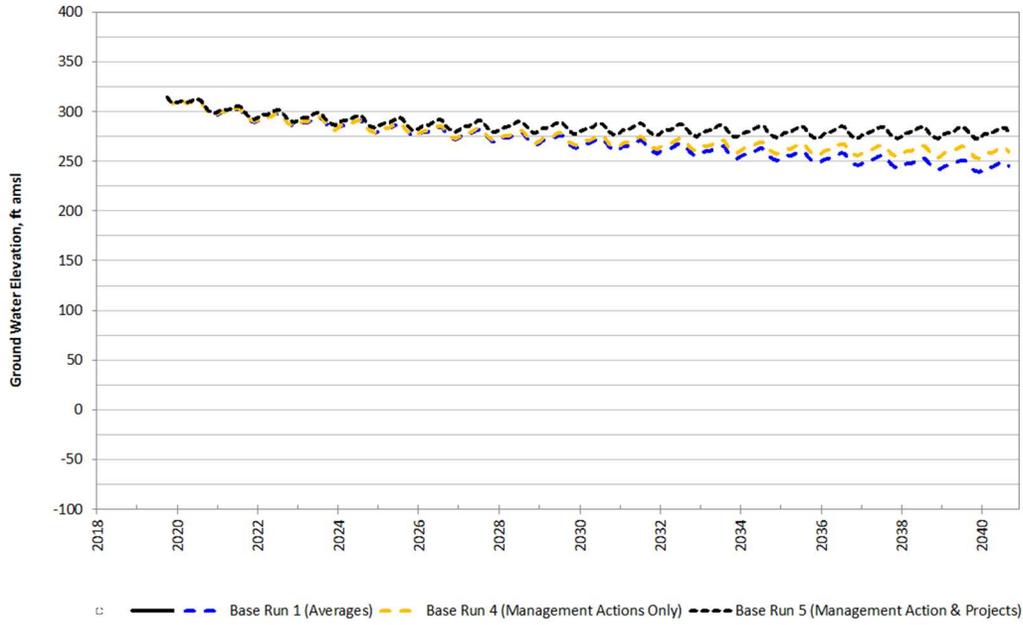
Well KSB-2203
Greater Kaweah GSA
Well ID: 18S22E24D01M
Aquifer System: Upper - Model Layer 1
Top of Screen Depth (ft): 340; Bottom of Screen Depth(ft): 19.156423;



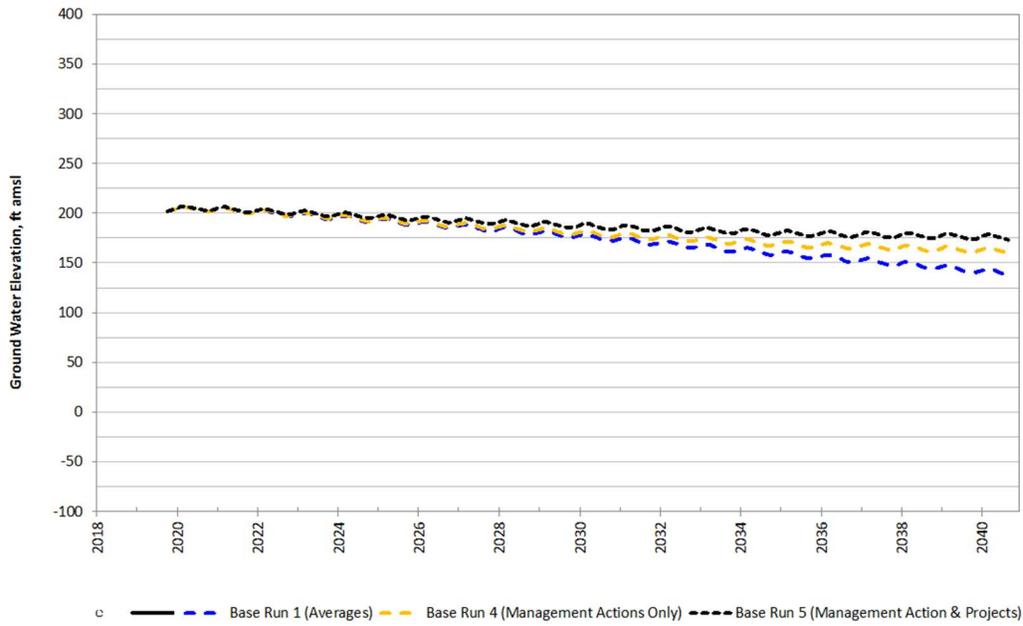
Well KSB-2291
Greater Kaweah GSA
Well ID: 19S22E23A01M
Aquifer System: Unknown - Model Layer 3



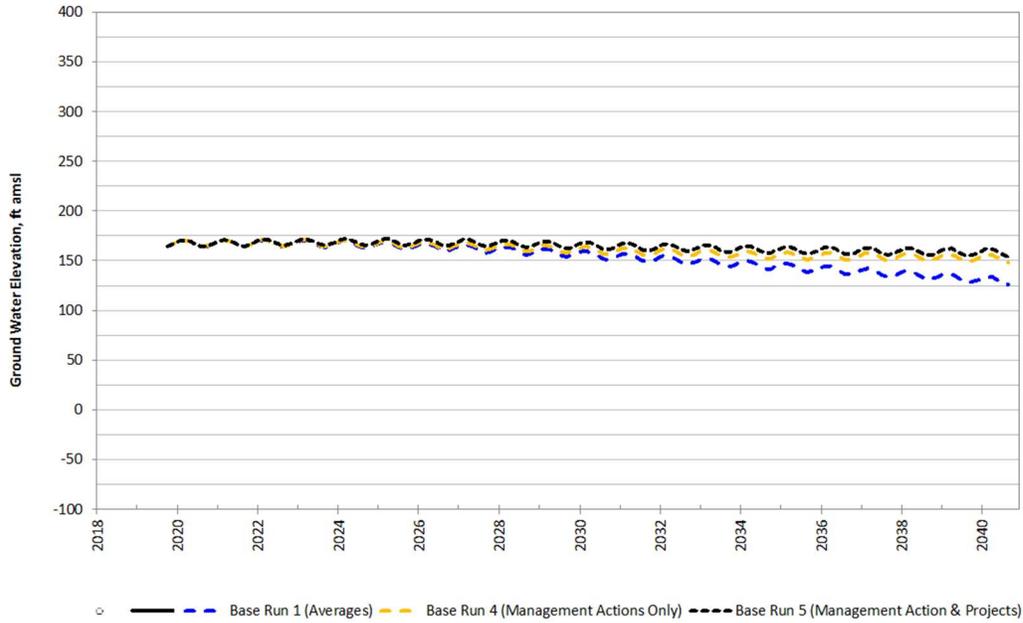
Well KSB-2297
Greater Kaweah GSA
Well ID: CID_065
Aquifer System: Unknown - Model Layer 3



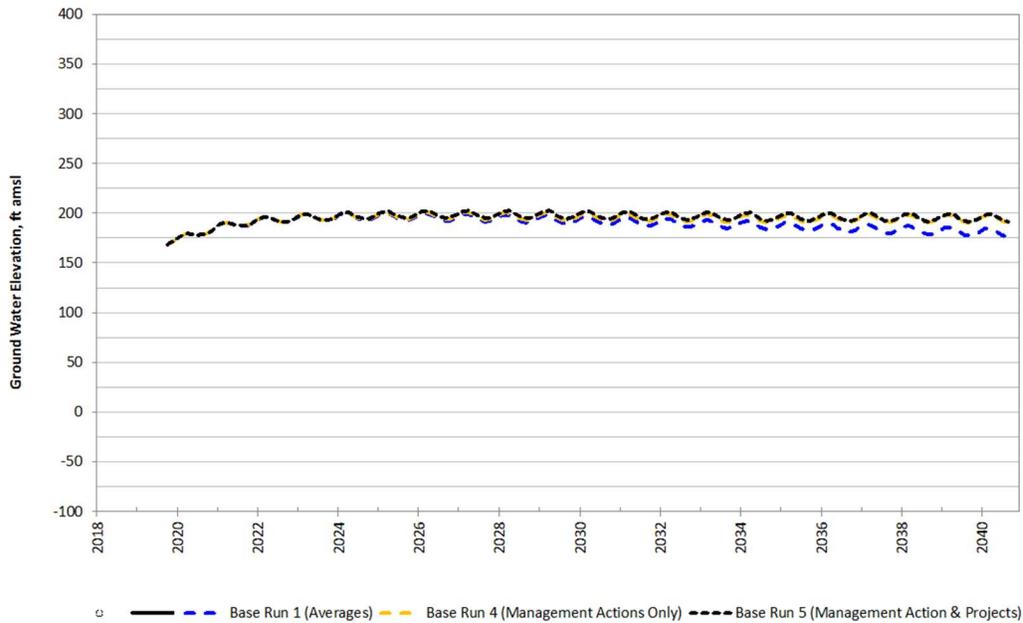
Well KSB-2322
Greater Kaweah GSA
Well ID: 19S22E36E01M
Aquifer System: Unknown - Model Layer 3



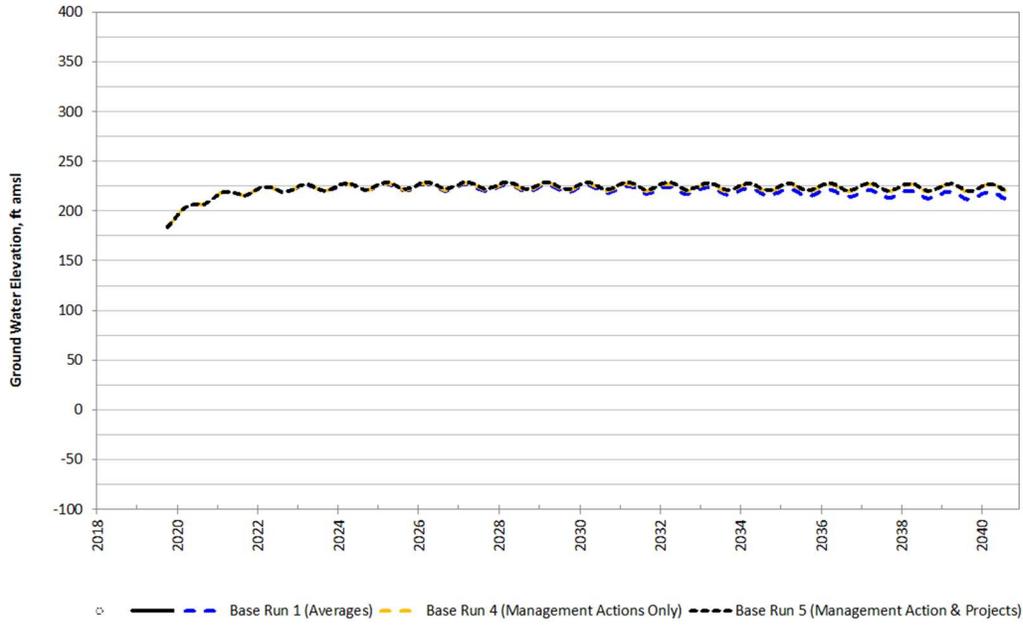
Well KSB-2333
East Kaweah GSA
Well ID: 20S21E11D01M
Aquifer System: Unknown - Model Layer 3



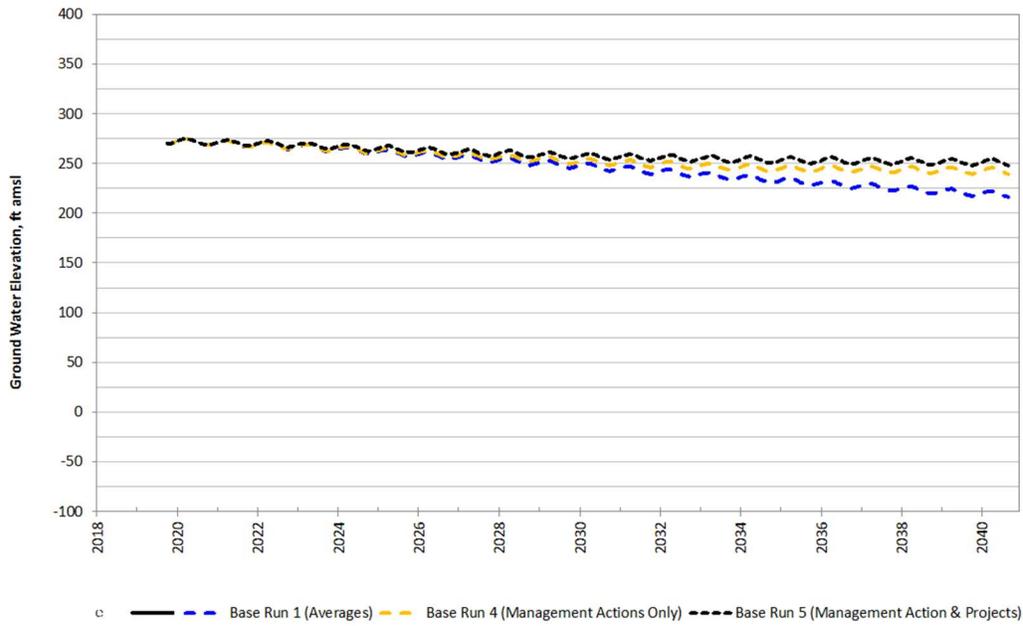
Well KSB-2344
East Kaweah GSA
Well ID: 19S21E26B01M
Aquifer System: Unknown - Model Layer 3



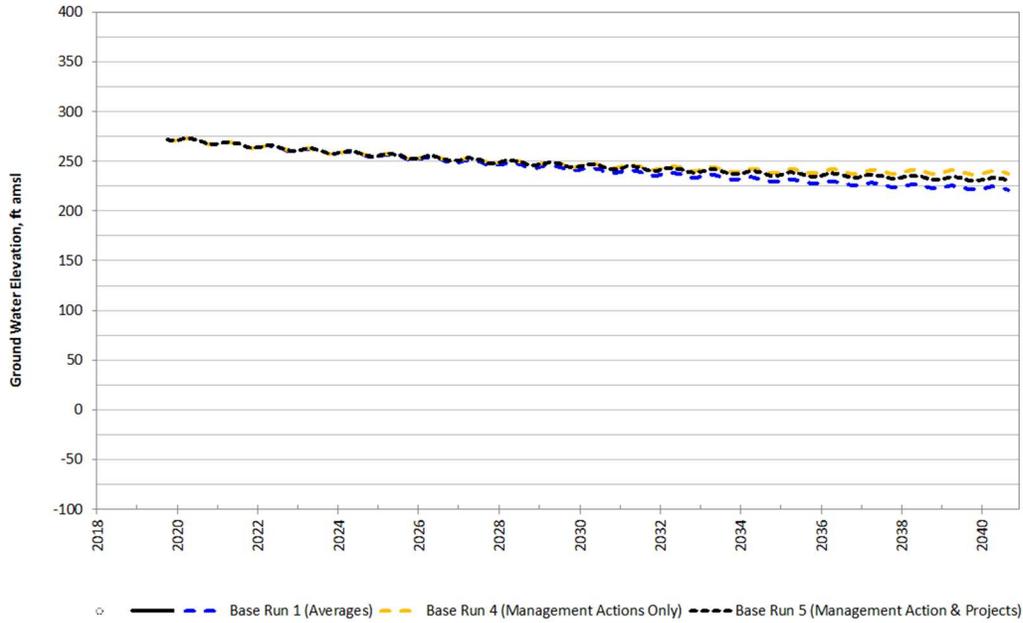
Well KSB-2345
East Kaweah GSA
Well ID: 19S21E23J01M
Aquifer System: Unknown - Model Layer 3



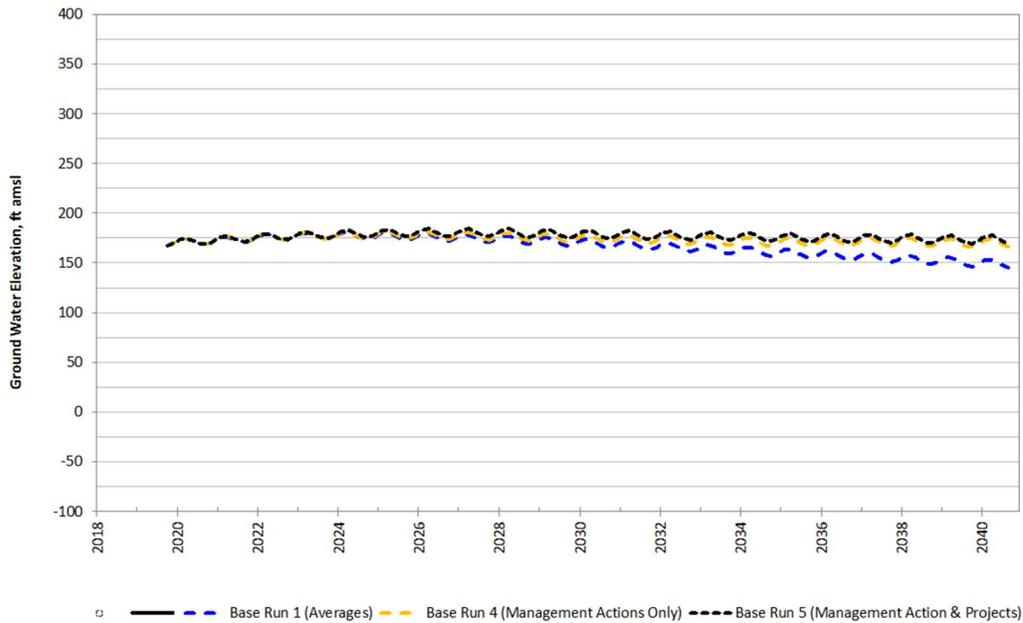
Well KSB-2354
East Kaweah GSA
Well ID: 19S21E36M01M
Aquifer System: Unknown - Model Layer 1



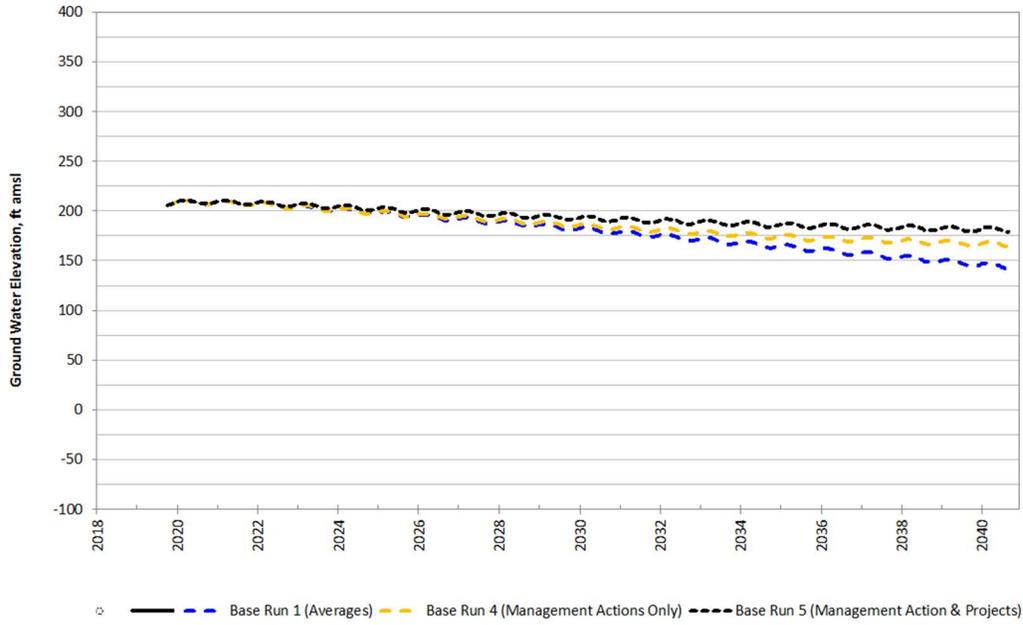
Well KSB-2369
East Kaweah GSA
Well ID: 19S21E13C03M
Aquifer System: Unknown - Model Layer 3



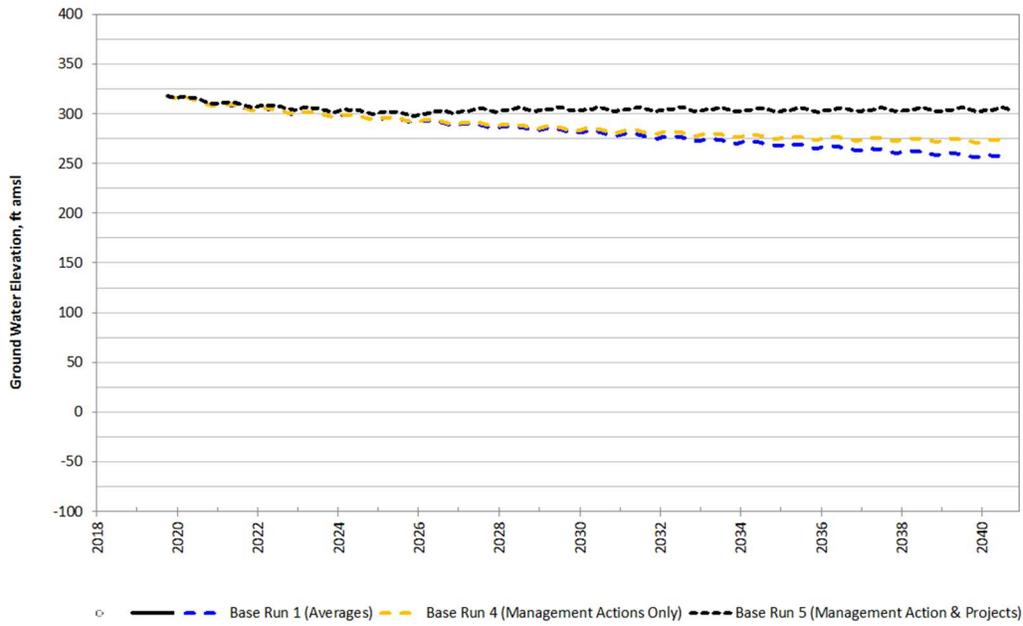
Well KSB-2405
East Kaweah GSA
Well ID: 20S21E01L01M
Aquifer System: Unknown - Model Layer 3



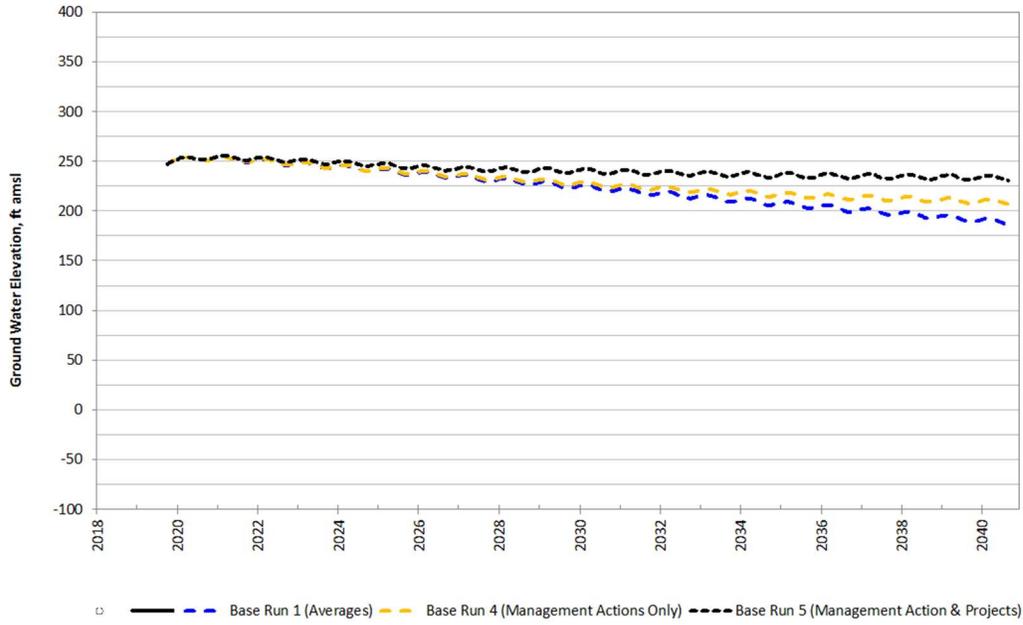
Well KSB-2411
East Kaweah GSA
Well ID: 20S21E12P01M
Aquifer System: Unknown - Model Layer 3



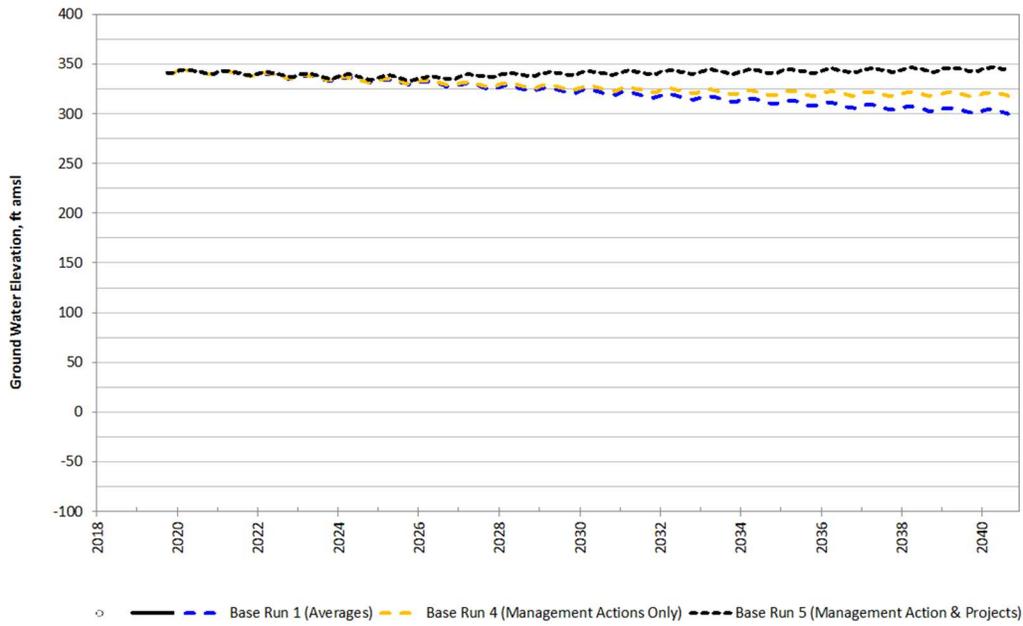
Well KSB-2466
Greater Kaweah GSA
Well ID: 19S22E01N02M
Aquifer System: Upper - Model Layer 1
Total Depth (ft): 138



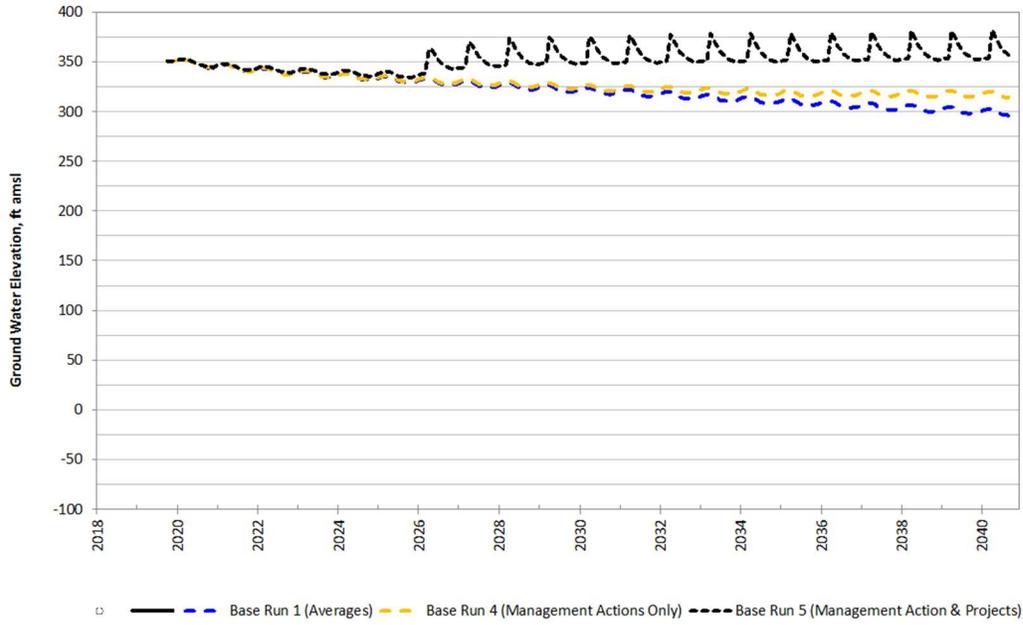
Well KSB-2507
East Kaweah GSA
Well ID: 19S21E12Q01M
Aquifer System: Unknown - Model Layer 1



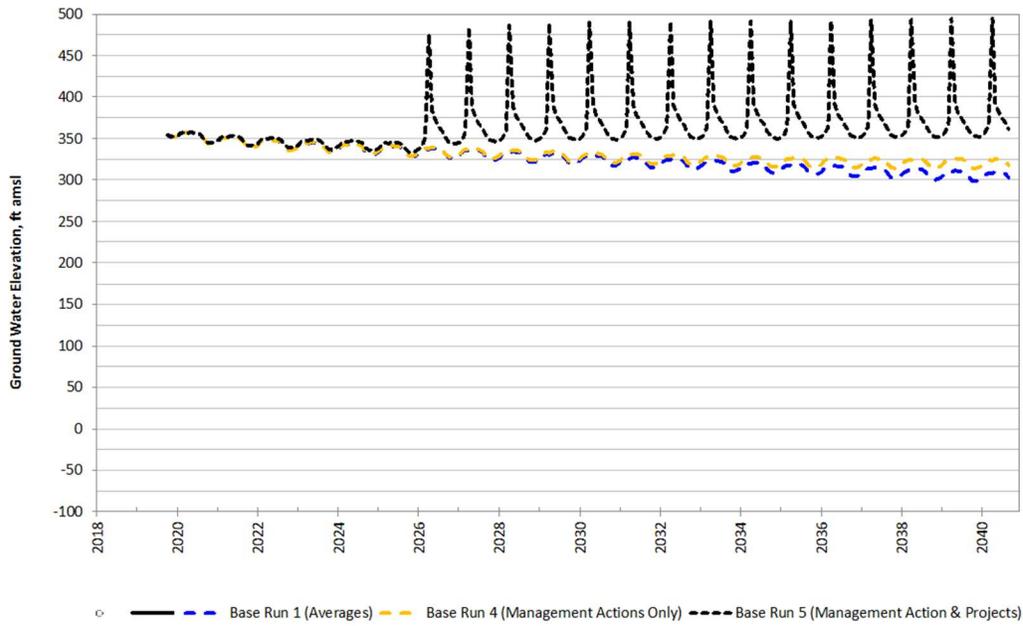
Well KSB-2513
East Kaweah GSA
Well ID: 19S21E24K01M
Aquifer System: Unknown - Model Layer 1



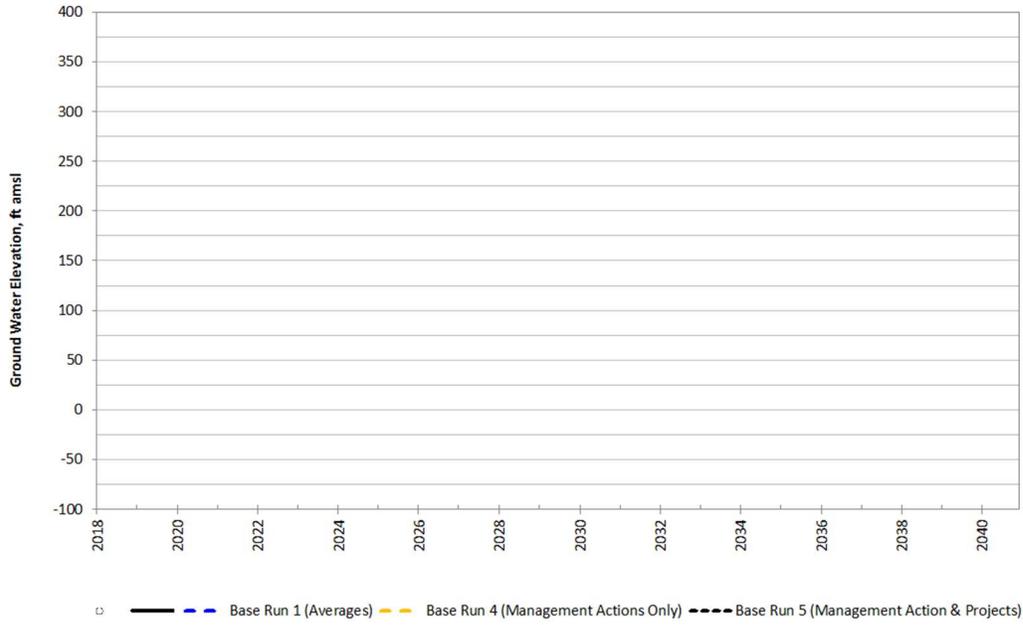
Well KSB-2519
Greater Kaweah GSA
Well ID: 19S22E36E02M
Aquifer System: Unknown - Model Layer 3



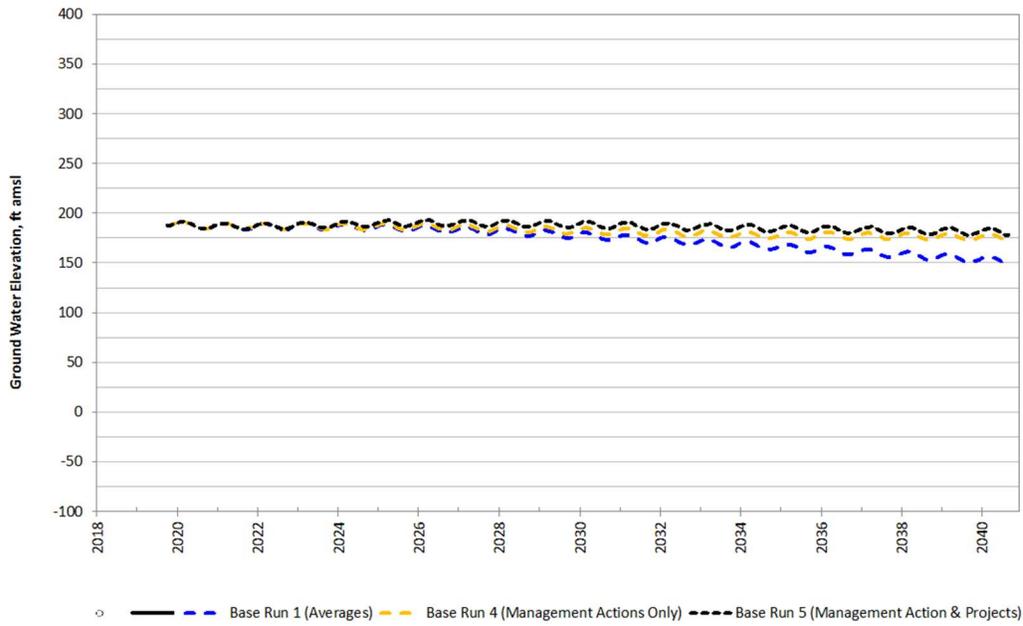
Well KSB-2539
Greater Kaweah GSA
Well ID: CID_041
Aquifer System: Unknown - Model Layer 3



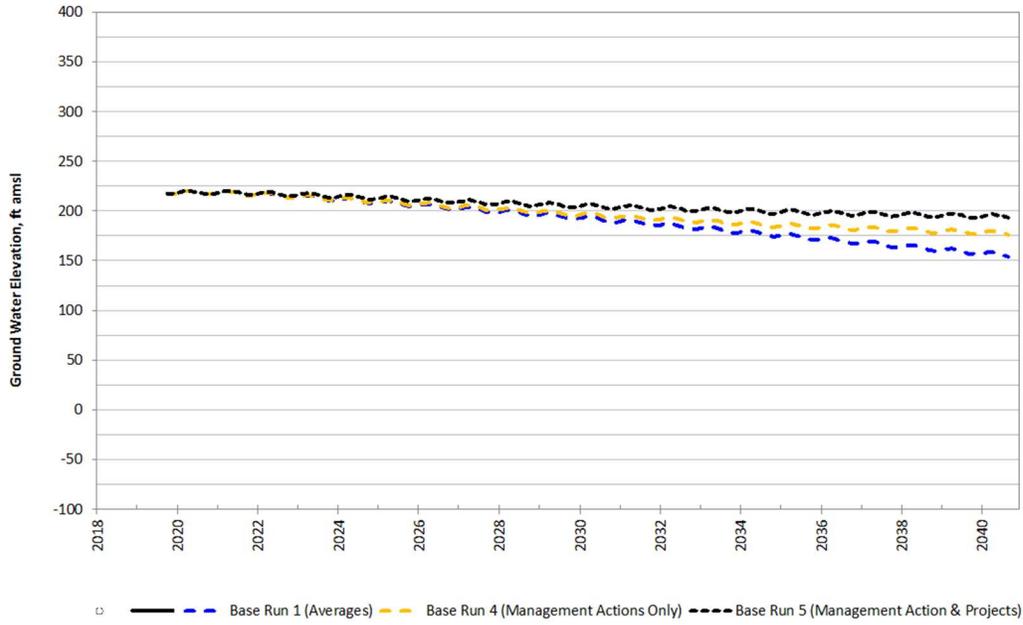
Well KSB-2588
East Kaweah GSA
Well ID: 20S21E13B01M
Aquifer System: Unknown - Model Layer 1



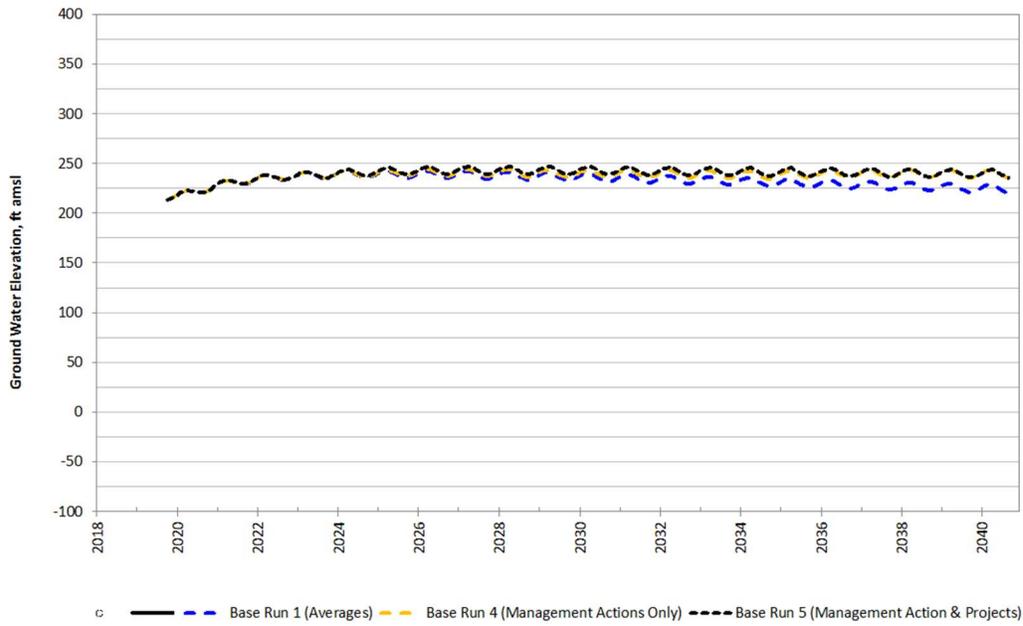
Well KSB-2590
East Kaweah GSA
Well ID: 19S21E24H01M
Aquifer System: Unknown - Model Layer 3



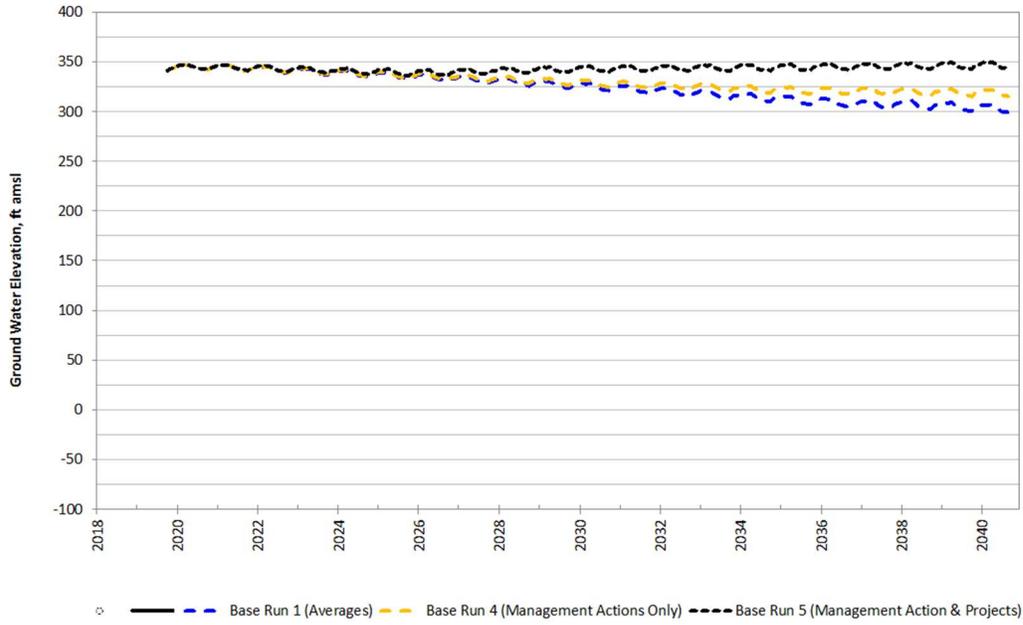
Well KSB-2593
East Kaweah GSA
Well ID: 20S21E01A01M
Aquifer System: Unknown - Model Layer 3



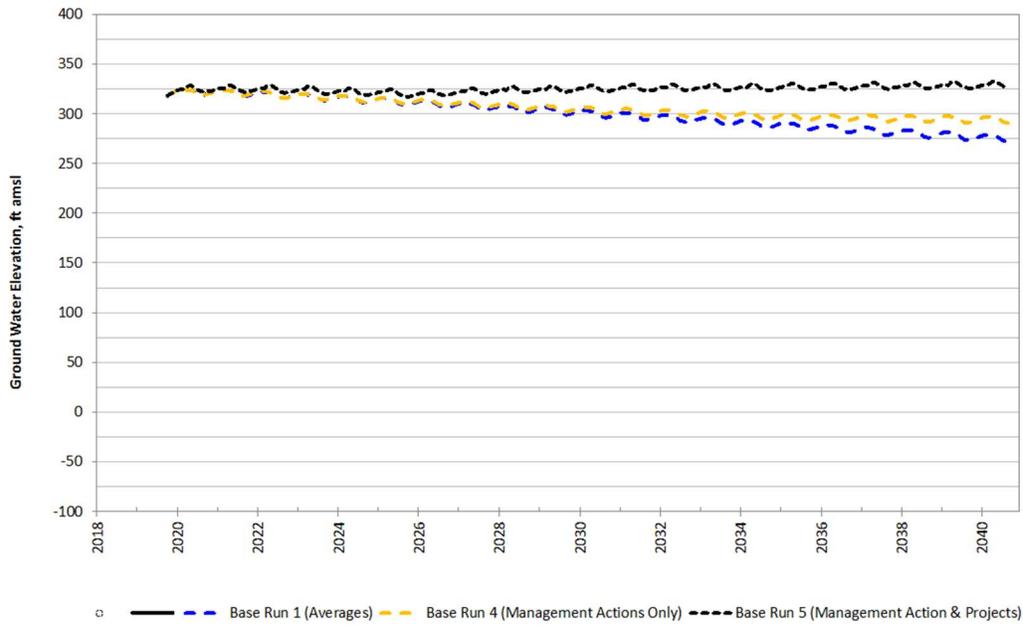
Well KSB-2618
East Kaweah GSA
Well ID: 19S21E13J01M
Aquifer System: Unknown - Model Layer 1



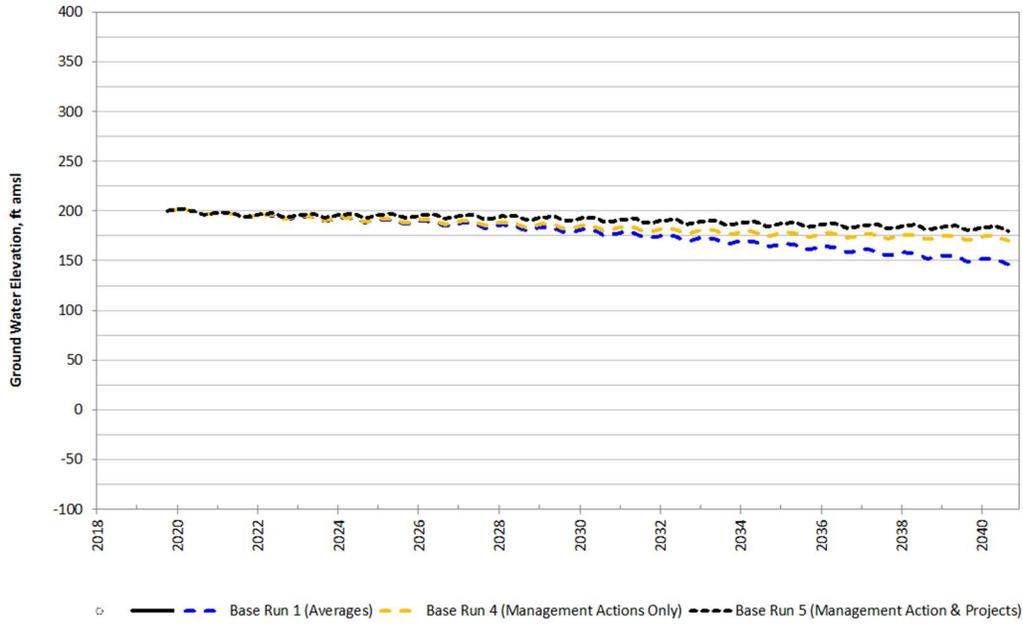
Well KSB-2690
Greater Kaweah GSA
Well ID: CID_100
Aquifer System: Unknown - Model Layer 3



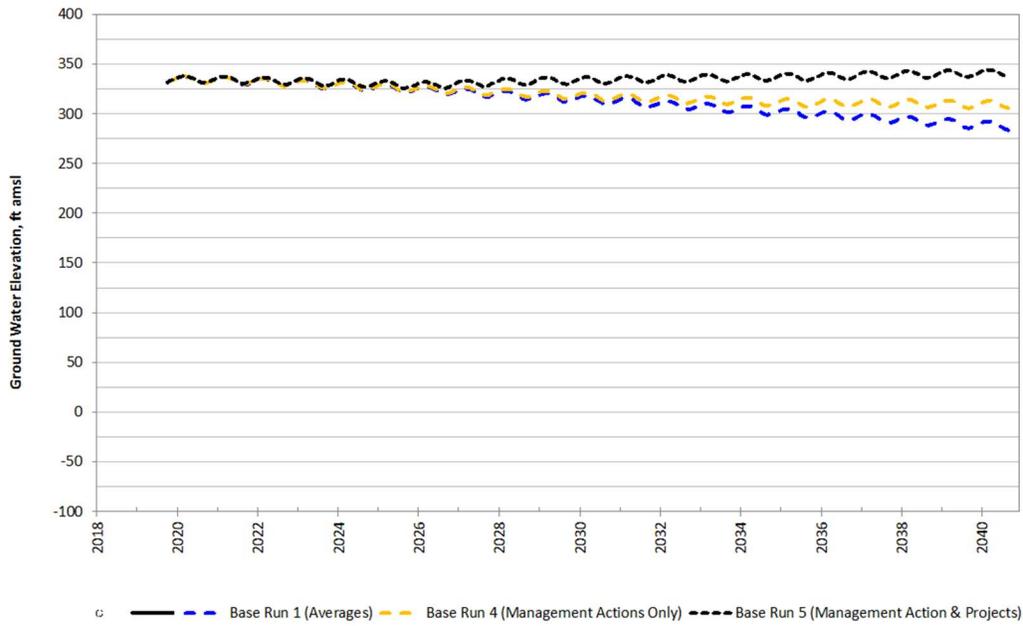
Well KSB-2696
East Kaweah GSA
Well ID: 19S21E13A01M
Aquifer System: Unknown - Model Layer 3



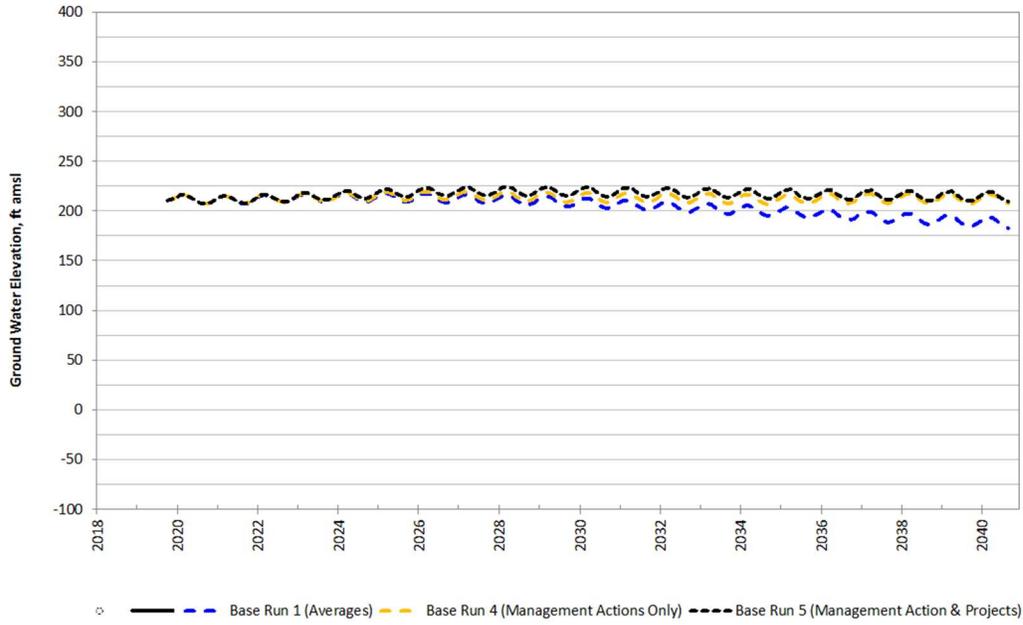
Well KSB-2697
East Kaweah GSA
Well ID: 19S21E25J01M
Aquifer System: Unknown - Model Layer 3



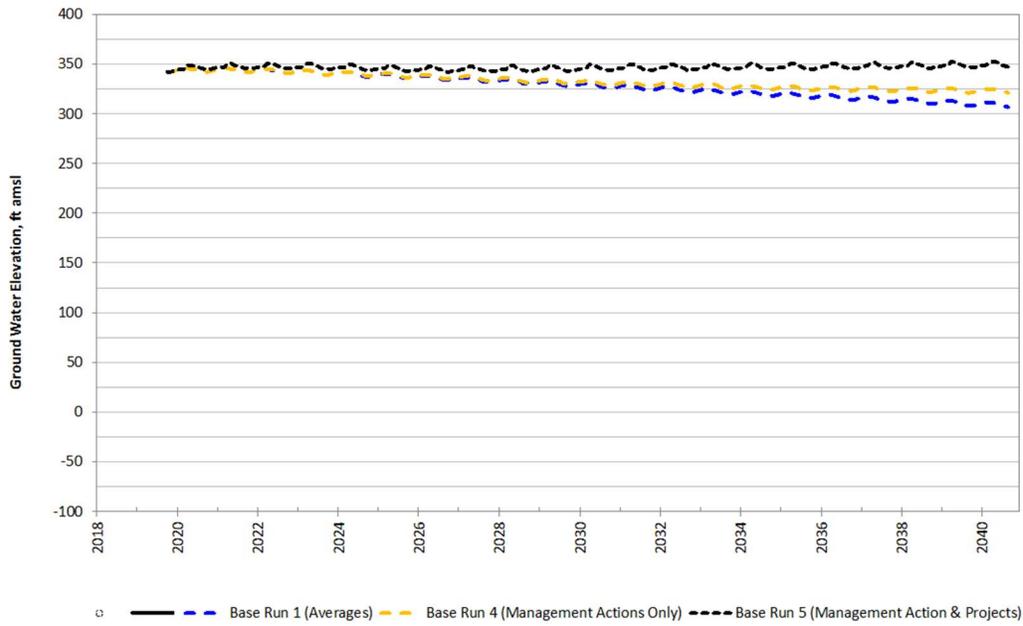
Well KSB-2765
Greater Kaweah GSA
Well ID: CID_067
Aquifer System: Unknown - Model Layer 3



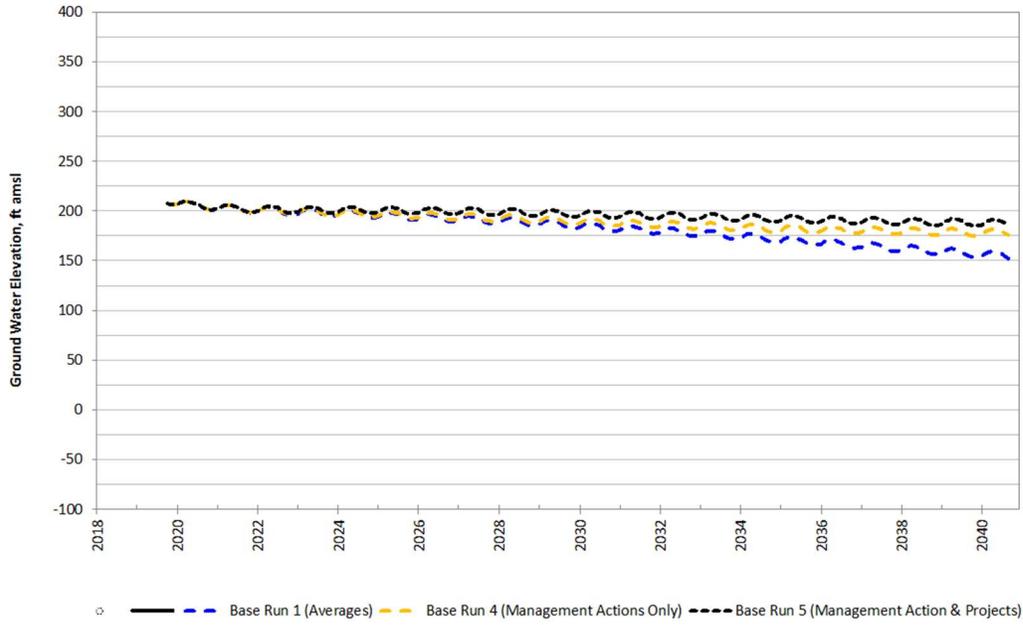
Well KSB-2769
East Kaweah GSA
Well ID: 20S22E06N01M
Aquifer System: Unknown - Model Layer 3



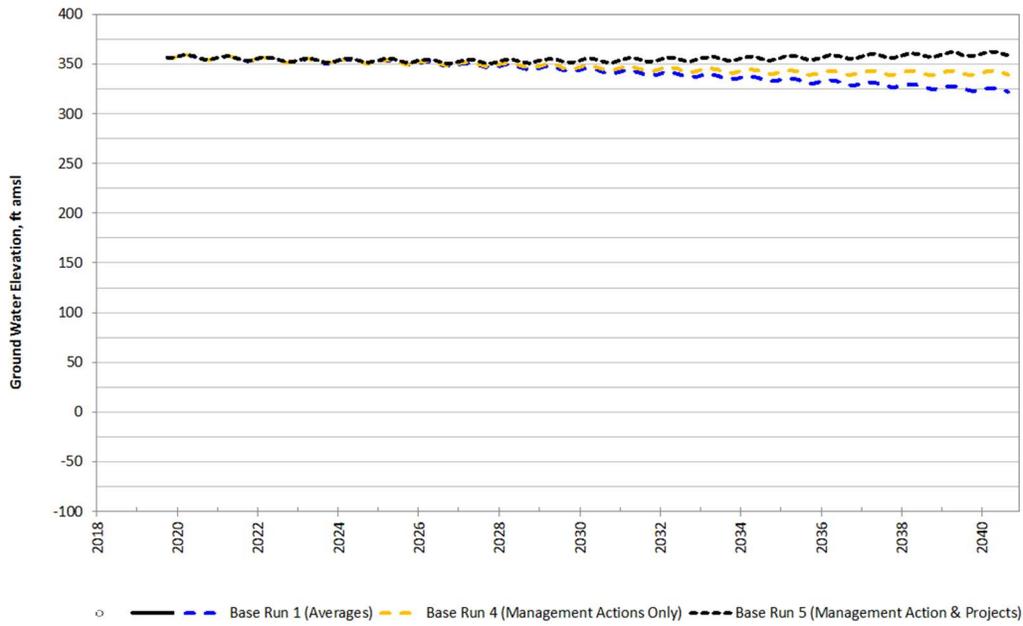
Well KSB-2773
East Kaweah GSA
Well ID: 19S22E19M01M
Aquifer System: Unknown - Model Layer 3



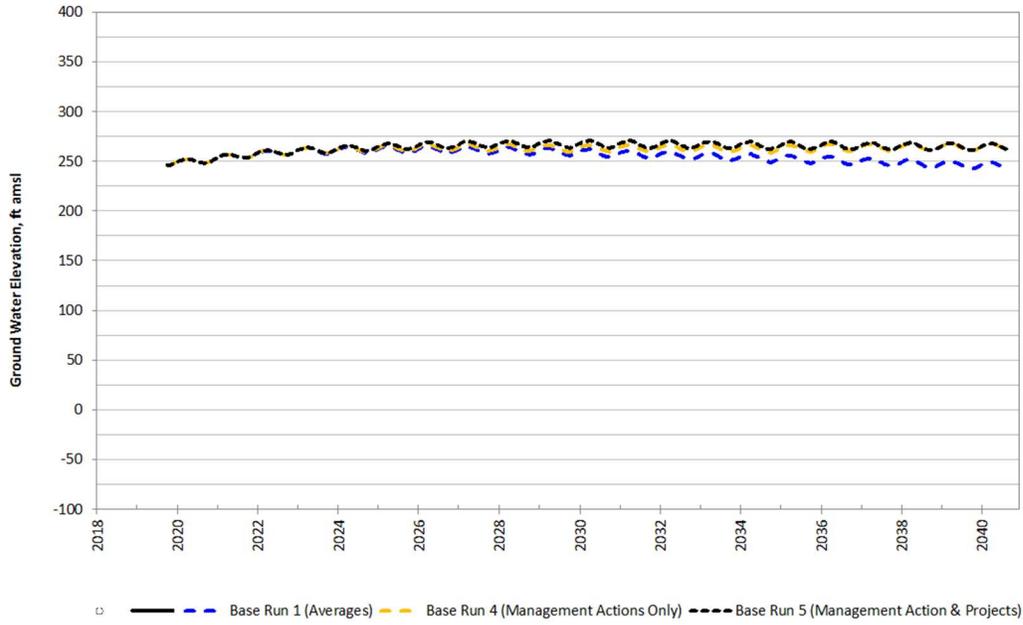
Well KSB-2790
East Kaweah GSA
Well ID: 19S22E30D01M
Aquifer System: Unknown - Model Layer 1



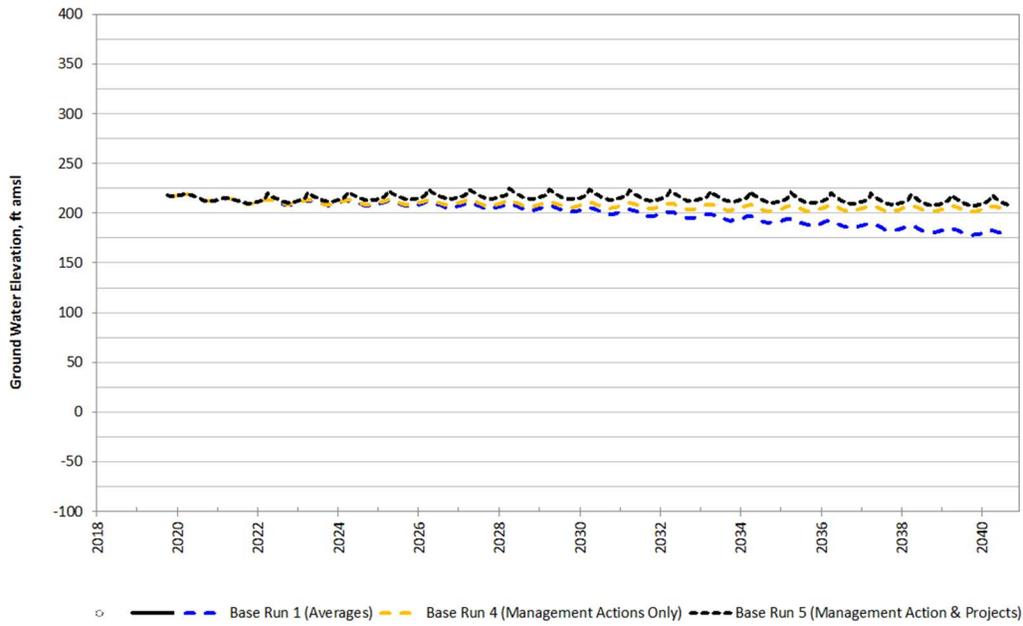
Well KSB-2822
Greater Kaweah GSA
Well ID: CID_021
Aquifer System: Unknown - Model Layer 3



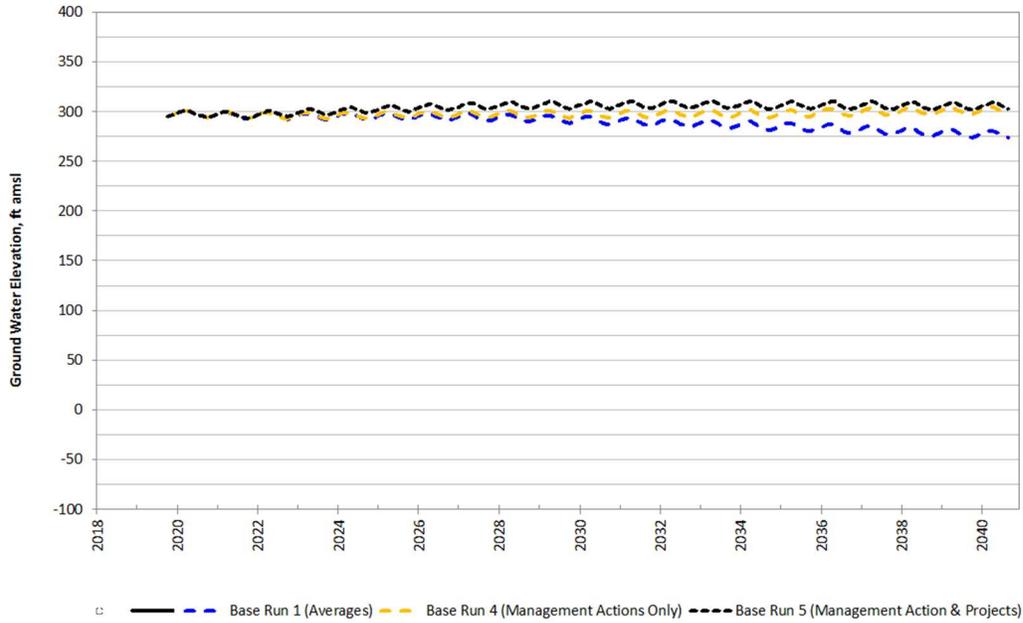
Well KSB-2823
East Kaweah GSA
Well ID: 20S22E07M01M
Aquifer System: Unknown - Model Layer 1



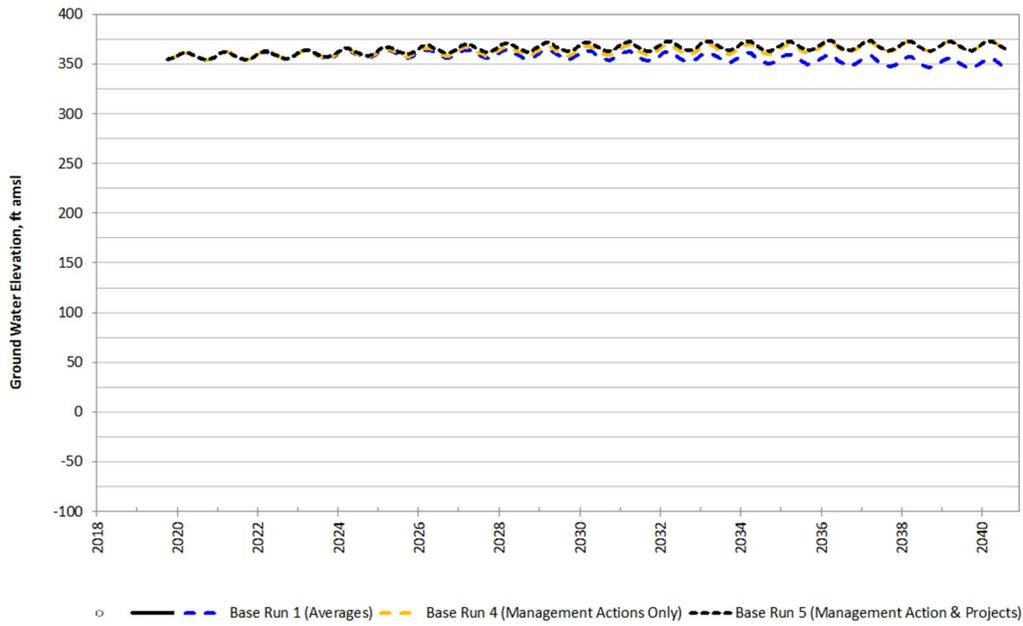
Well KSB-2826
East Kaweah GSA
Well ID: 20S22E06C01M
Aquifer System: Unknown - Model Layer 3



Well KSB-2895
East Kaweah GSA
Well ID: 19S22E31B02M
Aquifer System: Upper - Model Layer 3
Top of Screen Depth (ft): 271; Bottom of Screen Depth(ft): -22.189495;



Well KSB-2927
East Kaweah GSA
Well ID: 19S22E31B03M
Aquifer System: Unknown - Model Layer 3



Appendix 1E

Notice of Intent to Develop a Groundwater Sustainability Plan



January 10, 2018

Mr. Trevor Joseph, SGM Section Chief
California Department of Water Resources
P.O. Box 94236-001
Sacramento, CA 94236
Email: Trevor.Joseph@water.ca.gov

RE: *Notice of Intent to Develop a Groundwater Sustainability Plan*

Dear Mr. Joseph:

Pursuant to California Water Code Section 10727.8, and California Code of Regulations Section 353.6, the Department of Water Resources (DWR) is hereby given notice that the Greater Kaweah Groundwater Sustainable Agency (GKGSA) intends to commence with the development of a Groundwater Sustainability Plan (GSP) for a portion of the Kaweah Subbasin (5-22.11) within the boundaries of the GKGSA. The GSP will be one of multiple plans implemented by multiple groundwater sustainable agencies and coordinated pursuant to a single coordination agreement compliant with Section 10727.6 that covers the entire Kaweah Subbasin.

The GKGSA has created three standing committees which will help assist in the development and implementation of the GSP. Further ad hoc committees may be formed to help assist with further outreach efforts. The GKGSA also will hold a series of public workshops as part of the outreach plan as the GSP is developed. In addition, interested parties may contact the undersigned to be placed on the interested party list maintained by the GKGSA. The interested party list is notified of all board meetings and other meetings related to GSP development. The GKGSA has initiated a website to assist in further outreach efforts (www.greaterkaweahgsa.org).

The GKGSA looks forward to working collaboratively with DWR on developing and implementing a GSP. Should DWR have any questions or require any further information regarding this notice of intent, please contact Secretary Mark Larsen at (559)747-5601, or mlarsen@kdwcd.com.

Very truly yours,

Mark Larsen, Secretary

Cc: California Public Utility Commission

Appendix 1F

Greater Kaweah GSA Communication and Engagement Plan



**Greater Kaweah Groundwater
Sustainability Agency
Communication and
Engagement Plan**

Final

November 1, 2018

Prepared for:

Greater Kaweah Groundwater Sustainability
Agency

Revision	Description	Author	Quality Check	Independent Review
1	Draft	Kirsten Pringle	Craig Moyle	Michelle Ricker, Eric Osterling
2	Final	Kirsten Pringle	Craig Moyle	Eric Osterling
3				
4				

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Executive Summary

The Greater Kaweah Groundwater Sustainability Agency (GKGSA) Communication and Engagement Plan (Plan) provides a high-level overview of near- and long-term outreach strategies, tactics and tools that support public and stakeholder communication actions, as required by the Sustainable Groundwater Management Act (SGMA) of 2014. While primarily focused on achieving the communication needs of the GKGSA, this Plan also describes certain intra-basin activities that serve to accomplish the needs of the agency and its fellow Kaweah Subbasin Groundwater Sustainability Agencies (GSAs): East Kaweah GSA (EKGSA) and Mid-Kaweah GSA (MKGSA). The Plan is comprised of four main sections as follows:

Section 1: Introduction and Overview

Passed by the legislature during the third year of California's worst drought in decades, SGMA requires local public agencies to establish a governance structure and lead the development and implementation of a Groundwater Sustainability Plans (GSPs) to address and respond to undesirable conditions caused by chronic groundwater overdraft in subbasins identified to have high and medium risk of overdraft. The GKGSA is one of three GSAs in the Kaweah Subbasin (DWR Bulletin 118, 5-022.11) identified as a high priority region at risk of critical overdraft by the state's California Statewide Groundwater Evaluation Monitoring (CASGEM) Program. Other GSAs in the Kaweah Subbasin are EKGSA and the MKGSA, subbasins identified to have high and medium risk of overdraft.

Section 2: About the Greater Kaweah Groundwater Sustainability Agency

The GKGSA was formed in August 2016 as a Joint Powers Authority (JPA) between Kaweah Delta Water Conservation District (KDWCD), County of Tulare, Kings County Water District (KCWD), Lakeside Irrigation Water District (LIWD), and St. Johns Water District (SJWD). The nine-member GKGSA Board of Directors includes representation from each of the JPA members, as well as a representative of California Water Service (Cal Water), the Stakeholder Committee, and the Rural Communities Committee. The Stakeholder Committee, Rural Communities Committee, and Technical Advisory Committee are standing committees established through the Board of Director vote and are subject to the Ralph M. Brown Act (California Government Code §54950 et seq.).

Section 3: Greater Kaweah GSA Communication and Engagement

Outreach activities described in the Plan are managed by the Stakeholder and Rural Communities Committees. The described outreach activities draw, in part, from the GKGSA Advisory Committee Assessment, a document aimed to inform the organizational structure of the committee and collect outreach requirements and recommendations from committee members. Planned outreach activities are supported by a range of outreach tools, which include:

- **Interested Party Database:** Pursuant to Water Code §10723.4, the three GSAs in the Kaweah Subbasin intend to establish and jointly manage a coordinated Interested Party Database (IPD) for distribution of notices related to GSP preparation, meeting announcements, availability of draft plans, maps and other related information. Slated for release in fall 2018, the website provides stakeholder contact management, event management, mass email notification, and administrative record functions that accomplish certain requirements of SGMA. For contact management, the platform supports self-enrollment to an email database of the GSA or GSAs of the

stakeholder's choice. If uncertain of which GSA applies to their property or area of interest, the website will provide a link to assist in identification of the appropriate agency.

- **Communication and Engagement Database:** The database will identify potential stakeholder and outreach audiences. Stakeholders may be divided into three groups, based upon the level of stakeholder engagement for each. Pursuant to the requirements of SGMA, any outreach conducted to these stakeholders will be recorded in the Interested Parties Database and listed in the GSP. These tiers are described as follows:
 - **Group 1:** Collaborated (Inform + Consult + Collaborate) – This group is closely connected during the planning process through direct engagements aimed to exchange information through active two-way communication. As a pro-active and re-active activity, these engagements gather information, and develop solutions to existing and emerging issues.
 - **Group 2:** Consulted (Inform + Consult) – This group is connected during planning through written informational materials and scheduled presentations. This engagement is a pro-active activity seeks to gather stakeholder opinions to information presented by GKGSA.
 - **Group 3:** Connected (Inform) – This group is connected during planning through distribution of written informational materials and prepared informational presentations. Presentations would be held in response to stakeholder requests.
- **Project Website:** The GKGSA's partner agencies have developed a stand-alone website for the GSA: www.greaterkaweahgsa.org. The website provides information about SGMA, the member agencies, Board of Directors and committee meeting notices, public outreach information, and other informational resources.
- **Key Messages:** Initial key messages associated with SGMA, GKGSA, and sustainable groundwater management have been developed and included in Appendix A. These key messages will be periodically updated.
- **Outreach Materials:** A suite of informational materials are planned for development utilizing a common visual identify to assist the reader readily identify the GKGSA from the array of GSAs in California. These materials maybe be translated into multiple languages. These documents include an electronic newsletter, fliers, brochures, fact sheets, utility bill inserts, PowerPoint presentations, and surveys.

A variety of outreach activities are planned in support of GSP development through adoption of the agency's GSP by Jan. 31, 2020. Activities aimed to engage the public and stakeholders throughout this phase include:

- **Standing Meetings:** In addition to regular meetings of the Board of Directors, three standing meetings subject to the Brown Act are held or co-hosted by the GKGSA. These include the Stakeholder Committee, Rural Communities Committee, and Technical Advisory Meetings.
- **Member Agency Meetings:** Staff of the GKGSA plan to conduct periodic presentations before the boards and councils of the founding agency members.
- **Local Public Agency Support:** Staff of the GKGSA plan to coordinate with staff of member agencies, participating agencies and other local public agencies within the agency's boundaries (i.e. County of Kings and City of Hanford) to schedule and conduct briefings to that agency's elected officials, management or community members on GSP topics specific to their jurisdictional area. These presentations would be held on an as-needed basis prior to the release of the GKGSA Public Draft GSP.
- **Public and Stakeholder Meetings:** The GKGSA intends to host a series of meetings to present technical topics to the public and stakeholders to assist in development of the GSP. These meetings are planned to start in fall of 2018.
- **Community Presentations:** To maintain and expand awareness of the agency, staff intend to provide high-level presentations to rural schools, civic organizations, non-government organizations and other interest groups with interests in sustainable groundwater management.
- **Disadvantaged Community Outreach:** The GKGSA is home to numerous disadvantaged communities (DAC) and severely disadvantaged communities (SDAC). The agency intends to engage these communities through direct outreach activities and in collaboration with various non-profit organizations formed to support DACs and SDACs. This collaboration is intended to identify opportunities for the GSA to partner with these groups in development of projects to include to the agency's GSP.

- **GSP Review and Adoption:** Staff anticipates adoption of the 2020 GKGSA GSP to be up to seven months. This will include a mid-2019 release of a Public Draft GSP for a public review period of up to 90-days. Public comments collected during this phase will be compiled into the GKGSA Public Comment Report, which informs completion of the Draft Final GSP, slated for release in the fall of 2019. A public hearing to adopt the Draft Final GSP is proposed for December 2019.
- **Post Adoption Activities:** Following adoption and submittal of the Greater Kaweah GSP by the statutory deadline of January 31, 2020, the California Department of Water Resources (DWR) will perform a 60-day public review period for all GSPs and relay such comments to their respective GSA. These comments will inform DWR's evaluation of submitted GSPs. These evaluations are due by legislative statute in 2022. GKGSA staff plan to assemble public comments submitted to DWR, as well as public comments shared during the agency's public hearing to adopt, as errata to the GKGSA Public Comment Report.

Section 4: Intra-Basin Outreach Activities

In addition to the joint management of the IPD, the Kaweah Subbasin GSAs plan to consider implementation of two intra-basin coordination outreach activities. These activities include co-hosting annual "state of the subbasin" forums intended to share subbasin-wide information to the public and stakeholders during plan development and throughout GSP implementation. The agencies additionally plan to consider issuing one consolidated annual report to DWR in response to GSP Emergency Regulations §356.2

Abbreviations

Board of Directors	Greater Kaweah Groundwater Sustainability Agency Board of Directors
Cal Water	California Water Service
CASGEM	California Statewide Groundwater Elevation Monitoring Program
CSD	community service district
CWC	Community Water Center
DAC	disadvantaged community
DWR	California Department of Water Resources
EKGSA	East Kaweah Groundwater Sustainability Agency
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
IPD	Interested Parties Database
JPA	Joint Powers Authority
KCWD	Kings County Water District
KDWCD	Kaweah Delta Water Conservation District
LCJA	Leadership Counsel for Justice and Accountability
LIWD	Lakeside Irrigation Water District

M&I	municipal and industrial
MKGSA	Mid-Kaweah GSA
MOU	memorandum of understanding
NAHC	Native American Heritage Commission
Plan	Greater Kaweah Groundwater Sustainability Agency Communication and Engagement Plan
SDAC	severely disadvantaged community
SGMA	Sustainable Groundwater Management Act
SGWP	Sustainable Groundwater Planning
SHE	Self-Help Enterprises
SJWD	Saint Johns Water District

Plan Authors and Reviewers

Eric Osterling, Manager, Greater Kaweah GSA

Craig Moyle, Stantec

Kirsten Pringle, Stantec

Michelle Ricker, GEI Consultants

Joe Cardoza, Stakeholder Committee

Mike Chrisman, Stakeholder Committee

Carole Combs, Stakeholder Committee

Matt Hutcheson, Stakeholder Committee

John Kirkpatrick, Stakeholder Committee

Blake Mauritson, Stakeholder Committee

Don Mills, Stakeholder Committee

Soapy Mulholland, Stakeholder Committee

James Silva, Stakeholder Committee

Zack Stuller, Stakeholder Committee

Marty Toomey, Stakeholder Committee

Brian Watte, Stakeholder Committee

Paul Boyer, Rural Communities Committee

Danny Hogue, Rural Communities Committee

Rudy Mendoza, Rural Communities Committee

Bill Pensar, Rural Communities Committee

Barbara Sally, Rural Communities Committee

Monroe Self, Rural Communities Committee

1.0 INTRODUCTION AND OVERVIEW

As part of its development and passage of the Sustainable Groundwater Management Act (SGMA) of 2014, the State legislature intended that local public agency actions pursuant to the new law be conducted in an open public process. This document identifies and presents the public and stakeholder communication and engagement activities to be implemented by the Greater Kaweah Sustainability Agency (GSA) in support of development and eventual implementation of a Groundwater Sustainability Plan (GSP) within the agency's jurisdictional boundaries. This Plan is intended to function as a guide versus a prescriptive approach to outreach activities, thereby supporting a flexible and adaptive process for the GKGSA Board of Directors (Board of Directors) to implement in response to stakeholder needs during GSP development. Development of this plan was informed, in part, through information and advice collected through the GKGSA Stakeholder Assessment. This Communication and Engagement Plan (Plan) describes the GKGSA's approach to achieve communication and engagement activities identified in California Code of Regulations Section 354.10:

§ 354.10. Notice and Communication

Each Plan shall include a summary of information relating to notification and communication by the Agency with other agencies and interested parties including the following:

(a) A description of the beneficial uses and users of groundwater in the basin, including the land uses and property interests potentially affected by the use of groundwater in the basin, the types of parties representing those interests, and the nature of consultation with those parties.

(b) A list of public meetings at which the Plan was discussed or considered by the Agency.

(c) Comments regarding the Plan received by the Agency and a summary of any responses by the Agency.

(d) A communication section of the Plan that includes the following:

(1) An explanation of the Agency's decision-making process.

(2) Identification of opportunities for public engagement and a discussion of how public input and response will be used.

(3) A description of how the Agency encourages the active involvement of diverse social, cultural and economic elements of the population within the basin.

(4) The method the Agency shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.

Key Sustainable Groundwater Management Act Dates:

- June 30, 2017: Establish Groundwater Sustainability Agencies (or equivalent) for all high and medium priority basins – Water Code § 10724(b)
- July 1, 2017: County must affirm or disaffirm responsibility as Groundwater Sustainability Agency if no Groundwater Sustainability Agency has been established – Water Code § 10724(b)
- Jan. 31, 2020: All critically over drafted high and medium priority basins must be managed under a Groundwater Sustainability Plan. Water Code § 10720.7(a)(1)
- On April 1 following Groundwater Sustainability Plan adoption and annually thereafter, Groundwater Sustainability Agencies provide report on progress towards sustainability to the California Department of Water Resources. Water Code § 10728

1.1 ABOUT THE SUSTAINABLE GROUNDWATER MANAGEMENT ACT

SGMA was passed by the legislature during the third year of California's chronic drought. While the drought was declared over due to near record rainfall in the 2016/17 season, groundwater basins throughout the state have not recovered to pre-drought conditions and, in some cases, experienced permanent groundwater storage capacity losses through land subsidence. The legislation requires local public agencies and newly-formed Groundwater Sustainability Agencies (GSA) in high and medium priority subbasins to sustainably manage California groundwater resources with oversight by the California Department of Water Resources (DWR) and potential intervention by the State Water Resources Control Board if management activities are determined to be inadequate. Passage of SGMA ended an era where sustainable groundwater management was a voluntary action or a court mandated requirement through adjudication.

Following passage of SGMA, DWR embarked on a series of public and agency meetings to develop GSP Emergency Regulations. These regulations were released in July 2016 and are chaptered under the California Code of Regulations Title 23. Waters (§350-§358.4). In conjunction with release of these regulations, DWR published the Groundwater Sustainability Plan Emergency Regulations Guide. The guide summarizes and defines the processes and requirements found in Title 23 for GSA formation, the development and implementation of GSPs, the responsibilities of the DWR and interbasin coordination (§357.2).

1.2 ABOUT THE KAWEAH SUBBASIN

The Kaweah Subbasin of the San Joaquin Valley Basin (DWR Bulletin 118, 5-022.11, Figure 1) is one of 515 groundwater subbasins in California, and is one of 127 subbasins that have been identified as high or medium priority by DWR's California Statewide Groundwater Elevation Monitoring (CASGEM) Program. The CASGEM Program has identified the Kaweah Subbasin as a high priority critical overdraft basin, a determination that requires implementation of sustainable groundwater management actions by January 31, 2020. The subbasin is primarily located within the Tulare County, with a portion included in Kings County. At the time of this plan, three GSAs have been established within the subbasin pursuant to SGMA, including:

- East Kaweah Groundwater Sustainability Agency (EKGSA)
- Greater Kaweah GSA (GKGSA)
- Mid-Kaweah Groundwater Sustainability Agency (MKGSA)

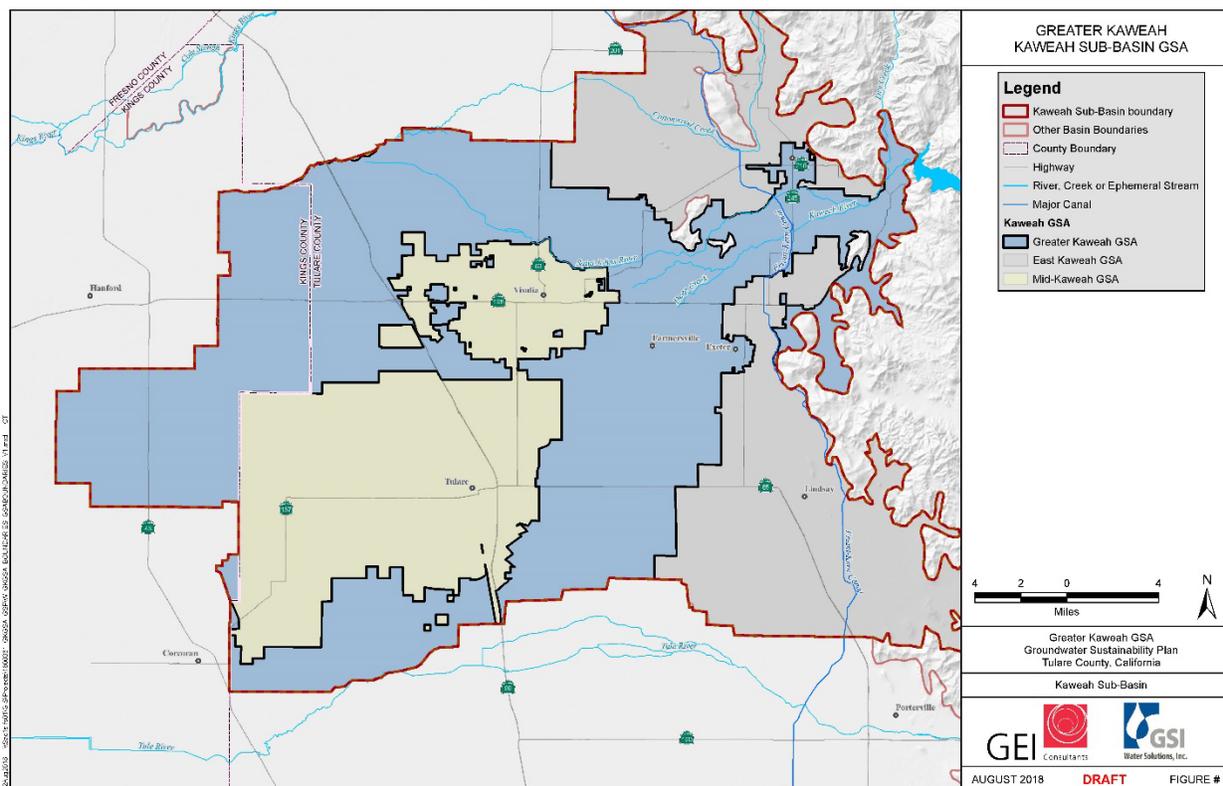


Figure 1 Kaweah Subbasin Groundwater Sustainability Agencies

2.0 ABOUT THE GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY

The GKGSA includes active participation by most local public agencies¹ within its jurisdictional area with water supply, water management responsibilities and land use responsibilities. The founding agencies of the GSA are Kaweah Delta Water Conservation District (KDWCD), County of Tulare, Kings County Water District (KCWD), Lakeside Irrigation Water District (LIWD), and St. Johns Water District (SJWD). The agency was formed August 23, 2016, via execution of a joint powers agreement (JPA). It serves as the single, independent public agency – pursuant to Government Code §6500 et seq. – for the area within its jurisdictional boundaries (See Figure 1).

The agency is led by a nine-member board of directors, with two seats held by KDWCD; one seat for each founding agency; one seat held by California Water Service (Cal Water); and one seat each from a representative nominated by the Rural Communities Committee and the Stakeholder Committee. Cal Water is a privately held water utility regulated by the California Public Utilities Commission. Based in San Jose, Calif, Cal Water is the largest regulated American water utility west of the Mississippi River and the third largest in the United States. Its place on the board was made possible through amendment to Senate Bill 13 by Sen. Fran Pavley and chaptered in CWC Water Code

¹ CWC §10271 (n) “Local agency” means a local public agency that has water supply, water management, or land use responsibilities within a groundwater basin.

§10723.6(b)². Following the amendment to Senate Bill 13, Cal Water requested to serve as a participating member of the GKGSA. Cal Water's seat on the GKGSA Board is provided through an agreement with the GKGSA JPA. The Cal Water representative on the board of directors is nominated by the utility and appointed by the board. Cal Water operations in the Kaweah Subbasin include Visalia, East Tulare Villa (known as "Tulco"), West Goshen, Goshen and Oak Ranch. Cal Water responsibilities on GKGSA apply all operations except Visalia, which is part of Mid-Kaweah GSA.

Members of the Rural Communities Committee include local public agencies that meet eligibility requirements to serve as a GSA for their service area but have chosen to engage as committee members. These agencies include cities of Exeter, Farmersville and Woodlake and the following small community water providers: Lemon Cove Sanitary District, Ivanhoe Public Utilities District (PUD), Patterson Tract Community Services District (CSD), and Tract 92 CSD.

The Stakeholder Committee is intended to reflect the range of interested persons or representatives of interested entities within the agency's boundary consistent with California Water Code §10723.2. Committee members currently include farmers, ranchers, private agricultural water systems, and representatives of the environmental community. Participating organizations currently include Consolidated Peoples Ditch Company, Farmers Ditch Company, Fleming Ditch Company, Foothill Ditch Company, Lemon Cove Ditch Company, Mathews Ditch Company, Sequoia Riverlands Trust, Tulare Basin Wildlife Partners, and Wallace Ranch Water Company.

Other local public agencies within the GKGSA to be engaged during plan development include the County of Kings and the City of Hanford, whose city limits extend into the Kaweah Subbasin. This area includes the Kings Industrial Park, which receives M&I service from the city. Section 3.5.1.1 describes on how the GKGSA will coordinate with these agencies during the GSP public review phase. Kings County and the City Hanford may also serve on the Rural Communities Committee, although they are not currently members. In addition, these agencies can participate in the GSP planning process by providing public comment at regularly scheduled board of directors and committee meetings and participating in public meetings and workshops. Water resources in GKGSA includes surface and groundwater supplies. Surface water supplies support the region's agricultural economy and groundwater replenishment. Municipal and industrial (M&I) water resources in the region is drawn exclusively from groundwater resources. Surface water supplies in the region are primarily diverted from the Kaweah and St. John's rivers. KDCWD manages distribution of surface water supplies from these rivers on behalf of surface water right holders and conducts groundwater recharge activities in coordination with its 27-member districts and other regional partners. KDCWD currently operates 40 recharge basins independently or in coordination with its member districts. KCWD also conducts in-lieu groundwater recharge operations with surface water flows from the Kaweah, St. John's, and Kings Rivers. This includes a groundwater bank along the Peoples Ditch Company, which KCWD is a shareholder. The County of Tulare is the land use authority for unincorporated regions within the GKGSA and supports public water systems through two County Service Areas, one of which serves the community of Well Tract – a small community east of the City of Woodlake's sphere of influence. Residents of Wells Tract receive drinking water and waste water services from the City of Woodlake through an agreement with the County of Tulare. LIWD is a public agency that

² (b) A water corporation regulated by the Public Utilities Commission or a mutual water company may participate in a groundwater sustainability agency through a memorandum of agreement or other legal agreement. The authority provided by this subdivision does not confer any additional powers to a nongovernmental entity.

operates irrigation facilities that distribute agricultural surface water supplies held by Lakeside Ditch Company, a private water company.

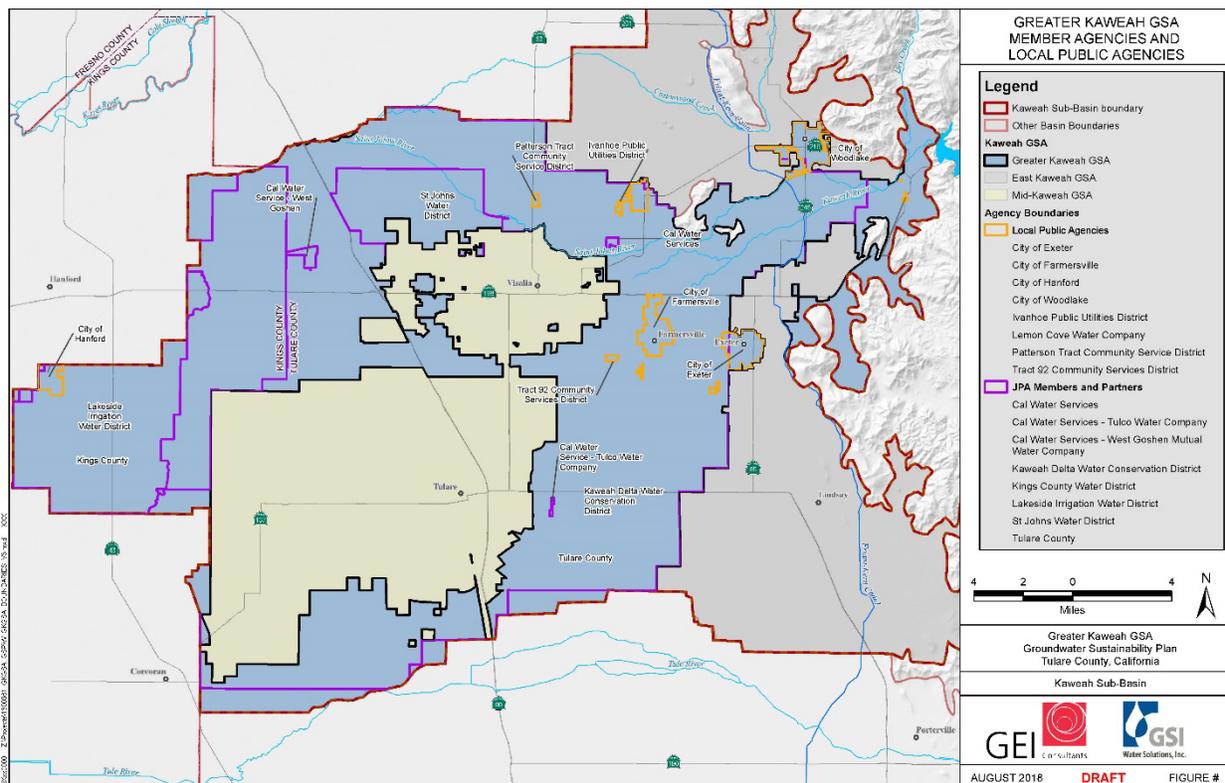


Figure 2 Member Agencies and Local Public Agencies of the Greater Kaweah GSA

2.1 DECISION MAKING SUPPORT

Decision making support to the GKGSA Board of Directors is provided by a GSA manager, legal counsel, three standing committees, and an intra-basin coordination team. The decision-making structure is illustrated Figure 3 and described further in the sections below. Additional committees may be formed by the Board of Directors to advise the Board on matters that fall within the scope of the committee’s assignment. If formed, the Board will appoint one Board member and alternated Board member to be a member and chair the committee. Committees will meet as often as directed by the Board of Directors, as determined by the chair of the committee.

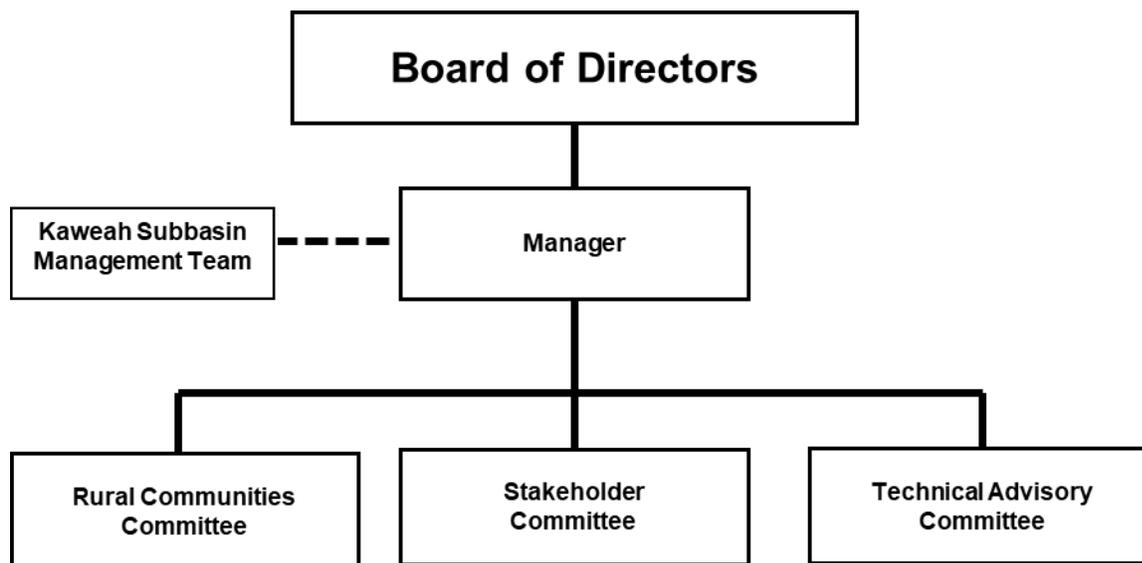


Figure 3 Decision Making Structure of Greater Kaweah GSA

2.1.1 Manager

The GSA Manager is appointed by the Board of Directors and serves at its pleasure. This position provides administrative and fiscal management for the GSA and serves as overall coordinator for development and implementation of the GSP. Other ancillary administrative services are performed in-kind by staff members of the GSA member agencies, to and including the GSA Secretary and Treasurer as appointed by the Board. Administrative functions include servicing the needs of the GSA and Board including, but not limited to meeting calendars, notices, agendas, minutes, resolutions and other reports or services required to conduct the business of the GSA. As fiscal agent the duties include payables, receivables, audit data, audits and any other fiscal requirements or fiscal controls needed to conduct the business of the GSA.

2.1.2 Legal Counsel

Legal counsel serves at the pleasure of the Board and is retained to advise members and the GKGSA staff on topics associated with the development and implementation of the GSA, and applicable functions of the Board.

2.1.3 Stakeholder Committee

The Stakeholder Committee is the first of three standing committees filled through Board appointment. With meetings held pursuant to the Brown Act, the committee is intended to reflect range of interested persons or representatives of interested entities within the agency’s boundary consistent with California Water Code §10723.2. Committee members currently include farmers, ranchers, private agricultural water systems, and representatives of the environmental community.

2.1.4 Rural Communities Committee

The Rural Communities Committee is the second of three standing committee filled through Board appointment and meetings are subject to the Brown Act. Members of this committee are the operators of public water systems (California Health & Safety Code §116275) in three cities and four unincorporated communities. Each of these communities have been classified as either a disadvantaged community (DAC) or severely disadvantaged community (SDAC) during the U.S. Census American Community Survey (2012 - 2016), as further discussed in Section 3.3.

2.1.5 Technical Advisory Committee

The Technical Advisory Committee is a Board-appointed six-member panel that includes one technical representative each from the founding JPA agencies and Cal Water. The role of the committee is to coordinate and provide input for development of the GSP for the GKGSA. Similar to the Rural Communities Committee and the Stakeholder Committee, meetings of the Technical Advisory Committee are subject to the Brown Act.

2.1.6 Kaweah Subbasin Management Team

Established in November 2017, the Kaweah Subbasin Management Team is an intra-basin coordination activity involving the three GSAs within the Kaweah Subbasin. The team was formed under a memorandum of understanding (MOU) for Cooperation and Coordination of the Kaweah Subbasin. Team meetings are held monthly and publicly noticed consistent with the Brown Act. As described in the MOU, the Team's purpose is to conduct necessary studies and seek mutual agreement in the preparation of a Coordination Agreement require by SGMA. The team is comprised of three members of each GSA, with one vote per GSA. These participants are appointed by their respective Board of Directors and serve at their direction. Coordination of meeting locations and meeting moderation is rotated among each subbasin GSA.

3.0 GREATER KAWEAH GSA COMMUNICATION AND ENGAGEMENT

Consistent with SGMA, the GKGSA intends to develop and implement its GSP in close coordination, consultation and cooperation with the public and stakeholders through various outreach activities tailored to accomplish the regulatory goals of SGMA. The GKGSA announced its public and stakeholder engagement objectives as part of its August 2016 formation notification (Water Code §10723.8)(a)(4)). This notification serves as the foundation for consistent and progressive engagement activities to the diverse social, cultural, and economic stakeholder communities within the jurisdictional boundaries of the GSA.

Communication and engagement activities described in this section include tools, tasks, and tactics tailored to the unique needs of the GKGSA. These activities draw, in part, from results of the GKGSA Communication and Engagement Assessment. Data collection for the Communication and Engagement Assessment consisted of one-on-one and small group interviews, preceded by a Communication's Platform Assessment questionnaire. Assessment participants included representatives from the GKGSA Board of Directors and Stakeholder, Rural Communities, and Technical Advisory Committees, as well as one other additional participant with interest in groundwater issues in the region.

The content of the Communication's Platform Assessment questionnaire and interviews sought to identify the following:

- Common outreach practices of member agencies, such as newsletters, news releases, consumer reports, and social media.
- Identification of staff responsible for outreach activities of member agencies.
- Identification of stakeholder databases potentially available for use by GSA.
- Member agency opinions of constituent awareness of GSA and SGMA, and the factors that contribute to that awareness level.
- Approaches to stakeholder engagement by GSA and in partnership with one or more its member agencies.
- Identification of member agency responsibility to sustainable groundwater management in relation to responsibilities of the GSA.

Responses from the Assessment interviews and Communications Platforms Assessments are summarized in the GKGSA Communication and Engagement Assessment. Findings and suggestions from the Assessment informed development of this Public Outreach Plan. The outreach tools and activities in this Plan are framed to establish and maintain broad community awareness in SGMA and the GKGSA. These activities additionally seek to encourage active and consistent participation in groundwater management planning by GSA stakeholders towards completion of a durable and implementable GSP.

3.1 OUTREACH TOOLS

Outreach tools are activities for stakeholder identification, tracking engagements with stakeholders, and vehicles to publish and disseminate information to the public and stakeholders. This section describes the suite of tools developed or planned for use by the GKGSA. When possible, the GSA will attempt to leverage existing communications platforms. The GKGSA Communication and Engagement Assessment identifies existing outreach tools and platforms frequently used by the member and participating GSA agencies. The most commonly used tools are newsletters, email notifications, and utility bill inserts. The GSA may provide materials in other regionally common languages as directed by the Board of Directors, Rural Communities Committee, and Stakeholder Committee. A common visual identity format will be implemented for all printed and electronic informational materials distributed to the public and stakeholders.

3.1.1 Interested Party Database

To manage and document participation during the plan development process with individual stakeholders, GSAs are required to establish, maintain and utilize an Interested Party Database (IPD) as a means to distribute notices related to GSP preparation, meeting announcements, availability of draft plans, maps and other related information. Agencies are required to add any person who provides a written request to be placed on the IPD (Water Code §10723.4).

The GKGSA began development of its IPD in fall 2016. The IPD was submitted to DWR as part of the GKGSA's GSA Formation Notification in May 2017. The IPD is intended to be a "living" document that is continually updated as GKGSA identifies and engages stakeholders.

As part of existing intra-basin coordination, the three Kaweah Subbasin GSAs intend to establish a jointly manage IPD and meeting calendar website integrated to each agency's website. GKGSA's existing IPD will be incorporated

into the basin-wide IPD. Slated for release in fall 2018, the website is intended to provide stakeholder contact management, event management, mass email notification, and administrative record functions. For contact management, the platform supports self-enrollment to an email database of the GSA or GSAs of the stakeholder's choice. If uncertain of which GSA applies to their property or area of interest, the website will provide a link to assist in identification of the appropriate agency. Information requested during the subscription process includes the following fields:

- Name
- Email
- Company/Organization
- Address
- Stakeholder Category (Water Code §10723.2³):
 - Citizens Groups
 - General Public
 - Disadvantaged Communities⁴
 - Agricultural Well Owners
 - Domestic Well Owners
 - Commercial and Industrial Self-Supplied
 - Private and Public Water Purveyors
 - Surface Water Users⁵
 - Governmental and Land Use Agencies
 - Tribal Governments and Communities
 - Environmental and Ecosystem Interests
 - Remediation and Groundwater Cleanup

The subscription enrollment form is anticipated to include a range of notification topics applicable to each GSA. For the GK GSA, this menu is as follows:

- All GSA Notices and Announcements
- Board Meetings
- Committee Meetings
- Media Notices
- Document Release
- Kaweah Subbasin Management Team

The site's calendar provides a dashboard view of scheduled meetings and links to receive additional information, download documents, register to attend, and review the list of those that has registered to attend. A link will be provided for visitors to add the event to their personal calendar (e.g. Microsoft Outlook, Google Calendar, etc.). Links to adopted outreach plans and other related documents are planned for inclusion on the website.

Administratively, the site assists GSAs in the preparation and conduct of public meetings, monitor the effectiveness of communication activities, and serve as a platform to submit information required by SGMA. Public meeting functions include coordinated scheduling of GSA events, distribution of announcements by mass email, and logistical planning of public meetings based on attendee registration. Readership trends from mass email campaigns will be measured to identify the frequency emails are opened and forwarded on to others. Geographic information provided by

³ As available and consistent with Water Code Section 10723.2

⁴ Includes those served by private domestic wells or small community water systems (Water Code §10723.2(i))

⁵ If there is a hydrologic connection between surface and groundwater bodies (Water Code §10723.2(g))

subscribers can be displayed on a map to reveal potential geographic gaps in public participation. Finally, the platform will be integrated to the state's GSP submittal website (<https://sgma.water.ca.gov/portal/>) for receipt of the agency's public outreach plan and record of public participation.

3.1.2 Communication and Engagement Database

The Communication and Engagement Database is a Microsoft Excel spreadsheet used to plan, implement, and evaluate engagements with stakeholder groups and the media. The database will be managed by GKGSA support staff and the Stakeholder and Rural Communities Committees. The spreadsheet will include four sections as follows:

Tab: Stakeholder Database – This section includes stakeholder organizations identified as subject to, or potentially interested in, SGMA and the GSA activities. These organizations are categorized in the database consistent with §10723.2 and assigned to one of three “groups.” These groups serve to define a level of engagement with a stakeholder community based on self-identified or pre-assessed need. These groupings are as follows:

- **Group 1: Collaborated (*Inform + Consult + Collaborate*)** – This group is closely connected during the planning process through direct engagements aimed to exchange information through active two-way communication. As a pro-active and re-active activity, these engagements gather information, and develop solutions to existing and emerging issues.
- **Group 2: Consulted (*Inform + Consult*)** – This group is connected during planning through written informational materials and scheduled presentations. This engagement is a pro-active activity seeks to gather stakeholder opinions to information presented by GSA.
- **Group 3: Connected (*Inform*)** – This group is connected during planning through distribution of written informational materials and prepared informational presentations. Presentations would be held in response to stakeholder requests.

The grouping assignment for each stakeholder community is subject to change based on stakeholder interest and GSP content needs. It is anticipated that the assignment will be dynamic throughout the planning process as issues are identified and addressed. Such changes will be documented consistent with Water Code § 354.10 (b) and 354.10 (d).

Tab: Upcoming Outreach – This section identifies pending outreach activities to be implemented by the GKGSA. This section defines the date of the activity, the host, the organization type, the identified presenter or task lead and associated action items.

Tab: Outreach Record – This section documents outreach activities to stakeholder groups and represents the administrative record for inclusion in the agency's GSP. This includes planned outreach actions and those that were in response to a stakeholder group's request. Meeting attendance, duration and key topics covered during the presentation will be recorded in the database.

Tab: Media Database – This section identifies media outlets applicable to the GKGSA and document media relations activities. The section will be periodically updated with contact information of reporting and editorial staff, as well as requirements for placement of advertisements. All media relations activities (i.e. news releases, interviews, etc.) and their results will be recorded here and included as part of the administrative record during submittal of the adopted GSP.

3.1.3 GSA Website and Social Media

Pursuant to GSP Emergency Regulations Section 353.6, the GKGSA members developed a stand-alone website for the GSA. Located at www.greaterkaweahgsa.org, this website provides information about SGMA, the member agencies, Board of Directors, Board and committee meeting notices and summaries, links, and a contact form. The GSA website is formatted to be compatible with smartphone platforms to assist in engagement with stakeholders who prefer or are reliant on this format. This effort recognizes, in part, that high-speed internet use is not universal throughout the GSA jurisdictional area either through lack of availability, personal choice, or economic reasons.

Social media sites are another electronic communication tool. Approximately half of the GKGSA Communication and Engagement Assessment participants identified social media as a frequently used outreach tool. Social media is more commonly used by M&I water providers, rather than agricultural water providers, to communicate with their customers and constituents. M&I water providers may expand the use of social media to inform their constituents and customers about GKGSA Board of Directors and committee meetings, public meetings, and key GSP development milestones, including release of the public draft GSP.

The GKGSA intends to post various documents in Spanish – and other languages, as appropriate – on the project website to assist in stakeholder communication and engagement activities. Factors under consideration include identification of a demonstrable need of the pertinent stakeholder group and availability of resources.

3.1.4 Key Messages

An initial list of key messages has been developed for use in all GKGSA communications and are provided in Appendix A. These messages will provide a menu of message options to utilize when responding to stakeholders, the public, media and other groups. These messages will also be available for use by member agencies for response to GSA or SGMA-specific activities specific to their jurisdictional area and incorporation into existing communications platforms. The key messages will be organized to deliver information related to SGMA, GSA formation, and GSP development, and should be adapted to the target audience (i.e. urban community, rural community, disadvantaged community, grower or industry representative). Key messages are subject to change during the GSP development process as information is developed as conditions change.

3.1.5 Outreach Tools and Resources

Outreach tools and resources for the GKGSA support outreach activities implemented to build and maintain awareness and support plan development. Informational materials distributed to stakeholders will have a common visual identity to assist GSA stakeholders distinguish its work product from other GSAs in the region. The range of documents planned for use include agency letterhead, meeting summaries, comment cards, fliers, PowerPoint presentations, sign-in sheets, brochures, factsheets, news releases, media advisories, utility bill inserts, template staff reports, surveys, and others as-needed. The general purpose/approach for these materials are as follows:

Letterhead: Utilized for formal communication to the public, stakeholders and other parties. This letterhead identifies agency members, the agency Board of Directors, and key staff. This document may serve as a stand-alone communication vehicle or as a companion to other outreach materials.

Meeting Summaries: Utilized to memorialize discussions, decisions and other important milestones associated with a meeting hosted by the GSA.

Comment Cards: Provided in a postcard format, this document serves to collect public and stakeholder feedback and receive requests to be added to the Interested Parties Database. Depending on setting, document may be pre-addressed for convenient delivery to the agency by U.S. Mail.

PowerPoint Presentation: Provided in electronic format, this document will provide visual and text content that support verbal presentations by GSA members and staff.

Sign-in Sheet: This document will assist in maintaining the record of engagement for agency meetings and assist stakeholders in signing up to the IPD.

Newsletter: A periodic online newsletter intended to keep stakeholders and the public up to date on the GSP development process, notify stakeholders of upcoming public meetings and workshops and address other topics applicable to sustainable groundwater management pertinent to the region. It is anticipated that the newsletters would be sent to the stakeholders up to three times per year during the GSP development process. The newsletter may include the following content: status of the GSP development process and milestones, key groundwater issues or topics of concern for the subbasin, regional coordination activities, state-wide updates on SGMA and a schedule of planned public meetings, workshops or other events in the subbasin, regional coordination activities, statewide updates on SGMA and a schedule of planned public meetings, workshops or other events. The GSA may also utilize existing newsletters and email notifications developed and distributed by its member and participating agencies.

Brochures and Fact Sheets: These are typically one to two pages in length and developed to assist engagement with the public and stakeholders on specific topics. The editorial focus of these documents will be managed by the Advisory Committee in coordination with the Management Committee.

Utility Bill Inserts: Utility bill inserts are a frequently used and effective method of communication between agencies and their customers or constituents. These documents utilize space, as available, in utility bills delivered to customers by U.S. Mail. The agency may utilize these formats, as available, during the following plan development intervals:

- Fall 2018 – This first insert seeks to raise awareness of GKGSA and encourage enrollment in the IPD.
- Winter 2018 -19 – This second insert continues to raise awareness and encourage visitation to the agency website to stay informed of sustainable groundwater management activities to date.
- Fall 2019 – This third insert will be timed to coincide with public notification for adoption of the GKGSA GSP.

Fliers: These one-page documents are focused on stakeholder communities and intended to raise awareness of certain topics or events of the GKGSA.

News Releases: These documents are typically one to two pages in length and serve to draw media attention to a significant event or milestone of the agency.

Calendar Advisories: One-page documents that provide a brief description of a GKGSA event or milestone (e.g. deadline for receipt of public comment).

Template Staff Reports: Multi-page staff template reports prepared by GKGSA staff and the Technical Advisory Committee on key GSP development milestones, including release of the public draft GSP. GKGSA member and participating agencies may utilize the template staff reports to provide updates to their boards or councils.

Social Media: Social media is a rapid and convenient method to reach stakeholders and other interested parties. GKGSA maintains a Twitter account, established in August 2018, to provide notices about GSA meetings, events, and news. Postings to the site will be completed in coordination with updates to the project website and additional activities identified in coordination with the Stakeholder Committee and Rural Communities Committee. GKGSA member and participating agencies may also share GKGSA event postings and news to their agencies' social media accounts.

Surveys: The GKGSA intends to periodically conduct surveys of the public, stakeholder groups and other interested parties. These surveys can be circulated online, email, direct mail, conducted in person, or provided as an interactive tool during public meetings. This activity is an important tool to assist in data collection, raise or increase awareness of key topics, respond to key issues, or collect feedback to topics important for development of the GKGSA GSP. The Rural Communities and Stakeholder Committees will be responsible for the management, implementation and oversight of all agency surveys. Where necessary, draft surveys will be presented to the Board of Directors for their approval. The content of each survey will address the following criteria:

- Duration
- Purpose and objective
- Target audience and circulation
- Application to Sustainable Groundwater Management Planning
- Contribution to objectives of GSA

Anticipated survey topics are as follows and subject to change during the planning process. The schedule for implementation of these activities will be determined by the Rural Communities and Stakeholder Committees, or GKGSA staff.

- **Post-Event Surveys:** These surveys would be printed on a 5.5 x 8.5-inch sheet of paper and circulated during a public meeting or workshop. These surveys may serve to evaluate the information shared during a meeting, or function as a data collection vehicle associated with a key topic discussed at the meeting.
- **Awareness Surveys:** These surveys are anticipated to be circulated electronically either through email, the project website, or social media (e.g. Facebook, SurveyMonkey, etc.) These surveys would include high-level questions associated with sustainable groundwater management. Awareness surveys are typically circulated at various intervals to measure changes in stakeholder responses.
- **Subject-Matter Surveys:** These surveys are exploratory in nature and seek to collect information from a specific stakeholder community or geography. Such surveys can help inform the planning process by testing alternatives to potential actions (e.g. alternatives to an identified undesirable result) or recruiting information (e.g. location of properties with multiple wells at different depths).

3.2 OUTREACH ACTIVITIES

The GKGSA intends to conduct and monitor a variety of public outreach activities each aimed to inform, engage and respond to stakeholders and other interested parties during GSP development, adoption and, later, implementation. These activities serve to engage and interact with the public and stakeholders during GSP development, and to assist GSA staff and leadership collect information important to groundwater sustainability planning. This engagement and interaction occur in six general areas: Standing Meetings; member agency meetings; public and stakeholder

meetings; existing community meetings; and community working groups. GKGSA will also conduct targeted outreach to DACs and severely disadvantaged communities (SDAC), described in Section 3.3. The date and schedule of these engagements is illustrated in Appendix C: GKGSA Outreach and Coordination Schedule. Commonly used tools applicable to each form of engagement are included in the descriptions below.

Outreach activities and distribution of outreach materials will also include partnerships with “trusted messengers” in the community. Trusted messengers are agencies, organizations, or individuals that already work or engage with stakeholders in the GKGSA and could be serve as communications partners to the agency. Trusted messengers identified through the GKGSA Communication and Engagement Assessment include the Tulare County Agricultural Commissioner, Tulare and Kings Counties Farm Bureaus, local irrigation districts, farm credit banks, Kaweah Basin Water Quality Association, and California Citrus Mutual. As described in Section 3.3, the GKGSA will also partner with non-profit organizations currently working with DACs and SDACs in the region. This includes organizations such as Self-Help Enterprises (SHE), the Leadership Counsel for Justice and Accountability (LCJA), and Community Water Center (CWC) who have a long history of working with communities in the GKGSA and can provide community outreach and engagement support.

3.2.1 Standing Meetings

Commonly Used Tools: Sign-in Sheet, Comment Card, Meeting Summary, Survey

Schedule:

- Monthly: Board of Directors
- Monthly: Rural Communities Committee
- Monthly: Stakeholder Committee
- Monthly: Technical Advisory Committee
- Monthly: Kaweah Subbasin Management Team

The GKGSA hosts or participates in five standing meetings that are subject to the Brown Act. These include the agency’s Board of Directors; the agency’s Stakeholder, Rural Communities, and Technical Advisory committees; and the Kaweah Subbasin Management Team meetings. Notification for these meetings are performed pursuant to the Brown Act. They represent points of access for the public and stakeholders to observe and participate in a forum where key decisions are presented, discussed and decided. They also serve to engage with the public and stakeholders in the decision-making process for development of a GSP that addresses local requirements consistent with SGMA. Topics presented for Board review and decision are brought by the agency’s Manager in consultation with the Rural Communities, Stakeholder, and Technical Advisory committees. Details of each meeting are be reported on the agency website consistent with Water Code §10725.2.

3.2.2 Local Public Agency Support

Commonly Used Tool: Comment Card, Template Staff Report

Schedule:

- On-Request/Identified Need

- Community Work Groups
- Winter/Spring 2019: GSP Chapter Overviews
- Spring/Summer 2019: Staff Reports

During development of the GKGSA, staff intend to coordinate with staff of member agencies, participating agencies and other local public agencies within the agency's boundaries (i.e. County of Kings and City of Hanford) to schedule and conduct briefings to that agency's elected officials, management or community members on GSP topics specific to their jurisdictional area. These presentations would be held on an as-needed basis and held prior to the release of the GKGSA Public Draft GSP. Events anticipated to occur include:

- On-Request/Identified Need – These presentations would be conducted on an as-needed basis, likely in response to a request by elected officials or community stakeholders. These events may be suggested by GSA in support of delivering community-specific information to these stakeholders.
- Community Work Groups – Local public agencies may opt to engage local community leaders in topic-specific meetings to communicate plan development details specific to their area. Such meetings serve to engage community leaders during plan development and inform elected officials and staff of stakeholder opinions and perceptions.
- GSP Chapter Overviews – These presentations would be led by staff of member agencies and participating agencies to brief elected officials and other key stakeholders of GSP content and receive direction.
- Staff Reports – Prior to the release of the Public Draft GSP, GSA staff intend to work with agency staff of member agencies, participating agencies, and other local public agencies for development and presentation of a staff report that documents components of the GSP consistent with agency's responsibilities under SGMA.

3.2.3 Public Meetings and Workshops

Commonly Used Tools: Sign-in Sheet, Comment Card, Meeting Summary, Surveys

Schedule:

- Fall 2018: Groundwater Recharge Project Identification Workshop
- Fall/Winter 2018: Sustainable Management Criteria Workshops

Public meetings and workshops serve as a platform to educate community members and stakeholders about GKGSA activities, as well as collect information important for development and implementation of the GSP. Public agencies in the Kaweah Subbasin have used public meetings to actively engage stakeholders since the initial passage of SGMA in 2014. Early public meetings focused on educating the public about the requirements of SGMA. In early 2016, agencies in the Greater Kaweah region formed a MOU working group to discuss formation of the GKGSA. This resulted in a series of public roundtable discussions which addressed the GKGSA's governance structure, boundaries, and agency administration. Pursuant to the requirements of SGMA, the decision to form the GKGSA was made at a public meeting with opportunity for public comment.

The GKGSA will continue to use feedback and information provided at public meetings to help inform development and implementation of the GSP. During development of the GSP, the GKGSA intends to stage two public meetings. These meetings will be planned and managed by the Rural Communities and Stakeholder committees in close coordination with the GSA Board. The meetings will focus on specific stakeholder groups, such as school districts, water purveyors, domestic well owners, industry groups, agricultural associations, disadvantaged or economically stressed communities and non-governmental agencies. The primary functions of these meetings are: 1) to build and maintain awareness of SGMA, the GSA and the plan development process; 2) to receive public and stakeholder input

and advice during plan development; 3) to encourage the public and stakeholders to attend and participate at agency Board and Advisory Committee meetings; and 4) to encourage public and stakeholder enrollment in the Interested Parties Database. Notification of these meetings will be conducted through the agency website, the Interested Parties Database and other communication vehicles available through member agencies or other partners. These may include newsletters, post cards, fliers, utility bill inserts and social media. Results of these meetings will be posted on the agency website and tracked in the Communication and Engagement Database. The two meetings are described as follows:

Groundwater Recharge Project Identification Workshop: The purpose of this event is to engage a broad spectrum of stakeholders throughout the GKGSA in the identification of potential sites to construct groundwater recharge facilities. This session would include a technical presentation of the reliability and availability of surface waters in the GKGSA and engage participants in breakout sessions or other formats to brainstorm locations where facilities could be built. Participants would be asked, among other things, to identify the potential size of the facility, how the water would be delivered to the site, and any factors that make the site an ideal candidate for groundwater recharge (e.g. rapid percolation, etc.) Workshop results would be compiled into a project database and assessed for potential feasibility and implementation costs by technical staff.

Sustainable Management Criteria Workshops: The purpose of this event is to engage stakeholders in the review of draft Sustainable Management Criteria under consideration by the GKGSA and receive stakeholder recommendations for potential improvement. This event would also discuss preliminary groundwater management thresholds associated with the seven undesirable results prescribed by SGMA. These workshops will allow technical staff to refine Sustainable Management Criteria and thresholds based on community feedback.

3.2.4 Existing Public and Community Meetings

Commonly Used Tool: Comment Card, Survey

Schedule:

- Fall 2018
- Winter and Spring 2019

The GKGSA plans to participate in a range of existing public and community meetings engage stakeholders in support of GSP development. These meetings would include rural school boards and Parent Teacher Associations (see Figure 4), neighborhood associations, mobile home parks, civic groups, non-profit and other community organizations. These sessions are intended to occur between the fourth quarter of 2018 and second quarter of 2019. Subsequent presentations may be provided upon request by a stakeholder group or as a follow-on action of the Rural Communities Committee and Stakeholder Committee. The initial round of presentations will focus on expanding self-enrollment in the IPD, increasing awareness of SGMA and increasing awareness and participation in GKGSA GSP development. Subsequent rounds of community presentations would serve to continue dialog with stakeholder communities and alert groups to pending key milestones (e.g. public hearings). Organizations targeted for engagement – inclusive of the timing, sequence, and action items – are included in the Communication and Engagement Database. The presentations may be led by agency staff, member agency staff, committee members, or consultant support staff using the prepared key messages.

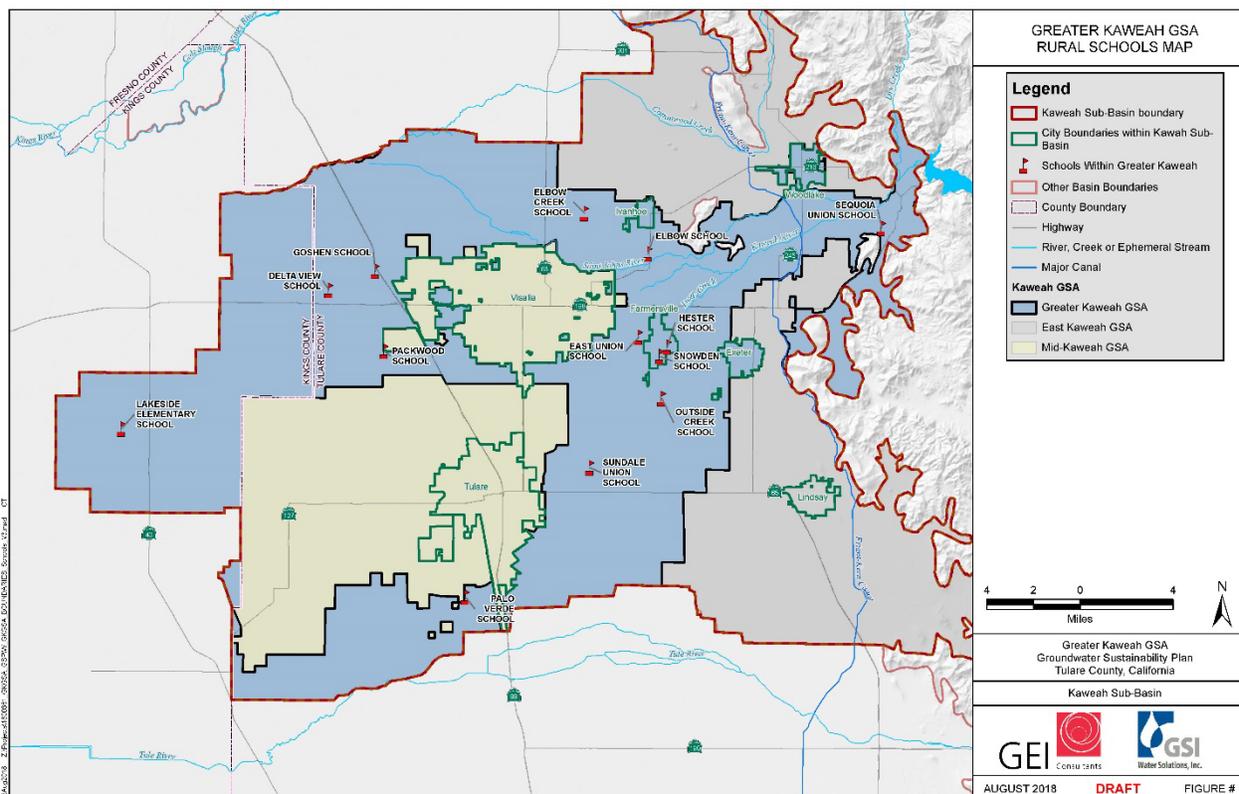


Figure 4 Rural Schools within and near Greater Kaweah GSA

3.3 DISADVANTAGED COMMUNITY OUTREACH

DWR defines a Disadvantaged Community (DAC) as a community with an annual median household income (MHI) that is less than 80 percent of the statewide annual median household income (MHI) and Severely Disadvantaged Community (SDAC) less than 60 percent of the annual MHI. As shown in Figure 4 and Table 1, many of the communities in the GKGSA are designated or either a DAC or SDAC. This includes the cities of Exeter, Farmersville, and Woodlake; as well as the unincorporated communities of West Goshen, Linnell Camp, Lemon Cove, Ivanhoe, and Patterson Tract (See Figure 5).

Table 1. DAC/SDAC Communities in Greater Kaweah GSA

City/Community	Annual MHI ¹	DAC/SDAC Designation ²	Water Service Provider
City of Exeter	\$42,590	DAC	City of Exeter
City of Farmersville	\$33,689	SDAC	City of Farmersville
City of Woodlake	\$34,583	SDAC	City of Woodlake
Lemon Cove	\$39,360	DAC	Lemon Cove Sanitary District
Linnell Camp	\$20,565	SDAC	County of Tulare
Ivanhoe	\$31,611	SDAC	Ivanhoe Public Utilities District
Patterson Tract	\$39,006	DAC	Patterson Tract Community Services District ³
West Goshen	\$25,335	SDAC	California Water Service
Key: DAC = disadvantaged community MHI = median household income SDAC = severely disadvantaged community			
Notes: ¹ MHI data from 2012 – 2016 U.S. Census Bureau American Community Survey Five-Year Estimates ² DAC/SDAC designation based on 2012 – 2016 U.S. Census Bureau American Community Survey Five-Year Estimates. Annual California Statewide MHI for 2012 – 2016 was \$63,783. DACs are communities with less than 80 percent of the annual MHI. SDACs are communities with less than 60 percent annual MHI. ³ Patterson Tract Community Services District only serves a portion of the Census-designated place Patterson Tract. Patterson Tract Community Services District serves the east side of Road 124, Lincoln Road, and Grandview Road from Avenue 324 to Avenue 328. The remaining area of Patterson Tract is served by other water service providers or private wells.			

DACs and SDACs in the region face a number of unique water supply challenges. Many of these communities rely solely on groundwater for their water supply, making them especially susceptible to groundwater quality problems and falling water tables, and vulnerable to pumping restrictions. These communities also lack sufficient funding to update critical water system infrastructure and treat groundwater quality issues as they arise. In addition, some communities provide water to DACs or SDACs outside of the agency. For example, the City of Exeter may extend water service to Tooleville—an SDAC located in EKGSA. To ensure that the challenges faced by DACs and SDACs are addressed, the GKGSA will implement a targeted outreach strategy for these communities and coordinate closely with other GSAs in the Kaweah Subbasin.

Engagement with DACs and SDACs will primarily occur through the Rural Communities Committee, along with targeted outreach tools and activities. Targeted outreach tools include DAC and SDAC outreach materials translated into multiple languages. The GKGSA website and other outreach materials may also be translated to provide accessibility for a wider audience. Targeted outreach activities include outreach to schools in DACs and SDACs, presentations to community groups in DACs and SDACs, media alerts to Spanish-language or other non-English media outlets, and targeted DAC and SDAC public meetings. These targeted public meetings will be held during the same schedule and address the same topics as the general public meetings described in Section 3.2.3; however, the content of the meetings will focus on water supply challenges faced by DAC and SDAC. The meetings will also be

formatted to ensure inclusion of communities' residents, including providing interpretation services and holding the meetings during evenings and in easily accessible locations. Feedback provided during targeted DAC and SDAC public meetings will be compiled into a separate DAC/SDAC public comment report and inform development of the GSP.

Staff working in or serving DACs may also form DAC community working groups. As currently envisioned, the working groups would be comprised of active community members in the DACs or SDACs. The working groups would be led by DAC staff, with support the GKGSA. The DAC community working groups would serve as both an educational platform to inform DAC representatives about technical topics, as well as a method to engage these members in the GSP planning and implementation process. Prior to each working group meeting, members would be provided educational materials about key GSP topics and chapters for discussion. The objective of the working groups would be to develop an informed body of DAC representatives that could provide meaningful input on the GKGSA GSP. Targeted DAC and SDAC outreach will seek to be implemented in partnership with non-profit organizations currently working with DACs and SDACs in the region. In 2017, DWR issued \$85.8 million in grant funds through the Sustainable Groundwater Planning (SGWP) Program to support GSP development activities by GSAs and other groups. This award includes a \$1 million grant to SHE, a \$758,000 grant to the LCJA, and a \$614,353 grant to the CWC – three non-profit groups organized to assist DAC address a range of social, civic and environmental issues. Funds allocated to these groups are available, among other things, to provide technical support for development of projects, provide translation support to GSAs, and staff participation in GSA activities. At the time of this plan, agency has initiated partnership efforts with SHE and LCJA, and has attended events sponsored by CWC. The agency intends to explore options to partner with these agencies in a range of public meetings such as the Groundwater Recharge Project Identification Workshop and the Sustainable Management Criteria Workshops described in Section 3.2.3.

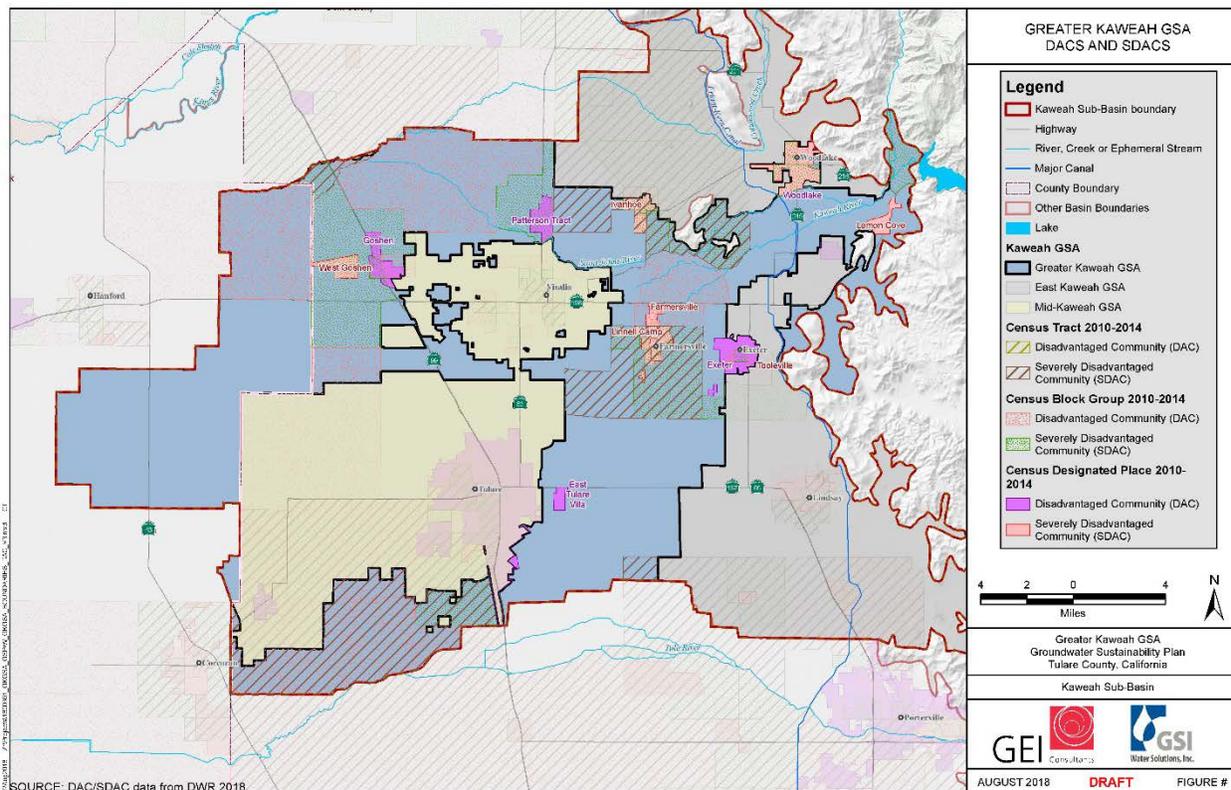


Figure 5 Disadvantaged Communities within the Kaweah Subbasin

3.4 TRIBAL OUTREACH

GKGSa submitted a Sacred Lands File and Native American Contacts List Request to the Native American Heritage Commission (NAHC) on May 15, 2018. GKGSa’s request to the NAHC included a general description of the GKGSa and map identifying US Geological Survey quadrangles wholly or partially in the GKGSa’s boundaries. The NAHC replied to the request on May 22, 2018 and identified fix potentially affected California Native American Tribes in the area of potential effect. These tribes, and their status, is identified in Table 2. The GKGSa’s Sacred Lands File and Native American Contacts List Request, NAHC’s response letter, and list of tribes identified by the NAHC are included as Appendix D.

Table 2. NAHC Tribal Coordination List

Tribal Name	Contact	Title	Address	City/State/ Zip	Sacred Lands File?
Kern Valley Indian Community	Robert Robinson	Chairperson	P.O. Box 1010	Lake Isabella, CA 93240	Yes
Santa Rosa Indian Community of the Santa Rosa Rancheria	Rueben Barrios Sr.	Chairperson	P.O. Box 8	Lemoore, CA 93245	Yes
Tubatulabals of Kern Valley	Robert L. Gomez Jr.	Chairperson	P.O. Box 26	Lake Isabella, CA 93240	Yes
Tule River Indian Tribe	Neil Peyron	Chairperson	P.O. Box 589	Porterville, CA 93258	Yes
Wuksache Indian Tribe/Eshom Valley Band	Kenneth Woodrow	Chairperson	1179 Rock Haven Ct.	Salinas, CA 93906	Yes

There are no tribes with designated tribal lands within the GKGSA's boundaries. Per the NAHC's letter response, the record search of the NAHC's *Sacred Lands File* identified that the Wuksache Indian Tribe/Eshom Valley Band has a sacred land in the area known as Rocky Hill. The Rocky Hill area is in the foothills east of the City of Exeter and is presumed to be outside both the boundaries of the GKGSA and Kaweah Subbasin. However, tribes often have cultural, archeological, and other interests in areas outside of their designated tribal lands. Therefore, the GKGSA will coordinate with the tribes as part of the planning process.

GKGSA staff began engaging tribes during GSA formation. In October 2016, GKGSA staff sent a letter (see Appendix D) to the Santa Rosa Indian Community of the Santa Rosa Rancheria informing them about potential formation of the GKGSA and inviting a representative of the tribe to serve on the Stakeholder Committee. At this time, the Santa Rosa Indian Community of the Santa Rosa Rancheria and other tribes in the region have not expressed interested in serving on the Stakeholder Committee. However, the GKGSA will continue to keep tribes informed about GKGSA activities and GSP development and implementation. Tribal contacts will be added to the IPD and Communication and Engagement Database and tribal representatives will be advised about GKGSA outreach activities, including public meetings and workshops, and opportunities to engage in development of the GSP. Additional engagement may occur at request of the tribes.

3.5 GSP REVIEW AND ADOPTION

The adoption of the GKGSA GSP is anticipated to last up to seven months, consisting of two-phases designed to enhance the public's opportunity to provide input to the GSP above SGMA's legislative requirements. Under SGMA, GSAs are required to hold a single public hearing prior to board action to GSP adoption. Notification of this public hearing is governed by CWC §10728.4:

A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests

consultation within 30 days of receipt of the notice. Nothing in this section is intended to preclude an agency and a city or county from otherwise consulting or commenting regarding the adoption or amendment of a plan.

While the above Water Code provision intimates a three-month adoption process, the GSA anticipates hosting a public meeting in mid-2019 to present and receive public input to the GKGSA Public Draft GSP. The release of this document and activities consistent with CWC §10728.4 are as follows:

3.5.1 Public Review Phase

The Public Review Phase is anticipated to take up to three months and begin in mid-2019. The major milestone of this phase is release of the agency's Public Draft GSP and conduct of a public review period. This phase seeks to provide opportunities for public input to the GSP prior to formal adoption proceedings pursuant to §10728.4. This step is separate from a public comment processes to be conducted by DWR (Water Code §10733.4(3)(c)⁶). The agency's Public Review Phase includes the following components:

Public Draft GSP: The Public Draft GSP is intended for release in mid-2019 for up to a 90-day public review.

Public Meeting: During the day public review period for the Public Draft GSP, the agency intends to host at least one public meeting intended to provide a high-level presentation of the document and receive comments from the public and stakeholders. A stenographer may staff this public meeting to record verbal comments.

Notifications: Consistent with Government Code §6066, the agency intends to place two newspaper advertisements at least five days apart, 14 days prior to the public meeting. Additional notification activities include distribution of a news release to local and regional print, broadcast and on-line media sources, distribution of event fliers to organizations identified in the Communication and Engagement Database, and mass email distribution via the agency's Interested Party Database.

Public Comment Report: A Public Comment Report will be developed to document all written comments submitted during the public comment period and staff responses to these comments. This document will include all verbal comments collected by a stenographer during the public meeting, as available. Information contained in this document will contribute to completion of the Draft Final GSP.

3.5.1.1 City and County Review

SGMA provides cities and counties specific authority to request consultation with a GSA prior to GSP adoption or amendment. California Water Code §10728.4 states that:

A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of receipt of the notice. Nothing in this section is intended to preclude an agency

⁶ Upon receipt of a groundwater sustainability plan, the department shall post the plan on the department's Internet Web site and provide 60 days for persons to submit comments to the department about the plan.

and a city or county from otherwise consulting or commenting regarding the adoption or amendment of a plan.

As of the development of this plan, jurisdictions eligible to request formal consultation under CWC §10728.4 include the cities of Exeter, Farmersville, Hanford, Woodlake, and the County of Kings. This provision is not considered to be applicable to the County of Tulare because the County is a member agency of the GKGSA JPA. To minimize the potential need to request formal consultation of these communities, the GKGSA intends to offer pre-consultation coordination with the elected officials of these jurisdictions during the public review phase. The scope of this pre-consultation will be defined by results of Local Public Agency Support described in Section 3.2.2 of this plan.

3.5.2 GSP Adoption Phase

The GSP Adoption Phase is expected to last 90 to 120 days and slated to begin in late summer/early fall 2019. This phase includes the following components:

Notice of Intent: Pursuant to Water Code §10728.4, the agency will prepare and release a Notice of Intent to Adopt its GSP during a regularly scheduled meeting of the Board of Directors. This notice will be provided to the County of Tulare and cities within the jurisdictional area of the GSA. Consultation meetings will be performed in the event written request is received pursuant to §10728.4. As for-profit water purveyors operate within the jurisdictional boundary of GKGSA, the agency intends to provide a courtesy copy of this Notice of Intent to the California Public Utilities Commission. This action continues notification first initiated pursuant to Water Code 10727.8(a).

Member Agency Briefing: Prior to release of the Draft Final GSP, GKGSA staff plan to provide a briefing of the document's key elements and results from the public comment period before the boards of its member agencies. These presentations will provide a high-level overview and communicate the adoption schedule by the GKGSA Board of Directors.

Release Draft Final GSP: The Draft Final GSP is intended for public release in late fall/early winter 2019.

Notifications: Pursuant to Government Code §6066, the GSA will place two newspaper advertisements at least five days apart, 14 days prior to the conduct of a public hearing required by Water Code §10728.4. Additional notification activities include distribution of a news release to local and regional print, broadcast and on-line media sources, distribution of event fliers to organizations identified in the Communication and Engagement Database, and mass email and text notification using the agency's Interested Party Database.

Public Hearing: Pursuant to the Water Code, the Board of Directors will host a formal public hearing to receive verbal comments from the public and stakeholders. This hearing is in advance of a Board of Directors action to adopt the 2020 GKGSA GSP and authorize the Coordination Agreement (SGMA §10727(b)(3) and GSP Emergency Regulations §357.4). Written comments provided by the public and other interested parties will be accepted during the hearing. A stenographer may be in attendance to record public comments. Written and verbal comments will be retained for post adoption use (see Section 3.4 Post Adoption Activities). This hearing is slated to occur in early December 2019.

3.6 POST ADOPTION ACTIVITIES

Adoption of the GKGSA GSP authorizes agency staff to begin implementation of the identified actions. The adoption additionally initiates review and evaluation of submitted GSPs by DWR to be tracked by the GKGSA as part of GSP implementation. These activities include the following components:

Public Review: Water Code Section 10733.4 directs DWR to conduct a public comment period for submitted GSPs for a period of 60 days. This review is conducted on a subbasin level and begins after DWR receives all GSPs from GSAs in a groundwater subbasin. Comments are submitted via an on-line form managed by DWR. These comments are delivered to DWR staff and automatically relayed to a subbasins point of contact as identified in the GSP or Coordination Agreement, as applicable. It is anticipated that DWR will refer to these comments as part of its completion of GSP Evaluations by 2022 (GSP Emergency Regulations §355.2). Comments are submitted via an on-line form managed by DWR. These comments are delivered to DWR staff and automatically relayed to a subbasins point of contact as identified in the GSP or Coordination Agreement, as applicable. It is anticipated that DWR will refer to these comments as part of its completion of GSP Evaluations by 2022 (GSP Emergency Regulations §355.2).

Public Comment Report Errata: Following the close of DWR's 60-day public review period, the GSA anticipates publishing an erratum to the Public Comment Report. Anticipated for delivery to the agency Board of Directors in last spring/early summer 2020, this document will compile and respond, as appropriate, to comments submitted to DWR and relayed to the agency, and comments provided to the agency during formal adoption proceedings.

3.7 OUTREACH IN SUPPORT OF GSP IMPLEMENTATION

The GKGSA expects to continue use of the outreach tools and tactics described in this plan as part of outreach to the public and stakeholder community following adoption of the GSP. The format and approach of this outreach will be described in an update to this plan based, in part, on results of engagement with stakeholders during the plan development; recommendations by the Rural Communities, Stakeholder, and Technical Advisory committees, and direction of the agency Board of Directors.

4.0 INTRA-BASIN OUTREACH ACTIVITIES

Coordinated outreach activities between the three GSAs in the Kaweah Subbasin are preliminary and subject to agreement of the GSAs. These activities are described as follows:

4.1 SUBBASIN FORUMS

Subbasin forums are conference-style events co-hosted by management and technical staff for each of the Kaweah Subbasin GSAs. The purpose of these forums is to provide the public and stakeholders with a broad, subbasin-wide perspective of groundwater conditions in the region and allow each GSA to describe important features for their specific area. These meetings would be held annually and promoted through various notification activities including advertising, news release, event fliers, and mass email to the IPDs of the GSAs.

4.2 ANNUAL REPORTS

Following submittal of adopted GSPs, subbasins are required to develop and submit to DWR annual reports that identify progress and status of sustainable groundwater management activities (GSP Emergency Regulations §356.2). These annual reports will additionally be distributed to subbasin stakeholders through the Interested Party Database and various community meetings. The Kaweah Subbasin GSAs anticipate joint release of these annual reports and implementation of coordinated outreach activities.

APPENDICES

5.0 APPENDICIES

Appendix A KEY MESSAGES

Version: November 1, 2018; Content is subject to change.

A.1 SUSTAINABLE GROUNDWATER MANAGEMENT ACT

What is the Sustainable Groundwater Management Act?

The Sustainable Groundwater Management Act (commonly referred to as “SGMA”), signed into law in 2014, provides a framework for long-term sustainable groundwater management across California. It requires that local and regional authorities in the medium and high priority groundwater basins form a locally-controlled and governed Groundwater Sustainability Agency, which will prepare and implement a Groundwater Sustainability Plan.

Is the Sustainable Groundwater Management Act related to the drought?

Not directly. Sustainable groundwater management, much like management of surface water resources, is the result of a long-term vision and commitment by one or more water users or communities. That said, now that California has faced several consecutive years of drought, the need to manage groundwater is more relevant than ever. Some of our groundwater basins have reached an all-time historic low. Creating a framework for State oversight ensures a standard, consistent process to maintain and actively monitor and manage basins at the local level, and reduce impacts seen from overuse of these basins.

Why was the Sustainable Groundwater Management Act established?

Over the years, California water managers, individual well owners and communities that rely on groundwater resources have observed a rapid decline of water levels in some aquifers.⁷ Impacts and issues related to the decline are apparent. In some areas, groundwater pumping has exacerbated land subsidence, which also threatens infrastructure such as roads, canals and bridges. Drought and low water levels have also impacted water quality and quantity of private well users.

In January 2014, the Governor’s Office identified groundwater management as one of ten key action steps in its California Water Action Plan. The Sustainable Groundwater Management Act, signed into law months later, follows up on that action, giving local agencies the ability to manage their respective basins following statewide guidelines.

What does “Sustainable Groundwater Management” mean?

“Sustainable groundwater management” is defined as the management and use of groundwater in a manner that can be maintained long-term without causing undesirable results in six areas:

⁷ An **aquifer** is an underground layer of water-bearing permeable rock, rock fractures or unconsolidated materials (gravel, sand or silt) from which groundwater can be extracted using a water well.

- Chronic lowering of groundwater levels (not including overdraft if a basin is otherwise managed)
- Significant and unreasonable reduction in groundwater storage
- Significant and unreasonable sea water intrusion
- Significant and unreasonable degraded water quality, including migration of contaminant plumes that impair water supplies
- Significant and unreasonable land subsidence that substantially interferes with surface land uses
- Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of surface water

Who is required to comply with the Sustainable Groundwater Management Act?

The Act requires the formation of Groundwater Sustainability Agencies to comply with the Act within basins identified by the State as medium or high priority. Certain parts of the state, notably those for which groundwater use is under the jurisdiction of a court adjudication, are currently exempted from most of SGMA's mandates. Entities eligible to serve as a Groundwater Sustainability Agency are defined by the Act as a local public agency that has water supply, water management or land use management responsibilities within a groundwater basin ([California Water Code Section 10721\(n\)](#)). If no local agency steps forward, the county is the default agency. The statutory deadline to form a Groundwater Sustainability Agency was June 30, 2017.

What is a Groundwater Sustainability Agency?

A groundwater sustainability agency is one or more local governmental agencies that implement the provisions of the Sustainable Groundwater Management Act. A local agency is defined as one that has water supply, water management or land management authority. Groundwater Sustainability Agencies assess the conditions of their local groundwater basins, adopt locally-based sustainable management plans to create drought resiliency and improve coordination between land use and groundwater planning.

Will the Sustainable Groundwater Management Act affect existing water and property rights?

The Sustainable Groundwater Management Act does not change existing groundwater or property rights. Groundwater rights will continue to be subject to regulation under article 10, section 2, of the California Constitution.

What authority will Groundwater Sustainability Agencies have?

Local Groundwater Sustainability Agencies can choose to implement as many of the legal powers as they deem necessary for management of their basin. The Sustainable Groundwater Management Act as currently enacted empowers all Groundwater Sustainability Agencies to:

- Adopt rules, regulations, ordinances and resolutions to implement the Act
- Monitor compliance and enforcement
- Require registration of groundwater wells
- Require appropriate measurement devices and reporting of extractions
- Investigate, appropriate and acquire surface water rights, groundwater and groundwater rights into the Groundwater Sustainability Agency.
- Identify projects and management actions to achieve sustainability in the basin by 2040.
- Acquire or augment local water supplies to enhance the sustainability of the groundwater basin
- Propose and collect fees
- Adopt and fund a Groundwater Sustainability Plan according to existing laws

Groundwater Sustainability Agencies may use a number of management tools to achieve sustainability goals. The specific tools and methods a Groundwater Sustainability Agency will use to achieve sustainability will be determined in discussion with stakeholders and identified in the Groundwater Sustainability Plan.

It is also important to note that the Sustainable Groundwater Management Act requires local agencies to acknowledge Groundwater Sustainability Plans when a legislative body is adopting or substantially amending its General Plan. General Plans must accurately reflect the information in the Groundwater Sustainability Plan with regards to available water supplies.

Is the State trying to take over control of groundwater?

The State legislature, in passage of SGMA, communicated its intent that sustainable groundwater management is best left with local government agencies with expertise and responsibilities over water supplies. To help foster local control, the Act provided local agencies with tools and authorities they previously lacked to manage groundwater resources sustainably. However, the legislation also included a series of triggers that would result in intervention by the State Water Resources Control Board in the event a subbasin failed to meet requirements of the Act. This State intervention occurs only if local efforts, including county efforts, to form a Groundwater Sustainability Agency or prepare a viable Groundwater Sustainability Plan are not successful. Where intervention occurs, the State can impose fees and groundwater pumping restrictions that can remain in place until local efforts are able to sustainably manage groundwater resources. The Greater Kaweah Groundwater Sustainability Agency partners are committed to maintaining local control and managing groundwater resources on behalf of agricultural water users, rural and urban communities and the environment.

Would the Kaweah Subbasin be sustainable had the legislature and the courts not re-allocated surface water supplies used for farms, cities and businesses to the environment?

The re-assignment of surface water supplies to environmental purposes by the courts and legislature is one of several factors contributing to chronic groundwater overdraft in the Kaweah Subbasin. Without a doubt, this re-allocation away from direct or in-lieu groundwater recharge has exacerbated the overdraft problems and challenged the ability of local agencies to sustainably manage groundwater resources. However, growth in the regional economy and population, coupled with changes agricultural practices, are also substantial contributors to groundwater overdraft and cannot be ignored. Sustainability requires striking a balance among all water users – agriculture, municipal, industrial and environmental – that is reasonable, supportable and valid.

If Groundwater Sustainability Agencies are locally controlled, what is the State's role in this effort?

The California Department of Water Resources is the agency responsible for oversight of the formation of Groundwater Sustainability Agencies and Groundwater Sustainability Plans, but the State Water Resources Control Board (Water Board) and California Water Commission also have roles in the implementation of the Sustainable Groundwater Management Act. The Department of Water Resources has a list of regulations, objectives and actions formulated to assist local agencies and Groundwater Sustainability Agencies with the preparation and implementation of Groundwater Sustainability Plans. Under law, all regulations adopted by the Department of Water Resources become effective only upon approval by the California Water Commission. Under a limited set of circumstances, the Water Board may intervene if local efforts to form a Groundwater Sustainability Agency or prepare a viable Groundwater Sustainability Plan are not successful.

How will adjacent Groundwater Sustainability Agencies be handled?

The regulations require that all Groundwater Sustainability Agencies coordinate with adjacent Groundwater Sustainability Agencies in a given basin. This coordination will occur through additional discussions with neighboring agencies as Groundwater Sustainability Agencies are formally developed, and the Groundwater Sustainability Plans will describe how the adjacent Groundwater Sustainability Agencies will work together to achieve groundwater sustainability for the entire basin. The State requires that multiple Agencies within a basin or subbasin each sign on to a coordination agreement which binds their respective management activities together in a cohesive fashion.

A.2 KAWEAH SUBBASIN

When was the Greater Kaweah Groundwater Sustainability Agency formed?

The Greater Kaweah Groundwater Sustainability Agency (GKGSA) is a joint powers authority (JPA) of local public agencies and was established on August 23, 2016. The founding members of the JPA – Kaweah Delta Water Conservation District, County of Tulare, Kings County Water District, Lakeside Irrigation Water District, and St. Johns Water District—notified the California Department of Water Resources of the GSA’s formation on May 1, 2017.

How many GSAs are in the Kaweah Subbasin?

DWR recognizes three GSA in the Kaweah Subbasin. They include: East Kaweah GSA, GKGSA and Mid-Kaweah GSA.

What is the health of the Kaweah Subbasin?

The Kaweah Subbasin (DWR Bulletin 118) has been identified by the California Department of Water Resources as being in critical over-draft and a high priority as part of the [CASGEM Groundwater Basin Prioritization](#). The region has extensive history of groundwater overdraft dating back to the early 1900s. Construction of federal Central Valley Project in the 1940s and 1950s served to stabilize groundwater conditions in the region through delivery of surface water from the San Joaquin River watershed. Likewise, importation of State Water Project supplies to interconnected areas westerly of the Kaweah Subbasin have aided in sustaining groundwater levels. However, a variety of factors have led to chronic long-term overdraft in the region, including competition for available surface water supplies, population growth, and expansion of farming in areas fully or partially dependent on groundwater.

What is the health of the Greater Kaweah GSA portion of Subbasin?

Groundwater supplies within the GKGSA consist of subsurface flows from the Sierra to the east, deep percolation of imported water applied to crop irrigation, percolation of precipitation, natural channel and man-made channel seepage, managed aquifer recharge projects operated by agencies within the GSA, and percolation of effluent from wastewater treatment plants in the GSA. While lands within the GSA receive surface water, these sources do not satisfy 100 percent of demands from agriculture, industries, cities and rural residents. Groundwater studies have demonstrated the amount of water we pump from the aquifer continues to exceed the amount that has been replenished by nature or recharge actions by agencies, otherwise known as “overdraft”. Among other possible impacts, this chronic lowering of groundwater levels may increase the risks for degradation of water quality and land subsidence. These and other conditions associated with lowering groundwater levels are being analyzed as part of the development of the GSPs for the three GSAs in the subbasin.

How are groundwater users involved?

During passage of the Sustainable Groundwater Management Act, the legislature placed a high value on active involvement by groundwater users in planning for and preserving our shared natural resource. Among the requirements in the Sustainable Groundwater Management Act is development of a list of interested parties (Water Code §10723.2) and an explanation of how their interests will be considered in development and operation of the Groundwater Sustainability Agency and the development and implementation of the agency's sustainability plan. The Greater Kaweah Groundwater Sustainability Agency team desires to understand and utilize ideas from groundwater user stakeholders throughout development and implementation of a Groundwater Sustainability Plan for the region. Interested Parties are encouraged to sign up for notifications from the GKGSA website and attend and participate in Board and Advisory Committee meetings.

Will stakeholders or the public have the opportunity to weigh in on the Groundwater Sustainability Plan development?

Stakeholders are encouraged to subscribe to the GKGSA Interested Parties Database at (<http://greaterkaweahgsa.org/>). The primary venues for stakeholders to get involved in the GSP development process are regularly scheduled GKGSA Board and Stakeholder and Rural Communities Committees meetings. The agency also anticipates conducting briefings to member agency boards and commissions, presentations to civic and non-profit organizations, and various public meetings. The schedule for Board and committees' meetings is available on the website.

What is the governance structure for the Greater Kaweah GSA? How will the agencies work together to run it?

The GKGSA is governed by a nine-member Board of Directors, with two elected members from the Kaweah Delta Water Conservation District; one elected member of the governing body of County of Tulare, Kings County Water District, Lakeside Irrigation Water District, and St. John's Water District; a representative from California Water Service; and one representative each from the Stakeholder and Rural Communities Committees. Directors from JPA member agencies are elected officials who have been appointed to serve their respective boards or councils. The representative from California Water Service will be nominated by the utility and appointed by the Board. Board representatives from the Stakeholder and Rural Communities Committees will be nominated by their respective committees and appointed by the Board. The JPA that formed the agency stipulates voting thresholds by issue.

A.3 GROUNDWATER SUSTAINABILITY PLAN

What is a Groundwater Sustainability Plan?

A Groundwater Sustainability Plan is the plan developed by a Groundwater Sustainability Agency that provides for sustainably managed groundwater that meets the requirements of the State's new groundwater laws. Groundwater Sustainability Agencies in high- and medium-priority groundwater basins are required to submit a Groundwater Sustainability Plan to the California Department of Water Resources. The plan must outline how the Groundwater Sustainability Agency will implement, manage and measure specific actions for the health and viability of the basins. The California Department of Water Resources will evaluate the Groundwater Sustainability Plan and provide the

Groundwater Sustainability Agency with an assessment of the plan and any necessary recommendations within two years following its establishment.

When does a Groundwater Sustainability Plan have to be established?

Subbasins deemed to be in critical overdraft (which includes the Kaweah Subbasin) are required to complete and begin implementation of their Groundwater Sustainability Plan by January 31, 2020. Subbasin) are required to complete and begin implementation of their Groundwater Sustainability Plan by January 31, 2020.

What will the process and timing be for development of the GSP?

The GKGSA is currently working on developing its GSP. The agency projects release of a Public Draft GSP in July 2019, for a public review period of up to 90-days and include a public meeting to receive comments. The GSP will be revised to address public and stakeholder comments. The Final GSP will be adopted at a public hearing, tentatively scheduled for December 2019. All GSPs in the Kaweah Subbasin are due no later than January 31, 2020.

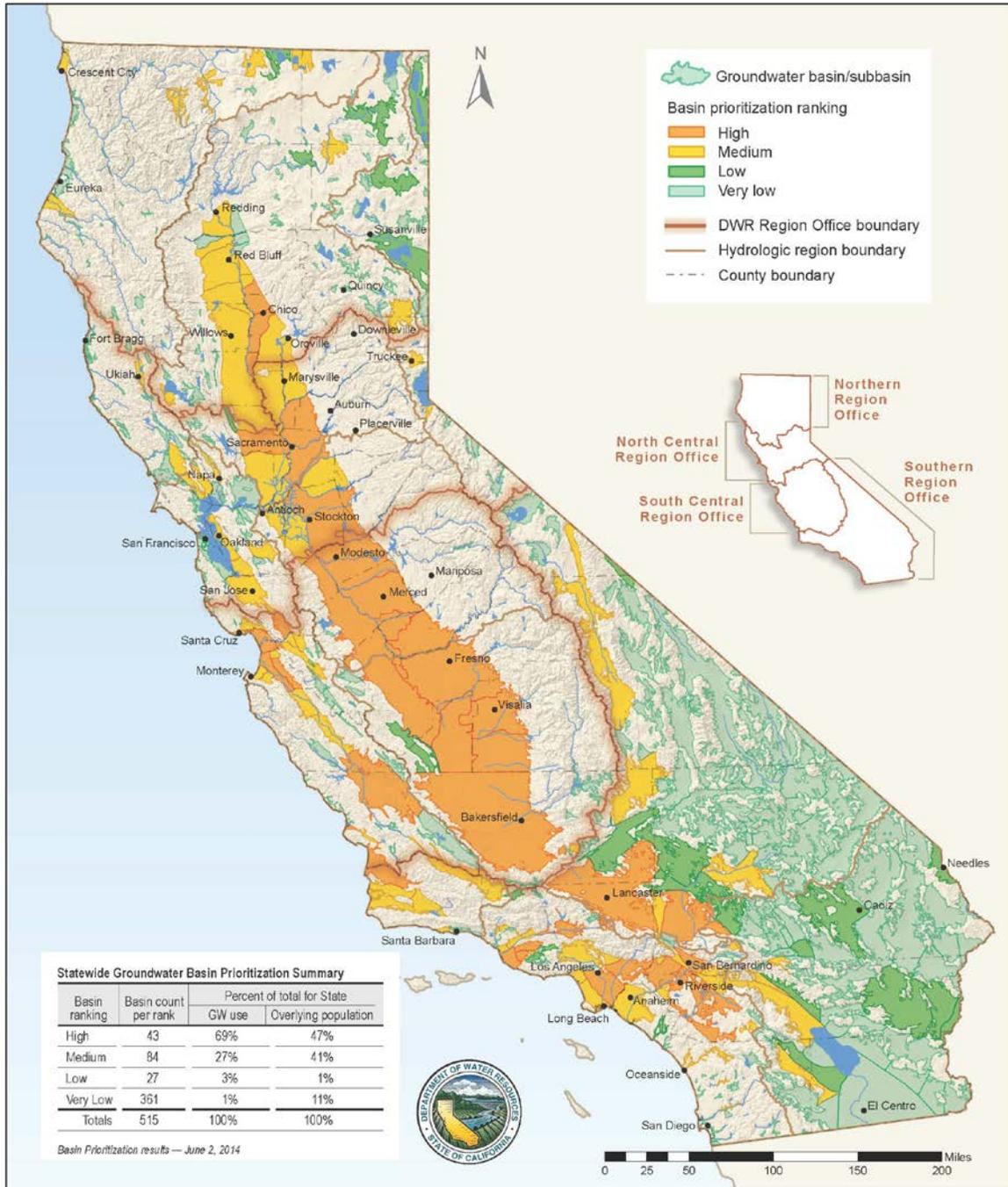
What happens after the GSP is completed?

Following submittal and acceptance by DWR, the GSAs in the Kaweah Subbasin GSAs will begin implementation. Each year, the agencies are required to submit a combined Groundwater Sustainability Plan Annual Report to the State (Water Code §10728). Pursuant to § 356.4 the agencies are required to evaluate their GSP least every five years and whenever the Plan is amended and provide a written assessment to the Department. § 356.4 the agencies are required to evaluate their GSP least every five years and whenever the Plan is amended and provide a written assessment to the Department.

Are GSPs required for new or amended County or City General Plan?

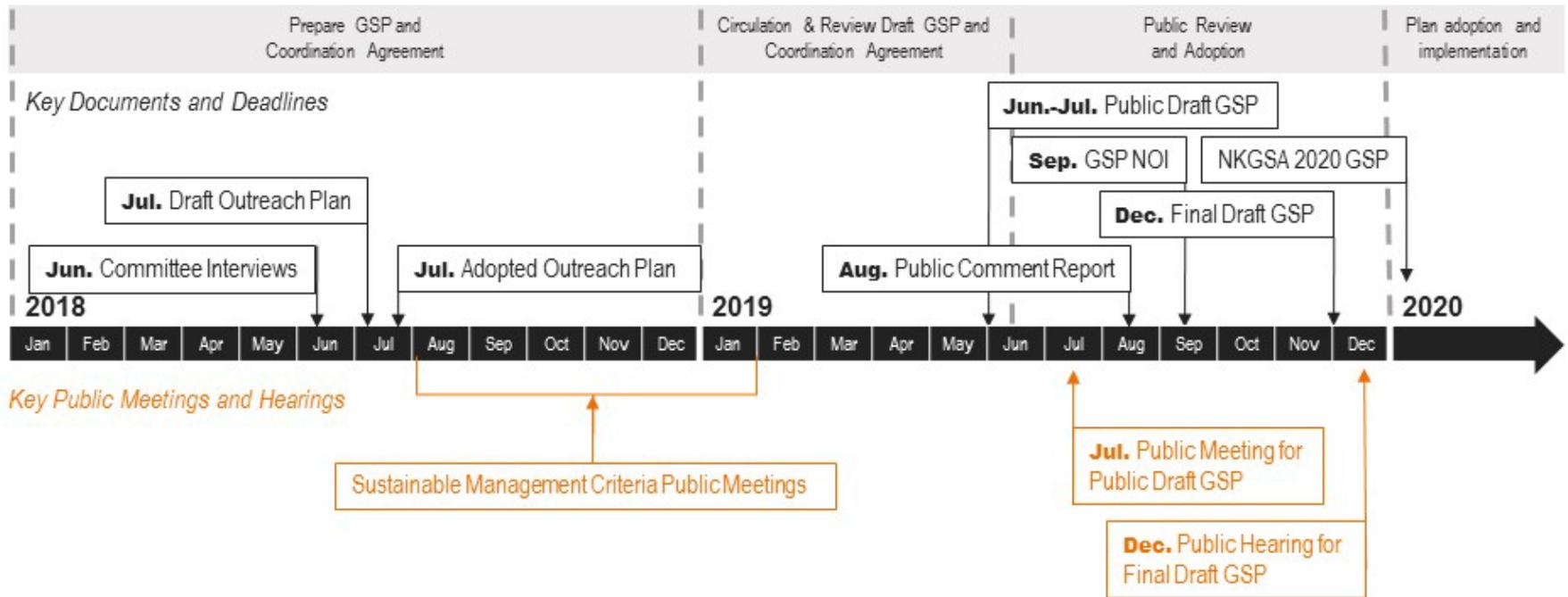
Prior to adopting a new or amended General Plan, Government Code §65350.5 requires each planning agency to review any applicable groundwater sustainability plan, groundwater management plan, adjudicated water right or interim plan by the State Water Resources Control Board (commencing with §10735). In addition to this, the GSA (per §653352.5) is required to provide the planning agency the current GSP (or alternative); judgment, decree, agreement or interim plan, if relevant; and a report addressing the anticipated effect on implementation of the GSP by the proposed General Plan update or amendment.

Appendix B CASGEM GROUNDWATER PRIORITIZATION



CASGEM Groundwater Basin Prioritization

Appendix C GREATER KAWEAH GSA OUTREACH AND COORDINATION SCHEDULE



Appendix D NATIVE AMERICAN HERITAGE COMMISSION SACRED LANDS FILE DOCUMENTS

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Groundwater Sustainability Plan

County: Tulare & Kings

USGS Quadrangle Name: Auckland, Lemon Cove, Rocky Hill, Ivanhoe, Exeter, Cairns
Corner, Monson, Visalia, Tulare, Tipton, Traver, Goshen, Paige, Lake View
School, Buris Park, Remnoy, Waukena, Corcoran, Hanford, Guernsey

Township: See Map **Range:** _____ **Section(s):** _____

Company/Firm/Agency: Greater Kaweah Groundwater Sustainability Agency

Street Address: 2975 N. Farmersville

City: Farmersville **Zip:** 93223

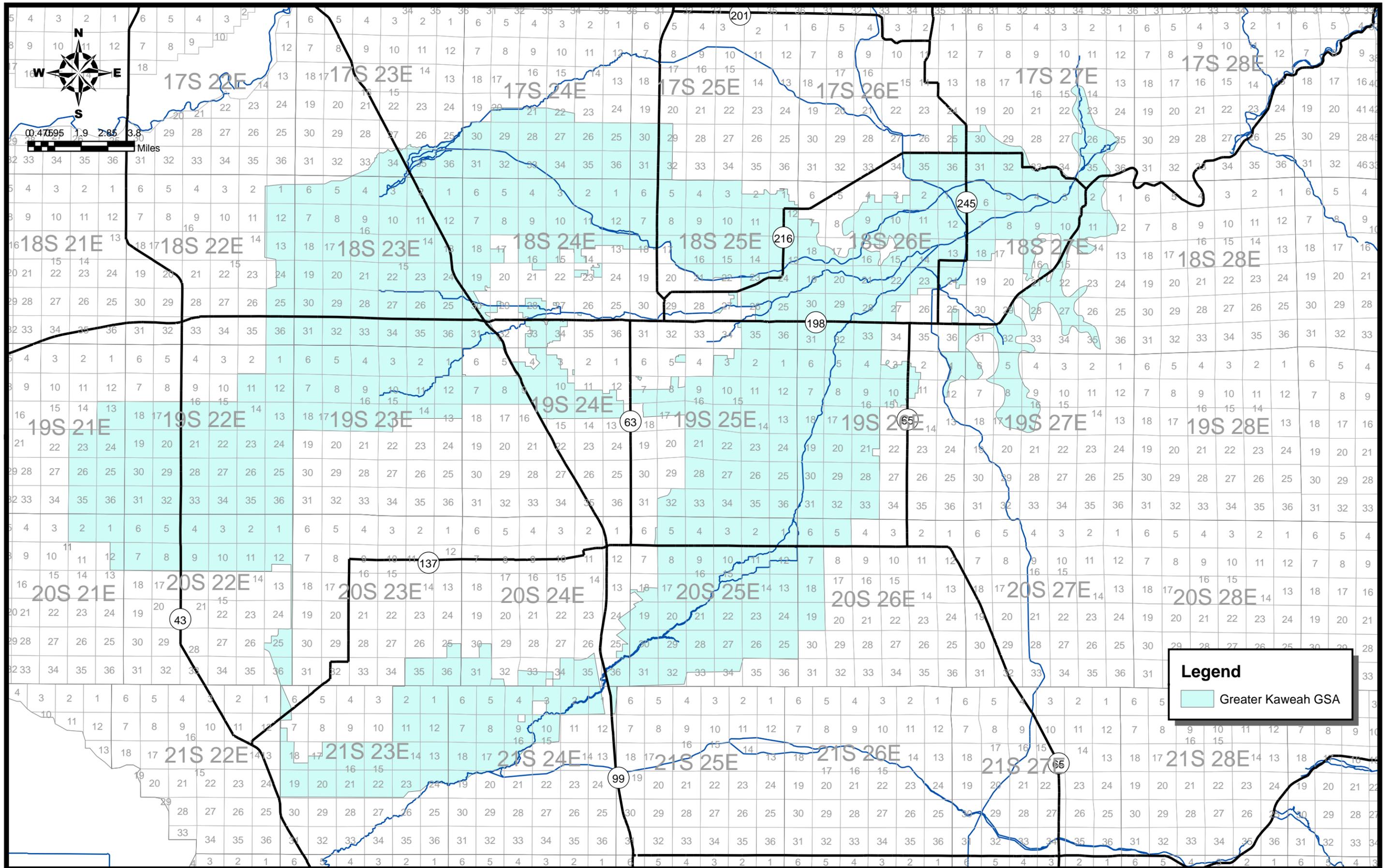
Phone: (559) 747-5601

Fax: (559) 747-1989

Email: mlarsen@kdwcd.com

Project Description:

The Greater Kaweah Groundwater Sustainability Agency is a new agency that has formed that will comply with the 2014 Sustainable Groundwater Management Act (SGMA). We will be developing a Groundwater Sustainability Plan to locally manage groundwater in a new way to reach sustainability of the resource.



Legend

- Greater Kaweah GSA

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710



May 22, 2018

Mark Larsen
Greater Kaweah Groundwater Sustainability Agency

Sent by Email: mlarsen@kdwcd.com
Number of Pages: 2

RE: Groundwater Sustainability Plan, Tulare and Kings County

Dear Ms. Larsen:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* (SLF) was completed for the area of potential project effect (APE) for the above referenced project. **Sacred sites were identified in the Rocky Hill project areas provided.** Please contact the Wuksache Indian Tribe/Eshom Valley Band for more information about potential sacred sites and tribal cultural resources within your APE.

The absence of site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE. Other sources of cultural resources information should be contacted regarding known and recorded sites. Please contact all of the people on the attached list. The list should provide a starting place to locate areas of potential adverse impact within the APE. I suggest you contact all of those listed, if they cannot supply information, they might recommend others with specific knowledge. **By contacting all those on the list, your organization will be better able to respond to claims of failure to consult under applicable laws.** If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: sharaya.souza@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sharaya Souza".

Sharaya Souza
Staff Services Analyst
(916) 573-0168

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

Native American Heritage Commission

Native American Contacts

5/22/2018

Kings River Choinumni Farm Tribe

Stan Alec

3515 East Fedora Avenue
Fresno, CA 93726

(559) 647-3227 Cell

Foothill Yokuts
Choinumni

Wuksache Indian Tribe/Eshom Valley Band

Kenneth Woodrow, Chairperson

1179 Rock Haven Ct.
Salinas, CA 93906

kwood8934@aol.com

(831) 443-9702

Foothill Yokuts

Mono

Wuksache

Santa Rosa Indian Community of the Santa Rosa Rancheria

Rueben Barrios Sr., Chairperson

P.O. Box 8
Lemoore, CA 93245

(559) 924-1278

(559) 924-3583 Fax

Tache

Tachi

Yokut

Table Mountain Rancheria of California

Leanne Walker-Grant, Chairperson

P.O. Box 410
Friant, CA 93626

(559) 822-2587

(559) 822-2693 Fax

Yokuts

Table Mountain Rancheria of California

Bob Pennell, Cultural Resources Director

P.O. Box 410
Friant, CA 93626

rpennell@tmr.org

(559) 325-0351

(559) 325-0394 Fax

Yokuts

Tule River Indian Tribe

Neil Peyron, Chairperson

P.O. Box 589
Porterville, CA 93258

chairman@tulerivertribe-nsn.gov

(559) 781-4271

(559) 781-4610 Fax

Yokuts

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes for the proposed:
Groundwater Sustainability Plan, Kings County.

Appendix 1G

DWR Stakeholder Communication and Engagement Guidance Document



California Department of Water Resources
Sustainable Groundwater Management Program

January 2018

Guidance Document for
Groundwater Sustainability Plan

Stakeholder Communication and Engagement



Guidance Document for Groundwater Sustainability Plan Stakeholder Communication and Engagement January 2018

The objective of this guidance document is to provide Groundwater Sustainability Agencies (GSAs) information to aid with stakeholder communication and engagement for Groundwater Sustainability Plan (GSP) preparation. It provides examples and existing resources related to public engagement and effective communication for Sustainable Groundwater Management Act (SGMA) implementation.

Limitation and use of this guidance information

This guidance document is not intended to prescribe specific outreach and communications methods for GSAs or local agencies to follow, but to provide resources and various examples for consideration. This guidance document also summarizes the public notification requirements that GSAs must adhere to in order to comply with SGMA and the GSP regulations. Other than what is required by statute or regulation, GSAs have discretion on how they communicate and engage with the beneficial uses and users of groundwater within a basin.



California Department of Water Resources
Sustainable Groundwater Management Program
1416 Ninth Street
P.O. Box 942836
Sacramento, CA 94236-0001
www.water.ca.gov/groundwater



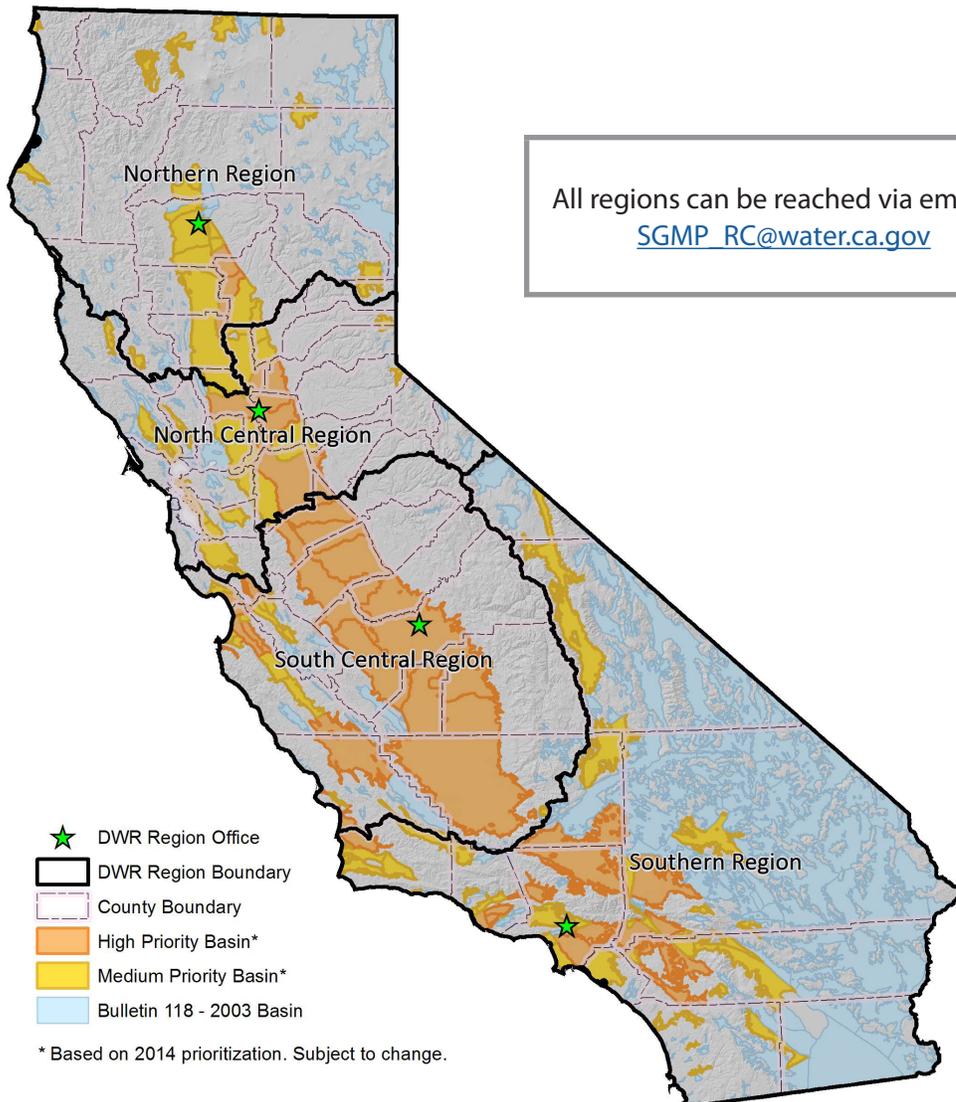
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DWR Region Offices

The California Department of Water Resources (DWR) provides a variety of SGMA-related resources to assist water management groups and the public. Four DWR Region Offices are strategically located across the state.

All high and medium priority basins are assigned a Point of Contact from DWR Region Offices. POCs assist GSAs and stakeholders in the basin to connect with the Sustainable Groundwater Management Program and locate resources for assistance. POC contacts can be found on DWR website <https://www.water.ca.gov/Programs/Groundwater-Management/Assistance-and-Engagement>.



Section 1

Overview

The legislative intent of the historic 2014 Sustainable Groundwater Management Act (SGMA) is for groundwater to be managed sustainably in California's groundwater basins by local public agencies and newly-formed Groundwater Sustainability Agencies (GSAs).

In the basins designated by the Department of Water Resources (DWR) as medium and high priority, local public agencies and GSAs are required to develop and implement groundwater sustainability plans (GSPs) or alternatives to GSPs (Alternatives).

Under the requirements of SGMA, GSAs must consider interests of all beneficial uses and users of groundwater. As a result, the GSP development needs to consider effects to other stakeholder groups in or around the groundwater basin with overlapping interests. These interests include, but are not limited to, holders of overlying groundwater rights (including agriculture users and domestic well owners), public water systems, local land use planning agencies, environmental users, surface water users, federal government, California Native American tribes, and disadvantaged communities (Water Code 10723.2).

Furthermore, the GSP Regulations require that GSAs document in a communication section of the GSP the opportunities for public engagement and active involvement of diverse social, cultural, and economic elements of the population within the basin. Expertise of stakeholders may increase the chance that the GSAs are using best available information and best available science for GSP development.

As GSAs begin to meet to develop a GSP, common questions, such as the ones below, are considered regarding stakeholder communication and engagement.

How can a GSA effectively communicate and engage with multiple and varied stakeholders?

This document helps GSAs determine who the interested parties are (individuals, organizations, local agencies) that they need to engage with and provides guidance to better understand their issues and interests of beneficial uses and users of groundwater.

What are methods and tools for communications and engagement?

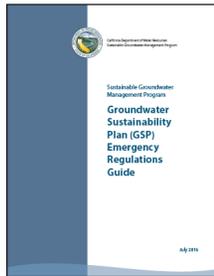
This document provides links to methods and tools that can be modified and used to reach and communicate with stakeholders. Not all of the tools will be applicable to all GSAs, but they are presented as examples of effective ways to engage.

How can a GSA conduct meaningful engagement to develop a GSP?

This document gives GSAs a step-by-step example of how to communicate and engage with stakeholder groups. In addition to following the procedure requirements for public notice, meaningful engagement is to integrate stakeholders throughout the development of a GSP and allow active participation in the decision-making process. The benefits of meaningful engagement are improved outcomes, optimized resources, broad support, and reduced conflict.

Published Resources

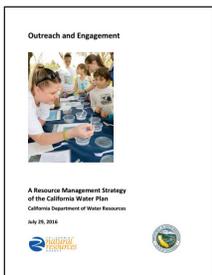
There are several published documents that either directly or indirectly address best practices or statutory requirements for stakeholder engagement. In addition to the information in this guidance document, these documents may be useful for GSAs while developing a Communication and Engagement (C&E) Plan or other outreach programs.



Groundwater Sustainability Plan (GSP) Emergency Regulations Guide, California Department of Water Resources

This guide (published July 2016) includes information to aid with the understanding of

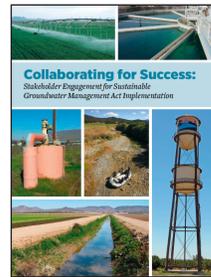
the GSP Regulations. It explains the fundamental concepts of the regulations and contains information directly relevant to the regulations through four general phases of development and implementation. <https://goo.gl/QYwqT9>



Outreach and Engagement: A Resource Management Strategy for the California Water Plan, California Department of Water Resources

The California Water Plan provides a broad set of

resource management strategies (RMSs) that can help local agencies and government (and GSAs) manage their water and related resources. While not specific to SGMA, the Outreach and Engagement RMS directly addresses water management in California and discusses tools and practices by water agencies to facilitate contributions by public individuals and groups toward good water management outcomes. <https://goo.gl/YfQQcu>

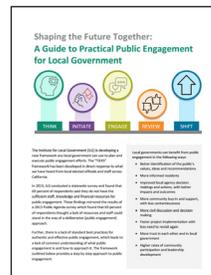


Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation, Community Water Center

Prepared by the Community Water Center in July 2015,

the intent of this report is to convey the value of stakeholder engagement to sustainable groundwater management. The report outlines the statutory requirements for stakeholder engagement in SGMA, gives examples of best practices and examples of collaborative management from around the state, and provides a recommended roadmap for effective stakeholder engagement drawn specifically for SGMA implementation.

http://www.cleanwateraction.org/files/publications/ca/SGMA_Stakeholder_Engagement_White_Paper.pdf

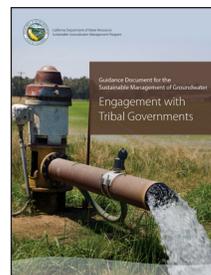


Inclusive Public Engagement, Institute for Local Government (ILG)

This report offers tip sheets and resources to effectively and successfully plan and implement successful engagement strategies. Whether it's supporting and connecting with local leadership

programs as a pipeline to engage specific populations, or partnering with local community-based organizations to reach beyond the small slice of the public that most frequently attends meetings, ILG's inclusive public engagement resources will offer perspective to any planning process.

<http://www.ca-ilg.org/inclusive-public-engagement>



Engagement with Tribal Governments Guidance Document (Draft), California Department of Water Resources

This document is meant to help local agencies engage with a Tribal government in the planning, financing, and management of a

GSA, or with development or implementation of a GSP.

Section 2

About Public Engagement

What is Public Engagement?

As defined by the Center for Advances in Public Engagement:

Public engagement is a process that brings people together to address issues of common importance, to solve shared problems, and to bring about positive social change.

Effective public engagement invites citizens to get involved in deliberation, dialogue, and action on public issues that they care about. It helps leaders and decision makers better understand the perspectives, opinions, and concerns of citizens and stakeholders.

When done well, public engagement goes far beyond the usual participants to include those members of the community whose voices have traditionally been left out of political and policy debates.

Public Engagement Benefits

- **Helps** people weigh a variety of perspectives and listen to each other's views.
- **Builds** common understanding, manages differences, and establishes direction for moving ahead on tough issues.
- **Builds** trust and improves communication between the public and leaders.
- **Creates** new opportunities for citizens to become involved in public problem solving and decision making.

Build Public Engagement for Regional Sustainability

Many areas have public engagement efforts already in place for other water management efforts such as Integrated Regional Water Management Plans and Groundwater Management Plans. Use these existing stakeholder connections as you begin your SGMA-related communication and engagement efforts. Collectively, all water management plans work with a shared interest toward the ultimate goal of regional sustainability.

Levels of Engagement

It is important that stakeholders understand the role they are invited to play in a public engagement program. This will help provide clarity to the process and help avoid misunderstandings. Stakeholder roles may naturally evolve over the period that they are engaged in a public process, and as transition occurs, it is wise to redefine these roles. When an advisory committee or partnership between public agencies is established, it is helpful to develop a charter or other memo of understanding that describes the roles and responsibilities of all involved.

Figure 1 is a summary of the levels of public engagement that comes from the International Association of Public Participation.

	INCREASING LEVEL OF PUBLIC IMPACT 				
	Inform	Consult	Involve	Collaborate	Empower
Public participation goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities, and/or solutions.	To obtain public feedback on analysis, alternatives, and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
Promise to the public	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.
Example techniques	<ul style="list-style-type: none"> • Fact sheets • Web sites • Open houses 	<ul style="list-style-type: none"> • Public comment • Focus groups • Surveys • Public meetings 	<ul style="list-style-type: none"> • Workshops • Deliberate polling 	<ul style="list-style-type: none"> • Citizen advisory committees • Consensus-building • Participatory decision-making 	<ul style="list-style-type: none"> • Citizen juries • Ballots • Delegated decision

Figure 1. International Association of Public Participation (IAP2) Spectrum of Public Participation

Section 3

Planning Communication & Engagement

Stakeholder engagement can allow agencies to leverage networks and resources to their advantage and can provide a means whereby agencies can capitalize on local knowledge, including the expertise, resources, and capacity of individual stakeholders.

— *Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation, Community Water Center*

There are four phases of SGMA implementation as illustrated in the diagram on pages 12 and 13. The statutory requirements for engagement are summarized for each phase. The other relevant sections of the Water Code and GSP Regulations are also provided for reference.

Phase 1 (GSA formation and coordination) was completed June 30, 2017 per SGMA. GSA formation and coordination has helped start relationship building and shared understanding with stakeholders. As GSAs move forward with Phase 2 (GSP preparation and submission), successful communication and engagement (C&E) with stakeholders will require up-front resource commitments and planning.

GSP Regulations (Section 354.10) require a communication section to include the following:

1. An explanation of the Agency's (GSAs) decision-making process.
2. Identification of opportunities for public engagement and a discussion of how public input and response will be used.
3. A description of how the Agency (GSA) encourages the active involvement of diverse social, cultural, and economic elements of the population within the basin.
4. The method the Agency (GSA) shall follow to inform the public about progress implementing the Plan, including the status of projects and actions.

DWR will assess, as part of GSP Regulations Section 355.4, whether the interests of the beneficial uses and users of groundwater in the basin, as well as the land uses and property interests potentially affected by the use of groundwater in the basin, have been considered. DWR will take into account comments made in accordance with GSP Regulations Section 353.8 when determining whether interests within the basin have been considered in the development and operation of the GSA and the development and implementation of the GSP.

The following guidance for planning communication and engagement is adaptable for basin-wide application. In instances where there are multiple GSAs covering a basin, GSAs should coordinate with each other to ensure that all stakeholders are identified for outreach and are informed through the process of other SGMA implementation efforts within the basin that may affect them. This means a GSA may need to outreach to stakeholders outside of their boundaries to ensure all beneficial uses and users are included in the GSP development process.

Communication & Engagement Steps

Communication and Engagement (C&E) consists of seven general steps. These steps are illustrated in Figure 2 and explained in further detail below.

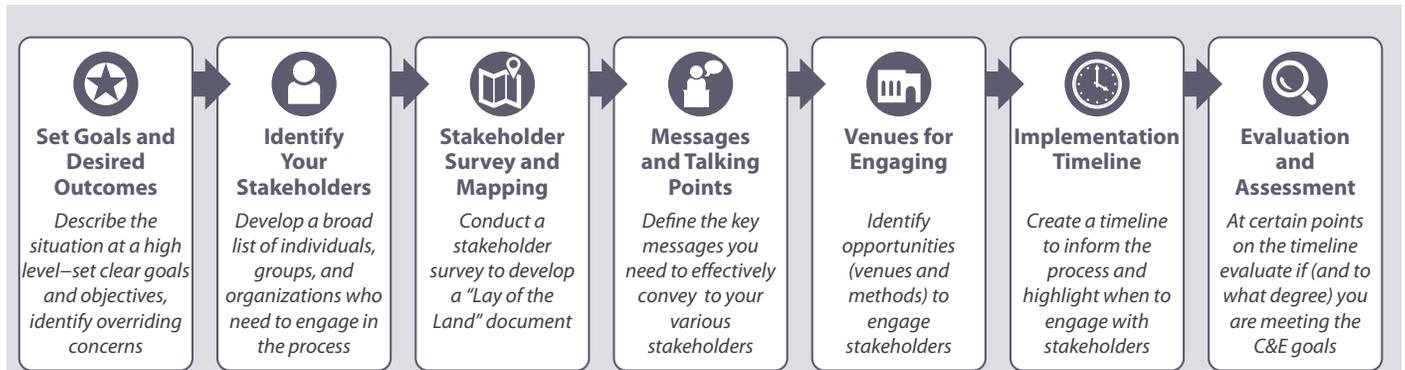


Figure 2. Communication and Engagement Steps



Set Goals and Desired Outcomes

Start by providing a description and background of your GSA and explain the intent of C&E is to support the development of your GSP. Then define in simple terms the challenge, regulatory requirement, or opportunity, and the desired outcome.

Answer these questions:

- What are we trying to accomplish?
- How will we know if we are successful?
- What are the challenges or barriers?
- What are the opportunities?
- What is the timeframe?
- When will public input be relevant?
- How will public input be used?



Identify Your Stakeholders

Identify the many interested individuals and groups you expect to engage with or inform at any stage of the GSP process.

Answer these questions when making your list:

- Who has a financial, political, business, or personal stake in this issue? (*i.e. organizational mission, regulatory role, land ownership, etc.*)
- What organization, agency, or individual must be involved in the GSP process for it to proceed? (*Due to organizational mission, regulatory role, landownership, etc.*)
- What organizations, agencies, or individuals are likely to have an interest in this effort, or be impacted by the development of your GSP? (*Due to organizational mission, or established interest in subject matter.*)

Use the following chart to stimulate brainstorming about who should be invited to engage in your GSP development. The category of interest intends to reflect “diverse social, cultural and economic elements of the population”. The list is not exclusive. GSAs are encouraged to add other interested persons or groups as needs are identified.

Stakeholder Engagement Chart for GSP Development

Category of Interest	Examples of Stakeholder Groups
General Public	<ul style="list-style-type: none"> • Citizens groups • Community leader
Land Use	<ul style="list-style-type: none"> • Municipalities (City leaders, County planning departments) • Regional land use agencies
Private users	<ul style="list-style-type: none"> • Private pumpers • Domestic users • Schools and colleges • Hospitals
Urban/ Agriculture users	<ul style="list-style-type: none"> • Water agencies • Irrigation districts • Municipal water companies • Resource conservation districts • Farmers/Farm Bureaus
Industrial users	<ul style="list-style-type: none"> • Commercial and industrial self-suppliers; groups • Local trade association or group
Environmental and Ecosystem	<ul style="list-style-type: none"> • Federal and State agencies (Fish and Wildlife) • Wetland managers • Environmental groups
Economic Development	<ul style="list-style-type: none"> • Chambers of commerce • Business groups/associations • Elected officials (Board of Supervisors, City Council members) • State Assembly members • State Senators
Human right to water	<ul style="list-style-type: none"> • Disadvantaged Communities • Small community systems • Environmental Justice Groups
Tribes	<ul style="list-style-type: none"> • Tribal Government
Federal and State lands	<ul style="list-style-type: none"> • Military bases/Department of Defense • Forest Service • National Park Services • Bureau of Land Management • California Department of Fish and Wildlife
Integrated Water Management	<ul style="list-style-type: none"> • Regional water management groups (IRWM regions) • Flood agencies • Recycled water coalition

SGMA (Section 10723.2) calls for consideration of all interests of **all beneficial uses and users** of groundwater:

The groundwater sustainability agency shall consider the interests of all beneficial uses and users of groundwater, as well as those responsible for implementing groundwater sustainability plans. These interests include, but are not limited to, all of the following:

(a) Holders of overlying groundwater rights, including:

- (1) Agricultural users.
- (2) Domestic well owners.

(b) Municipal well operators.

(c) Public water systems.

(d) Local land use planning agencies.

(e) Environmental users of groundwater.

(f) Surface water users, if there is a hydrologic connection between surface and groundwater bodies.

(g) The federal government, including, but not limited to, the military and managers of federal lands.

(h) California Native American tribes.

(i) Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems.

(j) Entities listed in Section 10927 that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the groundwater sustainability agency.

Resources to help identify and contact stakeholders are provided in the [Stakeholder Communication and Engagement Digital Toolkit](#) and Appendix B of [Community Water Center's Collaborating for Success: Stakeholder Engagement for Sustainable Groundwater Management Act Implementation](#) includes suggested resources.



Stakeholder Survey and Mapping

Contact each stakeholder organization to learn more about them, describe the project, and invite them to engage in the process. Prepare for your first meeting with project background, necessary maps, and a stakeholder survey. Also be prepared to convene a follow up meeting within a week or two, to answer questions that come up during this meeting.

Develop a set of questions to use in a one-on-one meeting with a stakeholder group. This meeting will give you answers to help you understand stakeholder interests, issues, and challenges.

An example of a **stakeholder survey** can be downloaded from the online [digital toolkit](#). Consider surveying communities using their most often used languages (i.e. Spanish).

Examples of questions in a survey include:

- Are you familiar with SGMA regulations?
- Are you currently engaged in activities or discussions regarding groundwater management in this region?
- Do you own, manage, or operate land in this basin?
- Do you manage water resources? If yes, what is your role?
- Are bilingual information and meeting materials needed?

Using the information gathered during your meetings with stakeholder organizations, create a stakeholder mapping grid by doing a “Lay of the Land” exercise. The exercise will chart all of the stakeholder groups you decide are important to the public engagement program and list known issues, interests, challenges, preferred methods of communication, and strategies and roles for engagement.

A “**Lay of the Land**” exercise example can be downloaded from the online [digital toolkit](#).

Examples of information included in the “Lay of the Land” exercise include:

- Types of stakeholders
- Stakeholder key interests related to groundwater
- Key documented issues



Messages

Define the key messages you need to effectively convey to your various stakeholders. Key messages should be three overriding messages that explain the goals and outcomes for development of the GSP.

- **Key message 1:** Concise explanation of the goal of the C&E strategy to support the development of a successful GSP
- **Key message 2:** The GSA is committed to working with identified stakeholders using an open and transparent communication and engagement process
- **Key message 3:** The overall GSP will be more successful with an engaged group of stakeholders providing useful information

It would also be helpful to develop a set of talking points that can be used by members of your GSA when communicating with specific stakeholder groups. These talking points can also be customized to a specific group.

Another useful tool is a Q&A document that contains likely questions or responses you anticipate from stakeholder groups based on the issues, challenges, and interests you discovered in the mapping exercise.



Venues for Engaging

You must decide on the scale of the public engagement necessary to achieve the goals and objectives of your C&E strategy. This will help you determine the best venue for your information and messages to be heard. It is important to regularly provide feedback and updates to the interested persons and stakeholder groups who provide input to the GSP through public convenings. Invite the public to meetings at key milestones to learn and contribute input. You should also consider how public comments will be received, reviewed, and responded to.

Water Code Section 10723.4 requires GSAs to establish and maintain an interested persons list; regular notifications to persons on this list should be one of the venues used for public engagement.

Convenings

- Community issue-specific or location-specific advisory committees
- Small group briefings or workshops at key milestones to learn and contribute input

Presentations

- Presentations by lead public agencies to small or large groups at scheduled events
- Presentations by lead public agencies to elected officials at publicly noticed meetings

Digital

- Public-facing website or webpage, regularly updated and easily accessible
- Online resources, posted for interactive or non-interactive uses
- Regular updates shared via social media, email, or newsletters

Community, regional, and social media

- Submit/post regular updates to media that promote opportunities for public engagement
- Submit/post regular updates to media that provide information about how public input is being used, project status, and next opportunities for engagement

Advisory Committees

GSAs may appoint and consult with an advisory committee. A properly developed and engaged advisory body can be of great assistance in engaging the broad range of interest groups in a basin and creating a shared understanding of local sustainability.



Inform Your Stakeholders

- Invest in signs and banners to announce meetings
- Hand out fliers at key public locations to reach the general public
- Personally call stakeholder groups
- Mail and email meeting announcements
- Post on social media pages

Groundwater Sustainability Agency Stakeholder Meeting, April 2017

Professional Facilitators

Many public agencies find it helpful to engage the services of a professional facilitator to guide discussions and decision-making between partnering agencies and other interested parties.

Professional facilitators, with deep expertise in mediation, negotiation, and consensus building, help broker agreements in tough natural resources disputes. Professional facilitators actively manage a process to support stakeholders' desired outcomes. They work closely with all stakeholders to design an effective process, manage meetings, seek input between meetings, and strategize throughout to deliver widely supported decisions.



Implementation Timeline

Now that you've identified your stakeholders, your key messages, and where and when to engage with them, you'll need to create a timeline for your C&E strategy. Don't confuse this with an implementation timeline for your GSP. The C&E timeline tracks communication and engagement activities and tactics.

Here is a list of common C&E tactics to include in a timeline:

- Website launch
- When to send email or other digital communication
- Media outreach activities
- Public meetings



Evaluation and Assessment

At various points along the implementation timeline, stop and assess how well you are performing against your goals and objectives. You can redirect resources, update strategies, or introduce new tactics.

The following questions as listed in the [Collaborating for Success report](#) are useful metrics for evaluation. Surveys and interviews are good tools to obtain feedback.

- Are stakeholders educated about the GSP development process and their own role?
- Is the timeline for implementation of the GSP clear?
- Has the GSA received positive press coverage?
- Do diverse stakeholders feel included?
- Have there been behavior changes related to the program goals? Or improved trust/relationships among participants?

Sample C&E Plan Outline

This example outline is a tool for GSAs to create common understanding and transparency throughout the GSP preparation and submission process. This process should be tailored to the basins and stakeholder needs. Documentation of the engagement and outreach by GSAs is important for Phase 3 (GSP review and evaluation). GSAs could evaluate the successes and learn from the stakeholder feedback to make necessary adjustments in order to achieve their goals.

Sample C&E Plan Outline

1. **Set Goals and Desired Outcomes**
 - a. Description and background of the GSA and subsequent GSP
 - i. Explanation of your GSA's decision-making process
 - b. Goal/desired outcomes of GSP development
 - c. Communication objectives to support the GSP
 - d. Overriding concerns, major concerns or challenges
2. **Identify Your Stakeholders**

See stakeholder engagement chart example provided in [digital toolkit](#).

 - a. List the stakeholder groups, community organizations or others who are concerned about the GSA/GSP and how each group will engage with the development of the GSP
3. **Stakeholder survey and mapping**

See example provided in [digital toolkit](#).

 - a. Meet one on one with stakeholders and ask them a set of questions to help find out their issues, interests and challenges
 - b. Compile a "Lay of the Land" document of your stakeholders to identify how to engage with them
4. **Messages and Talking Points**

Define the key messages you need to effectively convey to your various stakeholders

 - a. Key messages: Three overriding messages that explain the goals and outcomes for development of the GSP
 - b. Talking points/Q&A: Anticipating likely questions or issues will support effective engagement with stakeholders
 - c. Likely questions or issues and responses
5. **Venues for Engaging**

Identify the opportunities – venues or methods – to engage stakeholders.

 - a. Depending on the level of engagement, you'll want to determine the venue and how to share your key messages
 - b. Determine how you will invite, inform, and follow up with stakeholders
6. **Implementation Timeline**

List the milestones and stakeholder engagement opportunities throughout the GSP development process.

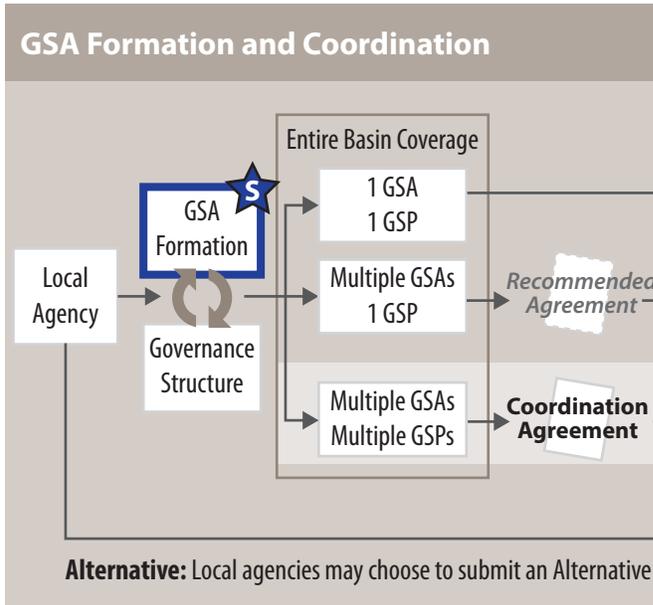
 - a. C&E Plan and GSP milestones
 - i. Refer to the Stakeholder Engagement by Phase graphic for required engagement milestones
 - b. Supporting tactics: Include tactics or tools you will use to communicate your messages and resources available to support
 - i. Website launch
 - ii. When to send email or other digital communication
 - iii. Media outreach activities
 - iv. Community meetings
7. **Evaluation and Assessment**

Assess at various points during Implementation to evaluate how your plan is performing against your goals and objectives.

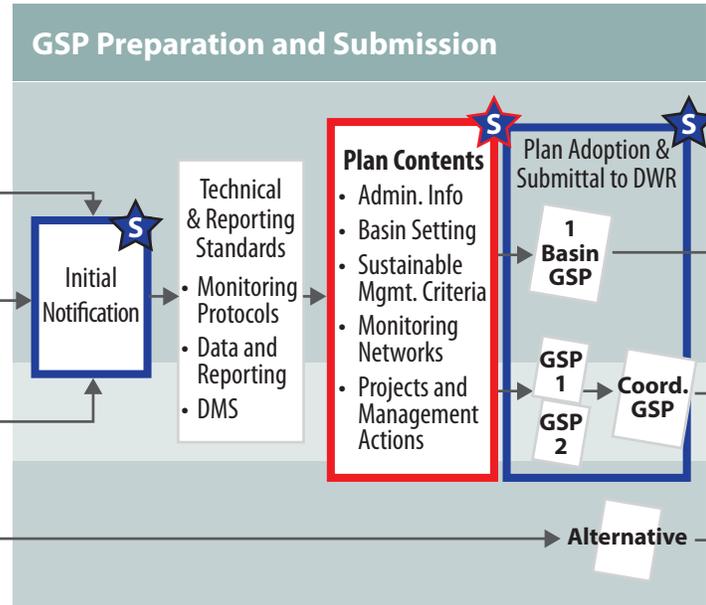
 - a. What worked well?
 - b. What didn't work as planned?
 - c. Meeting recaps with next steps
 - d. Lessons learned
 - e. Budget analysis

Stakeholder Engagement Requirements by Phase

Phase 1: 2015–2017



Phase 2: 2017–2022



Phase 1 Engagement Requirements

- **Establish and Maintain List of Interested Parties** §10723.4
- **GSA Formation Public Notice** §10723(b)
- **GSA Formation Public Hearing** §10723(b)
- **GSA Formation (due 6/30/17)** §10723(b)
- **Notify DWR:**
 - › Include list of interested parties
 - › Explain how parties' interests will be considered
- **Pre-GSP Development** §10727.8
 - Provide a written statement describing how interested parties may participate to:
 - › DWR
 - › Cities within the GSA boundary
 - › Counties within the GSA boundary

Phase 2 Engagement Requirements

- **GSP Initial Notification** §353.6*
 - › GSAs are required to submit GSP Initial Notifications through the SGMA Portal - GSP Initial Notification System at <http://sgma.water.ca.gov/portal/#gsp>
 - › Public can comment on the submitted GSP notification
- **GSP Preparation** §10727.8 and §10723.2
 - › Encourage active involvement
 - › Consider beneficial uses and users of groundwater when describing *Undesirable Results, Minimum Thresholds, and Projects & Actions*
- **GSP Communications Section** §354.10*
 - › GSA decision-making process
 - › Opportunities for engagement and how public input is used
 - › How GSA encourages active involvement
 - › Method of informing the public
- **Public Notice of Proposed Adoption** §10728.4
- **GSP Adoption Public Hearing** §10728.4
- **GSP Submittal** §354.10*
 - › Include a summary of communications: description of beneficial uses/users, list of public meetings, comments received/responses

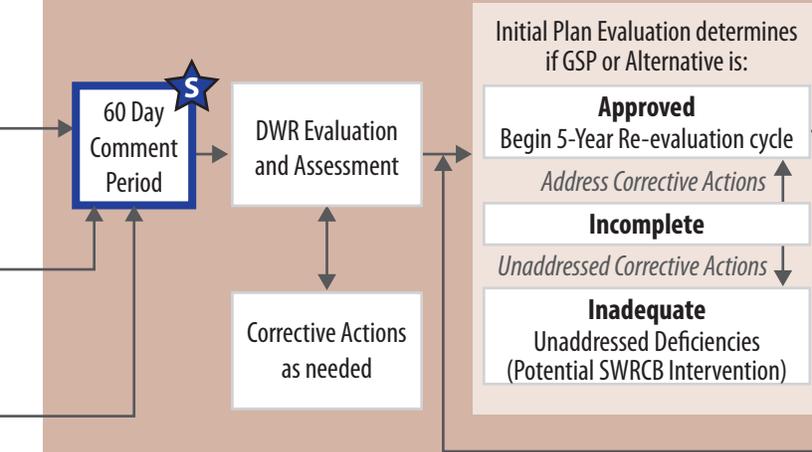
 Stakeholder Input

 Stakeholders should be informed throughout the development of Plan Content

Code References: §(#) = SGMA, §(#) * = GSP Regulations

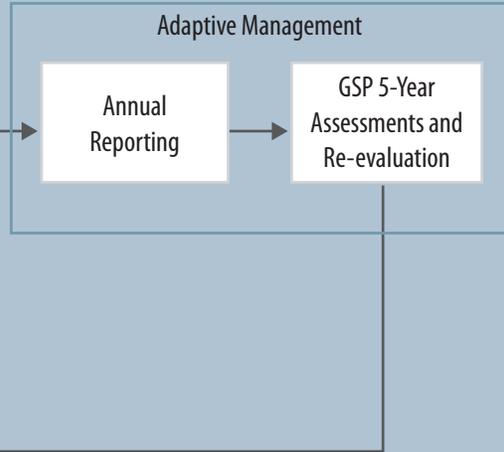
Phase 3: 2018+

GSP Review and Evaluation



Phase 4: 2022+

Implementation and Reporting



Phase 3 Engagement Requirements

- **60 Day Comment Period** §353.8*
 - › Any person may provide comments to DWR regarding a proposed or adopted GSP via the SGMA Portal at <http://sgma.water.ca.gov/portal/>
 - › Comments will be posted to DWR's website

Phase 4 Engagement Requirements

- **Public Notices and Meetings** §10730
 - › Before amending a GSP
 - › Prior to imposing or increasing a fee
- **Encourage Active Involvement** §10727.8

Engagement Requirements Applicable to ALL PHASES

- **Beneficial Uses and Users** §10723.2
Consider interests of all beneficial uses and users of groundwater
- **Advisory Committee** §10727.8
GSA may appoint and consult with an advisory committee
- **Public Notices and Meetings** §10730
 - › Before electing to be a GSA
 - › Before adopting or amending a GSP
 - › Prior to imposing or increasing a fee
- **Encourage Active Involvement** §10727.8
Encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin
- **Native American Tribes** §10720.3
 - › May voluntarily agree to participate
 - › See Engagement with Tribal Government Guidance Document
- **Federal Government** §10720.3
 - › May voluntarily agree to participate

Section 4

Engagement Methods & Tools

Stakeholder Communication and Engagement Digital Toolkit

A set of tools and examples are available for the purposes of SGMA outreach at DWR's Sustainable Groundwater Management website. The examples from local SGMA work groups include agenda, basin fact sheet, newsletter, mailing list sign up, etc. The templates may be downloaded, modified, and tailored to specific needs and audiences. While not all tools and templates are applicable to all GSAs, they are available as examples of effective ways to engage.

Find the Digital Toolkit at:

<https://www.water.ca.gov/Programs/Groundwater-Management/Assistance-and-Engagement>

DWR will add additional resources and case studies as they are developed to the Digital Toolkit.

Section 5

Additional Resources

DWR Region Office Contacts

DWR has knowledgeable staff available at the four region offices located across the State and in Sacramento. DWR's regional coordinators along with the [Point of Contacts](#) (POCs) are available to answer questions and provide available assistance and resources. The Regional Coordinators can answer SGMA related questions, provide educational presentations, discuss facilitation support services, and put you in contact with SGMA program contacts and other State and federal agencies. DWR Regional Coordinators can be reached via email at SGMP_RC@water.ca.gov.

Integrated Regional Water Management

Integrated Regional Water Management (IRWM) is a collaborative effort to identify and implement water management solutions on a regional scale that increase regional self-reliance, reduce conflict, and manage water to concurrently achieve social, environmental, and economic objectives. DWR, through the IRWM grant program, worked with 49 IRWM regions to coordinate regional water management activities and implemented multi-benefit projects with local agencies. Stakeholder communication and engagement plays a key role in the successes of the IRWM. Information about these activities is available at: <https://www.water.ca.gov/Programs/Integrated-Regional-Water-Management>

Other Agency Information

State Water Resources Control Board

In areas where groundwater users and local agencies are unable or unwilling to sustainably manage their groundwater, SGMA authorizes State Water Resources Control Board (State Board) intervention.

http://www.waterboards.ca.gov/water_issues/programs/gmp/about.shtml#info

Contact Email: groundwater_management@waterboards.ca.gov T: (916) 650-0474

California Department of Fish and Wildlife Groundwater Program

CDFW developed a Groundwater Program to ensure fish and wildlife resources reliant upon groundwater are addressed in GSPs and that CDFW remains in compliance with regulatory requirements.

<https://www.wildlife.ca.gov/Conservation/Watersheds/Groundwater>

Federal Agencies

GSAs can locate federal lands under various federal government jurisdiction (i.e. Bureau of Indian Affairs, Bureau of Land Management, National Parks Service, Department of Defense, Fish and Wildlife Services) from the Water Management Planning Tool under the Federal Lands layer. <https://gis.water.ca.gov/app/boundaries/>

The federal government may voluntarily agree to participate in the preparation or administration of a GSP through a joint powers authority or other agreement with local agencies in the basin. The GSAs should work to include federal interests in all aspects of the public process. Successful examples include ex-officio liaison on the GSA Board and membership on technical and public advisory committees.

Appendix 1H
Public Comment Summary and Attachments

**Greater Kaweah Groundwater
Sustainability Agency
Groundwater Sustainability
Plan**

Public Comment Summary

January 17, 2020

Prepared for:

Greater Kaweah Groundwater
Sustainability Agency

Prepared by:

Stantec Consulting Services, Inc.

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**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

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**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

ABBREVIATIONS

CID	Comment Identification Number
CWC	California Water Code
DWR	California Department of Water Resources
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
Matrix	Comment and Response Matrix
MCR	Multiple Comment Response
GKGSA	Greater Kaweah Groundwater Sustainability Agency
SGMA	Sustainable Groundwater Management Act of 2014
Summary	Public Comment Summary

ATTACHMENTS

Attachment A – Notice of Release of Public Draft GKGSA GSP

Attachment B – Water Code §10728.4 Consultation

Attachment C – Transcription of Public Hearing Comments

Attachment D – Written Public Comments

Attachment E – Comment and Response Database

Attachment F – Notice to Adopt Final GSP

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
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**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

1.0 INTRODUCTION

Following passage of the Sustainable Groundwater Management Act of 2014 (SGMA), the California Department of Water Resources (DWR) developed and released emergency regulations to guide the development, review, adoption and evaluation of Groundwater Sustainability Plans (GSP) authored by local public agencies subject to SGMA. The Groundwater Sustainability Plan Emergency Regulations (California Code of Regulations, Title 23; Division 2; Chapter 1.5; Subchapter 2. Groundwater Sustainability Plans), released May 18, 2016, included evaluation and assessment criteria DWR staff would apply for the review of GSPs (Article 6, sections 355-355.10). Evaluation criteria associated with the review and response of stakeholder comments to GSPs is as follows:

Whether the Agency has adequately responded to comments that raise credible technical or policy issues with the Plan – §355.4 (b)(10)

This Public Comment Summary (Summary) describes the process, tools, and results associated with the release, review, and consultation of Greater Kaweah Groundwater Sustainability Agency's (GKGSA) GSP consistent with §355.4 (b)(10).

1.1 DOCUMENT FORMAT

This Summary is comprised of the following four sections:

- Section 1 – Introduction: Section 1 provides an overview of the purpose and structure of the document, as well as a description of the GSP evaluation criteria for addressing comments on the GSP.
- Section 2 – Notification and Comment Submittal: Section 2 describes the public comment and notification process for the Draft GSP and the method by which the GKGSA notified cities and counties within the plan area of the proposed plan.
- Section 3 – Submitted Comments: Section 3 provides an overview of comment letters received on the Draft GSP during the public comment period. The comment letters in their entirety are included as **Attachment D – Written Public Comments** to this Summary.
- Section 4 – Comment Review and Response: Section 4 describes how the GKGSA reviewed and responded to comment letters received during the public comment period in a database format (see **Attachment E – Comment and Response Database**).

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

2.0 NOTIFICATION AND COMMENT SUBMITTAL

The GKGSA Board of Directors authorized release of its Public Review Draft GSP on September 16, 2019 for a 90-day public comment period. Electronic versions of the Draft GSP were available for download at the Agency's website (www.greaterkawahgsa.org) and for pick-up at the Agency's office, located at 2975 N. Farmersville Blvd., Farmersville, California. A hard copy was also available for on-site review at the Agency office.

Agencies, the public, and other interested parties were invited to provide written comments to the Draft GSP until 5 p.m., December 16, 2019. Written comments were accepted by email at gsp@greaterkawahgsa.org; through an on-line comment form available at www.greaterkawahgsa.org; or by U.S. Mail or hand-delivery to the Agency office. Verbal comments were received during a December 16, 2019 public hearing held by the GKGSA Board of Directors.

The GKGSA notified agencies, the public, and other interested parties of the availability of the Draft GSP and the comment period consistent with requirements of California Water Code (CWC) sections 10723.4 and 10728.4, and the Ralph M. Brown Act. These actions are described below. Additionally, the Agency utilized its Twitter account (<https://twitter.com/GreaterKawah>) to post notifications associated with the Draft GSP release and the GSP public.

2.1 SECTION 10723.4 NOTIFICATION

CWC §10723.4 relates to a formal list GSAs are required to maintain for purposes of informing stakeholders of Agency activities. This CWC section is as follows:

The groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding plan preparation, meeting announcements, and availability of draft plans, maps, and other relevant documents. Any person may request, in writing, to be placed on the list of interested persons.

Consistent with this section, the GKGSA maintains and exercises two interested party databases that includes individuals and organizations that have requested to be placed on the list, and other parties identified by Agency staff as beneficial groundwater users as defined by CWC §10723.2¹. Interested party databases utilized by the GKGSA include an in-house Excel database maintained by GKGSA staff and the Kaweah Groundwater Communication Portal (www.kawahgcp.com), a website jointly maintained by the three GSAs in the Kaweah Subbasin (Greater Kaweah, East Kaweah and Mid-Kaweah).

Individuals that requested to be added or subscribed to the list were notified on September 16, 2019 of release of the Draft GSP and public review period by email. Additionally, five California Native American tribes – Kern Valley Indian Community, Santa Rosa Indian Community of the Santa Rosa Rancheria, Tubatulabals of Kern Valley, Tule River Indian Tribe, and Wuksache Indian Tribe/Eshom Valley Band – and two individual stakeholders were notified by U.S. Mail. See **Attachment A – Notice of Release of Public Draft GKGSA GSP** for electronic versions of these notices.

¹

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=10723.2.&lawCode=WAT

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
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2.2 SECTION 10728.4 NOTIFICATION

CWC §10728.4, in part, requires GSAs notify and offer consultation to incorporated cities and counties within the agency's jurisdiction. This CWC section is as follows:

A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of receipt of the notice. Nothing in this section is intended to preclude an agency and a city or county from otherwise consulting or commenting regarding the adoption or amendment of a plan.

Pursuant to this section, the GKGSA provided written notification of the Draft GSP release and opportunity to consult with the Agency by U.S. Mail and email. Public agencies that received this September 16, 2019 notification were the cities of Exeter, Farmersville, Hanford, and Woodlake; and the counties of Kings and Tulare. See **Attachment A – Notice of Release of Public Draft GKGSA GSP** for electronic versions of these notices. The County of Kings requested §10728.4 consultation with GKGSA via an October 3, 2019 letter signed by the County's Director of Water and Natural Resources Julianne Phillips (see **Attachment B – Water Code §10728.4 Consultation**). The consultation meeting between the County of Kings and GKGSA was held on December 12, 2019.

3.0 SUBMITTED COMMENTS

The GKGSA received 14 written comment letters and six verbal comments on the Draft GSP during the public comment period. Of the 14 written letters, two were submitted by individual contributors and the remaining 12 were submitted by organizations representing beneficial uses and users of groundwater in the region, including state agencies, local and regional governments, private and public water purveyors, and organizations representing disadvantaged communities. **Table 1**, shown below, provides the list of written comments that were received on the Draft GSP, organized stakeholder name alphabetically by commenter name. **Table 2**, shown, below, provides the list of individuals that provided verbal comments at the December 16 public hearing. Transcripts of oral comments are available in **Attachment C – Transcription of Public Hearing Comments**. Copies of each written comment letter are provided as **Attachment D – Written Public Comments** to this Summary.

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

Table 1. List of Written Comments Received on Draft GSP

Commenter or Agency Name	Commenter Type	Date Comment was Received
California Department of Fish and Wildlife	State Agency	12/16/19
City of Visalia	Local Government	12/13/19
City of Woodlake	Local Government	12/16/19
Del Strange	Individual Contributor	11/11/19
Exeter and Lindsay-Strathmore Irrigation Districts	Water Purveyor	12/16/19
Karen Yohannes	Individual Contributor	11/07/19
Kings River Water Association	Interest Group/Non-Governmental Organization	12/16/19
Leadership Council for Justice and Accountability	Interest Group/Non-Governmental Organization	12/12/19
Self-Help Enterprises	Interest Group/Non-Governmental Organization	12/05/19
The Nature Conservancy	Interest Group/Non-Governmental Organization	12/13/19
Tulare County Farm Bureau	Interest Group/Non-Governmental Organization	10/30/19
Various Non-Profits	Interest Group/Non-Governmental Organization	12/16/19
Westchester Group Investment Management, Inc.	Interest Group/Non-Governmental Organization	12/13/19
Wonderful Citrus, LLC	Individual Contributor	12/13/19

Table 2. List of Verbal Comments on Draft GSP Provided During Public Hearing on December 16, 2019

Commenter Name	Commenter Agency or Organization
Amanda Monaco	Leadership Counsel for Justice and Accountability, on behalf of the community of Ivanhoe
Blanca Escobedo	Leadership Counsel for Justice and Accountability, on behalf of the community of Ivanhoe
Carole Combs	Tulare Basin Watershed Partnership
Del Strange	Individual Contributor
Karen Yohannes	Individual Contributor
Liesbet Olaerts	Self-Help Enterprises

4.0 COMMENT REVIEW AND RESPONSE

This section describes the process and tools the GKGSA used to review and respond to comments on the Draft GSP. Following the close of the public comments, GKGSA staff and consultant support reviewed and assigned a Comment Identification Number (CIN) to each issue-specific comment in submitted letters and the public hearing transcripts. Of the 14 letters and 6 verbal comments received, GKGSA and consultant staff identified **336** issue-specific comments applicable to the GSP. To organize and manage the review of these comments, a database was established to organize, categorize, group, and respond to each comment. This comment management approach included the following process steps.

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
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4.1 COMMENT AND RESPONSE DATABASE

The Comment and Response Database (available as **Attachment E – Comment and Response Database**) was created in Microsoft Excel, a software platform to sort, group, and analyze content in multiple fields. **Table 3**, shown below, provides a description of each field utilized for the review and response to submitted comments.

Table 3. Comment and Response Fields

Field Title	Field Description
Author	Name of submitting individual, agency or organization.
Category	A title that broadly applies to the issue-specific comments. See Section 4.1.1 for additional detail.
Comment Identification Number (CIN)	A sequentially assigned number for each issue-specific comment which includes an abbreviation of the author's name (i.e. Comments for John Smith would be JS-001, JS-002, etc.)
Multiple Comment Response (MCR) number	A MCR represents a single response that applies to two or more comments. MCRs are assigned in numerical sequence (e.g. MCR-001, MCR-002, etc.).
Batch	Represents a segmentation of comments in association with CWC §355.4 (b)(10). See section 4.1.3 for additional detail.
Description	Short description of the main topic or issues raised in the comment.
Comment	Includes verbatim text of comment from original letter, or summary of verbal comment provided during public hearing.
Response	Response to comment.

4.1.1 Category

To aid the comment management process, staff assigned all comments a category based on an issue-specific topic. The categories provide the opportunity to sort comments by topic and assign the appropriate subject-matter expert to develop the comment response. **Table 4**, shown below, provides a list of the comment categories.

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
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Table 4. Groundwater Sustainability Plan Comment Categories

Acronym	Category
AL	Pumping Allocations/Metering/De Minimus Extractors/Water Marketing/Extraction – Water Accounting Framework
DC	Disadvantaged Communities/Rural Domestic Users
GA	GSA Organization
GE	General
GL	Groundwater Levels
GP	County General Plan
HM	Hydrogeologic Modeling
IS	Interconnected Surface Waters/ Groundwater Ecosystems/Environmental Beneficial Users – Dependent
LS	Land Subsidence
MA	Management Areas
MU	Municipal Land/Water Use
PM	Projects and Management Actions
PO	Public Outreach
SB	Subbasin Characteristics
SMC	Sustainable Management Criteria
WB	Water Budget/Water Accounting Framework
WI	Well Inventory
WQ	Water Quality
WR	Water Resources/Water Rights

4.1.2 Multiple Comment Response

Following the category assignment, staff evaluated comments within these groupings for their similarity. Where similarity was found, these comments were assigned a Multiple Comment Response (MCR). An MCR is a single response that applies to multiple comments of a similar nature. **Table 5**, shown below, provides a brief description of each MCR number.

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
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PUBLIC COMMENT SUMMARY**

Table 5. Defined Multiple Comment Response Numbers

MCR Number	Definition
MCR-1	Did not adequately consider environment as a beneficial user
MCR-2	Improper analysis of interconnected surface waters and groundwater depended ecosystems
MCR-3	Inadequate monitoring network
MCR-4	Sustainable management criteria for drinking water groundwater levels are not adequate
MCR-5	Provide drinking water warning system / assistance program
MCR-6	Fails to adequately protect groundwater quality
MCR-7	Projects and management actions do not achieve the sustainability goal
MCR-8	Include recharge projects within or near disadvantaged communities
MCR-9	Define local/Greater Kawaeh Groundwater Sustainability Agency specific sustainability goal and undesirable result
MCR-10	Wants equitable allocation of groundwater, uniformly applied throughout the basin
MCR-11	Wants equitable pumping allocation uniformly applied throughout the basin and advanced notice of any ramp-down
MCR-12	Operation of groundwater bank
MCR-13	Data management system for tracking use of groundwater and surface water by owner, field, and parcel with consistent means of measurement
MCR-14	Data management system integrated with water market, evapotranspiration accountable
MCR-15	Water use measurements, including remote sensing

Key:

MCR = Multiple Comment Response

4.1.3 Comment Categorization

Following completion of category and MCR assignments, staff assigned comments to one of three “batches.” The batch assignment was predicated on the comment’s scope, relevance, and applicability to CWC §355.4(b)(10). These groupings are further described below.

- **“Batch A”:** Comments largely associated with editorial issues or other require minor revisions were assigned Batch A. Of the **336** comments, **198** were classified as Batch A comments and addressed directly by GKGSA and consultant staff.
- **“Batch B”:** Comments that relate to technical or policy issue suitable to GKGSA staff response were assigned to Batch B. Of the **336** comments received, **113** comments were classified as Batch B.
- **“Batch C”:** Comments that raise a credible technical or policy issues requiring direction from the GKGSA Board of Directors were assigned as Batch C. Of the **336** comments received, **25** were classified as Batch C.

**GREATER KAWEAH GROUNDWATER SUSTAINABILITY AGENCY
GROUNDWATER SUSTAINABILITY PLAN
PUBLIC COMMENT SUMMARY**

4.2 REVIEW AND RESPONSE

This subsection describes the process the GKGSA Board of Directors, committee members, and staff implemented to develop, review and approved responses to stakeholder comments. This process consists of three general steps.

4.2.1 Step 1: Staff Assessment

Following the close of the public comments, GKGSA staff and consultant support completed an initial assessment of all comments and populated their findings in the Comment and Response Database. Copies the database were provided to GKGSA Board of Directors and committee members for their reference.

4.2.2 Step 2: Board and Committee Review

The Rural Communities Committee and Stakeholder Committee discussed comments received and draft comment responses during combined committee meetings held on January 6 and January 14, 2020. The Board of Directors reviewed and considered all comments received during meetings held on January 6 and January 15, 2020. Responses and potential revisions based on such comments are provided as **Attachment E – Comment and Response Database** to this Summary.

4.2.3 Step 3: Approval

The Board of Directors adopted the final GSP on January 22, 2020. The final GSP includes a copy of the Comment and Response Database, which provides responses and potential revisions to the GSP based on comments received. The notice for the public hearing to adopt the final GSP is provided as **Attachment F – Notice to Adopt Final GSP** to this Summary.

**ATTACHMENT A
NOTICE OF RELEASE OF
PUBLIC DRAFT GKGSA GSP**



September 16, 2019

NOTICE OF RELEASE OF PUBLIC REVIEW DRAFT GROUNDWATER SUSTAINABILITY PLAN AND PUBLIC HEARING

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies city and county governments, as well as other interested parties within its jurisdiction, that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223.

A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider all comments received.

Comments are due December 16, 2019 and may be submitted one of the following ways:

1. Online using the [GSP comment form](#) on the GKGSA website
2. Via e-mail at gsp@greaterkaweahgsa.org
3. By mail to 2975 N. Farmersville Blvd., Farmersville, CA 93223
4. Hand delivered to our office or to staff at one of our public Board or committee meetings

GKGSA looks forward to working with its stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for Kaweah region.

From: Eric Osterling
Sent: Monday, September 16, 2019 4:57 PM
To: GKGSA GSP <gsp@greaterkawahgsa.org>

Subject: NOTICE: Public Review Draft GKGSA GSP Now Available
Importance: High

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies city and county governments, as well as other interested parties within its jurisdiction, that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkawahgsa.org/resources/groundwater-sustainability-plan/>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider all comments received from stakeholders and will also accept a request for formal consultation from cities and counties if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with its stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Thank you,

Eric C. Osterling
General Manager



2975 North Farmersville Blvd.
Farmersville, California 93223
office: 559.302.9987
www.GreaterKawahGSA.org

September 16, 2019

City of Exeter
Attn: Mr. Adam Ennis, City Manager
100 North C Street
Exeter, CA 93221

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Ennis:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies City of Exeter that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkawahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from City of Exeter and will also accept a request for formal consultation If requested within 30 days of receipt of this notice.

GKGSA looks forward to working with City of Exeter and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: Barbara Sally, Council Member

GK L19-0009
File: GK 400.02

September 16, 2019

City of Farmersville
Attn: Ms. Jennifer Gomez, City Manager
909 West Visalia Road
Farmersville, CA 93223

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Ms. Gomez:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies City of Farmersville that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from City of Farmersville and will also accept a request for formal consultation if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with City of Farmersville and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: Paul Boyer, Council Member

GK L19-0006
File: GK 400.02

September 16, 2019

City of Hanford
Attn: Mr. Mike Olmos, Interim City Manager
319 North Douty
Hanford, CA 93230

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Olmos:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies City of Hanford that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from City of Hanford and will also accept a request for formal consultation If requested within 30 days of receipt of this notice.

GKGSA looks forward to working with City of Hanford and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: None

GK L19-0007
File: GK 400.02

September 16, 2019

City of Woodlake
Attn: Mr. Ramon Lara, City Manager
350 North Valencia Avenue
Woodlake, CA 93286

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Lara:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies City of Woodlake that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from City of Woodlake and will also accept a request for formal consultation if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with City of Woodlake and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: Rudy Mendoza
Jason Waters

GK L19-0008
File: GK 400.02

September 16, 2019

County of Kings
Administration
Attn: Ms. Rebecca Campbell, CAO
1400 West Lacey Blvd.
Hanford, CA 93230

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Ms. Campbell:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies County of Kings that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from County of Kings and will also accept a request for formal consultation if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with County of Kings and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

CC: None

GK L19-0005
File: GK 400.02

September 16, 2019

County of Tulare
Administration
Attn: Mr. Jason T. Britt, CAO
2800 West Burrell Avenue
Visalia, CA 93291

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Britt:

Pursuant to Water Code Section 10728.4, a groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies County of Tulare that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223. A copy of the GKGSA Public Review Draft GSP is currently being uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from County of Tulare and will also accept a request for formal consultation if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with County of Tulare and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: Pete Vander Poel, Supervisor
Kuyler Crocker, Supervisor

GK L19-0004
File: GK 400.02

September 16, 2019

Kern Valley Indian Community
Attn: Mr. Robert Robinson
P.O. Box 1010
Lake Isabella, CA 93240

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Robinson:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from all stakeholders and will also accept a request for formal consultation from tribal representatives if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

CC: None

GK L19-0010
File: GK 400.02

September 16, 2019

Santa Rosa Indian Community of the Santa Rosa Rancheria
Attn: Leo Sisco
P.O. Box 8
Lemoore, CA 93245

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Sisco / Current Chairperson:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from all stakeholders and will also accept a request for formal consultation from tribal representatives if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: None

GK L19-0011
File: GK 400.02

September 16, 2019

Tubatulabals of Kern Valley
Attn: Mr. Robert L. Gomez, Jr.
P.O. Box 26
Lake Isabella, CA 93240

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Gomez:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from all stakeholders and will also accept a request for formal consultation from tribal representatives if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

CC: None

GK L19-0012
File: GK 400.02

September 16, 2019

Tule River Indian Tribe
Attn: Mr. Neil Peyron
P.O. Box 589
Porterville, CA 93258

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Peyron:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from all stakeholders and will also accept a request for formal consultation from tribal representatives if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

CC: None

GK L19-0013
File: GK 400.02

September 16, 2019

Wuksache Indian Tribe/Eshom Valley Band
Attn: Mr. Kenneth Woodrow
1179 Rock Haven Court
Salinas, CA 93906

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Woodrow:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkaweahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for inspection may be requested. GKGSA will review and consider comments received from all stakeholders and will also accept a request for formal consultation from tribal representatives if requested within 30 days of receipt of this notice.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None

CC: None

GK L19-0014

File: GK 400.02

September 16, 2019

Mr. Del Strange
318 Old Line Avenue
Exeter, CA 93221

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Strange:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkawahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for on-site inspection may be requested.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: None

GK L19-0015
File: GK 400.02

September 16, 2019

Mr. Jed Downing
18611 Avenue 314
Visalia, CA 93292

Subject: Notice of Release of Public Review Draft GKGSA GSP

Dear Mr. Downing:

Pursuant to Water Code Sections 10723.4 and 10728.4 respectively, a groundwater sustainability agency shall establish and maintain a list of persons interested in receiving notices regarding the availability of a draft groundwater sustainability plan and may adopt or amend a plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The Greater Kaweah Groundwater Sustainability Agency (GKGSA) hereby notifies cities and counties and other interested parties that it intends to hold a public hearing in consideration of the Greater Kaweah Groundwater Sustainability Plan (GSP) on December 16, 2019 at 10:00 am at 2975 N. Farmersville Blvd., Farmersville, CA 93223 and to adopt a final GSP on or before January 31, 2020. A copy of the GKGSA Public Review Draft GSP has been uploaded and made available from GKGSA's website at <http://greaterkawahgsa.org>. Alternatively, an electronic copy on flash drive and/or hard copy for on-site inspection may be requested.

GKGSA looks forward to working with you and other stakeholders in finalizing and implementing what is one of several very important water and land use planning documents for our region.

Sincerely,

Eric C. Osterling,
General Manager

Enclosures: None
CC: None

GK L19-0016
File: GK 400.02

**ATTACHMENT B
WATER CODE §10728.4
CONSULTATION**



October 3, 2019

Mr. Eric Osterling
Greater Kaweah GSA
2975 N. Farmersville Blvd.
Farmersville, CA
93223

RE: SGMA Request for County Consultation

Dear Mr. Osterling:

I am writing on behalf of Kings County (the "County") to request that the Greater Kaweah Groundwater Sustainability Agency ("GKGSA") responsible for the development of the Greater Kaweah Groundwater Sustainability Plan ("GKGSA GSP") consult with the County regarding how the GKGSA GSP complements or conflicts with the County's legal authority over groundwater.

On September 19, 2019, the County received via email "**Notice: Public Review Draft of the GKGSA GSP Now Available**" ("Notice"). California Water Code Section 10728.4 provides: "A groundwater sustainability agency may adopt or amend a groundwater sustainability plan after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The groundwater sustainability agency shall . . . consult with a city or county that requests consultation within 30 days of receipt of the notice." The County hereby requests a consultation with the Greater Kaweah Groundwater Sustainability Agency regarding the draft GKGSA GSP.

To schedule this consultation, or if you have any questions or concerns, please contact me at (559) 852-2447 or Julianne.Phillips@co.kings.ca.us.

Sincerely,
Julianne K. Phillips
Director
Division of Water and Natural Resources

cc: Rebecca Campbell
Lee Burdick

**ATTACHMENT C
TRANSCRIPTION OF PUBLIC
HEARING COMMENTS
DECEMBER 16, 2019**



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Del Strange, Resident

“Mr. Chairman, board members, ladies and gentlemen, I’m Del Strange, I live here in Exeter, have been involved in water issues for over 30 years and am very concerned about the Plan as it’s presented and drafted.

PH-DL-001

Water subsidence or land subsidence is the key issue that I’ve addressed in my written comments and I don’t want to go through that in details in front of you, but I think it’s extremely important to take a look at those issues and address them far into the future. Subsidence is an ongoing thing that’s not going to go away and it’s only going to get worse as we withdraw more water from the aquifer and allow the land to settle and subside according to the damage to our infrastructure, our city buildings roads bridges just about everything can be significant if allowed to happen so it’s most important that that be addressed and taken care of with NO SUBSIDENCE ALLOWED PERIOD.

PH-DL-002

On the issue of water being lost to the atmosphere and so forth any ponds or lakes that are being projected and planned in the future this must be taken into consideration. There’s six acre feet of water per acre is lost annually here in the valley to surface water basins and one of the key things into the future is the mining and so forth into our aquifers and the exposure groundwater to the surface in the perpetuity is going to require a great amount of water loss that we can’t afford. There’s no indigenous water resources in our area that can take care of that.

PH-DL-003

And then finally I would like to since I don’t have access to the internet or email or whatever I would respectfully request that any of the responses to my comments that I made be sent to me or mailed to so that I can understand what’s taking place. Thank you, thank you very much for the opportunity to comment and I think you’re doing a great job in trying to keep our water resources properly managed and taken care of.”

PH-DL-004



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Carole Combs, Tulare Basin Watershed Partnership

“I’m Carole Combs, executive director of the Tulare Basin Watershed Partnership and I wanted to bring to your attention the fact that the California Department of Fish and Wildlife has just submitted a comment letter this morning, did you see that? We’ve been waiting for it, I am going to particularly interested in reading it as a member of the Stakeholder Committee I’m committed to working with this entity and the Department of Fish and Wildlife because our organization prepared the Tulare Basin Riparian Wildlife Corridor Conservation Plan which was submitted to the Department of Fish and Wildlife and approved by that entity and the Wildlife Conservation. When projects can *[words unclear]* with this plan going forward there will be an opportunity for funding from the Wildlife Conservation Board. So I just wanted to make that clear from the onset *[words unclear]* from our organization would like to make time going forward.”

PH-CC-001



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Amanda Monaco, Leadership Council for Justice and Accountability

“Hi, Amanda Monaco Leadership Council for Justice and Accountability. I’m also here on behalf of the community of Ivanhoe. We work with folks in Ivanhoe on a whole host of issues from transportation to others but also it also includes drinking water, so we’ve been working with them on engaging in SGMA, unfortunately they weren’t able to come this morning cause of the timing of the hearing. First of all I do want to acknowledge this whole process has been a lot of work by a lot of people and that’s a lot we’ve all been trying to get to know what is the SGMA thing and how to deal with it, so I do want to acknowledge that intense amount of work and number of meetings and amount of time that everyone that has gone to. We also appreciate working with Eric Osterling on collaborating on public outreach. We were able to cohost some workshops and that was a really great relationship really productive I felt. Unfortunately, we submitted a comment letter that did highlight some of our concerns with the plan and I won’t go to into detail but I wanted to highlight the main ones.

PH-LCJA-001

First of all given the way that the Sustainable Management Criteria for groundwater quality and groundwater quantity are formed it leaves a lot of domestic wells without a lot of regulation and monitoring on how groundwater activities and groundwater management impact their water quality. And second according to our analysis at the Measurable Objective alone 67% of domestic wells could be at risk of being dewatered and 15% of public supply wells could be at risk of being fully dewatered. We know that the GSA is also done their own analysis so we would want to help collaborate on kinda understand better those numbers and ensuring that we can on the ground analysis of where wells are and who’s going to be impacted.

PH-LCJA-002

But given those impacts we feel it is very crucial to do one of two things in order to adequately consider the interests of disadvantaged community as communities as a they are required and to avoid an impact under civil rights law, one would be to change the sustainable management criteria and make them more perspective of water quality and groundwater supply for communities and the second would be to approve the drinking water mitigation program. We are encouraged that the GSA has included that as a potential project, but see it as critical to approve that going forward NOW so that we can ensure that impacts are going to mitigated or protected against.

PH-LCJA-003

We also listed some other technical concerns that we had such as some information with the water budget and monitoring and identification of public supply wells but I won’t go into that but I do want to highlight a few others comments from the community of Ivanhoe. Specifically

PH-LCJA-004

they were concerned about the sustainability goal which Blanca will talk about, they were very worried about a groundwater market and the potential impacts of a groundwater market and want the GSA to take that into consideration. They're generally concerned about their drinking water resources and want to ensure they'll have clean and adequate supply not only in their community water center but folks on domestic wells around their community. They also want to be able to do more *[words unclear]* development and ensure there is water for that as well as the community park and they would like a recharge basin in their community, unfortunately they don't have the technical capacity to design that and we helped them on some things but we don't have the technical capacity to design a project like that, so we felt I know Eric and I have had some conversations about that so we would like to collaborate on a project like that. Thanks."

PH-LCJA-004
(contd.)



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Blanca Escobedo, Leadership Council for Justice and Accountability

“Hi Blanca Escobedo, Leadership Council for Justice and Accountability. Like my colleague Amanda said we work with residential Ivanhoe and one of the residents couldn’t be here today but he wanted me to highlight the importance of shifting language and the label the way *[words unclear]* prioritizing enterprise and ensure and will include protecting drinking water *[words unclear]* for disadvantaged communities *[words unclear]* to include *[words unclear]* drinking water.”

PH-LCJA-005



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Karen Yohannes, Resident

“First of all I want to start with a thank you also it’s been a long journey to get to this point and so thank you so much for all of your hard work and I have a few comments. The first one I shared before I have another concern white area stakeholders aren’t in the district have not really had representation in this GSA and that’s just kind of been a concern I’ve had.

PH-KY-001

My comments are section 6.2 the water accounting framework. I have a concern about the general *[words unclear]* I’m concerned that the current allocation seepage and how return flows and over irrigation of all appropriators to be salvaged nonnative yield is essentially allowing change to a water right with potential transfers of water to third parties to the injury of groundwater pumpers even though the seepage has existed for decades and the appropriators will not have physically changed anything on the ground or in their water rights to gain a very valuable credit to the injury of existing groundwater pumpers. The law may allow them to recapture the seepage or run-off for their own use but that’s very different from crediting them with water they have allowed to leave their property for decades and have taken no effort to recapture to prevent from doing so. It is my opinion that a greater portion of the salvaged category should be shared to increase the native supply for all groundwater users the following variables create uncertainty that Terminus Dam built with public money by the ACOE, the lack of measurements surface deliveries application and actual seepage leaves room for apportionment to native supply for the shared benefit of the subbasin. This apportionment is not to be confused with actual projects for recharge just irrigation return flows over irrigation and preventing seepage.

PH-KY-002

The next on is section 7 concerning groundwater allocation program the management action category. It should not be controversial that if you allocate groundwater on anything OTHER than some actual or historic use you have a greater probability to giving some folks more than they need and some folks less and the pain will be unevenly distributed to those that rely heavily on groundwater pumping. A proportional approach with historical pumping and current use are priorities that need to be considered when making pumping allocation decision and policy. I know those have not yet been made but I’d like to comment on this section. The necessity for enacting the management action of allocation may not be necessary the issue of groundwater exportation of 60,000 a/f a year was not allowed to leave our subbasin to the detriment of those farming within it. This needs to be addressed as the impact on groundwater dependent agriculture will suffer disproportionality. This exported water will never make its way back into the native supply. Prescriptive right allocation needs to be viewed at the concept

PH-KY-003



of self help of neighboring farmers that have proven production and other evidence of groundwater use. It is my opinion that mutual water companies and entities claiming groundwater pumping prescription should not be allocated a greater apportionment for their growers than the correlative amount designated for overlying right holders. Thank you.”

↑
PH-KY-003
(contd.)



**Record of Verbal Comments Provided During
Draft GSP Public Hearing on
Monday, December 16, 2019**

Speaker: Liesbet Olaerts, Self-Help Enterprises

My name is Liesbet, I work for Self-Help Enterprises. I first as everyone want to acknowledge the huge task to put the plan together. I also want to thank Eric for having worked with our organization to conduct community meetings in West Goshen, Hypericum, and Lemon Cove and why we understand this is like a living breathing document and it will change as we gather more data I just want to express a couple of our concerns.

PH-SHE-001

Basically are similar to what Amanda brought up. We partnered with them to conduct our own impact analysis and our data shows a pretty huge impact to drinking water users so we will like to continue collaborating and potentially improve that analysis and *[words unclear]* sets stricter *[words unclear]* near vulnerable communities and *[words unclear]* populations.

PH-SHE-002

And similar to what Amanda said like if possible to develop and conduct an economic analysis to implement the mitigation program within the first year of the GSP implementation. We provided a digital comment letter and the letter we also expressed concerns and questions that community residents express during workshops. Thank you for the opportunity to provide comment.”

PH-SHE-003

ATTACHMENT D
WRITTEN PUBLIC COMMENTS



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

CODE = CDFW

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 12, 2019

Via Mail and Electronic Mail

Don Mills
Greater Kaweah Groundwater Sustainability Agency
2975 North Farmersville Boulevard
Farmersville, California 93223
gsp@greaterkaweahgsa.org

Subject: Comments on the Greater Kaweah Groundwater Sustainability Plan

Dear Mr. Mills:

The California Department of Fish and Wildlife (Department) Central Region is providing comments on the Greater Kaweah Draft Groundwater Sustainability Plan (GSP) prepared by the Greater Kaweah Groundwater Sustainability Agency (GSA) pursuant to the Sustainable Groundwater Management Act (SGMA). As trustee agency for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species (Fish & Game Code §§ 711.7 and 1802).

Development and implementation of GSPs under SGMA represents a new era of California groundwater management. The Department has an interest in the sustainable management of groundwater, as many sensitive ecosystems and species depend on groundwater and interconnected surface waters. SGMA and its implementing regulations afford ecosystems and species specific statutory and regulatory consideration, including the following as pertinent to Groundwater Sustainability Plans:

- Groundwater Sustainability Plans shall identify and consider impacts to groundwater dependent ecosystems (GDEs) pursuant to 23 California Code of Regulations (CCR) § 354.16(g) and Water Code § 10727.4(l);
- Groundwater Sustainability Agencies shall consider all beneficial uses and users of groundwater, including environmental users of groundwater pursuant to Water Code §10723.2 (e); and Groundwater Sustainability Plans shall identify and consider potential effects on all beneficial uses and users of groundwater pursuant to 23 CCR §§ 354.10(a), 354.26(b)(3), 354.28(b)(4), 354.34(b)(2), and 354.34(f)(3);
- Groundwater Sustainability Plans shall establish sustainable management criteria that avoid undesirable results within 20 years of the applicable statutory

deadline, including depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water pursuant to 23 CCR § 354.22 *et seq.* and Water Code §§ 10721(x)(6) and 10727.2(b) and describe monitoring networks that can identify adverse impacts to beneficial uses of interconnected surface waters pursuant to 23 CCR § 354.34(c)(6)(D); and

- Groundwater Sustainability Plans shall account for groundwater extraction for all Water Use Sectors including managed wetlands, managed recharge, and native vegetation pursuant to 23 CCR §§ 351(a) and 354.18(b)(3).

Furthermore, the Public Trust Doctrine imposes a related but distinct obligation to consider how groundwater management affects public trust resources, including navigable surface waters and fisheries. Groundwater hydrologically connected to navigable surface waters and surface waters tributary to navigable surface waters are also subject to the Public Trust Doctrine to the extent that groundwater extractions or diversions affect or may affect public trust uses (*Environmental Law Foundation v. State Water Resources Control Board* (2018), 26 Cal. App. 5th 844). Accordingly, groundwater plans should consider potential impacts to and appropriate protections for navigable interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters.

In the context of SGMA statutes and regulations and Public Trust Doctrine considerations, the Department values SGMA groundwater planning that carefully considers and protects groundwater dependent ecosystems and fish and wildlife beneficial uses and users of groundwater and interconnected surface waters.

COMMENT OVERVIEW

The Department supports ecosystem preservation in compliance with SGMA and its implementing regulations based on Department expertise and best available information and science.

The Department recommends the GSP provide additional information and analysis that considers all environmental beneficial uses and users of groundwater in its sustainability management criteria and better characterize or consider surface water-groundwater connectivity. In addition, the Department is providing comments and recommendations below.

CDFW-001

COMMENTS AND RECOMMENDATIONS

The Department comments are as follows:

1. Comment #1. Environmental Beneficial Users. Chapter 1 Introduction. Section 1.4 Notice and Communication, Subsection 1.4.2 Description of Beneficial Uses and Users (pages 1-20 to 1-23). The GSP does not thoroughly identify environmental beneficial uses and users of groundwater.

a. *Issue:* Pursuant to 23 CCR § 354.10(a), GSPs should include in the Notice and Communication Section a “description of the beneficial uses and users of groundwater in the basin.” The GSP identifies ‘Environmental Users of Groundwater’ as environmental organizations (page 1-23), rather than as the plants, animals, and groundwater dependent ecosystems that rely on groundwater. Additionally, environmental users were not included on the list of ‘Surface Water Users’ (page 1-22), even though Kaweah River, St. John’s River, Deep Creek, and Outside Creek in the GSA Plan Area support riparian vegetation and potential GDEs (Klausmeyer et al. 2018) which constitute beneficial users of surface water. These vegetated riparian areas are among the environmental beneficial uses and users of surface water and groundwater in the subbasin, in addition to the animal species supported by the in-stream and riparian habitats.

CDFW-002

b. *Recommendations:* The Department recommends identifying and elaborating on potential environmental beneficial uses and users of groundwater in the Notice and Communications Section by including a detailed description on how these users, such as GDEs and the species therein, may rely on groundwater and may be impacted by Sustainable Management Criteria pursuant to 23 CCR §§ 354.10(a), 354.26(b)(3), 354.28(b)(4), 354.34(b)(2), and 354.34(f)(3). The Critical Species LookBook (TNC 2019) is a resource to help identify threatened and endangered species in any basin subject to SGMA and to help understand species relationships to groundwater. The LookBook also offers narrative on species and habitat groundwater dependence that can be a model for describing environmental beneficial uses and users of groundwater in the GSP.

2. Comment #2. Interconnected Surface Waters. Chapter 2 Basin Setting. Section 2.2 GSA Basin Setting Features (page 2-2). The GSP offers an incomplete analysis of interconnected surface waters (ISW).

a. *Issue:* The analysis of surface water interconnectivity is based on limited data and offers an incomplete understanding of surface water-groundwater interconnectivity. Pursuant to 23 CCR § 354.16(f), a GSP shall identify “interconnected surface water systems within the basin and an estimate of the quantity and timing of depletions of those systems” within the GSP’s ‘Groundwater Conditions’ section. The GSP provides a qualitative discussion on the likelihood of surface water interconnectivity on page 2-2

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noting, "Groundwater levels throughout the majority of the Kaweah Subbasin do not appear to support Interconnected Surface Waters or Groundwater Dependent Ecosystems (GDEs). Data availability are limited at this time and additional work is necessary to determine if the plant communities and habitats are riparian versus groundwater dependent." Throughout the plan, the GSP continues to emphasize ISW data gaps:

- i. "Interconnected surface water was not considered to be a likely sustainability indicator due to groundwater depths exceeding 50 feet throughout most of the subbasin but will be studied further during the initial portion of the implementation period" (page ES-x).
- ii. "Further study is warranted in the forebay area during the initial implementation this GSP to better define GDEs and interconnected surface waters" (page 1-17).
- iii. The following is a data gap identified for the GSP: "Groundwater elevation monitoring in areas with shallower groundwater levels to confirm whether or not the potential interconnected surface water and/or GDEs are present" (page 2-2).
- iv. "Due to limited data, Depletion of Interconnected Streams is also not under consideration in this Plan and will be reviewed if new data proves an interconnection" (page 4-8).

Absent baseline information on groundwater elevations and instream flow, it is difficult to accurately identify ISW. However; a lack of data does not justify disregard for ISW in the GSP, particularly when suspected shallow groundwater and ISW exist in the Plan Area. *Appendix 2A Kaweah Subbasin: Basin Setting Components* states, "Streams located in the eastern portion of the Subbasin, generally between the Friant Kern Canal eastward to McKay Point (See Figure 19), are more likely to be relatively neutral to gaining stream reaches during limited times of year" (page 145 and Figure 19). Therefore, within the GSA Plan Area there is potential surface water-groundwater interconnectivity along the Kaweah River, St. John's River, Deep Creek, and Outside Creek.

- b. *Recommendations:* To reconcile the data-poor and incomplete analysis of ISW and depletions attributable to groundwater, the Department recommends the GSA consider the following actions:
 - i. Install shallow groundwater monitoring wells near potential GDEs along ISW, potentially pairing multiple-completion wells with streamflow gauges. These new data sources would support

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improved understanding of surface water-groundwater interconnectivity. Some of this additional monitoring may be accomplished with the GSP's proposed expansion of the existing groundwater monitoring network (see Comment #5).

- ii. Identify the estimated quantity, timing, and location of streamflow depletions in the subbasin per 23 CCR 354.28 (c)(6)(A). If this information is not available using the Subbasin's existing numerical model, determine an expeditious and clear approach to estimating these values, potentially integrating new monitoring data streams.
- iii. Periodically reevaluate sustainable management criteria based on an improved understanding of ISW and with consideration for impacts to environmental beneficial uses and users of groundwater (see Comments #1, 4, 5).

3. Comment #3. Groundwater-Dependent Ecosystems. Chapter 1 Introduction. Section 1.3 Description of Plan Area, Subsection 1.3.7.12 Impacts on Groundwater Dependent Ecosystems (page 1-17); Appendix 2A, *Kaweah Subbasin: Basin Setting Components - Draft*, Section 2.10 Groundwater Dependent Ecosystems (page 146 and Figure 19). The GDE identification sections, pursuant to 23 CCR § 354.16 (g), are based on limited information to demonstrate exclusion of ecosystems that may depend on groundwater. The Department recommends additional studies and further data collection is needed to identify GDEs.

- a. *Issue:* The GSP relies on the Natural Communities Commonly Associated Groundwater (NCCAG) (Klausmeyer et al. 2018) Dataset to identify potential GDEs, then dismisses the likelihood of any GDEs occurring based on a depth-to-groundwater analysis stating, "Given that groundwater is produced from aquifers more than 50 feet deep beneath the GSA, the vegetation and wetlands listed by TNC are believed to be surface water dependent" (page 1-17). Importantly *Appendix 2A Kaweah Subbasin: Basin Setting Components* identifies areas with the shallowest depth to groundwater in the Kaweah basin, including portions of the Kaweah River in the Greater Kaweah GSA, and suggests local GSAs review these areas and consider them for further study (page 146 and Figure 19).
 - i. Depth to Groundwater: Potential GDE evaluation was based on a depth-to-groundwater analysis using groundwater elevation data from Spring 2015, when groundwater levels were "at or near the lowest levels on record since the 1960s" (East Kaweah GSP page 2-72). The removal of areas with a depth to groundwater greater than 50 feet in Spring 2015 relies on a single-point-in-time baseline

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hydrology, specifically a point in time that is several years into a historic drought when groundwater levels were trending significantly lower due to reduced surface water availability. Exclusion of potential GDEs based on a singular groundwater elevation measurement is an invalid method, because it does not consider representative climate conditions (i.e., seasons and a range of water type years) and it does not account for GDEs that can survive a finite period of time without groundwater access (Naumburg et al. 2005) and can rely on groundwater table recovery periods for long term survival.

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- ii. Data Gaps: The GSP acknowledges that there is a shallow groundwater monitoring data gap necessary to evaluate GDEs (page 2-2), and again acknowledges the data gap in the GDE section, noting “further study is warranted in the forebay area during the initial implementation this GSP to better define GDEs and interconnected surface waters” (page 1-17). The Department concurs the GSP needs additional information to fill in this data gap.
- a. *Recommendations*: The Department recommends the GSA consider the following for information gathering related to GDEs:
 - i. Depth to Groundwater: The Department recommends the GSP develop a hydrologically robust baseline from which to identify GDEs that relies on multiple, climatically representative years of groundwater elevation, that accounts for the inter-seasonal and inter-annual variability of GDE water demand, and that is based on a clear understanding of shallow groundwater. A robust hydrologic baseline will help account for GDEs that can survive a finite period of time without groundwater access (Naumburg et al. 2005) and rely on groundwater table recovery periods for long term survival.
 - ii. Data Gaps: To address data gaps, the Department recommends:
 - 1) refining the identification/removal of potential GDEs through field verification,
 - 2) improving readability of GDE maps,
 - 3) identifying groundwater dependent fish and wildlife species in the basin,
 - 4) identifying and implementing appropriate monitoring approaches to track environmental beneficial users over time,
 - 5) developing a monitoring program that is capable of capturing early signs of adverse impacts to GDEs, and
 - 6) designing an appropriate mitigation plan to reverse observed negative impacts to GDEs (e.g., stressed phreatophyte vegetation).

- iii. Include Additional References for Evaluation: The Department recognizes that NCCAG (Klausmeyer et al. 2018) provided by California Department of Water Resources (CDWR) is a good starting reference for GDEs; however, the Department recommends the GSP include additional resources (including local knowledge) for evaluating GDE locations. The Department recommends consulting other references, including but not limited to the following tools and other resources: the California Department of Fish and Wildlife (CDFW) Vegetation Classification and Mapping Program (VegCAMP) (CDFW 2019A); the CDFW California Natural Diversity Database (CNDDDB) (2019B); the California Native Plant Society (CNPS) Manual of California Vegetation (CNPS 2019A); the CNPS California Protected Areas Database (CNPS 2019B); the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (2018); the USFWS online mapping tool for listed species critical habitat (2019); the U.S. Forest Service CALVEG ecological grouping classification and assessment system (2019); and other publications by Klausmeyer et al. (2019), Rohde et al. (2018), The Nature Conservancy (TNC) (2014, 2019), and Witham et al. (2014).

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4. Comment #4. Sustainable Management Criteria. Chapter 5 Sustainable Management Criteria (starting page 5-1). Sustainable Management Criteria (SMC) demonstrate no consideration of Undesirable Results (URs) for environmental beneficial uses and users of groundwater, and Minimum Thresholds (MTs) do not reflect a 'Critically Overdrafted' Basin status.

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a. *Issues:*

- i. SMC may risk adverse impacts to GDEs by tolerating sustained, on-going groundwater decline (see Comment #4.a.ii), but the GSP lacks an analysis on effects of undesirable results to environmental beneficial uses and users of groundwater pursuant to 23 CCR § 354.26(b)(3). Potential impacts of chronic lowering of groundwater level URs on beneficial uses and users focus on the financial burdens associated with mitigating impacts to wells, such as drilling deeper wells (page 3-5). URs are said to occur when one third of Representative Monitoring sites (RMS) in all three GSA jurisdictions in the Subbasin exceed MTs for groundwater elevation (page 3-4). The GSP lacks a discussion on the potential effects on the environmental beneficial users of groundwater and interconnected surface water if URs occur. Considering GDEs are vulnerable to sustained decreases in groundwater elevation (Naumburg et al., 2005) that are permissible under the proposed MTs (see Comment

#4.a.ii), there are likely to be significant impacts to GDEs where interconnectivity is lost under UR conditions.

- ii. In addition to a lack of analysis of SMC impacts to environmental beneficial users of groundwater, the proposed SMC generally do not reflect a 'Critical Overdrafted' subbasin. The Kaweah Subbasin is designated as 'Critically Overdrafted,' meaning "continuation of present water management practices [in the basin] would probably result in significant adverse overdraft-related environmental, social, or economic impacts" (CDWR "Critically Overdrafted") (CDWR 2019). Even though the Subbasin is designated Critically Overdrafted, the GSP establishes Minimum Thresholds (MTs) that allow for a decline in groundwater elevations mirroring that of the greatest historical decline witnessed between 2006 and 2016 (page 5-3). Resultantly, some proposed MTs accommodate 50 to 100+ foot decreases in groundwater elevation by 2040 (*Appendix 5B SMC Hydrographs for Groundwater Levels*). The GSP concludes that "undesirable results will not occur at water levels above these 2040 projections, barring significant and unreasonable impacts on existing wells and freshwater storage within the Kaweah Subbasin" (page 5-3). Under MT conditions, the GSP estimates that fully one third of wells would go dry, including one third of all domestic wells (page 3-21). To postulate that URs are not present until one third of wells go dry surely overlooks potential impacts to GDEs that would likely experience adverse impacts even before shallow domestic wells go dry. The GSP proposes assistance measures to mitigate impacts to shallow domestic wells (pages 5-8, 7-70), but no such consideration is given to potential impacts in GDEs. Thus, these MTs that allow for sustained groundwater decline mirror the historical trends that led to the subbasin's Critically Overdrafted status and that will likely to lead to significant and unreasonable impacts to GDEs reliant on shallow groundwater. Conceptually, there is a disconnect between the subbasin's 'Critically Overdrafted' designation and SMC that allow for continued groundwater level decline.
- iii. As stated above, the Kaweah Subbasin is characterized by CDWR as 'Critically Overdrafted,' meaning "continuation of present water management practices [in the basin] would probably result in significant adverse overdraft-related environmental, social, or economic impacts" (CDWR 2019). The Kaweah Subbasin has experienced significant land subsidence as indicated in Figure 5.5 (page 5-26). In Section 2 Basin Setting, the GSP states that as much as 10 feet of subsidence has occurred in the northwestern GSA area since 1950, and as much as 20 feet has occurred in the

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southwestern GSA area. Within Section 2 of the Basin Setting, the GSP discusses the causes for land subsidence stating, "Subsidence will occur when groundwater extraction decreases the water pressure in the aquifers (sand and gravel layers) and causes groundwater to flow out of the aquitards (clay layers). The lower water pressure in the clays allows the clays to compress which results in land subsidence" (page ix). The GSP also states, "The water-level sustainability indicator will be considered for differential land subsidence..." (page 3-7) and further explains that the targeted sustainability indicators for the basin include stabilization of groundwater levels and, by proxy, groundwater storage and land subsidence. The SMCs provided in the plan allow for the continued chronic lowering of groundwater levels; this lowering of groundwater elevations does not promote stabilization of groundwater levels and, by proxy, neither does it promote stabilization of groundwater storage loss and land subsidence. Additionally, the GSP sets MTs that allow for one-third of representative monitoring sites to exceed thresholds of up to 87 inches of compaction (in some locations) over a 20-year window. With the proposed lenient MTs for groundwater levels and land subsidence, there is no clear path for corrective measures to decrease land subsidence issues within the basin.

- b. *Recommendations:* The Department recommends the GSA reevaluate SMC with the following suggestions:
 - i. Clarify how species and habitat groundwater needs were considered in the identification of SMC and identify specific potential adverse impacts on environmental beneficial users of groundwater and causal relationships with groundwater pumping (e.g., terrestrial GDE stress/loss, increased instream temperatures, etc.). Reconsider SMC for depletions of ISW after reanalysis of ISW with additional data (see Comment #2).
 - ii. Revise MTs to reflect a 'Critically Overdrafted' subbasin designation by seeking to improve current groundwater elevation conditions rather than allow for continued aquifer depletions over the next two decades, and by establishing MOs and MTs that depend on subbasin action to reduce land subsidence and that empower the groundwater basin to improve groundwater decline and land subsidence issues over the next two decades.

5. **Comment. #5 Monitoring Network.** Chapter 4 Monitoring Network (starting page 4-1). The number and distribution of groundwater monitoring wells in the

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Plan Area and along the surface waters in the GSA are insufficient for analysis of shallow groundwater trends and groundwater-surface water interconnectivity.

a. *Issue:* Existing groundwater monitoring wells are insufficient to characterize shallow groundwater and surface water-groundwater interactions within the regions of the Plan Area most likely to support GDEs and ISW such as the eastern-most reaches of the Kaweah River, St. John's River, Deep Creek, and Outside Creek (page 4-11, Figure 4-3). Absent an expansion of monitoring wells and stream gauges in these regions, the GSP will have limited success in tracking and understanding impacts to environmental beneficial uses and users of shallow groundwater and interconnected surface waters [23 CCR § 354.34(2)]. The GSP intends to confirm the status of ISW and GDEs through proposed monitoring network expansions along the Kaweah and St. John's Rivers (pages 4-18, 4-21). Figure 4-3 shows Representative Monitoring Sites for Groundwater Level Monitoring Network, but it does not identify the location of proposed additional monitoring wells (page 4-11). Expedited installation of monitoring wells in areas with shallow groundwater could help improve an understanding of shallow groundwater trends. Shallow groundwater data are critical to understanding groundwater management impacts on fish and wildlife beneficial uses and users of groundwater, including GDEs and potential interconnected surface water habitats, that are impacted disproportionately by shallow groundwater trends.

b. *Recommendation:* The Department recommends installing additional shallow groundwater monitoring wells near potential GDEs in the basin and along interconnected surface waters, potentially pairing multiple-completion wells with streamflow gages for improved understanding of surface water-groundwater interconnectivity. Where the GSP already has plans to undertake these actions, the Department recommends specifying the locations and timelines for additional monitoring well installations.

6. Comment. #6 Management Actions. Chapter 7 Project and Management Actions to Achieve Sustainability (starting page 7-1). Demand reduction management actions critical to Kaweah Subbasin sustainability goal achievement are deprioritized in the Project and Management Actions chapter.

a. *Issue:* The GSP focuses on supply augmentation projects, deprioritizing demand management actions. For example, the GSP explains, "The Management Actions proposed in this Plan by the GSA are generally considered pilot programs for the first five years of SGMA implementation. This pilot phase would allow the GSA to monitor and evaluate the efficacy of each action prior to full implementation throughout the GSA" (page 7-52). Considering the Kaweah Subbasins' current unsustainable rate of

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groundwater consumption and considering the cost and timing challenges associated with supply augmentation projects, a balanced portfolio approach to achieve groundwater sustainability should include early implementation of demand-management strategies.

- b. *Recommendation:* The Department appreciates the identification of potential management actions (starting page 7-52) and recommends expediting implementation of management actions to ensure the GSA will achieve sustainability. Specifically, the Department recommends early implementation of actions such as 'Groundwater Extraction Measurement Program' (page 7-59) such that subsequent actions (e.g., 'Fee and Incentive Program [page 7-79], and 'Groundwater Allocation Program' [page 7-85]) can be implemented immediately when needed, rather than endure institutional and administrative delays that might cost the basin MT exceedances and URs.

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OTHER COMMENTS: Implementation of Future Project Actions Related to SGMA

SGMA exempts the preparation and adoption of GSPs from the California Environmental Quality Act (CEQA) (WC § 10728.6); however, SGMA specifically states that implementation of project actions taken pursuant to SGMA are not exempt from CEQA (WC § 10728.6). The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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The Department is also a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381), and the Department expects that it may need to exercise regulatory authority as provided by the Fish and Game Code for implementation of projects related to the GSP that are also subject to CEQA. These projects may be subject to the Department's lake and streambed alteration regulatory authority (i.e., Fish & G. Code, § 1600 et seq.). Notification pursuant to Fish and Game Code § 1602 is warranted if a project will (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); and/or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. Likewise, to the extent that implementation of any project may result in "take" as defined by State law of any species protected under the California