



July 20, 2022

Mr. Paul Gosselin
Deputy Director, SGMO
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

**Subject: Mid-Kaweah GSA 2022 First Amended Groundwater Sustainability Plan
Revisions Summary**

Dear Mr. Gosselin:

The Mid-Kaweah GSA (MKGSA) is pleased to submit its 2022 First Amended Groundwater Sustainability Plan (GSP). This revision is in response to the Department of Water Resources' (DWR's) Kaweah Subbasin Determination Letter dated January 28, 2022. The Determination letter identified deficiencies in the original GSP submitted on January 31, 2020. This letter summarizes the GSP revisions and serves as a guide for understanding the revisions.

The Mid-Kaweah GSP is one of three coordinated GSPs in the Subbasin. DWR's Determination Letter identified three plan deficiencies, of which only two are relevant to the Mid-Kaweah GSP:

1. The plan does not set sustainable management criteria for chronic lowering of groundwater levels in the manner required by SGMA and the GSP regulations
2. The plan does not set sustainable management criteria for subsidence in the manner required by SGMA and the GSP regulations

MKGSA addressed these two deficiencies with the following general GSP revisions.

- Developed new chronic lowering of groundwater level Sustainable Management Criteria (SMC). The chronic lowering of groundwater levels SMC is completely redrafted using new data and a new approach to setting SMC. The approach is included in the fully revised Appendix 5A and 5B. In accordance with SGMA regulations, the revised approach identifies beneficial uses and users, assesses significant and unreasonable impacts on the uses and users, and develops SMC based on avoiding these impacts. The new chronic lowering of groundwater level SMC is in Section 5.3.

- Developed new subsidence SMC. The subsidence SMC is redrafted using new data and a new approach to setting SMC. The approach is included in the GSP text and supported by calculations in a new Appendix 5E. In accordance with SGMA regulations, the revised approach identifies beneficial land uses and users, assesses significant and unreasonable impacts on the uses and users, and develops SMC based on avoiding these impacts. Additionally, the SMC are coordinated with SMC in surrounding subbasins. The new subsidence SMC is in Section 5.6.
- Modified the groundwater storage SMC. The groundwater storage minimum thresholds and measurable objectives in the original 2020 GSP are based on calculations using groundwater elevation minimum thresholds and measurable objectives. The revised groundwater level SMC impact the groundwater storage SMC. Although not identified as a deficiency in the DWR Determination Letter, the groundwater storage SMC was recalculated using the revised groundwater level SMC values. Therefore, the approach to the groundwater storage SMC was not fundamentally changed, only the calculations.
- Reorganized SMC sections. The original 2020 GSP separated undesirable results from the main SMC text. Furthermore, the original GSP grouped discussions of all minimum thresholds together and all measurable objectives together. For clarity, the SMC section was reorganized by sustainability indicator. The four relevant SMC are found in new Sections 5.3 through 5.6.
- Improved the mitigation program in Section 7. A mitigation program was included in the original GSP as one of the management actions. The mitigation program description has been expanded to cover both impacts from lowered groundwater levels and subsidence. In addition, significantly more detail has been added to the mitigation program description in the GSP, including the estimated number of facilities needing mitigation, a commitment to developing a mitigation plan by June 30, 2023, the inclusion of an interim mitigation plan, and estimated costs. Although the mitigation program is yet to be finalized, the expanded program in the GSP establishes a relatively well-developed program.
- An Emergency Ordinance to establish extraction limits, make measurable progress towards achieving the sustainability goal, and ensure compliance with the GSP. This emergency ordinance was adopted by the Mid-Kaweah GSA on May 1, 2022. The ordinance is included in Appendix 7F.
- Updated the coordination agreement. The updated coordination agreement reflects the cooperative approach the three GSAs took to developing groundwater level and subsidence SMCs. The updated coordination agreement additionally reflects improvements and additions to the mitigation programs.

In summary, the main edits can be found in

- The Executive Summary
- Section 3.2
- Section 5.1 through 5.6
- Section 7.1, 7.4.2, 7.4.3, and 7.4.8
- Appendices 5A, 5B, 5C, 5E, and 7F

Many other small modifications were incorporated into the GSP. However, the list above should provide adequate guidance for review of the MKGSA 2022 First Amended GSP and 2022 First Amended Coordination Agreement.

For simplicity, we uploaded only included the Appendices that were changed in the redline version of the First Amended GSP. All appendices are included in the clean version of the First Amended GSP.

Do not hesitate to contact us with any questions about our 2022 First Amended GSP. I can be contacted via email at akf@tulareid.org or phone at (559) 686-3425.

Sincerely,



Aaron Fukuda, Interim General Manager