

Groundwater Sustainability Plan Comments

by
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Mid-Kaweah Groundwater Sustainability Agency

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Dear M-KGSA Management and Staff,

In 2015 it was my honor to be selected with ten other concerned citizens to join the *M-KGSA Advisory Committee*. Our group's members bring an extraordinary mix of backgrounds and interests to the table and we all share the common goal of helping find long term solutions to the valley's alarming groundwater crisis. I congratulate the agency's staff and engineering consultants in their efforts to negotiate the challenging world of SGMA mandates and deadlines.

Sadly this spring Bob Ludekens one of our original members died after a heroic battle with cancer. Bob brought a lot of practical experience and was eager to share his ideas regarding realistic groundwater sustainability goals and strategies with GSA decision makers. Unfortunately time ran out for Bob... before he could be heard.

In my opinion the current M-KGSA *Groundwater Sustainability Plan* is an incomplete document that fails to monitor and protect the basin's natural streams and waterways. Throughout the plan statements are made minimizing the importance of protecting interconnected waterways that support and feed the underground aquifers we are tasked to sustain. The *Kaweah River*, *Saint Johns River* and *Visalia's* many beautiful creeks are all interconnected parts a working delta that deserves protection and better management. Below is an example of the dismissive language used repeatedly throughout the plan:

"Water bodies, primarily stream channels, which become temporally disconnected throughout the year from the underlying water table may experience the disappearance of adjacent vegetative habitat which may be considered as a beneficial use of groundwater. Such occurrences are generally restricted to the upper reaches of applicable channels in the forebay region of the aquifer system near the Sierra foothills. The consensus among Subbasin GSAs and stakeholders is that the intermittent nature of this vegetative habitat is such that its temporary loss does not rise to the level of an undesirable result. As stated previously, the interconnection of surface water and groundwater was disrupted many decades ago in the MKGSA. Therefore, a monitoring network and monitoring is not required for this GSA"

Neighboring *Kaweah River Sub-Basin GSA's* such as the *Eastern Kaweah*, *Greater Kaweah* and several *Kings County GSAs* are also serviced by flows from the *Tule* and *Kings Rivers*. If a solution is to be found, neighboring intra-basin GSAs must cooperate and coordinate with each other to monitor and protect these shared waterways if sustainability plans are to succeed.

A comprehensive Groundwater Sustainability Plan must consider its impact on our rivers, creeks, canals and ditches. If they are not valued and protected, what is to keep avaricious agencies from proposing upstream pipeline projects to curtail seepage and "save" water for downstream surface water customers at the expense of the entire basin's water table?

Using new technologies the Agency's consultants have collected an impressive amount of new geological and hydrological data. Water audits and "Water Budget" discussions are interesting exercises, and the airborne geophysical data collection efforts are intriguing. This new data will build upon the existing work of the *Kaweah Delta Water Conservation District*, an entity that should perhaps play a bigger role in formulating the basin's plans. They have been working on the problem for a long time and they are the connection to the U.S. Army Corps of Engineers. Ideally, the Corps should be part of this discussion. Flood control and recharge efforts are not exclusive.

I would like to see better computerized graphics. Use the well log data from cities, public water agencies and public schools to create the dynamic 3D models that will show the public how bad reality is.

Respectfully,

A handwritten signature in blue ink that reads "Richard J. Garcia". The signature is written in a cursive, flowing style.

Richard J. Garcia