

September 13, 2019

MKGSA Groundwater Sustainability Plan Public Comments
c/o Tulare Irrigation District
P.O. Box 1920
Tulare, CA 93275

Re: Mid-Kaweah Public Review Draft Groundwater Sustainability Plan

Thank you for the opportunity to comment on the Mid-Kaweah GSP. I appreciate the efforts that have gone into this plan and generally feel like the Plan is heading in a good direction.

I do have some clarifying comments regarding the Project and Management Actions in Section 7 of the Plan. Specifically, the concept of on-farm recharge covered in Section 7.3.4. My comments are as follows:

1. It would be helpful to understand how on-farm recharge water quantities will be credited and accounted for. Will there be any losses applied, or "leave-behind?"
2. Will individual water user accounts be created to manage the credits?
3. In addition to on-farm recharge, I would like to see some further discussion on private water user/landowner recharge projects such as recharge basins and subsurface recharge system projects. With these projects, the same questions outlined above regarding how recharge will be credited and accounted for would be applicable.

It would be beneficial to see these items further defined in the Plan, but if specifics on such Projects and Management Actions cannot be quantified at this time, I would at least like to see the Plan outline a process of how such projects and actions could be developed post Plan, and prior to implementation.

Sincerely,



Brian L. Hauss
Vice President